

Appendix G8. Public Comment #5

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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-2019-0056-0024

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Organization Information

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Government Agency:

Government Agency Type:

Category: Association-Natl.

General Comment

Attached is the National CACFP Sponsors Association comment letter regarding the Agency Information Collection Activities - Proposals, Submissions, and Approvals - Child and Adult Care Food Program ID FNS-2019-0056-0001.

We uploaded a letter earlier today to the website comment collection and have since clarified one section where the first two bullet points are written slightly differently.

Please accept this as our official comment letter.



A National Platform for the Child and Adult Care Food Program Community

February 24, 2020

Andrea Farmer
Community Meals Branch, Policy and Program Development Division
Child Nutrition Programs, Food and Nutrition Service
U.S. Department of Agriculture
1320 Braddock Place
Alexandria, VA 22314

RE: FR Docket No. ID: FNS-2019-0056-0001: Agency Information Collection Activities; Proposals, Submissions, and Approvals: Child and Adult Care Food Program

The National CACFP Sponsors Association (NCA) thanks you for the opportunity to provide comments on the **Agency Information Collection Activities; Proposals, Submissions, and Approvals: Child and Adult Care Food Program**.

We have identified areas, listed below, we hope you will consider when reviewing the burdens of reporting and record keeping in the CACFP and in answer to your request for comments on these matters:

- a) Whether the proposed collection of information is necessary for the proper performance of the functions of the agency, including whether the information shall have practical utility;
- b) the accuracy of the agency's estimate of the burden of the proposed collection of information, including the validity of the methodology and assumptions that were used;
- c) ways to enhance the quality, utility, and clarity of the information to be collected; and
- d) ways to minimize the burden of the collection of information on those who are to respond, including use of appropriate automated, electronic, mechanical, or other technological collection techniques or other forms of information technology.

Sponsors are required to check the National Disqualified List (NDL) when signing on a new home provider or center. As of January 2020, the website no longer allows Sponsors to enter a provider or principal's birth date, only the first and last names. This complicates the process since the data a sponsor may receive could potentially include multiple of false positives, especially when checking "common" type names. For example, the name Mary Jones could elicit numerous finds on the NDL locally, and many more finds when taking into consideration that the NDL searches across all the states. Sponsors may be declared Seriously Deficient by a State agency for allowing a provider to participate on the CACFP when they may be on the NDL. Adding the birth date back as a search field on the NDL for Sponsor's use would be advantageous for both State agencies and Sponsors.

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The Report to Congress: “Reducing Paperwork in the Child and Adult Care Food Program” of August 2015 has created some efficiencies in the food program. A fresh review of the report reveals multiple areas where greater efficacies can be realized. The following bullets are areas that USDA can address. The details of the bullets can be found in the Report to Congress are:

Implement existing flexibilities to reduce paperwork

- Provide technical assistance to help each State agency understand how to effectively implement existing flexibilities to reduce paperwork;
- Work with State agencies and their leadership to implement changes;
- Use the Management Evaluation process as an opportunity to analyze additional State policies and promote best practices among State agencies; and
- Plan regional conference calls with State agencies to compare implementation and best practices among States.

Direct certification and ease documentation of children’s eligibility for CACFP benefits

- Explore USDA's authority to support opportunities for direct certification, community eligibility, and other forms of certifications to approve a child’s participation in CACFP; and
- Explore opportunities for USDA to promote current best practices in the use of direct certification in CACFP.
- Eliminate the collection of normal days, hours, and meals in care;
- Retrain sponsoring organizations and State agencies so that meals are not disallowed if parents make clerical errors in filling out enrollment forms.
- Accept any documentation the child care home or center uses that contains the required information;
- Allow sponsoring organizations to pre-populate data fields in forms with information from their electronic databases;
- Allow the parent to make changes if needed and initial the document, instead of filling out new documentation during the annual renewal process.
- Align monitoring requirements
- Remove the requirement that no more than 6 months elapse between reviews and allow sponsoring organizations to determine how to plan and schedule unannounced reviews;
- Remove the requirement that child care homes notify sponsoring organizations on days when the provider will not be serving meals and allow sponsoring organizations to determine how to manage child care homes when the provider plans to be out of the home during the meal service period;
- Eliminate the requirement that sponsoring organizations conduct household contacts;
- Define required data points to be collected, provide a sample form, and allow sponsoring organizations to develop their own method of documenting a review, whether by paper or electronically via computers, mobile devices, or other technology; and
- Ensure that problems of noncompliance are addressed consistently across all States.
- Eliminate requirements that sponsoring organizations and their child care homes and centers keep duplicate sets of records



Establish a single blended rate for Centers

- Implement a single blended-rate method of payment for centers, determined annually;
- Base payments to centers on each center's enrollment instead of averaging the rates of all centers under the same sponsoring organization; and
- Allow centers the option of amending the rate more frequently than annually.

Simplify documentation of food service records required by State agencies

- Work with sponsoring organizations to determine the best methods for verifying food production costs, including onsite reviews of food service records, electronic trackers of food costs and production, or portion menus, instead of meal production records;
- Eliminate State mandates that require:
 - Meal production records for sponsored centers;
 - Meal disallowances when meal production records reveal errors; and
 - Head Start centers to document infant formula choices.
- Allow:
 - Child care homes and centers to record all creditable meals served; and
 - Sponsoring organizations to determine which combination of meals served will provide the maximum reimbursement to the child care home or center.

Annual eligibility for for-profit centers

- USDA to establish annual eligibility determinations for for-profit centers serving high numbers of low-income children; and
- State agencies to eliminate requirements to submit monthly backup documentation of attendance, income eligibility forms, or title XX participation.

Eliminate budget requirements that are counterproductive to a fiscally responsible Program operation

- Simplify cost allocation of administrative funding among child care homes and centers that operate CACFP;
- Reduce the number of items that need prior written approval and allow carryover of line items that can be adjusted without prior written approval in the end-of-year budget; and
- Standardize a checklist of budget renewal requirements across all States.
- Collect annual budgets only from sponsoring organizations, not from the individual centers they sponsor;
- Allow sponsoring organizations to revise their budgets to capture allowable end-of-year budget changes 30 days after the end of the year;
- Allow sponsoring organizations of centers to:
 - Retain reimbursement of administrative expenses on an annual, not monthly, basis; and
 - Carryover unspent administrative funds after the end of the fiscal year.



A National Platform for the Child and Adult Care Food Program Community

Embrace technology solution to improve integrity and reduce paperwork

- Accept and provide training to staff and sponsoring organizations in using electronic and digitized signatures;
- Allow all data from required forms to be collected electronically and made available to reviewers in a usable format;
- Accept electronic records and storage in place of paper copying and filing systems;
- Allow electronic monitoring to confirm corrective action and perform follow-up reviews; and
- Encourage technology solutions that would:
 - Reduce the incidence of errors in the daily records that child care homes and centers must maintain; and
 - Overcome administrative challenges and barriers to participation of child care homes and centers in rural communities.

We hope to work together as a nutrition community to implement innovative policies to make our programs stronger.

We appreciate the opportunity to provide comments on a vital component of the CACFP. We look forward to working together to ensure the very best nutrition possible for every child in need of our programs.

On behalf of the board and membership of the National CACFP Sponsors Association,

A handwritten signature in black ink that reads "Kati Wagner". The signature is fluid and cursive.

Kati Wagner
President
National CACFP Sponsors Association