

## Appendix G4. Public Comment #3

# PUBLIC SUBMISSION

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**Docket:** FNS-2019-0056

Agency Information Collection Activities; Proposals, Submissions, and Approvals: Child and Adult Care Food Program

**Comment On:** FNS-2019-0056-0001

Agency Information Collection Activities; Proposals, Submissions, and Approvals: Child and Adult Care Food Program

**Document:** FNS-2019-0056-0016

Comment on FR Doc # 2019-27764

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## Organization Information

**Name:**

**Government Agency:** Minnesota Department of Education

**Government Agency Type:** State

**Category:** Govt.-State

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## General Comment

See attached file(s)



## Comment Request – Information Collection for the Child and Adult Care Food Program

The Minnesota Department of Education (MDE) Nutrition, Health and Youth Development Division is submitting the following comments for review:

Minnesota has seen a decrease in day care homes in recent years, which is consistent with FNS's rationale for adjusting the reporting and recordkeeping burden. However, we have also seen an increase in At-Risk Afterschool Meals and unaffiliated center sponsors. Additionally, there has been fast and steady growth in the number of unaffiliated centers over the past five years. This growth has significantly increased burden hours for state agency (SA) staff during both the application process for new centers (such as managing vended meals contract review) and during the administrative review process. In addition to several sponsors with unaffiliated sites that operate during evenings and weekends only, we are seeing growth in multi-purpose agencies which include At-Risk, child day care and adult day care. The lack of federal regulation and guidance regarding unaffiliated center sponsorship has led to competition issues and a consistent influx of center transfers between sponsors, which creates a significant increase in work without feeding more children or increasing sites. Furthermore, Minnesota has seen continuous growth of immigrant populations participating in the CACFP (both at the sponsor and site levels), requiring more SA time overall to explain the program in a culturally relevant manner.

MDE is happy to see that FNS recognizes the amount of time required to stay up-to-date on USDA requirements and guidance. Changes to policy or interpretation impact the vast majority of the staff at SAs, sponsoring organizations and program sites. When new standards are released, any documents referencing related citations, including state-sponsor program agreements, need to be updated. Additionally, the number of resources requiring review to find answers to specific questions can be daunting. For example, a SA staff may review the National School Lunch Act or Child Nutrition Act, related regulations, policy memos, handbooks and previous USDA correspondence to answer a single question from a sponsoring organization or site.