

An Assessment of Child & Adult Care Food
Program Supper Pilot within Milwaukee
Public Schools

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Executive Summary

The Child and Adult Care Food Program (CACFP) is a federal entitlement program that provides nutritious meals and snacks to about three million children a day. Under CACFP, providers at care centers, family care homes and after-school programs are reimbursed for meal and snack services.

CACFP benefits are valuable, but limited. Children ages 13 to 18 are ineligible to receive supper. Currently, eight states have authorized waivers to serve suppers to low-income students up to the age of 18 in after-school care programs. Wisconsin does not have a supper waiver.

This report evaluates the CACFP supper pilot program at 13 Milwaukee Public Schools (MPS) sites to assess the value and impact of a third meal. All parties involved in the CACFP supper program in Milwaukee were interviewed to gain insight into the current pilot program: DPI, MPS, Boys and Girls Clubs, principals, building service workers, food service workers, CLC staff and parents. Additionally, observations of the claims process and supper program were documented to better understand the administrative and on-site implementation of the supper program. The following are major findings in this report:

- Suppers improve student behavior as demonstrated by the reduction in hunger experienced by students during after-school hours.
- Administrative entities such as the Department of Public Instruction and MPS recognize nutritional value and need for supper programming.
- Federal regulations restrict CACFP outreach and participation to children ages 13 to 18, a significant constituency to after-school programs in Milwaukee.
- Since the MPS School Nutrition Services division has automated its reporting of information needed for the National School Lunch Program, it is difficult to manually customize information needed for CACFP administrative requirements.
- Though the MPS School Nutrition Services division and the Boys & Girls Clubs are interested in broadening the supper program, CACFP administrative complexities play a significant role in holding back plans for supper program expansion.

Introduction

Supper is not normally included as a meal served by school programming. Yet if a child remains at school for after-school programming, a third meal service is fundamental towards providing students with adequate nutrition. For many parents, after-school programming allows them to maintain a full work day while their children are receiving much needed day care. In addition to this, the nutritional needs of after-school program participants is evident as a duration disparity between school lunch and a home meal (if any) exists.

Through the federal entitlement program, Child Adult Care Food Program (CACFP), after-school program sites can offer much needed sustenance to students who participate in enrichment activities. However, CACFP meal services are limited to children up to the age of 12. Currently eight states have been granted waivers and are able to provide meals to low-income children up to the age of 18 in after-school programs. In many states, like Wisconsin, there is a need to provide students over the age of 12 with after-school care suppers.

In 2008, the Boys & Girls Clubs of Greater Milwaukee reported that 43 percent of the membership is 13 to 18 years of age and 42 percent of the membership live in households with annual incomes from \$0 to \$11,999. Given the evident and growing need, Milwaukee Public School (MPS) and Boys & Girls Clubs of Greater Milwaukee began a supper pilot program utilizing CACFP at four sites during the 2007-2008 school year with the intention to provide students with a hot meal instead of a small snack service. With its success, the supper pilot continued and expanded to 13 sites during the 2008-2009 school year.

To further explore value and impact of supper service as well as possible ways to expand the program to more sites, Hunger Task Force conducted this study to gain feedback from key stakeholders. Interviews of stakeholders were conducted to learn more about their sentiments and role in supper programming, on-site supper service was observed, and the reimbursement claims process was documented.

Background

A. HISTORY OF CACFP

The 1960s experienced a surge of mothers entering the workforce. The passage of the Equal Pay Act of 1963 (Public Law 88-38) and the 1964 Civil Rights Act (Public Law 88-352) increased job opportunities for women. By 1970, about 41 of every 100 women participated in the labor force.¹ At the same time, the National School Lunch Program (NSLP)² enrollment climbed to 18.9 million participants in the 1967-68 school year.³

In 1968, Congress instituted a three-year pilot program called the Special Food Service Program for Children (SFSPFC) (Public Law 90-302) in response to low-income areas with large populations of working mothers. The program was intended to ensure nutritious meals and snacks to the growing number of children in daycare by providing care facilities grants to states funding for snack and meal service when school was not in session.⁴ It aimed to improve the nutritional well-being of children attending after-school and summer programs. In 1969, about 23,000 children from 900 child care sites participated in the program.⁵

In 1975, SFSPFC was officially separated into two programs: Child Care Food Program (CCFP) and Summer Food Service Program (Public Law 94-105). At this time, the program expanded to include eligibility to encompass more types of child care centers, outside-school-hours-care centers, and family child care homes.⁶ As the need for childcare continued to grow, the eligibility expansion of care facilities allowed more nutritional resources for children in daycare. In 1978, CCFP was made a permanent entitlement program by Congress (Public Law 95-627).

From 1979 to 1981, program participation grew about 23 percent.⁷ Despite this growth, the Omnibus Budget Reconciliation Act of 1981 (Public Law 97-35) drastically amended CCFP to reduce reimbursement rates, quantity of food served, and age eligibility due to federal budgetary cuts. Daily meal reimbursements were limited to two meals and one snack for each participant and age eligibility was changed to participants ages 12 and under. This age limitation hindered service availability to high school age children, disqualifying participants ages 13 to 18.

¹ See U.S. Census Bureau, *Employment Status 2000*. Washington, DC: August 2003. Available at <http://www.census.gov/prod/2003pubs/c2kbr-18.pdf>

² National School Lunch Program (NSLP): a federal reimbursement meal program operating in public and nonprofit private schools to provide nutritious low-cost or free lunches to children. NSLP was established in 1946 by President Henry Truman.

³ Gunderson, Gordon (1971). *The National School Lunch Program*, available at: <http://www.fns.usda.gov/cnd/lunch/AboutLunch/ProgramHistory.htm>

⁴ See USDA, *Child & Adult Care Food Program: Legislative History*, available at <http://www.fns.usda.gov/CND/Care/Regs-Policy/Legislation/history.htm>

⁵ *Ibid.*

⁶ *Ibid.*

⁷ *Ibid.*

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Through the Older Americans Act of 1987 (Public Law 100-175), Congress authorized the inclusion of older adults at adult day care centers to CCFP. Under the act, elderly populations could receive congregate and home-delivered meals as part of an adult care program.⁸ With the new age bracket added to the program, the name was later changed to what is it is known today as the Child and Adult Care Food Program (CACFP).

As the need for child care continued to grow, other forms of care were included in CACFP. For instance, the Healthy Meals for Healthy Americans Act of 1994 (Public Law 103-448) extended automatic free meal eligibility for most children participating in Head Start programs. In Kentucky and Iowa, the Act also authorized or extended demonstration projects that provided meal service in neighborhoods with high crime rates to children between the ages of 13 and 18.⁹ This opened the door to permit services in communities considered at-risk and low-income. By 1997, more than 1.5 million children participated at over 126,000 sites.¹⁰

Through the Child Nutrition Reauthorization Act of 1998 (Public Law 105-336), CACFP further expanded services to authorize snack service to “at-risk” after-school programs for children through age 18. At-risk areas were defined as having 50 percent or more students eligible for free or reduce-priced school meals.¹¹ Children ages 13 to 18 are ineligible for CACFP meal service, but were now permitted to receive CACFP snack service at participating sites.

In 2000, CACFP was amended through the Agricultural Risk Protection Act (Public Law 106-224) to expand the at-risk after-school care to six pilot states allowing reimbursements to supper service for children through the age of 18 in after-school care programs.¹² Four of the six states were named in the law: Delaware, Michigan, Missouri and Pennsylvania. The remaining two states were to be selected by the Secretary of Agriculture based upon competitive applications. Through this process, the United States Department of Agriculture (USDA) selected New York and Oregon.¹³ The seventh state, Illinois, was added in the Agriculture, Rural Development, Food and Drug Administration, and Related Agencies Appropriation Act of 2001 (Public Law 107-76). The eighth and most current state added to the “at-risk” after-school supper pilot list was West Virginia, in the Consolidated Appropriations Act of 2008 (Public Law 110-161).

⁸ See Library of Congress, *Developments in Aging: 1996-Report of the Special Committee on Aging to the U.S. Senate* (1997), available at <http://thomas.loc.gov/>

⁹ See USDA, *Child & Adult Care Food Program: Legislative History*, available at <http://www.fns.usda.gov/CND/Care/Regs-Policy/Legislation/history.htm>

¹⁰ *Ibid.*

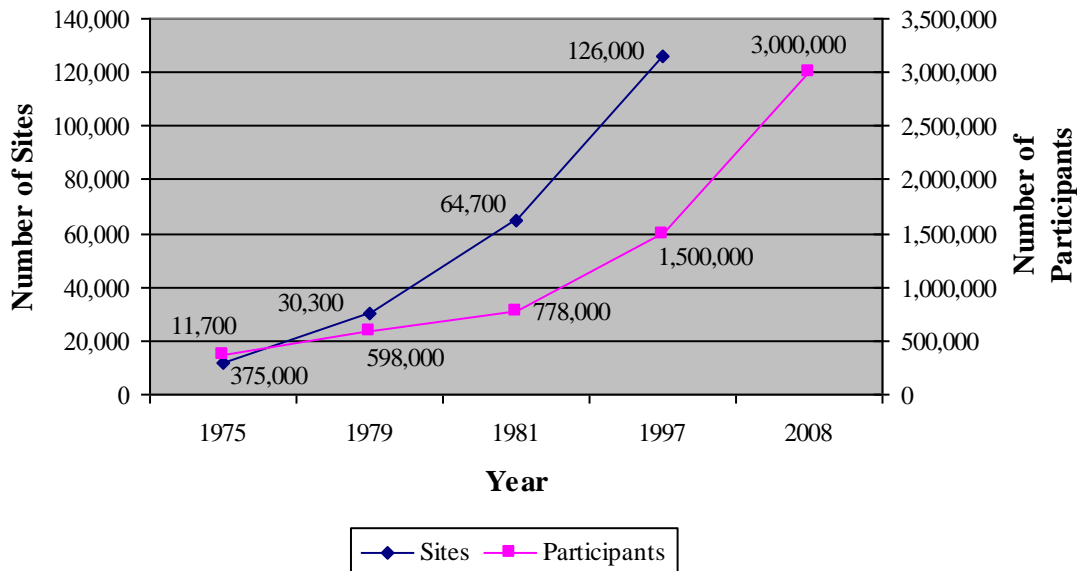
¹¹ See USDA, *Child & Adult Care Food Program*, available at <http://www.fns.usda.gov/CND/Care/CACFP/aboutcacfp.htm>

¹² See USDA, *Child & Adult Care Food Program: Legislative History*, available at <http://www.fns.usda.gov/CND/Care/Regs-Policy/Legislation/history.htm>

¹³ In August 2000, USDA’s Food and Nutrition Service (FNS) distributed applications to all CACFP state agencies. By the October 2000 deadline, 11 state agencies submitted applications, FNS rated the submissions using the following criteria: demonstration of need, state support of after-school care programs, and status of at-risk afterschool care programs in CACFP. In December 2000, the applicants were notified by the Department’s selection (16213 FR 73).

As CACFP participation numbers grew, attempts to modernize the administration and administrative process of the program gained attention. The Agricultural Risk Protection Act of 2000 changed state agencies and sponsoring organizations' administrative duties to tighten accountability. Some changes included required management improvement training, parent notification, and required monitoring for State agencies (Public Law 106-224).¹⁴ Additionally, since the paperwork was still geared towards its initial constituency of smaller daycare facilities, many larger sites such as after-school care programs noted the cumbersome administrative paperwork. The Child Nutrition and WIC Reauthorization Act of 2004 addressed this by increasing the minimum level of state administrative expense funding and began an inquiry to examine ways to reduce the paperwork that burdened many state agencies, sponsors, and care sites (Public Law 108-265).¹⁵ Today, the need for CACFP is still growing. In 2008, CACFP served over 1.8 billion meals and snacks to 3.1 million children and adults.¹⁶

Table 1. Growth of CACFP Child Participants and Sponsor Sites from 1975 to 2008¹⁷



Although the School Breakfast Program (SBP) and the National School Lunch Program (NSLP) are permanently established, programs like CACFP must be reauthorized every five years. The Child Nutrition and WIC Reauthorization Act of 2004 expires on June 30, 2009. For many advocacy groups, state agencies, politicians and other stakeholders, the reauthorization process allows an opportunity to advocate for program improvements.

¹⁴ See USDA, *Child & Adult Care Food Program: Legislative History*, available at <http://www.fns.usda.gov/CND/Care/Regs-Policy/Legislation/history.htm>

¹⁵ *Ibid.*

¹⁶ See FRAC, *Child & Adult Care Food Program*, available at <http://www.frac.org/>

¹⁷ *Ibid.*, See USDA, *Child & Adult Care Food Program: Legislative History*, available at <http://www.fns.usda.gov/CND/Care/Regs-Policy/Legislation/history.htm>; NOTE: Number of CACFP sites were unattainable for 2008.

Using CACFP for supper programming provides proper nutritional access to after-school programs nation-wide. Past program changes such as lowering age eligibility have left many school-age children ages 13 and above without the proper nutrition needed to reach their maximum potential in after-school activities.

B. CACFP FEDERAL REGULATIONS

CACFP is an entitlement program that offers reimbursement for all or part of the costs of meal service expenses and other aid¹⁸ to eligible child care centers, family and group daycare homes, adult daycare centers, and outside-school-hours care programs which serve meals to children and adults. All non-profit centers and licensed family child care providers are eligible to participate in the CACFP. For-profit centers who serve 25 percent or higher low-income children are also eligible. Eligible centers receive reimbursement for up to two meals and one snack or two snacks and one meal for each enrolled child age 12 and under.

The USDA's Food and Nutrition Service (FNS) oversees CACFP nationally, while the program is administered by state education agencies. In Wisconsin, the program is administered through the Department of Public Instruction (DPI). Locally, sponsoring organizations and independent child and adult care facilities establish an agreement with the state education agency to assume administrative and financial responsibility for CACFP operations. Monthly reimbursements are made to participating care facilities based on a child's eligibility for free, reduced-price, or paid meals. Reimbursement rates vary based on the type of meal.

**Table 2. Reimbursement Rates
Effective from July 1, 2008- June 30, 2009¹⁹**

Type of Meal	Free	Reduced Price	Paid
Breakfast	\$1.40	\$1.10	\$0.25
Lunch & Supper	\$2.57	\$2.17	\$0.24
Snack	\$0.17	\$0.35	\$0.06

Based on federal regulations, CACFP meals are intended to provide daily nutritious meals and snacks to participants. Meals must adhere to specific meal patterns to meet dietary guidelines for well-balanced meals. Due to quantity variations and nutrition content, the CACFP meal patterns also vary by type of meal and age group.

¹⁸ Other aid includes agricultural commodities or cash-in-lieu of commodities from the United States Department of Agriculture (USDA).

¹⁹ See USDA, *Child & Adult Care Food Program Reimbursement Rates*, available at <http://www.fns.usda.gov/cnd/care/>

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Table 3. Child Meal Pattern for Lunch or Supper²⁰

Food Components	Ages 1-2	Ages 3-5	Ages 6-12
1 milk fluid milk	1/2 cup	3/4 cup	1 cup
2 fruits/vegetables juice, fruit and/or vegetable	1/4 cup	1/2 cup	3/4 cup
1 grains/bread bread or cornbread or biscuit or roll or muffin or cold dry cereal or hot cooked cereal or pasta or noodles or grains	1/2 slice 1/2 serving 1/4 cup 1/4 cup 1/4 cup	1/2 slice 1/2 serving 1/3 cup 1/4 cup 1/4 cup	1 slice 1 serving 3/4 cup 1/2 cup 1/2 cup
1 meat/meat alternate meat or poultry or fish or alternate protein product or cheese or egg or cooked dry beans or peas or peanut or other nut or seed butters or nuts and/or seeds or yogurt	1 ounce 1 ounce 1 ounce 1/2 egg 1/4 cup 2 Tbsp. 1/2 ounce 4 ounces	1 1/2 ounces 1 1/2 ounces 1 1/2 ounces 3/4 egg 3/8 cup 3 Tbsp. 3/4 ounce 6 ounces	2 ounces 2 ounces 2 ounces 1 egg 1/2 cup 4 Tbsp. 1 ounce 8 ounces

MPS follows the Age 6-12 category in meal patterns for supper service due to the age range of after-school programming participants. During supper service, students receive all components referenced in Table 3.

C. CACFP IN MILWAUKEE PUBLIC SCHOOLS

1. CACFP Programming for Summer Meals

In addition to the federally funded Summer Food Service Program (SFSP), CACFP was first utilized for a third meal in Milwaukee during summer meal programming to provide students with access to nutritious meals. The need for the SFSP was highlighted in 2003 when Hunger Task Force released a report entitled *The State of the Summer Food Service Program in Milwaukee County*²¹. The report identified that in 2002, only 17 percent of children eligible to receive free or reduced-price meals at school were actually eating summer meals. In 2004, 44 core summer lunch (and sometimes breakfast) sites were opened from June 23 to August 27. This collaborative effort called *Fueling Young Minds*, was led with the support of MPS, the Harley-Davidson Foundation and Hunger Task Force.

²⁰ See USDA, *Child & Adult Care Food Program Meal Patterns*, available at <http://www.fns.usda.gov/cnd/care/>

²¹ Steiner, E. (2003). *The State of the Summer Food Service Program in Milwaukee County*. Milwaukee, WI: Hunger Task Force. Available at www.hungertaskforce.org

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In 2005, increased demand for meals led to the implementation of three meals at some summer sites. In the summer of 2005, MPS sought and received a waiver to combine federal funding from CACFP and SFSP. With reimbursements from both programs, summer providers were able to serve supper at four: LaFollette, Mitchell Street, 21st Street and Gaenslen. Since 2005, supper programming during the summer has grown: 52,069 suppers were served at 13 sites in 2006; 47,301 suppers at 19 sites in 2007; and 18,162 suppers at seven sites in 2008.²²

When schools recess for the summer months, low-income students lose out on meals normally provided for free or at reduced prices during school hours. Given this trend and the consecutive successes of supper service during the summer months, Boys & Girls Clubs and MPS collaborated to provide supper service at after-school programming sites during the traditional school year.

2. CACFP After-School Programming at MPS

In February 2008, MPS piloted a supper program at four school sites with Community Learning Center (CLC) programming from the Boys & Girls Clubs: Pierce, Siefert, Clarke, and Lloyd Elementary Schools. The schools were selected according to CACFP eligibility and also because they served a high number of free and reduced-price meals. In order to ensure the maximum amount of reimbursement, students had to meet the following federal requirements:

- 12 years of age or younger and
- Be enrolled in an after-school program.

In addition to receiving federal reimbursements from CACFP, Boys & Girls Clubs agreed to provide funding for the remaining balance for students who were ineligible for CACFP (e.g. students that were 13 years of age or older). At each of the four school sites, CLC students received hot meals during their after-school programming that were prepared on-site by MPS food service staff.

Due to the success of CACFP supper service, MPS and the Boys and Girls Clubs collaborated to increase supper service at more sites. For the 2008-2009 school year, the supper pilot expanded to 13 CLC sites:

1. 53rd Street School
2. Bethune Elementary School
3. Clarke Elementary School
4. Dover Elementary School
5. Fratney Elementary School
6. Lafollette Elementary School
7. Lincoln Avenue Elementary School
8. Lincoln Center of the Arts Middle School
9. Lloyd Elementary School
10. Pierce Elementary School
11. Riley Elementary School
12. Sherman Elementary School
13. Siefert Elementary School



²² See 2007 and 2008 *Fueling Young Minds Closeout Reports*. Milwaukee, WI: Hunger Task Force

D. HUNGER TASK FORCE RESEARCH

During the fall of 2003, Hunger Task Force assessed the CACFP in Milwaukee County and found significant anecdotal evidence demonstrating the underutilization of the program. Additionally, the Wisconsin Council on Children and Families found that if CACFP was fully implemented, at least 16,000 children under the age of five living in poverty could receive meal benefits.²³

In 2004, Hunger Task Force completed a report entitled *The Child and Adult Care Food Program in Milwaukee County*. The assessment consisted of a survey project of CACFP participants in family home daycare and group childcare center settings, 40 interviews with program participants and administrators, and a mapping project that depicted participating CACFP family home daycare centers and group childcare centers. One of the major findings was the underutilization of CACFP. Other findings of the project included:²⁴

- A program's participation in CACFP helps to strengthen the quality of care provided, especially for low-income children.
- CACFP is an important financial and informational resource for all types of care providers.
- CACFP is expensive to operate as administrative and reporting requirements have increased without a comparable increase in the administrative reimbursement rate.
- The 12 years of age and under limit of for meal service is problematic for after-school programs and emergency shelters serving Milwaukee County.

In Spring 2008, Hunger Task Force assessed the value and perception of the supper program through informal telephone interviews with nutrition agencies and advocacy organizations in the pilot states with CACFP supper.²⁵ Results were mixed as some states identified various administrative and logistical challenges.²⁶ Hunger Task Force then explored Wisconsin's potential for the at-risk after-school care supper program.

During this time, Hunger Task Force also developed a survey in conjunction with the DPI to determine if there was interest in advocating for an extension of the CACFP Supper Pilot to Wisconsin and to assess the need and capability of after-school care programs to serve suppers through CACFP. A total of 224 surveys were returned from 583 daycares and after-school care providers throughout Wisconsin, finding:²⁷

- 78 percent of respondents provide after-school care to children age 18 and under
- 72 percent of respondents serve after-school snacks through CACFP

²³ See Wisconsin Council on Children and Families, 2003 WISKIDS Count Data Book

²⁴ Gigliotti, Katherine. *The Child and Adult Care Food Program in Milwaukee County*. (February 2004). Milwaukee, WI: Hunger Task Force

²⁵ Hunger Task Force interviewed state agencies and advocates in Delaware, Illinois, Missouri, New York, Oregon, and Pennsylvania. Agencies and advocates in Michigan and West Virginia were unavailable.

²⁶ CACFP Supper Pilot Summary of Survey Results. (June 2008). Milwaukee, WI: Hunger Task Force. Full results of surveys and interviews can be found at www.hungertaskforce.org

²⁷ *Ibid.*

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- 20 percent of respondents from particularly large daycares and after-school sites are interested in serving suppers to children in their program through CACFP reimbursements
- Some providers who are not interested in supper service expressed that they would not have sufficient staff to serve another meal

E. PURPOSE OF STUDY

The at-risk after-school care supper programs in the eight pilot states have demonstrated mixed outcomes, yet Hunger Task Force believes that there are many benefits to offering students a third meal in high poverty communities like Milwaukee. Hunger Task Force and the Congressional Hunger Center designed and conducted a study of the CACFP supper pilots in MPS to:

- Document the reimbursement claims process to demonstrate the challenges of implementing and administering CACFP
- Evaluate the impact of CACFP meals and identify operational best practices at supper sites
- Collect evidence to inform Milwaukee stakeholders working on the Child Nutrition and WIC Reauthorization Act of 2009

Methodology

To determine participation barriers and levels of support for CACFP supper programs, this study was designed to gain perspectives from all parties involved in the CACFP supper program in Milwaukee: DPI, MPS, Boys & Girls Clubs, principals, food service workers, building service workers, CLC staff and parents. Additionally, observations of the claims process and supper program were documented to better understand the administrative and on-site implementation of the supper program. Interviews and observations were conducted between October and December 2008.

Interviewees were selected based on their vital role in implementing CACFP supper service at MPS sites. The following lists the types of interviews conducted:

- Face-to-face interviews at the 13 supper sites included: 10 principals²⁸, 13 service workers, 13 CLC staff, and 39 parents. Interview questions focused on overall opinion of CACFP, the advantages or disadvantages of supper service after-school, noticeable behavioral changes in students within the supper program, and nutritional value of supper. (For a complete copy of the interview questions see Appendices A, B and C on pages 25-27.)
- A phone interview was conducted with child nutrition program officials at DPI. Interviews focused on questions related to their overall opinion of CACFP, the complexity of the claims process, and impact of CACFP on their workload. (For a complete copy of the interview questions see Appendix D on page 28.)
- Two face-to-face interviews were conducted with administrative officials at the Boys & Girls Clubs. Interviews focused on questions related to their overall opinion of CACFP, noticeable behavioral changes in children and impact of CACFP on their workload and finances. (For a complete copy of the interview questions see Appendix D on page 28.)
- Two interviews were conducted with School Nutrition Services officials at MPS. Interviews focused on questions related to their overall opinion of CACFP, the complexity of the claims process, and impact of CACFP on their workload. (For a complete copy of the interview questions see Appendix D on page 28.)

Observations of the claims process and the implementation of the supper program at the sites were documented to identify strengths as well as challenges. Observations of the reimbursement claims process were performed at the MPS School Nutrition Services office. Claims for the month of November and December were observed.

On-site observations of meal service were performed at all 13 CACFP supper sites and included: supper preparation, supper service, attendance, meal service record keeping and clean up. Since supper preparation services varied by site, observation of services lasted approximately two hours daily. Each CACFP site was visited on an average of three times.

²⁸ Five of the 13 site principals were unavailable for interviews.

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The results of this study are limited by the subjective nature of observations, the exclusion of student feedback, and time restraints of on-site visitations. However, the study provides useful feedback from all parties involved in the CACFP supper program regarding the value of serving suppers to children. Additionally, the documentation of on-site supper service and the reimbursement claims process enabled the collection of best practices and challenges experienced during implementation of supper. This information can prove useful as stakeholders debate the value of CACFP suppers for Wisconsin children as well as provide a source for further study of the value and need for third meal programming and funding.

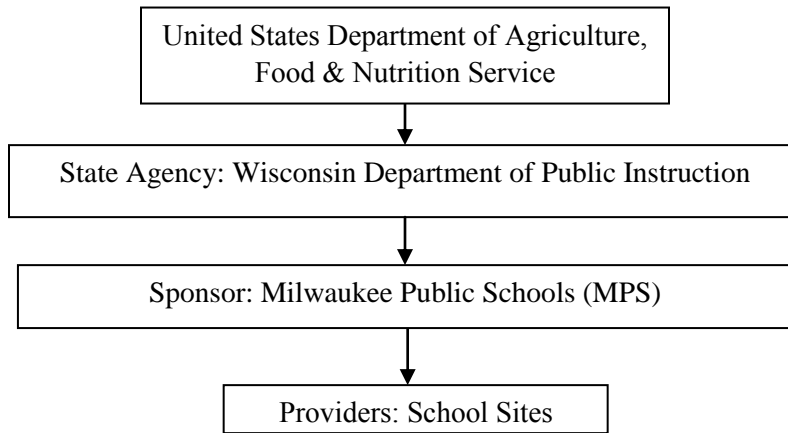
Results

The subsequent findings summarize interviews, document the claims process, and outline areas of best practices for CACFP supper service.

A. ADMINISTRATION OF CACFP

1. Overview of the CACFP Administration Process

In order to maintain accountability of federal funds appropriated to CACFP, funds are regulated through administrative partnerships demonstrated in the flow chart below:

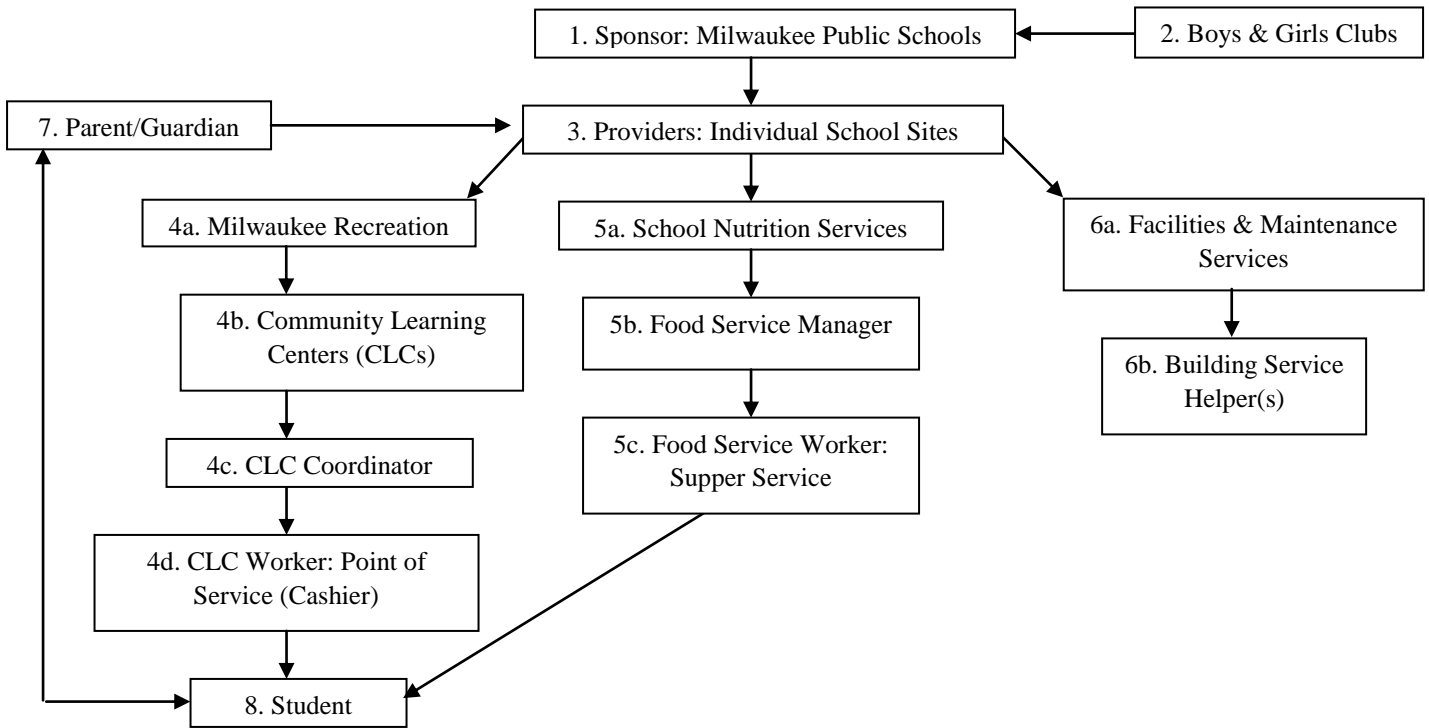


Name	Description
<i>USDA</i>	USDA’s FNS Division oversees CACFP. Federal funds are then released to the state agencies. For Wisconsin, DPI is the state administrative entity. USDA works with DPI to ensure funds are appropriately used.
<i>State Agency</i>	DPI grants permission to local or regional sponsors to oversee child care or after-school programming providers. MPS is considered the sponsor and individual school sites are considered providers. Sponsors conduct site visits and review transactions to ensure maximum accountability. Since MPS started the supper program, DPI currently has conducted annual audits.
<i>Sponsor</i>	As a sponsor MPS trains personnel at CACFP school sites to follow rules and regulations. MPS makes site visits to ensure food is properly prepared and served. MPS also monitors site paperwork and meal counts.
<i>Provider</i>	As providers, individual MPS sites prepare and serve meals on-site. They must adhere to CACFP regulations, not NSLP regulations. At MPS sites, CLC Coordinators and the Food Service Manager must work together to effectively communicate accurate meal preparation and point-of-service counts.

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2. On-Site Administrative Process of CACFP

Supper service at individual site levels is important to the implementation and accountability of CACFP. The flow chart below demonstrates the parties that are involved in effective supper service. Communication between all parties is extremely important for the implementation and sustainability of the supper program (For a complete copy of the each party's roles and responsibilities see Appendix E on page 29.)



Name	Description of Roles and Responsibility
1. <i>MPS</i>	Sponsors the CACFP Program
2. <i>Boys & Girls Clubs</i>	Possesses a partnership with MPS to provide meal services
3. <i>School Sites</i>	Site that houses after-school programming and supper service for students
4a. <i>Milwaukee Recreation Department</i>	Coordinates after-school programs like Community Learning Centers
4b. <i>Community Learning Centers (CLCs)</i>	Community Learning Centers are on-site after-school programs at MPS. Some CLCs include Boys & Girls Clubs programming.
4c. <i>CLC Coordinator</i>	Coordinates the CLC programming at MPS sites and works to implement the supper program
4d. <i>Cashier</i>	Inputs point-of-service information into the computer systems to track supper participants

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5a. <i>School Nutrition Services</i>	A division of MPS that coordinates school nutrition programming
5b. <i>Food Service Manager</i>	Manages the logistics of food service at individual sites
5c. <i>Food Service Supper Shift Worker</i>	Works the supper shift to prepare and serve supper during after-school programming
6a. <i>Facilities & Maintenance Services</i>	Facilities & Maintenance Services is responsible for maintaining the day-to-day upkeep of MPS facilities.
6b. <i>Building Service Helper</i>	Works with CLC staff to clean up after the supper is served
7. <i>Parents</i>	Authorize student participation in CLC programming and meal services.
8. <i>Student</i>	As meal recipients they are the beneficiaries of CACFP.

B. CACFP INTERVIEW RESULTS

1. Overall Opinion of CACFP Supper in After-School Programming

The majority of the stakeholders had positive opinions of CACFP supper service in after-school programming.

- All principals said that a nutritional need exists at their school site.
- CLC staff at all sites felt supper is needed to sustain students during after-school activities and thought supper is better than snack service.
- All food service staff had positive opinions of the CACFP supper program and found value in the service.
- 11 out of 13 building service workers said that clean up after supper service was minimal if CLC staff assisted.
- All parents felt that it was important that their children receive some form of sustenance during after-school programming.

“With the supper program, a lot has changed. I noticed that my son does more homework during tutoring. When I pick him up he no longer complains that he’s ‘starving’. He’s able to unwind and wait to have dinner with the family at 6:30.”

–Parent

From an administrative perspective, MPS emphasized that there are health benefits associated with supper service. DPI highlighted the extreme value in supper service during after-school programming and cited nutritional value in providing students with an after-school supper. The Boys & Girls Clubs said that hot supper service enhances after-school programming and stressed that there is a great need for supper service during after-school programming at most sites.

2. Impact of CACFP Supper Programming on: Workload and Operations

Implementing the supper program takes a lot of cooperation from multiple parties. The most deterring factor for implementing any type of program is workload. Interviews with all parties included conversations on how workload and operations were impacted with the implementation of supper. The following were major findings from the interviews:

Stakeholder	Finding
<i>Principal</i>	<ul style="list-style-type: none"> • Many principals are not directly involved with the management of after-school hours programming. • All principals expressed the importance of CLC, service workers and food service staff keeping an open line of communication to effectively implement the supper program.
<i>CLC Staff</i>	<ul style="list-style-type: none"> • Most of the CLC staff felt supper service does <u>not</u> negatively impact their workload. • All CLC staff felt it was important to divide specific tasks among each staff person to run a smooth supper service.
<i>Food Service Staff</i>	<ul style="list-style-type: none"> • All food service workers stated that supper was a relatively easy transition from regular lunch service since the facilities and ingredients are the same.
<i>Building Service Helpers</i>	<ul style="list-style-type: none"> • More than half of the building service workers felt it is important to officially include supper service clean up as part of their daily schedule. For many, supper service clean up is currently an unscheduled, but required, daily task. • Some building service workers estimated that supper clean up was about 30 minutes of extra work and expressed the need for compensation. • Most building service helpers felt their workload is most efficient when they have a communicative relationship with CLC staff.
<i>DPI</i>	<ul style="list-style-type: none"> • Cited that supper service does <u>not</u> negatively impact their workload and recognized the value and need of supper programming. • Noted that they would like to see more participants. • Expressed that increases in their workload demonstrates a growing number of meals being served to children who need them.
<i>MPS</i>	<ul style="list-style-type: none"> • Stated that their workload has significantly increased for the reimbursement claims process. • Stressed that the administrative requirements should be more tailored to their size and mode of operation.
<i>Boys & Girls Clubs</i>	<ul style="list-style-type: none"> • Cited that supper service does <u>not</u> negatively their workload. • Noted that their partnership with MPS enables their membership to participate in CACFP without managing extra income eligibility forms for CACFP.

3. Impact of CACFP Supper Programming on: Student Behavior

There are often direct correlations to proper nutrition and student behavior. Principals, CLC staff, and parents were asked about the effect of supper and student behavior. Though most principals admit that their involvement with after-school programming is minimal, all principals believe that poor student behavior can be associated with hunger issues.

“When we served snacks, students would still be hungry. Snacks were never enough for the students, they always needed more. With the supper program, we haven’t had any student complain about being hungry.”

–CLC Coordinator

Since the supper program started, all CLC staff members said that students no longer complain of hunger pangs. Prior to the supper program, students received snack service, which many CLC staff members said was not enough. Most CLC staff said that most poor behavior prior to the supper program came from complaints of hunger. For example, some students might act out or not stay on task because they expressed feeling hungry.

More than half of the parents observed that their children no longer complain of being extremely hungry when they get home and are able to wait for supper time. Additionally, more than half of parents say their children are calmer when they are home, after having eaten a CACFP supper.

4. Timing of CACFP Supper Programming

Eleven out of 13 sites serve supper between 2:30 p.m. to 3:30 p.m., while two schools serve supper at 4:30 p.m. and 5:15 p.m. Eleven out of 13 school sites provide supper at the beginning of the after-school programming in order to maximize the effectiveness of academic and enrichment activities. School sites that have later supper service cited the same reasons. For earlier supper services, food service workers can start their supper shifts after their regular shifts. Later supper service shifts require food service workers to take non-paid breaks in between their regular shift and supper shift. Regardless of later or earlier supper service, all CLC Coordinators stated the importance of supper service and ensuring a good enrichment program pace for the students.

The majority of families serve another supper at home. According to parents, many students still come home hungry for supper. Most families that have supper at home eat between 6:00 p.m. to 7:30 p.m. Many find that by having the supper program at school, their children are not looking for snacks when they get home in the evenings. Rather, they are able to wait until supper is served at home.

5. Effective On-site CACFP Supper Programming

At supper sites, the three key issues were apparent for a successful supper program:

- Effective communication between CLC staff, food service and building service workers to ensure accurate meal counts and clean eating spaces.

- Adequate CLC staffing is effective towards day-to-day meal services. Key roles include a cashier to input point-of-service numbers for accurate meal counts, staff to supervise students through the supper line, and during meal service and after-meal service clean up.
- Sites with established daily routines for supper service run most efficiently. Cashiers can readily enter student information as students can go through the dinner line.

6. Administrative Challenges to CACFP Supper Programming

Age Limitation:

DPI, MPS, and Boys & Girls Clubs all agree that the age limitation for meal services should be raised from age 12 to 18. According to the Boys & Girls Clubs of Greater Milwaukee, 43 percent of their 2008 year membership consists of participants ages 13-18.²⁹ Due to the age limitation, almost half of their constituency is ineligible to receive supper service.

Administratively, DPI and the School Nutrition Services Division of MPS recognize that the age restriction complicates the claims process. School Nutrition Services struggled to categorize students by age group. Initially, individual school sites kept a daily written record of students on paper. School Nutrition Services had to manually calculate lists by sorting students by birthdates from hand-written documents. School Nutrition Services' software technology is equipped to handle claims for breakfast and lunch on a regular basis, not CACFP supper claim. (For more information on the claims process, see "CACFP Implementation & Reimbursement Claims Process" on page 20.)

Non-MPS Students:

Claims are contingent on meal application forms. Non-MPS students who participate in CLC after-school programming at MPS sites do not have MPS student identification numbers (e.g. private school students). Though students may be age eligible for CACFP, School Nutrition Services cannot claim them since they do not have a MPS meal application on file.

CLC Participants from other MPS Sites:

Some supper sites have participants from other MPS sites. Each school site is equipped with a computer with their respective school site population meal application information on file. Students who enter the supper line must enter their student identification number. In order for that student to be recognized in the system for a supper meal count, his or her information must be downloaded to supper site's computer by School Nutrition Services. Instead of one student being entered into the system, the entire school roster must be downloaded. This process is called "field trip." This process must be completed for every student from other MPS sites who participates in the supper program.

Both School Nutrition Services and the Boys and Girls Clubs have expressed great interest in expanding the supper pilot. However, a larger caseload would add to the complexities already experienced with the

²⁹ See, Boys & Girls Clubs of Greater Milwaukee, *Agency Facts*, available at <http://www.boysgirlsclubs.org/>

federal claims and implementation requirements. More logistical and software adjustments must be made in order to effectively complete the necessary administrative requirements outlined in CACFP.

C. CACFP IMPLEMENTATION & REIMBURSEMENT CLAIMS PROCESS

The implementation and reimbursement claims process for CACFP was originally designed for sponsors of daycare facilities with smaller populations of participants. MPS operates on a larger scale and system, but must adhere to the same requirements as smaller sponsors. For a large sponsoring entity like MPS, there are certain start-up and maintenance functions that are cumbersome. The School Nutrition Services division at MPS possesses the capability and facilities to provide nutritious meals that meet federal guidelines. They demonstrate this to the federal government through adhering to the administrative requirements of the SBP and NSLP. The following lists the major requirements needed to implement CACFP:

1. Pre-Operational and Visitation Requirements:

Before a CACFP site can begin operation, it must follow pre-operational USDA guidelines. These requirements include:

- Pre-operational site visit to ensure adequate conditions
- Orientate Food Service and CLC Coordinators regarding issues such as reporting meal counts, average daily attendance and meal requirements
- After the initial pre-operational site visitations, sites must be reviewed an additional three times. Of the three, the first visit must be made within the first four weeks of operation

For School Nutrition Services, they must also make visitations to meet requirements for the SBP and NSLP as well. Since the SBP and NSLP are the School Nutrition Services' major areas of operations, they are already making routine visits to satisfy federal visitations guidelines. To complete these visitations to facilities that they are already familiar with is very time consuming and repetitive.

2. Documents Required for CACFP Participation:

1. Monthly Reimbursement Claims: Required after the end of each month.
 - Reimbursement claims are submitted via internet by the Finance Division of MPS on the 15th of the month after the claim month. For example, reimbursement claims for meal service in the month of January must be submitted by February 15.
 - Federal regulations require claims to be submitted within 60 days after the end of the claim month. For example, a January claim form is expected to be submitted by February 15, and cannot be paid if it arrives later than March 30. Claims received beyond the 60-day deadline cannot be paid unless there is a special exemption.
2. Quarterly Non-Profit Food Service Reports: Required for all sponsors operating two or more sites. Information of operation costs and how the program is funded is required every three months.
 - Quarterly Reporting Periods: October 1 – December 31, January 1– March 31, April 1– June 30, and July 1– September 30

3. Required Information for Monthly Reimbursement Claims:

The monthly reimbursement claims submitted to the state agency administering CACFP must include the following information:

1. Participant enrollment by “type of need category” must be accurately reported by type of need categories: free, reduced, and non-needy.
 - MPS utilizes students’ free, reduced-price and paid meal eligibility information to categorize type of need status for each participant
2. Participants also must be sorted to meet age eligibility by ages 12 and under and ages 13 and above
3. Record of the number of CACFP meals served meeting federal requirements
4. Record of average daily attendance
5. Number of days of meal service

Both DPI and MPS have stated that the claims process is complicated for sponsors like MPS. For instance, sorting students by age groups can be problematic. Currently, the school meal computer software used by MPS is programmed to logistically collect and sort information according to school breakfast and lunch requirements. Since CACFP has an age limitation, MPS must manually sort students ages 12 and under from students ages 13 and above. In addition to age categorization, students must be sorted by type of need category.

4. Edit Checks

Edit checks are meant to ensure accountability in the claims process to prevent any possible errors or false claims. Edit checks are performed monthly by School Nutrition Services with the reimbursement claims to certify that the claim submitted is correct. Federal regulations require that facilities never over-claim meals. Edit checking is a method used to compare the information that appears on a reimbursement claim with other information such as CACFP approved meal types and enrollment numbers.

D. CONCLUSION

CACFP Requirements for after-school programming for sponsors like MPS should give special consideration towards meeting CACFP federal requirements for operations and claims. By streamlining CACFP requirements to correspond with NSLP requirements, MPS could more efficiently meet administrative requirements.

The School Nutrition Services division’s major operations are concentrated towards breakfast and lunch programming. Logistically, CACFP follows separate federal guidelines that do not correspond with the SBP or the National School Lunch Program. The complexities experienced in the CACFP claims and implementation process of suppers are often due to three major issues:

1. **Duplication of tasks:** To meet federal requirements for the National School Lunch Program, School Nutrition Services must do periodic site visitations. Since CACFP has similar requirements, School Nutrition Services must do repeated visits to the same facilities that provide lunch and breakfast in order to evaluate similar required issues.

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2. **Technology:** School Nutrition Services' is most equipped to deal with claims for the NSLP. Information that is easily attainable for breakfast and lunch claims is not as readily available for CACFP claims since CACFP and NSLP are two separate programs. For example, CACFP claims have an age restriction, while lunch and breakfast claims do not.
3. **Logistics:** By sponsoring a program like CACFP, there are issues that School Nutrition Services face in which they normally don't encounter: age restrictions, cross-over of students from other MPS sites, and non-MPS students. Additionally, the School Nutrition Services division is normally accustomed to administering breakfast and lunch service for its student population.

Though School Nutrition Services and the Boys & Girls Club would like to further expand the supper program, a larger caseload would add to the complexities already experienced with the federal claims and implementation requirements. Before considering further site expansion for supper service, much of the aforementioned issues must be resolved.

Major Findings

1. **Importance of Third Meal Availability**

- CACFP is highly valued within after-school programming sites in Milwaukee.
- Administrative entities, such as DPI and MPS, recognize the nutritional value and need for CACFP supper programming.

2. **Negative Impacts of Age Restriction**

- Federal policy prohibits CACFP participation for children ages 13 to 18, a significant demographic for after-school programs like the Boys & Girls Clubs of Greater Milwaukee.

3. **Administrative Complexities**

- Sponsoring agencies like MPS have a difficult time meeting CACFP administrative requirements, such as monitoring, that overlap with the National School Lunch Program.
- CACFP requirements, such as categorizing by age and edit checks, are not coordinated with school breakfast and lunch regulatory requirements and MPS school meal software.
- CACFP sponsors like the Boys & Girls Clubs and MPS want to continue operating and expanding supper programming, but administrative complexities may hinder their plans.

Recommendations

1. CACFP stakeholders should advocate for a federal waiver to allow Wisconsin providers to serve CACFP suppers to children ages 13 to 18 in after-school programs.
2. Federal regulations should be simplified for school district sponsors to allow seamless implementation from one school meal program to another.
3. MPS and CLC staff at each supper site should maintain consistent communication to improve daily programming and increase “on-the-ground” efficiency.
4. MPS supper sites should consistently share “on-the-ground” best practices with each other.
5. Hunger Task Force should explore best-practice supper strategies outside of Milwaukee and share findings with supper program stakeholders in Milwaukee.

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Appendix A:

CACFP SUPPER PILOT SITES STAFF/PRINCIPAL INTERVIEW QUESTIONS

1. What is your overall opinion of the CACFP supper program?

2. What do you think of the food in the supper in terms of:
 - a. Quality:
 - b. Quantity:
 - c. Nutritional Value:

3. What time are the children being served supper? What are the advantages/disadvantages of that timeframe?

4. Have you noticed behavioral changes in the children now that they are being served supper?

5. How has the supper pilot program affected your work schedule? The CLC's/school's schedule?

6. Describe the tracking and reporting process used for the CACFP pilot program. What is your opinion of this process?

7. How does the CACFP supper pilot program impact your (positive/negative/no impact):
 - a. Workload
 - b. Finances
 - c. School/program operations

Appendix B:

PARENT INTERVIEW QUESTIONS

1. What is your overall opinion of the CACFP supper program?

2. What do you think of the food in the supper in terms of:
 - d. Quality:
 - e. Quantity:
 - f. Nutritional Value:

3. What time are the children being served supper?
 - a. What are the advantages/disadvantages of that timeframe?
 - b. Does your child become hungry later in the evening because they are fed supper mid-afternoon?
 - c. Does this meal accommodate your schedule? How/Why?
 - d. Are you eating an evening meal as a family after you child comes home?
 - e. Does having your children fed supper at their after-school program save your family money?

4. Have you noticed a difference or change in your child's behavior or academic performance since their after-school program has begun serving them supper?

Appendix C:

BUILDING SERVICE HELPER INTERVIEW QUESTIONS

1. What is your overall opinion of the CACFP supper program?

2. What impact (positive, negative, no change) has CACFP supper pilot had on your:
 - a. Work schedule?
 - b. Workload?
 - c. School operations?

3. Since the CACFP supper pilot began, have you noticed a change (positive, negative, no change) in terms of:
 - a. Students' behavior?
 - b. Student comments about being hungry?
 - c. Students' attention?
 - d. Students' attendance?

Appendix D:

MPS, DPI, AND BOYS & GIRLS CLUBS INTERVIEW QUESTIONS

Ask to MPS, DPI, B&G:

1. What is your overall opinion of the CACFP supper program? What value is there in the CACFP supper pilot? (Scale 1-5, low to high impact/value)
2. What do you think of the food in the supper?
 - a. Quality:
 - b. Quantity:
 - c. Nutritional Value:
3. Describe the claiming process that you perform for CACFP pilot program. What is your opinion of this process? If you could change something about how this program works, what would it be?
4. How does the CACFP supper pilot program impact your (positive/negative/no impact):
 - a. Workload
 - b. Finances
 - c. School/program operations

Ask to B&G Clubs and MPS:

1. What time are the children being served supper? What are the advantages/disadvantages of that timeframe?
2. Have you noticed behavioral changes in the children now that they are being served supper?
3. How has the supper pilot program affected your work schedule? The CLC's/school's schedule?

Ask to MPS:

1. How has the CACFP supper pilot affected your budget?

Ask to DPI:

1. Explain the CACFP supper pilot process from a state standpoint in terms of:
 - a. Operations
 - b. Budget
 - c. Impact (on students? Families?)
2. Do you feel there is a need for similar supper programming in Wisconsin? Why? If so, where?
3. How simple/complex do you feel the reporting process is for CACFP suppers? Suggest specific ways it could be improved.

Appendix E:

ON-SITE ADMINISTRATIVE PROCESS

Name	Description of Roles and Responsibility
1. <i>MPS</i>	<p>As the sponsor, must manage each school site that serves supper. At the MPS Central Office, the School Nutrition Services (SNS) division receives site based data from supper service, which includes meal counts from all participants. The following are major day-to-day activities:</p> <ul style="list-style-type: none"> • Meal service count numbers are then compared with the CLC’s Average Daily Attendance (ADA) numbers. • SNS inputs new student data for local school sites so students that are new or are from other MPS sites can be accounted for during supper service point-of-service numbers. • SNS handles billing and program discrepancies. For instance, students who are not eligible such as non-MPS students or students 13 years of age or older are able to eat, but their meals are not reimbursable. Per their agreement, balance dues are covered by Boys & Girls Clubs. • SNS sends its number counts to the MPS Finance division to complete monthly CACFP reimbursement claim to DPI. Quarterly, a Non-Profit Food Service (NPFS) Financial Report must be submitted.
2. <i>Boys & Girls Clubs</i>	<p>The Boys & Girls Clubs plays a major role in their partnership with SNS. Mutually, both parties benefit from their agreement. By participating in the MPS supper pilot, Boys & Girls Clubs can provide their membership at participating MPS sites with hot suppers, while MPS can provide the service with potentially low financial losses.</p>
3. <i>School Sites</i>	<p>School sites house CLC programming as well as provide on-site meals to students. Sites must be approved by the sponsor and state agency in order to operate as a CACFP site.</p>
4a. <i>Milwaukee Recreation</i>	<p>Milwaukee Recreation, also known as the MPS Department of Recreation & Community Services, is responsible for managing community recreation programs. It provides after-school programming services at various MPS sites.</p>
4b. <i>Community Learning Centers (CLCs)</i>	<p>Afterschool, many MPS sites become CLCs. The CLCs provide after-school programming in the form of a daycare, Boys & Girls Clubs, or other specialized programs. Participants must be enrolled in CLC and have a meal application on file in order to participate in supper service.</p>
4c. <i>CLC Coordinator</i>	<p>CLC programs are run by CLC Coordinators that manage after-school programming as well as coordinate supper service. They must maintain accurate daily updates on membership and attendance to inform the Food Service Manger about changes that may impact meal preparations. Additionally, they also have to communicate with the Service Helper with clean up roles and responsibilities. They also must maintain</p>

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	communication with the Food Service Manager by discussing cashier duties and collect ADA records for the reimbursement process.
4d. <i>Cashier</i>	For the reimbursement process, numbers received from the cashier is vital as it must be accurate when compared with the ADA. The cashiers are sometimes cafeteria managers, but often they are CLC staff members. Cashiers must coordinate students to ensure accurate record keeping during the supper line. They also work with other CLC staff members to ensure students are not missed during supper counts.
5a. <i>School Nutrition Services</i>	School Nutrition Services is a branch within the MPS school system that implement and manage school nutrition programming such as breakfast, lunch, and specialized meal programs like CACFP.
5b. <i>Food Service Manager</i>	Food Service Managers must maintain careful recordkeeping, order necessary products and assign the staff person needed for supper service. They must also coordinate with the person who assumes duties of the cashier to ensure accurate point-of-service numbers. It is key for the manager to communicate with CLC Coordinator in order to maintain accurate count of students to prepare meals for. For ineligible students, they must maintain accurate record of students who are 13 years of age or older and non-MPS students.
5c. <i>Food Service Supper Shift Worker</i>	Supper shift hours are either worked by Food Service Associates or Managers. If they are non-managers, they must coordinate with the Food Service Manager regarding supper preparation. The duration of supper service is about 2 hours. They must ensure that each student receive the entirety of a meal according to USDA guidelines and clean the kitchen after supper service.
6a. <i>Facilities & Maintenance Services</i>	Facilities & Maintenance Services is responsible for maintaining the day-to-day upkeep of MPS facilities.
6b. <i>Building Service Helper</i>	A portion of the clean up after supper service is completed by the building service helpers. They should communicate with the CLC Coordinator to maintain an agreement of clean up roles and responsibilities. For instance, the most common scenario consists of CLC staff cleaning up after supper service with service helpers taking out the trash. Variations of facilities may influence duties. For instance, multipurpose cafeterias may be more difficult to clean because the area is also used for physical activities such as basketball. Eating-only cafeteria rooms may be easier because they exclude other activities interfering with clean-up.
7. <i>Parents</i>	Parents must authorize their child to participate in CLC programming and meal services. In order to qualify for CACFP suppers, parents must submit a meal and CLC application. Additionally, they must submit any necessary documentation from doctors regarding food allergies.
8. <i>Student</i>	As meal recipients they are the beneficiaries of CACFP.