

Appendix G18. Public Comment #10

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Docket: FNS-2021-0011

Information Collection for the Child and Adult Care Food Program (0584-0055)

Comment On: FNS-2021-0011-0001

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

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Submitter Information

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General Comment

See attached file(s)

Attachments

05 24 21 CACFP FNS-2021-0011

May 24, 2021

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

Docket ID: FNS-2021-0011

Dear Ms. Roth:

The Wisconsin Department of Public Instruction (WDPI) appreciates the opportunity to submit comments regarding proposed information collection for the Child and Adult Care Food Program (CACFP).

CACFP Enrollment

CACFP enrollment record is not necessary as information is not current and outdated. The WDPI has concluded that USDA's ultimate purpose of collecting the specified child enrollment information is not being fulfilled and therefore does not justify the hardship imposed on the participants to collect this information and have it annually updated by the parents or guardians of the enrolled children.

WDPI has identified the following impediments to the efficient operation and administration of the Program:

- 1) The information for the children's normal days and hours in care and meals normally received while in care usually becomes obsolete soon after this information is collected because of frequent schedule changes. In other cases, the children's schedule variances are such that a "normal" schedule cannot be captured on an annually updated enrollment form and therefore is meaningless information. These reasons nullify the cross referencing process followed to compare meal counts to enrollment form documentation and thus the ability to detect the inflation of meal counts by facilities or the ability to identify potential concerns for sponsor reviewers during on-site reviews.
- 2) Substantial amount of facility staff time and effort is lost when collecting the required enrollment information and completing the annual updating process for all enrolled children when the information in turn is rendered useless for the reasons stated above.
- 3) A valuable amount of monitoring staff time and effort is lost when going through the reconciliation process of comparing enrollment information to meal count information and

the enrollment information does not reflect the actual times the children are present in child care.

4) WDPI reimburses child care centers based on the claiming percentage method. Most child care centers therefore do not track the meal counts of the children by individual child's name; they are recorded by an aggregate number per meal type per day. WDPI and sponsoring organizations of child care centers cannot therefore effectively complete a reconciliation of meal counts to enrollment information by child for the majority of the child care centers participating in the program.

5) Most meal counting errors and concerns are exclusively detected through the analysis of the child care's attendance records. Wisconsin child care licensing and certification rules require documentation of the actual arrival and departure of each child each day. Some child care providers require parent/guardian signature or initials each day of these arrival and departure times, some do not. Wisconsin child care licensing and certification rules also require child care providers to have the parents or guardians update their children's enrollment forms when changes have occurred to their name, home address, phone number, and emergency contact information. Meal counting errors and inflation concerns are detected from review of the attendance records regardless whether the provider requires a parent signature or initials or whether they have the parents or guardians certify current enrollment information for their children on an annual basis.

WDPI has collaborated with Wisconsin's child care licensing authority, the Department of Child and Families (DCF), with the intent to modify DCF's required enrollment form for collecting the normal days/hours/meals information. However, because DCF does not have an administrative rule requiring the enrollment form to be annually updated, it was decided that this modification would be moot. It was also decided that the modification would worsen the burden for home providers because it would require them to make copies of the enrollment form for submission to the sponsoring organization; making copies would require the home provider to have access to a working copy machine. Therefore, WDPI has provided an enrollment form to be used by child care centers to collect the enrollment information and the home sponsoring organizations have their own state approved forms to be used by the home providers to collect the enrollment information. The WDPI foresees savings for the CACFP participants and for the State agency as a result of this approach including:

- State agency and sponsoring organization monitors will have more time during site visits to focus on pressing concerns for serving healthier meals.
- Participants will value the CACFP for the purpose that it exists, to serve healthy meals to children. Less time and energy will be lost in collecting paperwork from the parents or guardians.
- Sponsoring organizations will have more administrative time to focus on resolving meal counting concerns by meaningful methods, like through additional site visits and closer scrutiny of the daily attendance records.
- Paper expense will lessen for the State agency, sponsoring organizations, and child care centers.
- Parents and guardians will experience less overload of paperwork completion.

- Participant level may increase due to less required paperwork and more children will have access to healthy meals.

Household Size Income Statements (HSIS)

Issues: HSIS data can be inaccurate and are not verified. The centers have a hard time getting the forms collected from the households. Majority of overpayments result from errors from these forms. WDPI suggests using a Direct Certification system to determine eligibility of CACFP participants and payments for centers or pay all meals at one rate reimbursement rate.

Ethnic and Racial Data Form

Data is collected by centers, kept on file at the center, but the data is typically not used. The process of visually identifying children based on their race and ethnicity encourages racial profiling.

CACFP Meal Pattern

When determining grains as Whole Grain Rich, WDPI recommends eliminate the Rule of Three. It would be better to return to only looking at the first grain ingredient on the ingredient list and, if the first grain (or second after water) is a whole grain/flour, the item is creditable as whole grain rich. The Rule of Three process is very complicated and the majority of CACFP operators find it difficult to understand due to needing to decipher between grains that are whole grains/flours, brans and germs, enriched grains/flours, grain derivatives, and non-creditable grains/flours. Further, there are various grain items that do not credit as whole grain rich by the Rule of Three, because the third grain ingredient is not creditable, but may credit as whole grain rich by a product formulation statement which is another item that is difficult for program operators from small CACFP facilities to obtain.

Thank you for the opportunity to comment. If you have any questions, please contact Amanda Cullen, Director, Community Nutrition Team at amanda.cullen@dpi.wi.gov.

Sincerely,



Dee Pettack
Policy Initiatives Advisor

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