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**CACFP At-Risk Afterschool Meals
Best Practices, 2011**

Final Report



November 2011

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CACFP At-Risk Afterschool Meals Best Practices, 2011

Final Report

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Any opinions, findings, conclusions, and recommendations expressed in this report are those of the authors and do not necessarily reflect the views of the U.S. Department of Agriculture.

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Executive Summary

Background

The at-risk afterschool meals component of the Child and Adult Care Food Program (CACFP) offers Federal funding to afterschool programs that serve a meal or snack to children in low-income areas. With the passage of the Healthy, Hunger-Free Kids Act of 2010, institutions in all 50 States and the District of Columbia participating in the at-risk afterschool meals component of CACFP are eligible to claim reimbursement at the free rate for up to one snack and one meal served to each eligible participant per day. Though reimbursement has been available in all 50 States and the District of Columbia for at-risk snacks since 1998, prior to the passage of this Act only 13 States and the District of Columbia were eligible to seek reimbursement for at-risk afterschool meals (usually supper). This report identifies practices pilot State agencies and sponsors used to implement and administer the at-risk afterschool meals component of CACFP, challenges they encountered, and solutions they developed.

Methods

The study collected primary data from pilot States that administered the at-risk meals component prior to the Healthy, Hunger-Free Kids Act and synthesized information from secondary sources. Background research included previous evaluation reports, surveys, training tools, and program data. Primary data collection had four components:

- Listening sessions that invited pilot State agencies and sponsors to share insights about the challenges they faced with the at-risk afterschool meals component of CACFP;
- A survey of nine pilot State agencies to assess similarities and differences in utilization of at-risk afterschool meals, approaches to outreach, and challenges faced. Data solicited in the survey included number of sponsors, types of sponsors, outreach strategies, and barriers;
- An online focus group with seven pilot State agencies in order to engage State agencies in a conversation about challenges and solutions administering the at-risk afterschool meals component;
- Key informant interviews to explore common issues faced by State agencies and their sponsors. Three formative, exploratory interviews were held with pilot State and advocacy organizations to understand best outreach practices and identify characteristics of effective sponsors. Eight interviews were held with sponsor organizations to identify challenges they face implementing, administering, and expanding at-risk afterschool meals.

Themes and topics from transcripts were compared with responses from the State agency survey. Verbatim quotes that exemplified common themes were incorporated into the analysis.

Findings

State agencies and sponsors generally supported the at-risk afterschool meals component. When administering the component, State agencies spent significant time and resources to train sponsors and provide technical assistance. To recruit new sponsors, State agencies noted that

many new sponsors were reaching them from word-of-mouth. Additional outreach was conducted by most, but not all, agencies.

Stakeholders supported the at-risk meals component, believed that it was reaching children in low-income areas, and argued it helped provide a meal or snack to children that they might not otherwise have had.

Most, but not all, State agencies reported that they were currently making active efforts to recruit new sponsors and expand the reach of the at-risk meals component. Outreach efforts included press releases, sending flyers to SFSP sponsors, developing their own at-risk brochures, and hosting webinars to spark interest. Some States found that they could raise awareness of at-risk meals by partnering with advocacy organizations. Regardless if they were actively conducting outreach efforts, State agencies noted that prospective sponsors often sought them out based on word-of-mouth.

State agencies reported investing significant time and resources to approve and train new sponsors and provide technical assistance. State agencies strongly believed that good training ensured compliance with Federal regulations as well as proper recordkeeping for reimbursements.

Challenges and Solutions

Stakeholders encountered various challenges that limited their ability to engage new organizations and expand the at-risk meals component. This study identified solutions that State agencies and sponsors used to address these challenges.

- Training, technical assistance, and other administrative responsibilities limited State agencies' ability to conduct outreach to new sponsors. State agencies frequently relied on word-of-mouth to promote the at-risk meals component.
 - *Best practices.* To increase participation, State agencies targeted sponsors that were enrolled in nutrition assistance programs, especially school districts and 21st Century Learning Centers. One State agency identified centers in eligible areas and auto-enrolled them in the at-risk afterschool meals component. State agencies also partnered with advocacy organizations to raise awareness of the at-risk afterschool meals component with potential sponsors.
- Afterschool care programs must meet State or local health and safety standards in order to participate in the at-risk afterschool meals component of CACFP. The process for obtaining health and safety inspections varied across counties or localities, hindering a State agency's ability to offer technical assistance. Some sponsors encountered delays because they lacked sufficient funds to make capital investments needed to meet health inspections. States noted that the biggest barrier for sponsors is getting started, and once they start, most sponsors stay enrolled in the at-risk afterschool meals component.
 - *Best practices.* Some States employed a screening tool to help determine if new sponsors required health and safety inspections or licenses. Start-up costs could be mitigated with one-time mini-grants.

- Some sponsors found it difficult to offer a variety of menus that the students enjoyed. Sponsors also encountered logistical challenges serving hot meals.
 - *Best practices.* To address these challenges, one sponsor made two months' worth of menus and cycled them throughout the year. Another sponsor served cold meals that required little preparation, such as wraps and salads.
- Eligibility and reporting requirements were a source of confusion for some new sponsors, as information was not always easily available or it was unclear how the rules applied to their organization.
 - *Best practices.* To help educate sponsors, State agencies revised their Web sites to make information more accessible. State agencies also structured trainings to address eligibility requirements at the beginning.
- Though USDA has regulations that simplify paperwork across programs, some State agencies noted that recordkeeping was a barrier to sponsor participation. Some sponsors participating in multiple nutrition assistance programs were asked to complete three different applications and collect three different sets of paperwork for the Summer Food Service Program (SFSP), at-risk afterschool meals, and the National School Lunch Program (NSLP).
 - *Best practices.* One State agency streamlined the application for schools by making the afterschool meals application a one-page addendum to the NSLP application; for non-school sponsors, this State agency partnered with an advocacy organization to streamline the application from 72 pages to 12 pages.

Discussion

State agencies looking to expand at-risk meals found that certain types of organizations were more able to readily offer the component. School districts and 21st Century Community Learning Centers were well positioned to administer at-risk meals. Many food banks and affiliated community organizations such as Boys and Girls Clubs were also able to adopt at-risk afterschool meals. These types of organizations shared several characteristics: 1) they had gained important experience in food preparation and in maintaining the required paperwork by sponsoring at-risk snacks or other nutrition assistance programs; 2) they often had pre-existing distribution networks and could deliver prepared meals to sites; and 3) strong leadership had championed the meals program and garnered support from staff.

In addition to the barriers identified by State agencies and sponsors, several policy and administrative barriers currently hinder further adoption and expansion of the at-risk meals component. First, the paperwork required for the at-risk meals component may pose a burden for sponsors that administer multiple FNS nutrition programs, such as NSLP and SFSP. A few State agencies expressed their desire to see the at-risk meals component become part of NSLP or be modeled after the Seamless Summer Option, which combines program components into one set of paperwork. State agencies and sponsors had little awareness of the regulations USDA already has in place to ease this burden. Second, there was some confusion interpreting program rules. For example, State agencies had wide latitude to interpret the educational enrichment provision, which led to inconsistent application across States. Additionally, there was some misinterpretation of nutritional requirements, as some believed that program regulations called

for a hot meal. Third, for-profit sponsors found it particularly challenging to meet eligibility requirements for the at-risk meals component. In addition to being located in an eligible area, a for-profit center must show that at least 25 percent of the children served by the center through its traditional child care component are eligible for free or reduced price meals. Some for-profit centers were located in eligible areas but could not demonstrate this 25 percent criterion. Not-for-profit centers do not have this 25 percent threshold requirement.

Recommendations

The study offers the USDA evidence-based recommendations for at-risk meals emerging from this research. Recommendations combine best practices identified by pilot States and areas that merit further attention.

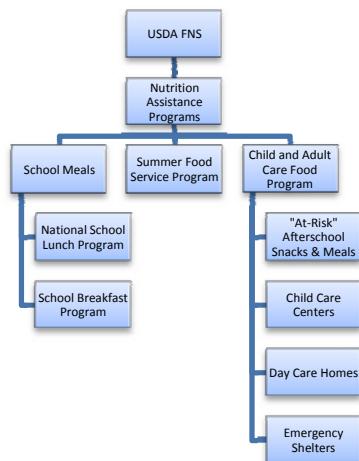
- Well-organized, plain-language information on the USDA Web site can address confusion surrounding eligibility, nutrition, and reporting requirements.
- Some efforts, such as the paperwork reduction taskforce, are currently under way at USDA to simplify the paperwork for sponsors. This taskforce may want to explore opportunities to integrate paperwork for CACFP afterschool components and NSLP. FNS's efforts in developing the Seamless Summer Option may serve as a model that can be replicated for CACFP.
- Renaming or branding efforts may seek to differentiate CACFP components as well as raise awareness of FNS's wide program offerings.
- Increased awareness of different menu and serving options, especially cold suppers, can inspire sponsors, clarify nutrition requirements, and help dispel the misconception that supper must be a hot meal.
- The at-risk meals component could potentially reach more children if the 25-percent threshold requirement was changed or removed for for-profit organizations.

Background

USDA Child and Adult Care Food Program

In 2010, 20.2 percent of U.S. households with children were food insecure—meaning that they had inconsistent access to enough food for active, healthy living—at some time during the year.¹ Food security impacts children’s current health as well as their future health and well-being. Previous studies have linked food insecurity in children with elevated risks of health and development problems, compared with children in otherwise similar food-secure households. USDA’s nutrition assistance programs, such as school meals, the Summer Food Service Program (SFSP), and the Child and Adult Care Food Program (CACFP), improve children’s food security by providing low-income households with access to healthful food and nutrition education (Figure 1).

Figure 1. U.S. Department of Agriculture, Food and Nutrition Service, Nutrition Assistance Programs for Children Organizational Chart



The CACFP comprises a set of programs that improve the quality of day care and make it more affordable for many low-income families. Each day, 3.2 million children receive nutritious meals and snacks through CACFP. CACFP reaches even further to provide meals to children residing in emergency shelters and snacks and suppers to youths participating in eligible afterschool programs.

At-Risk Afterschool Meals

The at-risk afterschool meals component of the CACFP offers Federal funding to afterschool programs that serve a meal (usually supper) or snack to children in low-income areas. At-risk afterschool programs provide a much needed service to their communities. They give children a safe

¹Coleman-Jensen, Alisha; Nord, Mark; Andrews, Margaret; and Carlson, Steven. “Household Food Security in the United States in 2010.” ERR-125. USDA, Economic Research Service. September 2010.

place to go after school and nutritious food that gives them the energy they need to concentrate on homework and join their friends in physical, educational, and social activities. Since 2000, the CACFP has been offering reimbursement for meals and snacks served to children participating in programs that offer afterschool enrichment activities for at-risk children and youth 18 and under.

To be eligible to participate in the at-risk afterschool meals component of CACFP either independently or through a sponsor, an afterschool program must:

- Be organized primarily to provide care for children after school or on the weekends, holidays, or school vacations during the regular school year (an at-risk afterschool center may not claim meals or snacks during the summer, unless it is located in the attendance area of a school operating on a year-round calendar);
- Provide organized, regularly scheduled activities (i.e., in a structured and supervised environment);
- Include education or enrichment activities; and
- Be located in a school attendance area in which at least 50 percent of the children are approved for free or reduced-price meals²

Prior to passage of the Healthy, Hunger-Free Kids Act of 2010, the nutritional support provided to children in afterschool programs varied by State. Though reimbursement has been available in all 50 States and the District of Columbia for at-risk snacks since 1998, between 2000 and 2010 only 13 States and the District of Columbia were eligible to seek reimbursement for at-risk afterschool meals.³ Eligible centers in the other 37 States could apply for reimbursement for snacks, but not meals, under the at-risk component. Alternatively, centers would apply for reimbursement under other CACFP components, which are subject to different rules and reimbursement rates. With the passage of the Healthy, Hunger-Free Kids Act of 2010, institutions in all 50 States and the District of Columbia participating in the at-risk afterschool meals component of CACFP are now eligible to claim reimbursement at the free rate for up to one snack and one meal served to each eligible participant per day.

Purpose of Report

With 37 States newly eligible to offer the at-risk meals component, there is an opportunity to learn from the District of Columbia and the States that have already been participating. This report identifies best practices that pilot State agencies and their sponsors are using to implement and administer the at-risk afterschool meals component of the CACFP, challenges these State agencies and sponsors encountered, and solutions they developed. Though the at-risk afterschool meals component of CACFP includes meals and snacks, this study focuses on meals (hereafter

²“At-Risk Afterschool Meals: A Child and Adult Care Food Program Handbook.” http://www.fns.usda.gov/cnd/care/Publications/pdf/At-Risk_Afterschool_Handbook.pdf [accessed 9/27/2011].

³Pilot states were Delaware, Michigan, Missouri, New York, Oregon, and Pennsylvania. By 2009, the program had expanded to include Connecticut, the District of Columbia, Illinois, Maryland, Nevada, Vermont, West Virginia, and Wisconsin.

referred to as the at-risk meals component). The findings from this report will be presented to Congress to satisfy the requirements of Section 337 of the Healthy, Hunger-Free Kids Act of 2010.

Research Goals

This research aims to assist policymakers, State agencies, and sponsors that administer the at-risk meals component of CACFP. The research questions driving this study were threefold:

1. What practices help State agencies and sponsors effectively administer and expand the at-risk meals component of CACFP?
2. What challenges or barriers hinder efforts to administer or expand this component of CACFP? and
3. What practices have helped State agencies and sponsors effectively address these barriers?

Research was conducted with 12 of 13 State agencies and sponsors in States that were eligible for the at-risk meals component prior to 2010. These pilot States were Connecticut, Delaware, the District of Columbia, Illinois, Maryland, Michigan, Missouri, Nevada, New York, Oregon, Vermont, West Virginia, and Wisconsin.⁴

Methods

To address the research questions, the study collected primary data and synthesized information from secondary sources. Background research included previous reports, surveys, program data, and tools from stakeholder audiences such as State and national agencies, advocacy groups, voluntary associations, and sponsors. Primary data collection had four components: listening sessions, extant data collection, key-informant interviews, and a focus group with State agencies.

Background Research

Background research was conducted to identify stakeholder activities pertaining to the at-risk meals component, policy characteristics of the program, available tools and training, and previously identified best practices. Background research included the following sources:

- General information about major program stakeholders (e.g., Food Research and Action Center (FRAC), the CACFP Sponsors Association, and State agencies);
- Technical assistance and support tools (e.g., trainings, informational materials, and recruitment materials);

⁴Pennsylvania was invited to participate in listening sessions, but participation in the survey and focus group was limited to a sample of pilot States.

- Evaluative and best practices content from State agency and sponsor Web sites (e.g., evaluation reports, best practices reports, and tip/advice sheets);
- Twitter feeds (#hungerpc2011) from the 2011 National Anti-Hunger Policy Conference—National CACFP Leadership Conference (March 6–8, 2011);
- Stakeholder surveys provided by the USDA Food and Nutrition Service (FNS); and
- Program data provided by FNS.

Background data were used to identify an initial set of program activities as well as barriers faced by sponsors and State agencies. These documents informed the data collection instruments and were used to select States for primary data collection.

Primary Data Collection

A four-tier study design was used to collect information from our target audiences. First, researchers attended listening sessions led by FNS with State agencies and sponsors. Second, nine State agencies were surveyed to collect basic program information and extant data. Third, drawing on information from the survey and listening sessions, an online focus group was conducted with State agencies to discuss program challenges and best practices. Finally, researchers interviewed select stakeholders from State agencies, sponsors, and advocacy organizations to gain a deeper understanding of program activities and challenges. Table 1 summarizes these primary data collection activities. Table 2 describes the States that participated in the research efforts. Table 3 profiles the sponsors and advocacy organizations that participated in the research.

Table 1. Methodology Summary

Method	Key Discussion Topic	Respondent Organization
Listening session	<ul style="list-style-type: none"> • Barriers, challenges, and best practices • Outreach barriers and strategies 	State agencies, sponsors
Survey	<ul style="list-style-type: none"> • Number of sponsors, sites, daily meals served • Outreach strategies 	State agencies (n=9) (see Table 2)
Focus Group	<ul style="list-style-type: none"> • Attitudes about meals program • Outreach strategies • Support to sponsors (technical assistance) • Characteristics of successful sponsors • Policy barriers and suggestions 	State agencies (n=7) (see Table 2)
Interview	<ul style="list-style-type: none"> • Outreach and recruiting activities • Expansion strategies • Support from States and to sites • Characteristics of successful sponsors and sites • Policy barriers and suggestions 	State agencies (n=2) (see Table 2), sponsors (n=6), potential sponsors (n=2), advocacy organizations (n=1) (see Table 3)

Table 2. Participant Profile: State Agencies

State	Selection Criteria		Methods		
	Year of Adoption	Population ⁵	Survey	Focus Group	Interview
Connecticut	2009	Urban	✓	✓	
Delaware	2000	Urban	✓		
District of Columbia	2009	Urban			✓
Illinois	2001	Urban	✓		
Maryland	2009	Urban	✓	✓	
Michigan	2000	Urban		✓	
Missouri	2000	Rural	✓		
Nevada	2009	Urban	✓		
New York	2000	Urban	✓	✓	
Oregon	2000	Urban			✓
Vermont	2009	Rural	✓	✓	
West Virginia	2008	Rural	✓	✓	
Wisconsin	2009	Rural		✓	

Table 3. Participant Profile: Advocacy/Sponsors

Sponsor Name	State	Organization Type	Active Sponsor
Delaware Food Bank	Delaware	Food bank	Yes
Harvesters	Missouri	Food bank	Yes
Montgomery County School District	Maryland	School district	Yes
New London Board of Education	Connecticut	School district	Yes
Project ISAAC	West Virginia	21 st Century afterschool program	Yes*
Vermont Boys & Girls Club	Vermont	Community organization	Yes
Edgewood Community Services	Maryland	Property management	No
Hornell Area Concern for Youth	New York	Community organization	No
Food Research and Action Center (FRAC)	District of Columbia	Advocacy	Not applicable

*Project ISAAC serves only at-risk afterschool snacks.

Listening Sessions

Researchers attended two telephone listening sessions with State agencies and sponsors. State agencies and sponsors were invited by FNS to share high-level insights about the challenges they faced with the at-risk afterschool meals component of CACFP. The listening sessions introduced

⁵ Data is drawn from the 2011 Statistical Abstract, U.S. Census Bureau. Urban is defined as a state with more than 70 percent of its population living in an urban environment. Rural is defined as a state with less than 70 percent of its population living in an urban environment.

the research and helped establish buy-in for their participation in the study. Feedback from the listening sessions informed the qualitative research that followed.

Survey

An online survey with nine preselected State agencies was conducted to assess similarities and differences in how the at-risk afterschool meals component was utilized, approaches to outreach, and challenges faced. Data solicited in the survey included the number of sponsors, types of sponsors, outreach strategies, and barriers. The States participating in the survey were Connecticut, Delaware, Illinois, Maryland, Missouri, Nevada, New York, West Virginia, and Vermont. The full survey instrument with responses is included as appendix A.

The survey also asked State agencies to nominate up to five sponsors and five organizations that inquired about becoming sponsors that could be followed up for interview. These referrals constituted our sampling frame for the sponsor key-informant interviews (discussed below).

Online Focus Group

An online focus group was convened with seven State agencies that administered the at-risk meals component prior to the Healthy, Hunger-Free Kids Act to engage State agencies in a conversation about the at-risk meals component. These participants, who are often unaware they face similar day-to-day challenges, were able to discuss experiences and solutions attempted in other States. Informed by the survey results, the focus group addressed such topics as technical assistance to sponsors, policy barriers, sponsor retention rate, and the characteristics of successful sponsors. The focus group discussion guide is included as appendix B.

Representatives from State agencies administering the at-risk meals component were recruited for the online focus group via an e-mail distributed by FNS Regional Offices. The e-mail explained the project goals and invited their participation in the online survey and focus group. Those who completed the survey were asked to participate in the State agency focus group. Because not all the survey respondents were available to take part in the focus group, researchers also reached out to representatives in State agencies that were not asked to complete the survey (Michigan and Wisconsin) to increase the number of focus group participants. States were selected to ensure a broad representation across the following factors: the year they adopted the meals program, urban or rural population, and regional diversity.

Key-Informant Interviews

A series of telephone interviews were conducted with key informants to explore common issues faced by the State agencies and their sponsors. Interviews were approximately 30 minutes long and were audio recorded with the participants' permission. Three formative, exploratory interviews were held with State and advocacy organizations to further understand best outreach practices and identify the characteristics of successful sponsors. Eight interviews were held with

sponsor organizations to identify the challenges they face in implementing, administering, and expanding the program. Key-informant interview instruments are included as appendixes C–E.

Formative Interviews

Three formative key-informant interviews (two with CACFP specialists at State agencies and one with a stakeholder at an advocacy organization) were conducted to inform the development of the focus group discussion guide and sponsor interview protocol. Formative interviews inventoried current program practices, explored the challenges that State agencies and sponsors routinely faced while administering the program component, and gathered specific examples from their experiences. The open-ended format of the interviews allowed participants to discuss other salient topics (such as characteristics of effective sponsors and sites, policy barriers, and suggestions) that would otherwise have gone unaddressed. By design, State agencies that participated in these formative interviews (Oregon and the District of Columbia) did not participate in the survey or focus group.

Sponsor Interviews

To understand sponsor experiences with the program component, eight in-depth interviews were conducted with sponsors and independent centers participating in the at-risk meals component. Six interviews were conducted with active sponsors and independent centers. To better understand the challenges that organizations face in implementing the at-risk meals component, researchers also interviewed two organizations that started, but did not complete, the sponsor application process with their State agencies.

Sponsors were nominated by State agencies in the online survey. Sponsors were screened to include a mix of organization type (e.g., school districts, not-for-profits, etc.), sponsors of others versus independent centers, number of children served, and regional diversity. In all, researchers spoke with sponsors from seven States. Sponsors represented various organization types, including school districts, afterschool care centers, food banks, housing projects, and community organizations like Boys & Girls Clubs.

Data Analysis

The data were analyzed to identify common themes, patterns, and important points of difference among the States, similar to that recommended by Krueger (1994)⁶ and Patton (1990).⁷ Two analytical techniques were employed:

- **Thematic analysis** to determine if certain themes emerged from the patterns. These themes may have been articulated directly by the participants or identified by the study team. In addition to assisting with the identification of patterns and themes in the data,

⁶Krueger, R.A. 1994. Focus Groups: A Practical Guide for Applied Research. Sage Publications; 2nd edition. Thousand Oaks, CA.

⁷Patton, M.Q. 1990. Qualitative Evaluation and Research Methods. Sage Publications. Newbury Park, CA.

content and thematic analyses also allowed the collected data to be reduced into a more easily studied and understood format.

- **Logical analysis** to yield patterns of differences, as well as similarities, that emerged from cross-classifying the data. This step was helpful in identifying patterns or themes that are not immediately obvious, while also taking into consideration outlier opinions.

Themes and topics from the qualitative transcripts were compared and reinforced by the responses from the State survey. Quotes that exemplified common themes were identified and incorporated into this analysis. The survey data are presented for reference and analysis (appendix A).

Findings

This section summarizes stakeholder attitudes about the at-risk meals component and current outreach and training activities. In addition, common barriers and challenges faced at the State,⁸ sponsor, and site level when administering the at-risk meals component are presented. This section concludes by presenting the solutions successfully used by stakeholders to overcome these barriers and challenges.

Attitudes About the At-Risk Afterschool Meals Component of CACFP

According to USDA, “Afterschool programs that serve meals or snacks draw children and teenagers into constructive activities that are safe, fun, and filled with opportunities for learning. The meals and snacks give them the nutrition they need to learn, play, and grow. Nutritious meals and snacks are important for effective learning and developing healthy eating patterns now and in the future.”⁹

Most stakeholders liked the at-risk component and believed that it was reaching children in low-income areas and providing a meal or snack to children that they might not otherwise have had. This section introduces the benefits of the at-risk meals component and State and sponsor attitudes about administering the program component.

State agencies had a strong understanding and support of the component’s objectives. Ten State agencies were able to accurately describe the goal of the at-risk meals component as providing nutritious meals to children in low-income areas. When State agencies and sponsors were asked about the benefits of the at-risk meals component, participants believed the meals relieved some financial burden on the family because children would eat less at home. Without the at-risk meals component, four State agencies expressed concern that children would not receive adequate nutrition at home.

⁸In our survey sample we found that seven States administered the at-risk afterschool meals component of CACFP via the State Department of Education and two States administered the program via the State Department of Health. This report refers collectively to both State agencies.

⁹“At-Risk Afterschool Meals: A Child and Adult Care Food Program Handbook.”

http://www.fns.usda.gov/cnd/care/Publications/pdf/At-Risk_Afterschool_Handbook.pdf [accessed 9/27/2011].

... It was a snow day and [the charter school was] going to send the kids home. They had a handful of kids in the office crying because they weren't going to have the at-risk afterschool meal and the kids said, "We're going to go hungry, there's no food at home." So they actually kept the school open and...fed the kids.

Two State agencies went further to say that sponsors valued the at-risk component as well, citing as evidence the low attrition they observed from sponsors who agreed to participate. These State agencies stated that the biggest barrier for sponsors is getting started, but once they start, most sponsors stay enrolled in the at-risk meals component. For their part, some sponsors believed that the component helped them by freeing up financial resources they could redirect for educational enrichment.

... If we have to take program money to buy food, it reduces the number of books, tutors, or programs that we can bring in. When we can meet the needs of young people, we can work with them on a physical and emotional level.

Outreach and Recruitment

State efforts to expand the at-risk meals component ensure that more eligible children are receiving well-balanced, nutritious meals and gaining educational enrichment. One of the motivating factors leading to the establishment of the CACFP at-risk afterschool meals component was a "desire to support educational and enriching afterschool care programs for children up to 18 years of age in at-risk neighborhoods to reduce juvenile crime and educational underachievement."¹⁰ One possible outcome of widespread participation in the at-risk meals component and snacks was that it could increase attendance at afterschool programs.

The State agencies in this study worked with diverse types of sponsors, such as school districts, nonprofit youth organizations, 21st Century Community Learning Centers,¹¹ advocacy organizations, food banks, faith-based "community action organizations," a culinary school, and a health association. A few State agencies noted that some of their most effective sponsors were affiliated organizations, like Boys & Girls Clubs, the Salvation Army, the Y, and the United Way. These organizations often self-sponsor. Sponsors that worked with unaffiliated sites could "take that paperwork burden off the sponsored institution, allowing them to better serve the kids and conduct enrichment programs." The number of sites sponsored varied considerably, ranging from 3 to 100 sites.

¹⁰USDA. Child and Adult Care Food Program: At-Risk Afterschool Meals in Eligible States, *Federal Register*, 75, 62, April 1, 2010. http://www.fns.usda.gov/cnd/care/Regs-Policy/Snacks/At-Risk_Meals_FR.pdf [accessed 9/27/2011].

¹¹"The 21st Century Community Learning Centers program is authorized under Title IV, Part B, of the Elementary and Secondary Education Act, as amended by the *No Child Left Behind Act of 2001*. [The program creates] community learning centers that provide academic enrichment opportunities for children, particularly students who attend high-poverty and low-performing schools, to meet State and local student standards in core academic subjects, to offer students a broad array of enrichment activities that can complement their regular academic programs, and to offer literacy and other educational services to the families of participating children." (U.S. Department of Education, Office of Elementary and Secondary Education Academic Improvement and Teacher Quality Programs, "21st Century Learning Centers: Non-Regulatory Guidance." Washington, DC: U.S. Department of Education, February 2003.)

Eight State agencies reported that they were currently making active efforts to recruit new sponsors and expand the reach of the at-risk meals component. Outreach efforts included press releases, sending flyers to SFSP sponsors, developing their own at-risk brochures, partnering with child advocacy organizations, and hosting webinars to spark interest. Six State agencies said that they collaborate with 21st Century Community Learning Centers to offer the at-risk meals component in all supported afterschool programs. Two State agencies highlighted this type of organization for strategic outreach focus. Three State agencies were not actively conducting outreach; one of these State agencies explained that outreach was not a priority for them because they had grown the component so much from word-of-mouth outreach alone.

Most stakeholders noted the importance of word-of-mouth to promote the at-risk meals component and to prompt inquiries from potential sponsors. Four State agencies reported that word-of-mouth and the popularity of the component were the most important sources of information, rather than any formal outreach and recruiting activities. For example, school staff who worked with other nutrition assistance programs such as the National School Lunch Program (NSLP) heard about the at-risk meals component and wanted their school to participate. One State vividly expressed the impact of word-of-mouth: “We’ve had lots of schools approach us to try to get on the program. We really haven’t had to do a lot of outreach... they’ve been beating our door down trying to get the suppers in their programs.”

State agencies that were actively attempting outreach observed that creating partnerships with advocacy organizations was a particularly effective outreach strategy. Six State agencies created partnerships with advocacy organizations to promote the at-risk meals component of CACFP and disseminate information about the at-risk meals component to those who were interested in participating.

Training and Oversight

Background

Once a sponsor has expressed interested in participating in the CACFP, the State agencies conduct screening and training with that sponsor. As part of this process, public or private nonprofit organizations that want to sponsor the at-risk component of CACFP apply to their State agency for approval. State agencies do pre-approval visits of potential sponsors to confirm the information in their application and to further assess the organization’s ability to administer CACFP.¹² Sponsors sign an agreement and are responsible for oversight of the at-risk meals component at the sites they sponsor. Sponsors receive Federal reimbursement through the State agency to cover the administrative and operating costs of preparing and serving meals to eligible children at their sites. In addition, sponsors are required to do a pre-approval visit to each site to discuss benefits and requirements and ensure that the facility is capable of providing the meal service.

¹²⁷ CFR §226.6(b)(1).

State agencies also conduct training on duties and responsibilities to key staff from all sponsored sites before starting to serve the at-risk meals component. At a minimum, training must include instruction appropriate to the level of staff experience and duties covering the following topics: meal patterns, meal counts, claims submission, review procedures, recordkeeping requirements, and reimbursement system. Sponsors must provide additional annual training sessions for key staff from all sponsored sites.¹³

Best Practices

State agencies reported investing significant time and resources to approve and train new sponsors. State agencies strongly believed that good training ensured compliance with Federal regulations as well as proper recordkeeping for reimbursements. These State agencies worked with potential sponsors by assisting them through the application process and then training the new sponsors to administer the at-risk meals component. The sponsors in turn provided training to potential and newly enrolled sites.

All 13 State agencies in this study provided training and significant amounts of technical assistance to new sponsors. State agencies provided technical assistance via telephone or e-mail, often on an as-needed basis, to sponsors until their applications were approved. New sponsors were required to attend trainings, and State agencies carefully reviewed first claims for accuracy and to assess their sponsors' processes for collecting and submitting claims. After new sponsors were approved, State agencies conducted reviews as required by USDA.¹⁴

State agencies also used a train-the-trainer model. Sponsors reported that they passed on what they learned from the State to their sites: the State trained sponsors to train sites. Furthermore, some sponsors trained site staff to train others at the site.

Challenges

Stakeholders encountered various challenges that limited their ability to engage new organizations and expand the at-risk meals component. State barriers included limited time for outreach, policy barriers with health and safety inspections, and sponsor barriers such as staffing, menu planning, and misinterpretation of USDA requirements.

Training, technical assistance, and implementation of other provisions required by the Healthy Hunger-Free Kids Act consumed a considerable amount of State resources, limiting State agencies' ability to conduct outreach to prospective sponsors. Three State agencies felt that their efforts to expand the at-risk meals component were constrained due to staffing limitations, saying they "can't be stretched any thinner." One State noted that they had limited ability to do more outreach because they spent most of their time implementing other changes required by the Healthy Hunger-Free Kids Act. State agencies also faced staffing constraints that limited how

¹³At-Risk Afterschool Meals, A Child and Adult Care Food Program Handbook
http://www.fns.usda.gov/cnd/care/Publications/pdf/At-Risk_Afterschool_Handbook.pdf [accessed 9/27/2011].
¹⁴Ibid.

they provided technical assistance. Technical assistance was often handled through telephone or e-mail; onsite technical assistance visits were rare. One State agency noted that it was “not staffed at a level to just go onsite and do [technical assistance].”

Although advocacy organizations assisted State agencies in their outreach efforts by referring new potential sponsors to the State agency, staffing constraints still limited the States agencies’ abilities to work with potential sponsors and assist them through the application process. One State observed that the assistance of the advocacy organizations “didn’t really take away much from our work load” because the burden of technical assistance still rested on the State agency.

Health and safety regulations also presented challenges. Although Federal law does not require licensing for organizations participating in the at-risk meals component, States or local jurisdictions may require licensing. However, if there is no State or local requirement for licensing, then afterschool care programs must meet State or local health and safety standards.¹⁵ Five State agencies faced challenges offering technical assistance to organizations on such issues as licensing or health and safety inspections. One State noted the process for obtaining health and safety inspections varied across counties or localities. Another State noted the lack of a process to provide a health inspection for an afterschool program; new sites had to participate in another nutrition assistance program like SFSP in order to receive an inspection.

Sponsors faced a different, yet sometimes related, set of challenges administering the at-risk meals component. Two sponsors reported that they were limited by their organizational capacity. One sponsor’s “distribution [was] limited to serving 30 vended sites” and as a result had to put sites on their waiting list. In cases like these, interested sites could wait, seek out another sponsor, or consider self-sponsoring. Two sponsors faced challenges related to menu planning. One sponsor described difficulties finding “menu options that the students enjoy”; another struggled to set appropriate portion sizes because they “don’t match with products in the stores.” In addition, sponsors that lacked infrastructure to meet health and safety requirements found that they did not have sufficient funds to make the capital investments needed to meet health inspections. One State summarized the situation as “a lot has to do with having the money to have a facility that will pass inspection.”

Sites faced a similar set of challenges and barriers. A for-profit child care center may receive reimbursement for at-risk afterschool meals and snacks if it meets the eligibility requirements and is eligible to participate in CACFP through its traditional child care center. This means that at least 25 percent of the children served by the center through its traditional child care component (1) are eligible for free or reduced price meals based on their family income; or (2) receive benefits under Title XX of the Social Security Act, and the center receives compensation under Title XX (also known as the Social Services Block Grant). The 25-percent threshold is based on the center’s enrollment or the licensed capacity, whichever is less.¹⁶ Two State agencies observed that these requirements made it hard to enroll otherwise-eligible, for-profit

¹⁵Ibid.

¹⁶Ibid.

organizations. These for-profit organizations wanted to help at-risk youth but they could not show that 25 percent of the children in their traditional child care component were eligible for free or reduced-price meals. One State agency said they had to turn “quite a few” institutions away because they could not demonstrate the 25-percent criterion. Not-for-profit centers do not have this 25-percent threshold requirement.

As with State agencies and sponsors, sites that participated in the at-risk meals component faced staffing limits: “It’s often food service staff that stay [and] serves the meal.” In some cases, State agencies had encountered school districts reluctant to offer the at-risk meals component because of the extra hours required of food service staff to prepare and serve the meals.

Sites that coordinated with vendors to deliver food also had to make advance judgments about how many meals they would need. If they specified an incorrect number of meals, the food could go to waste, or there could not be enough to go around.

Stakeholders sometimes demonstrated an imperfect understanding of USDA requirements for the at-risk meals component. First, there was some confusion over whether athletic programs could participate. Afterschool programs that include supervised athletic activity may participate as long as they are “open to all” and do not limit membership for reasons other than space, security, or licensing requirements. However, organized athletic programs that only participate in interscholastic or community-level competitive sports may not be approved as sponsors or independent centers in the program.¹⁷ One State offered their experience with athletic afterschool programs: “[The] interpretation of the regs from USDA...was broad,” and it created “confusion of why the athletics sports programs were kicked off.... [T]hey told us that the education and enrichment could be interpreted in a lot of ways.”

Another requirement that sometimes created confusion related to recordkeeping. To qualify for reimbursement, USDA requires that sponsors and sites keep daily attendance rosters and records of the number of meals prepared or delivered and served. In addition, sponsors must document eligibility, fiscal management, and completed trainings.¹⁸ Though USDA has regulations that simplify paperwork across multiple nutrition assistance programs, some State agencies noted that recordkeeping was a “real barrier for [school districts] to do three different applications and collect three different sets of paperwork for summer foods and at-risk afterschool and then National School Lunch.” One sponsor observed that “reconciling food costs and nonfood costs” when “they buy all their foods for the Head Start and at-risk afterschool” was a challenge; it was difficult “to break down what went where and show...food costs.”

¹⁷Ibid.

¹⁸Ibid.

Solutions

This section reports on solutions that State agencies and sponsors used to address challenges with the at-risk meals component. Table 4 displays barriers uncovered by this study and solutions State agencies and sponsors identified to address them.

Table 4. At-Risk Meals Component Challenges and Solutions

Challenge	Solution
Limited time for new sponsor outreach among State staff	Conducting outreach to existing programs Partnering with advocacy organizations
Local variability of health and safety requirements limits amount of assistance the State agency can provide	Screening tool to help State agencies determine if new sponsors need health and safety inspections or licenses
Sponsor's inability to support all interested sites; wait lists	Increasing communication among sponsors and State agencies
Menu planning	Cycling meal menus Serving cold suppers
Sites meeting eligibility requirements (especially for-profits)	Identifying and auto-enrolling eligible afterschool programs Making eligibility information easily available to sponsors on State agency Web sites
Recordkeeping across multiple nutrition assistance programs	Streamlining the application process Increasing awareness of existing mechanisms in place to reduce paperwork
Confusion with USDA program requirements	Addressing eligibility at the start of sponsor training Improving program information on State agency Web sites USDA providing clarification on at-risk meals component requirements (e.g., athletic programs, eligibility requirements for for-profit organizations)

Recruiting Sponsors:

- **Conducting outreach with existing programs.** State agencies suggested that State agencies new to the at-risk meals component go for the programs that already participate in nutrition assistance programs, such as school districts and large organizations that have many centers. They also recommended reaching out to existing sponsors to enroll existing afterschool programs in the at-risk meals component. Existing paperwork reduction efforts make it easier for school food authorities (SFAs) to operate multiple child nutrition programs. If SFAs operate more than one child nutrition program and the State administers those programs, then the State and SFA will sign one agreement for all the nutrition programs.¹⁹
- **Partnering with advocacy organizations.** State agencies can partner with advocacy organizations to complement their outreach efforts. Advocacy organizations offer their

¹⁹Ibid.

time, employees, and contacts to increase awareness of the at-risk meals component. With additional support from State agencies, these advocacy organizations can also identify organizations that might serve as new sponsors or sites. These efforts help State agencies “save some time with outreach efforts because...they help us out with marketing and spreading the word.”

- **Making program information easily available.** State agencies suggested that other States make it easy for sponsors to learn program eligibility and reporting requirements as early as possible. Suggested locations for eligibility information included the start of trainings or on the listserv. State agencies can help potential sponsors understand “what eligibility means” by providing clear language on program Web sites for potential sponsors to learn about eligibility requirements or self-assessments that do not require former knowledge of eligibility requirements.
- **Streamlining the application process.** Streamlining the meals program application reduces the burden on potential sponsors. Oregon streamlined the application for schools by making it a “one-page addendum ...to the NSLP application”; for nonschool sponsors, they partnered with an advocacy organization to streamline the application from 72 to 12 pages (see appendix F). If an SFA has successfully operated the NSLP, they are not required to provide additional evidence of administrative capability and financial viability. For example, a State agency can add an addendum to an existing NSLP agreement to allow an SFA to offer the at-risk meals component. Additionally, State agencies may waive the requirement for SFAs to submit a separate management plan for CACFP. SFAs have additional flexibility relating to the meal patterns.²⁰

Recruiting Sites:

- **Identifying and auto-enrolling eligible afterschool programs.** State agencies suggested that other States proactively identify eligible afterschool programs for the at-risk programs. One State identified eligible afterschool programs based on the school data; they “look it up and see if they’re 50 percent...and [they say] we’re going to enroll you in our at-risk program.” Another State identified afterschool programs via the 21st Century school coordinators; this State obtained a list of grantees and called to tell them about the at-risk meals component. Yet another State said they approached “current Summer Food Service Program sponsors who may also be involved in afterschool programs throughout the school year.” Finally, one sponsor identified eligible schools via the “Department of Education feeder pattern,” which is an online interactive map where the public can enter an address to identify the local schools for that address.

Program Administration:

- **Conducting high-quality trainings.** To minimize the number of barriers that sponsors face, State agencies suggested that other State agencies conduct “new program training.”

²⁰Ibid.

These trainings help State agencies manage expectations of what sponsors need to do to administer the at-risk meals component. Training can also anticipate “some of the challenges that they’re going to have” in an attempt to “troubleshoot potential barriers from the very beginning of implementation.”

- **Starting with other FNS nutrition programs and transitioning into the at-risk meals component.** State agencies suggested that sponsors that do not have food preparation experience should be encouraged to “start with snacks and move up to serving meals/supper once they get the swing of the snacks.”

Preparing and Serving Meals:

- **Cycling meal menus or serving cold suppers.** Sponsors have noted that many potential sites perceive meal planning, preparation, and service to be burdensome. Sponsors suggested that other sponsors “streamline the menus to make it easy” and reduce the burden for sites. One sponsor “made two months’ worth of menus” and cycled them throughout the year. Another sponsor served cold meals that require little preparation, such as wraps and salads.

Discussion

Stakeholders reported facing barriers and challenges when they adopted the at-risk meals component. Based on their experiences, characteristics common among sponsors successfully administering the at-risk meals component, as well as the barriers and solutions identified from the research, are outlined below.

Characteristics of successful sponsors

Successful sponsors had some common characteristics. First, successful sponsors in the at-risk meals component had often gained important food preparation and handling experience by sponsoring at-risk snacks or other nutrition assistance programs. Participating in other food programs also gave sponsors experience in maintaining the required paperwork, such as attendance rosters and food costs, and ensuring compliance for proper reimbursement. Second, sponsors with pre-existing distribution networks, such as food banks and regional nonprofits, were able to sponsor sites that needed meals prepared and delivered. Finally, strong leadership influenced staff at all levels of meal program administration. For example, school districts with principals who championed the meal program had more support from kitchen staff and believed more strongly in the goals of the meal program.

For these reasons, school districts and 21st Century Community Learning Centers were well positioned to readily adopt and administer the at-risk meals component. In addition, many food banks and affiliated community organizations such as Boys & Girls Clubs were also able to adopt the at-risk meals component.

Policy and administrative barriers and solutions

In addition to the barriers identified by State agencies and sponsors, several policy and administrative barriers that hinder further adoption and expansion of the at-risk meals component were identified.

Stakeholders used inconsistent language when talking about the at-risk meals component. Although most sponsors distinguished between CACFP and the at-risk component, at times the snacks and meals were spoken about separately while others spoke about them interchangeably. Moreover, while recruiting informants, despite clearly stating the purpose of the interview, researchers ran into confusion about the at-risk component. Halfway through one interview, a sponsor informed the interviewer that they were only doing the snacks program. At-risk afterschool meals and snacks are currently considered part of the same component of the CACFP, and sponsors offering at-risk snacks are also eligible to offer the at-risk meals component. However, our findings suggest that the at-risk meals component has some distinct barriers from snacks that sponsors and sites must address to successfully offer the component.

The definition of afterschool care and what qualifies as educational enrichment was also a barrier. Activities that included physical well-being in conjunction with afterschool care posed confusion for State agencies. In addition, one State noted that afterschool care for young children is different from that for adolescents, thus adding to the ambiguous definition of afterschool care.

The paperwork required for the at-risk meals component may pose a burden for sponsors that administer multiple FNS nutrition programs, such as NSLP and SFSP. Such sponsors must manage documentation for up to three food programs, maintaining separate rosters and food costs. State agencies and sponsors recommended that USDA allow sponsors to join the meals program as part of other USDA nutrition assistance programs. A few State agencies expressed their desire to see the at-risk meals component become part of NSLP or be modeled after the Seamless Summer Option.²¹ Under Seamless Summer, schools that participate in the NSLP can sign up for SFSP simply as part of the NSLP addendum. The Seamless Summer Option combines program components into one set of paperwork. State agencies and sponsors had little awareness of the regulations USDA already has in place to ease this burden.

State agencies also observed that current regulations make it difficult for for-profit organizations to meet program eligibility requirements. Specifically, it is difficult for for-profit organizations to meet the requirement that 25 percent of the children enrolled in a related traditional child care component qualify for free or reduced priced meals. The 25-percent threshold is based on the center's enrollment or the licensed capacity, whichever is less.²² State agencies had encountered for-profit organizations in eligible areas eager to offer meals to at-risk children who attend their afterschool programs at community centers but that were unable to meet this requirement.

²¹“School districts participating in the NSLP or SBP are eligible to apply for the Seamless Summer Option. Once approved through their governing state agency, school districts serve meals free of charge to children, 18 years and under, from low-income areas.” http://www.fns.usda.gov/cnd/seamless_summer.htm [accessed 9/27/2011].

²²“At-Risk Afterschool Meals: A Child and Adult Care Food Program Handbook.”

http://www.fns.usda.gov/cnd/care/Publications/pdf/At-Risk_Afterschool_Handbook.pdf [accessed 9/27/2011].

Expanding opportunities for for-profit organizations to participate in the at-risk meals component has the potential to increase the number of low-income children that receive program benefits.

By contrast, some eligible organizations were simply not aware of their eligibility. Some State agencies have removed this barrier for potential sponsors by proactively identifying eligible afterschool programs and informing them of their eligibility to enroll in the at-risk meals component.

Interpreting USDA nutrition requirements posed another barrier. A common misperception was that program regulations call for a hot meal, despite the lack of a Federal requirement to serve hot meals.

Finally, the biggest barrier for small, community-based organizations was having enough funds to make the capital investments necessary to meet health and safety inspections. Stakeholders recommended that State agencies and USDA allow organizations to apply for mini-grants to help them get started.

Limitations

The study had some limitations that are important to note. First, because a small number of State agencies participated in the at-risk meals component, during each part of the study there was limited opportunity to hear from a wide spectrum of views, particularly from sponsors and organizations interested in becoming sponsors. There was great variety in sponsors, including differences in size, organization type, and whether they are independent centers or sponsor others. The experiences and challenges of school districts, for example, are different from those of nonprofit organizations. Including a larger sample could have uncovered other experiences with the program. Second, the research relied on subjective self-reported experiences and perceptions, rather than objective observations gleaned from program data or direct observation. Third, key components of primary data collection included listening sessions and a focus group. While these methods offered the advantage of individuals sharing experiences and building upon each other's insights, they were also vulnerable to group dynamics such as group think. Moreover, because USDA sponsored the research and were present at these group sessions, State agencies and sponsors may have been reluctant to disclose challenges or negative views of USDA.

Recommendations

Below key recommendations emerging from this research for newly eligible State agencies and USDA are summarized. These recommendations combine best practices identified by pilot States and areas that merit further attention.

Recommendations for newly eligible State agencies

- **Conduct targeted outreach.** School districts, large organizations that have many centers, and sponsors participating in the CACFP are the most likely organizations to

adopt the at-risk meals component. State agencies can conduct proactive outreach to these organizations to raise awareness of the at-risk meals component and assess their interest in participating.

- **Identify afterschool programs in eligible areas.** To participate in the at-risk meals component, afterschool programs must be located in a school attendance area in which at least 50 percent of the children are approved for free or reduced-price meals. State agencies, who have access to information about school attendance areas and the percentage of children approved for free or reduced-price meals, are well-positioned to identify afterschool programs for the 50-percent, at-risk eligibility requirement. As part of their outreach efforts, State agencies can generate a list of programs in eligible areas.
- **Partner with advocacy organizations.** State agencies can partner to complement their outreach efforts. Advocacy organizations can offer their time, employees, and networks to raise awareness of the at-risk meals component and identify organizations interested in participating.
- **Improve program information.** State Web sites can include more information about the at-risk meals component, including plain-language information about eligibility criteria and meal and paperwork requirements.
- **Improve trainings.** State agencies can discuss program eligibility and reporting requirements at the beginning of trainings, thus reducing the need for further trainings and technical assistance among organizations that are ineligible or are unlikely to complete the application process. State program trainings can also troubleshoot from the beginning by discussing solutions to frequently encountered challenges.

Recommendations for USDA

- **Simplify information on the USDA Website.** Information about eligibility and meal requirements is often misinterpreted at various administrative levels. Some confusion and ambiguity could be reduced by presenting well-organized, plain-language information about eligibility criteria and meal and paperwork requirements. In addition, simplified and centralized information could help address perceived barriers for organizations that offer at-risk snacks and also want to offer at-risk meals.
- **Simplify CACFP paperwork across program components.** The need to fill out multiple forms of paperwork with different reporting requirements acts as a barrier to participation. Some efforts, such as the paperwork reduction taskforce, are currently under way at USDA to address this concern. This research identifies some strategies that may aid the taskforce. Combining reporting requirements across nutrition assistance programs or program components may reduce this burden. FNS's efforts in developing the Seamless Summer Option may serve as a model that can be replicated for CACFP. USDA may also want to consider integrating paperwork for CACFP afterschool components and NSLP. To ease application and paperwork barriers, USDA can do more to publicize and explain application simplifications that already exist for schools and other programs that participate in other components of CACFP.

- **Consider renaming the program components.** The current moniker “CACFP at-risk afterschool meals component” creates confusion between the meals and snacks offerings and with other FNS program offerings like the outside-school-hours care component of the CACFP. Renaming or branding efforts may seek to differentiate the CACFP components as well as raise awareness of FNS’s wide program offerings.
- **Raise awareness of different menu and serving options.** The common misconception that a supper should be a hot meal acts as a barrier to participation. Though USDA includes sample menus in the program handbook, providing more examples of menu planning, especially menu ideas with cold foods, may reduce or eliminate this barrier. Sample menus that seasonally change could serve as inspiration to sponsors and clarify the program’s nutrition requirements.
- **Clarify the definition of “at-risk afterschool care center.”**²³ Currently, State agencies and sponsors independently determine whether an organization is providing an afterschool enrichment activity. However, this latitude leads to inconsistent implementation across State agencies. Further definitional clarity from USDA can ensure that the program is offered to eligible organizations.

²³USDA. Child and Adult Care Food Program: At-Risk Afterschool Meals in Eligible States, *Federal Register*, 75, 62, April 1, 2010. http://www.fns.usda.gov/cnd/care/Regs-Policy/Snacks/At-Risk_Meals_FR.pdf [accessed 9/27/2011].

Appendix A: Questionnaire for State Agencies and Select Responses

Survey Period: June 6-20, 2011

Respondents: 9 State Agencies Administering CACFP At-Risk Meals

INTRO. Thank you for your interest in this research. This questionnaire is being sent to you by Westat, on behalf of the Food and Nutrition Service at the USDA. The USDA is interested in hearing about your experiences administering the CACFP At-risk afterschool meals Program. Westat is an independent contractor hired by USDA to provide an unbiased viewpoint on the various activities being carried out by States and sponsors participating in the CACFP At-Risk Afterschool Meals Program. The information you provide will inform a best practices report that will be submitted to Congress, as mandated by Section 337 of the Healthy, Hunger-Free Kids Act of 2010.

1. Please enter your name

Answers omitted to ensure confidentiality.

2. Job title:

Answers omitted to ensure confidentiality.

3. Organization you work for:

Answers omitted to ensure confidentiality.

4. Select your state:

Answers omitted to ensure confidentiality.

5. How would you rate the performance of the At-Risk Afterschool Meals Program in your state?

	Number of responses (n)	Percentage
Excellent	2	22%
Good	7	78%
Fair	0	0%
Poor	0	0%

6. Please provide the following information about your state. If you do not readily have the data available, please provide an estimate.

	State #1	State #2	State #3	State #4	State #5	State #6	State #7	State #8	State #9
a. How many at-risk afterschool care centers operated in your state in October 2010?	unknown	17	unknown	110	122	unknown	285	224	399
b. How many children participated in at-risk afterschool care centers in October 2010?	unknown	487	unknown	409,200	37,499	unknown	25,867	10,223	22,252
c. How many sponsors participated in CACFP at-risk afterschool meals and snacks programs in October 2010?	444	11	~25	5	10	7	1	52	36
d. Of the sponsors that participated in the CACFP at-risk afterschool meals and snack program, how many self-sponsor?	441 (3 at-risk sponsors are not affiliated with their at-risk sites)	11	~ 20	3	36	4 independent centers; 3 sponsoring organizations	8	49	data not available
e. How many at-risk afterschool care centers participated in the CACFP at-risk afterschool meals and snacks programs in October 2010?	1,816	17	~ 350 sites approved	110	122	14	79	224	399
f. What was the Average Daily Participation (ADP) in the CACFP at-risk afterschool meals and snacks programs in October 2010?	122,841	487	can submit data later	3,420	14,689	399	4,702	10,223	22,252
g. How many CACFP at-risk afterschool meals were served in October 2010?	1,864,655 (625,900 at-risk snacks, 1,238,755 at-risk suppers)	0	can submit data later	409,200	39,690	4,676 snacks, 1,003 suppers	59,999	181,577	3,430,445

7. What types of organizations participate as sponsors in the At-Risk Afterschool Meals Program in your state?

	Number of responses (n)	Percentage
Other not-for-profit youth organizations (e.g., Boys and Girls Clubs, YMCA)	9	100%
School districts	7	78%
Faith-based organizations	5	56%
Other organizations, please specify	5	56%
21st Century Afterschool Programs	4	44%
Advocacy organizations	2	22%
Residence-based (e.g., apartment buildings)	2	22%

7a. [IF OTHER ORGANIZATIONS IN Q7] Please specify the types of organizations that participate as sponsors in the At-Risk Afterschool Meals Program in your state.

Verbatim Responses (n=5)
Child Care Centers
Municipalities
Center-based After School Programs
Culinary Training Academy
Public entities and for-profit

8. Thinking more about sponsors in the At-Risk Afterschool Meals Program, how many sponsors do you have in each of the organization types?

<i>Top number is the count of respondents selecting the option. Bottom % is percent of the total respondents selecting the option.</i>	0	1-5	6-10	10+	Don't know
School districts	1	2	1	4	0
	12%	25%	12%	50%	0%
Faith-based organizations	2	1	1	2	1
	29%	14%	14%	29%	14%
Other not-for-profit youth organizations (e.g., Boys and Girls Clubs, YMCA)	0	1	4	4	0
	0%	11%	44%	44%	0%
21st Century Afterschool Programs	2	0	0	2	1
	40%	0%	0%	40%	20%
Advocacy organizations	2	2	0	0	2
	33%	33%	0%	0%	33%
Residence-based (e.g., apartment buildings)	3	2	0	0	1
	50%	33%	0%	0%	17%
Other organizations	2	0	1	3	1
	29%	0%	14%	43%	14%

9. How challenging is it to find sponsors to support the At-Risk Afterschool Meals Program?

	Number of responses (n)	Percentage
Very challenging	0	0%
Somewhat challenging	6	75%
Not too challenging	1	12%
Not at all challenging	1	12%

10. Are there enough sponsors in your state to support organizations that are interested in participating in the At-Risk Afterschool Meals Program?

	Number of responses (n)	Percentage
Yes	5	56%
No	0	0%
Unsure	4	44%

11. Are you currently doing any outreach or recruitment for the At-Risk Afterschool Meals Program?

	Number of responses (n)	Percentage
Yes	6	67%
No	3	33%

11a. [IF YES IN Q11] Please describe the type of outreach that you are doing for the At-Risk Afterschool Meals Program.

Verbatim Responses (n=6)
Partner with local advocacy group
Word of mouth between NSLP and CACFP Sponsors
MSDE partners with the Governor's Office for Children. We work with advocacy groups, such as Maryland Hunger Solutions, to do outreach.
Newspaper articles and news releases
We have our own At-risk Brochure for snack and supper geared towards CACFP sponsors. We marketed At-risk during the annual training for CACFP sponsors. We are collaborating with WV 21st CCLC to have supper offered in all supported afterschool programs.
A statewide outreach campaign is being conducted in collaboration with Hunger Free Vermont.
Working with the [a local social welfare association] to conduct an After-School Meals Summit in late June. Outreach flyers sent to Summer Food Service Program Sponsors. Discuss At-Risk After School Meals program at SFSP Sponsor training.

12. Which of the following barriers have you encountered while doing outreach or recruitment for the At-Risk Afterschool Meals Program?

	Number of responses (n)	Percentage
Food service challenges (e.g., limited staff to serve food, limited facilities for food preparation)	7	88%
Unable to meet health or safety standards	5	62%
Other, please specify	5	62%
Insufficient staff/staff turnover	3	38%
Licensing challenges	2	25%
Too much paperwork	1	12%
Organization too small	1	12%
Lack of interest	1	12%

12a. [IF OTHER IN Q12] Please specify what barriers you have encountered while doing outreach or recruitment for the At-Risk Afterschool Meals Program.

Verbatim Responses (n=5)
Sponsor lacks VCA, site does not do educational programming
NSLP Sponsors have to claim under CACFP and can be confused by CACFP and SFSP requirements (OVS; inventory separation; eligible participants).
Schools may be hesitant to venture into CACFP.
School District/21st Century Programs unable to take on the additional food service hours
Institution has no other funds

13. We would like to hear more about your experiences with the At-Risk Afterschool Meals Program. Would you be willing to participate in a 1-hour online focus group on Monday, June 20th, 2011?

Answers omitted to ensure confidentiality.

13a. [IF YES IN Q14] We will be holding a 1-hour online focus group on June 20th with representatives from state agencies to hear more about your experiences with the At-Risk Afterschool Meals Program . Which times on June 20th, 2011, would be convenient for you?

[PLEASE CHECK ALL THAT APPLY]

Answers omitted to ensure confidentiality.

14. We are interested in conducting a focus group with sponsors that participate in the CACFP At-risk afterschool meals Program. Please nominate sponsors in your state that we can contact as part of this research. We are interested in talking with sponsors successfully administering the CACFP At-Risk Afterschool Meals Program and sponsors that have faced barriers with the CACFP At-Risk Afterschool Meals Program.

First, please nominate up to 5 sponsors that are successfully working with many sites to administer the CACFP At-Risk Afterschool Meals Program.

Answers omitted to ensure confidentiality.

Second, please nominate up to 5 sponsors have been unable to participate in the CACFP At-Risk Afterschool Meals Program. For example, sponsors who attended a training session but did not submit an application to become a CACFP At-Risk Afterschool Meals Program sponsor, or sponsors who took the training and submitted an application but have not filed paperwork for reimbursement.

Answers omitted to ensure confidentiality.

15. What advice would you give to other states starting the CACFP At-Risk Afterschool Meals Program? What would you suggest they do to run a successful program?

Verbatim Responses (n=5)
Develop strategies for sponsor recruitment.
Allocate sufficient staff resources
Create strong training materials for sponsors.
Streamline the application and reimbursement process for current LEA sponsors to participate in supper. Allow for plenty of training time up front. Troubleshoot potential barriers from the very beginning of implementation. Share success stories as a marketing tool. In training, share examples of supper menus and enrichment activities.
We struggled with sponsors who wanted to feed suppers in areas of great need whose eligibility was not over 50%. Make sure that message is clear up front.
Approach current SFSP sponsors who may also be involved in afterschool programs throughout the school year. To be successful find vendors who can prepare meals since many programs do not have the facility equipment or staff to do self prep.
Good training is a must. Develop good resources. Have established programs help mentor new programs. Be ready to help sponsors find resources for preparing meals, either kitchens and staff or food service vendors.

CLOSE. Thank you for your time. If you indicated that you were willing to participate in the online focus group on June 20th, 2011, or are willing to share a list of sponsors in your state we will follow up with more details.

Appendix B: State Agency Focus Group Questions

Introduction

- Please introduce yourself -- say your first name, the agency you work for, and the state where you are located.

Background/Overall Assessments

- Please use a sentence or two to explain how satisfied or dissatisfied you are, overall, with the At-risk afterschool meals program.
- How would you describe the benefits of participating in the At-risk afterschool meals Program?

Outreach

- Tell me 1 or 2 things that would be needed to expand the reach of the At-risk afterschool meals program in your state.
- What strategies have helped you increase the number of sponsors participating in the program? (PROBES: improved targeting, regular contact, CACFP management software, connecting with other sponsors, CACFP.org)

Technical Assistance

- What types of technical assistance do you provide for the At-risk afterschool meals Program?
- What challenges have you (or your sponsors) encountered in the field with the CACFP At-risk afterschool meals Program?
- How do you address these challenges?

Effective Sponsors and Retention

- What are some characteristics of an effective sponsor?
- How do you retain sponsors?

Policy

- What regulations/laws have hindered organizations from participating in the program? Are these Federal, state, or local?
- What would you recommend that Federal, state, or local policymakers do to address these policy challenges? Please be as specific as possible.
- What do you think that USDA can or should do to help you in your efforts to increase participation in the program? Please be as specific as possible.

Closing

- What advice would you give to an organization that is new to the At-risk afterschool meals Program?
- Thank you for taking the time to share your thoughts.

Appendix C: Key-Informant Interview Protocol – State Agencies

I. INTRODUCTION AND CONSENT

Hello, [respondent name]. My name is _____ and I am calling on behalf of the USDA to ask you a few questions about your experiences with the CACFP At-risk afterschool meals Program, the challenges you face, solutions you've identified and what you think USDA can do to increase participation in the program. This interview should take about 30 minutes. Is this a convenient time to talk or shall we schedule another time?

BEFORE STARTING THE INTERVIEW

- Thank you so much for your time and willingness to share your opinions. Before we start, I want to clarify that the organization I work for, Westat, is an independent contractor hired by USDA to provide objective data collection and offer a third party viewpoint. We have no agenda except to understand the various perspectives on this issue.
- You don't have to answer any question you don't wish to, and you can stop at any time. In our report, we will not attribute what is said to specific individuals, however, your name and your thoughts will be shared with the USDA.
- With your permission, I would like to record our conversation so I don't have to take notes while we talk. Is that okay?

II. BACKGROUND

For my records, please tell me your:

- Name:
- Organization you work for:
- Job Title/Major responsibilities:
- How long have you been in your current job?

Let's talk a bit about the At-risk afterschool meals Program.

- Overall, how are things going with the At-risk afterschool meals Program? [PROBE: recruitment, outreach, administration, technical assistance]
- How would you describe the benefits of participating in the At-risk afterschool meals Program?

III. OUTREACH

- Are you currently doing outreach for the At-risk afterschool meals Program? Could you describe to me the types of outreach that you are doing?
- Walk me through the process of how you [expand/expanded] the outreach of the program.
 - How do you identify new organizations that you will target for outreach?
 - How do you identify organizations that are in 50% F/RP school catchment areas?
 - Where do you look for information about sponsors?

- How do you recruit new organizations?
- What strategies have worked best to conduct this outreach?
- What are some of the most common barriers you have encountered while doing outreach or recruitment for the At-risk afterschool meals Program?
- What have you done to address those challenges?

IV. PROXIMATE FACTORS OF SUCCESS

Thinking about the various factors involved with participating in the At-risk afterschool meals Program, let's talk a bit about what makes a successful sponsor. That is, a sponsor that supports other sites, or self-sponsors.

- What are some characteristics of successful sponsors? [PROBE: organization type, capacity]
- What type of support do sponsors typically need? [PROBE: financial, logistical, informational]
- How do you communicate with sponsors? How often?
- What do sponsors need to be able to make their work with the At-risk afterschool meals Program sustainable?

How about sites?

- What are some characteristics of successful sites? [PROBE: organization type, capacity]
- What type of support do sites typically need? [PROBE: financial, logistical, informational]
- What do sites need to be able to make their work with the At-risk afterschool meals Program sustainable?

V. POLICY

- Are there regulations/laws that have hindered organizations from participating? Are there regulations/laws that have hindered sponsors? Are these Federal, state, or local? What are these laws/regulations?
- What would you recommend that Federal, state, or local policymakers do to address these policy challenges?

What do you think that USDA can or should do to help you in your efforts to increase participation in the program?

VI. CLOSING

- Since your state became eligible to participate in the At-risk afterschool meals Program, have you changed anything or done anything differently? Tell me about that.
- What advice would you give to a state that is new to the At-risk afterschool meals Program? (Probe about working with sponsors)
- Is there anything else you would like to share with us about your work or something you feel we haven't covered?
- Do you have any questions?

Thank you for taking the time to share your thoughts.

Appendix D: Key-Informant Interview Protocol – Sponsors

I. INTRODUCTION AND CONSENT

Hello, [respondent name]. My name is _____ and I am calling on behalf of the USDA to ask you a few questions about your experiences with the CACFP At-risk afterschool meals Program, the challenges you face, solutions you've identified and what you think USDA can do to increase participation in the program. This interview should take about 30 minutes. Is this a convenient time to talk or shall we schedule another time?

BEFORE STARTING THE INTERVIEW

- Thank you so much for your time and willingness to share your opinions. Before we start, I want to clarify that the organization I work for, Westat, is an independent contractor hired by USDA to provide objective data collection and offer a third party viewpoint. We have no agenda except to understand the various perspectives on this issue.
- You don't have to answer any question you don't wish to, and you can stop at any time. In our report, we will not attribute what is said to specific individuals, however, your name and your thoughts will be shared with the USDA.
- With your permission, I would like to record our conversation so I don't have to take notes while we talk. Is that okay?

II. BACKGROUND

For my records, please tell me your:

- Name:
- Job title/Responsibilities:
- How long you have been at your current job?
- Tell me a little about your organization [PROBE: mission; profit/non-profit; size; years of operation; staff; type of programs and funding]

Also, just a few questions about your role as sponsor.

- How many organizations do you sponsor for the CACFP afterschool programs?
- How many organizations do you sponsor as part of the At-risk afterschool meals Program?

Let's talk a bit about the At-risk afterschool meals Program.

- Overall, how are things going with the At-risk afterschool meals Program? [PROBE: recruitment, outreach, administration, technical assistance]
- How would you describe the benefits of participating in the At-risk afterschool meals Program?

III. OUTREACH

- Are you currently doing outreach for the At-risk afterschool meals Program? Could you describe to me the types of outreach that you are doing?

- Walk me through the process of how you [expand/expanded] the outreach of the program.
 - How do you identify new organizations that you will target for outreach?
 - How do you identify organizations that are in 50% F/RP school catchment areas?
 - Where do you look for information about sites?
 - How do you recruit new organizations?
- What strategies have worked best to conduct this outreach?
- What are some of the most common barriers you have encountered while doing outreach or recruitment for the At-risk afterschool meals Program?
- What have you done to address those challenges?

IV. PROXIMATE FACTORS OF SITE SUCCESS

- What type of support do sites typically need? [PROBE: financial, logistical, informational]
- What are some characteristics of successful sites? [PROBE: organization type, capacity]
- What do sites need to be able to make their work with the At-risk afterschool meals Program sustainable?

V. POLICY

- Are there regulations/laws that have hindered organizations from participating? Are there regulations/laws that have hindered sponsors? Are these Federal, state, or Local? What are these laws/regulations?
- What would you recommend that Federal, state, or local policymakers do to address these policy challenges?
- What do you think that USDA can or should do to help you in your efforts to increase participation in the program?

VI. CLOSING

- Since you started participating in the At-risk afterschool meals Program, have you changed anything or done anything differently? Tell me about that.
- What advice would you give to an organization that is new to the At-risk afterschool meals Program? [Probe about working with sponsors]
- Is there anything else you would like to share with us about your work or something you feel we haven't covered?
- Do you have any questions?

Thank you for taking the time to share your thoughts.

Appendix E: Key-Informant Interview Protocol – FRAC

I. INTRODUCTION AND CONSENT

Hello, [respondent name]. My name is _____ and I am calling on behalf of the USDA to ask you a few questions about your experiences with the CACFP At-risk afterschool meals Program, the challenges you face, solutions you've identified and what you think USDA can do to increase participation in the program. This interview should take about 30 minutes. Is this a convenient time to talk or shall we schedule another time?

BEFORE STARTING THE INTERVIEW

- Thank you so much for your time and willingness to share your opinions. Before we start, I want to clarify that the organization I work for, Westat, is an independent contractor hired by USDA to provide objective data collection and offer a third party viewpoint. We have no agenda except to understand the various perspectives on this issue.
- You don't have to answer any question you don't wish to, and you can stop at any time. In our report, we will not attribute what is said to specific individuals, however, your name and your thoughts will be shared with the USDA.
- With your permission, I would like to record our conversation so I don't have to take notes while we talk. Is that okay?

II. BACKGROUND

For my records, please tell me your:

- Name:
- Job title/Responsibilities:
- Mission of your organization:
- How long you have been at your current job?

Let's talk a bit about the At-risk afterschool meals Program.

- Overall, how are things going with the At-risk afterschool meals Program? [PROBE: recruitment, outreach, administration, technical assistance]
- How would you describe the benefits of participating in the At-risk afterschool meals Program?

III. OUTREACH

- Are you currently doing outreach for the At-risk afterschool meals Program? Could you describe to me the types of outreach that you are doing?
- What strategies have worked best to conduct this outreach?
- What are some of the most common barriers you have encountered while doing outreach or recruitment for the At-risk afterschool meals Program?
- What have you done to address those challenges?

IV. PROXIMATE FACTORS OF SUCCESS

Thinking about the various factors involved with participating in the At-risk afterschool meals Program, let's talk a bit about what makes a successful state agency.

- What are some characteristics of successful state agency?
- What type of support do states typically need? [PROBE: financial, logistical, informational]

Now let's talk about what makes a successful sponsor. That is, a sponsor that supports other sites, or self-sponsors.

- What are some characteristics of successful sponsors? [PROBE: organization type, capacity]
- What type of support do sponsors typically need? [PROBE: financial, logistical, informational]
- What do sponsors need to be able to make their work with the At-risk afterschool meals Program sustainable?

How about sites?

- What are some characteristics of successful sites? [PROBE: organization type, capacity]
- What type of support do sites typically need? [PROBE: financial, logistical, informational]
- What do sites need to be able to make their work with the At-risk afterschool meals Program sustainable?

V. POLICY

- Are there regulations/laws that have hindered organizations from participating? Are there regulations/laws that have hindered sponsors? Are these Federal, state, or Local? What are these laws/regulations?
- What would you recommend that Federal, state, or local policymakers do to address these policy challenges?
- What do you think that USDA can or should do to help you in your efforts to increase participation in the program?

VI. CLOSING

- Since you started supporting organizations in the At-risk afterschool meals Program, have you changed anything or done anything differently? Tell me about that.
- What advice would you give to an organization that is new to the At-risk afterschool meals Program? [Probe about working with sponsors]
- Is there anything else you would like to share with us about your work or something you feel we haven't covered?
- Do you have any questions?

Thank you for taking the time to share your thoughts.

Appendix F: Oregon At-Risk Meal and Snack Application for School Districts

New Program Checklist School Districts – At-Risk Meal/Snack Application

Mail completed application to:
Oregon Department of Education
Child Nutrition Program
255 Capitol Street NE
Salem OR 97310
(503) 947-5902

Check if Enclosed ✓	ITEM	INSTRUCTIONS
	New Program Checklist	Check off enclosed items and mail to ODE or submit Online in CNPweb
	Sponsor Information Sheet	Complete and submit online to ODE in CNPweb: https://cnp.ode.state.or.us
	Site Information Sheet (s)	Complete and submit online to ODE one Site Application per site in CNPweb: https://cnp.ode.state.or.us
	CNPweb User Authorization	Complete, sign and mail to ODE
	ODE CNP-Sponsor Agreement Amendment	Complete, sign and date TWO copies and mail both copies to ODE
	School District At-Risk Management Plan	Complete and mail to ODE with application materials. Include all required attachments.
	Budget for Center Sponsors	Complete the appropriate budget and mail to ODE
	Outside Employment Policy	Complete, sign and mail to ODE
	W-9 Form	Complete, sign and mail to ODE if your program is not current National School Lunch or Summer Food sponsor
	One-Month Menu	Submit a One-Month Menu for each site by mail. If the same menu is used for all sites, submit only one. Keep a copy for your file.
	Racial Ethnic Data Collection Form	Complete and keep on file. Collect data annually.

Resources:

- Prototype Form – Information to Gather from Principals
- Racial Ethnic County Data for Oregon
- CACFP Appeal Procedure
- CACFP Budget Definitions

If you have questions about the application packet, please contact Darcy Miller, Nutrition Specialist, (503) 947-5899 or darcy.miller@state.or.us

Appendix F: Oregon At-Risk Meal and Snack Application for School Districts

Oregon Department of Education
255 Capitol St. NE
Salem, OR 97310

Office of the Superintendent
Child Nutrition Programs
(503) 947-5902

MANAGEMENT PLAN Child and Adult Care Food Program School Districts – At-Risk Snack/Supper Program Fiscal Year FY _____

INSTRUCTIONS: Complete *applicable sections* of this form and attach required support documentation. Return one copy to ODE CNP and retain one copy for your files.

Sponsor

Agreement Number

I. CACFP Training

- A. List scheduled annual CACFP training date(s) for current staff during next fiscal year:
(minimum of one required)

Month/Day/Year

Month/Day/Year

Month/Day/Year

II. CACFP Recordkeeping

- A. List position/title of the person who has the overall responsibility for maintaining CACFP records for three years plus the current fiscal year.
-

- B. Point-of-Service Meal Counts:

Meal service style: (check all that apply)

- Family style
 Restaurant
 Cafeteria
 Combination Family/Restaurant

Meal Count type:

- Actual count method
 Head count method (*Organization is only approved and claiming a maximum of 2 meals and 1 snack OR 2 snacks and 1 meal per participant per day*)

Complete the chart regarding point-of-service meal counts:

Task	Position responsible	When
Recording meal counts for each meal and snack service at the point of service		
Monitor staff compliance for taking accurate point-of-service meal counts		

Appendix F: Oregon At-Risk Meal and Snack Application for School Districts

C. Menu Planning:

Check all of the following menu-planning options that apply:

- For district-sponsored after school at-risk sites, the school district follows the CACFP meal pattern (option)
- For district-sponsored after school at-risk sites, the school district follows the ODE-Approved NSLP meal pattern:

Describe: _____

D. Vended Meals: For organizations that purchase meals:

Name and position of sponsor staff responsible for monitoring vended meal agreement or FSMC contract for CACFP meals:

Complete chart to indicate how your program ensures meals provided by your vendor meet CACFP requirements for components and portion sizes:

Check method/s used:	Frequency
<input type="checkbox"/> Cycle menu submitted to sponsor for review and approval	
<input type="checkbox"/> Monitor and observe meal service	
<input type="checkbox"/> Obtain staff feedback	
<input type="checkbox"/> Daily vendor receipts provided by vendor (required)	
<input type="checkbox"/> Meet with vendor to discuss issues/changes	
<input type="checkbox"/> Obtain copies of CN labels, recipes and other documentation	
<input type="checkbox"/> Other: Describe _____	

III. Civil Rights

Specify staff positions/titles responsible for the following civil rights requirements:

Staff Position(s)/Title(s) and Name	Civil Rights Requirement
	Developing and implementing written complaint procedure
	Training sponsor staff on civil rights requirements and sponsor procedures
	Making sure current <i>And Justice for All</i> poster is always posted in area where parents, adult participants and the general public can see and read it
	Including correct USDA Non-Discrimination statement on sponsor-published materials and information mentioning USDA or CACFP

IV. Building for the Future flyer

Do you have a Building For the Future flyer posted at each site where parents and guardians can read it? Yes No

V. Site Monitoring

Does the sponsor have more than one site enrolled on the CACFP?

- [] Yes If yes, complete this section
[] No If no, skip to next section

A. Complete and submit **Attachment B: CACFP Site Monitoring Review Schedule**

[] **Attachment B: CACFP Site Monitoring Review Schedule**

B. Does your program use the current Site Monitoring Report form provided by ODE?

- [] Yes [] No

If No, submit the monitoring review form used.

[] **Monitoring Review Form enclosed (must include all required items on ODE form)**

CERTIFICATION

I certify that the information in this application/agreement is true and correct. I certify that during the past seven years, neither the institution nor any of its principals have been declared ineligible to participate in any other publicly funded program by reason of violating that program's requirement. I understand that institutions and individuals providing false information will be placed on the national disqualified list and will be subject to civil or criminal penalties. I certify that the organization will abide by this management plan and budget and that all applicable State and federal regulations and policies will be observed.

SIGNATURE OF AUTHORIZED REPRESENTATIVE

DATE

(Signee must be same person who signed the State Agency-Sponsor Agreement)

Check each document enclosed with the Management Plan.

Multi-Site Programs Only:

- [] Site Monitoring Review form (If different than ODE form)
[] Attachment B: Site Monitoring Review Schedule

CACFP Site Monitoring Review Schedule for Fiscal Year 2009

Total Number of Sites: _____

FTE Monitoring Staff: _____ (average number of hours spent monitoring per month, divided by 173.33)

Site Name	Monitor / Position	Scheduled Site Monitoring Dates		