



STATE OF CONNECTICUT
DEPARTMENT OF EDUCATION



TO: Child and Adult Care Food Program Home Sponsors

FROM: John Frassinelli, Chief *J. Frassinelli*
Bureau of Health/Nutrition, Family Services and Adult Education

DATE: February 9, 2016

SUBJECT: **Operational Memorandum No. 3H-16**
School Area Eligibility Data for Day Care Home Tier I Determinations

Use of School Data

Enclosed is a listing of area eligible schools to be used for making Tier I eligibility determinations for day care homes in the Child and Adult Care Food Program (CACFP). The new list is based on public school data from the month of October 2015. As a reminder, refer to Operational Memorandum #05H-11, which discusses the Healthy, Hunger-Free Kids Act of 2010, Public Law 111-296 that modified the requirements for using area eligibility data to make tiering determinations for family day care homes participating in the CACFP.

All schools presented on the **List of Area Eligible Schools-October 2015 Data** reflect schools in which 50 percent or more of the enrolled children are eligible for free or reduced-price meals in the National School Lunch Program. Any provider who operates a day care home in the attendance area of a listed school would be eligible as a Tier I day care home provider. In some instances, there may be more than one school that services a particular address. In this circumstance, either one of the schools may be used to make the Tier I determination.

The new school data is effective **February 1, 2016** and would impact:

- the annual review of eligibility of providers sponsored by agencies with a policy of annual re-determination of all providers; and
- all providers new to the CACFP or those who have relocated as of February 1, 2016.

The following towns and schools have been added to the list since last year:

<u>Town</u>	<u>School(s)</u>
Brooklyn	Brooklyn Middle School
East Haven	East Haven High School
Montville	Charles E. Murphy School
Norwalk	Marvin Elementary School
	Roton Middle School
	Silvermine Elementary School

The following towns and schools have been added to the list since last year (continued):

<u>Town</u>	<u>School(s)</u>
Plainfield	Moosup Elementary School Plainfield Central School Plainfield Memorial School
Stafford	West Stafford School
Stamford	Hart School Westhill High School
Stratford	Stratford High School
Torrington	Torrington Middle School
Vernon	Northeast School Skinner Road School
West Haven	Washington School
Winchester	Batcheller Elementary School Mary P. Hinsdale School Pearson Middle School
Windsor Locks	North Street School

The following towns and schools have either closed or no longer meet the 50 percent enrollment requirements for area eligibility:

<u>Town</u>	<u>School(s)</u>
Bridgeport	Winthrop School
Danbury	Broadview Middle School King Street Primary School Pembroke School Shelter Rock School
Enfield	Hazardville Memorial School
Hamden	Dunbar Hill School
Meriden	Thomas Hooker School
Middletown	Snow School
New Haven	Clemente Leadership School Troup Magnet Academy of Sciences School
Stratford	Lordship School

Community Eligibility Provision

As an alternative to collecting individual applications for free and reduced-price meals, the Community Eligibility Provision (CEP) allows schools and local education agencies with a high percentage of low-income children to offer free meals to all students. Qualifying schools serve free lunch and breakfast through the National School Lunch Program (NSLP) and School Breakfast Program. School districts electing CEP must continue to provide to the NSLP State agency a list of schools under its jurisdiction in which 50 percent or more of enrolled children have been determined eligible for free or reduced-price meals.

Area eligibility determinations based on data from schools electing CEP as part of a group of schools or a school district must still use the individual school data rather than districtwide data for CACFP day care home tiering. These individual school data are obtained by multiplying the most current school level identified student percentage (ISP) by the 1.6 factor. If the result is equal to or greater than 50 percent, meal sites located in the attendance area of the school are area eligible. If a school electing CEP collects alternate household income information to be used for other purposes, school data based on these applications may not be used to determine area eligibility. For a list of schools using the CEP option, contact Celia Cordero in the Child Nutrition Unit.

Use of Census Data

CACFP day care homes that establish eligibility using census data are required to use the most recent census data available. In 2005, the Census Bureau began to annually estimate household income using the American Community Survey (ACS). The ACS is an ongoing survey that provides annual estimates, based on sampling data, in order to give communities more current information than the decennial census is able to provide.

Prioritizing Data in CACFP

CACFP regulations at 7 CFR 226.15(f) currently require institutions to first make a reasonable effort to establish area eligibility with school data prior to using census data. Previously, when census data were released decennially, school data were thought to more closely reflect the current socioeconomic status of a given area. Because census data are now annually estimated and released, this policy is no longer necessary. Therefore, this policy is amended to allow the use of either school or census data for applicable area eligibility determinations in the CACFP. Sponsoring organizations in the CACFP no longer have to first make a reasonable effort to establish area eligibility with school data prior to using census data.

Geographic Areas Covered by Census Data

CACFP day care homes located in a Census Block Group (CBG) or Census Tract in which 50 percent or more of the children are eligible for free or reduced-price school meals are considered area eligible for a period of 5 years. Previously, CBGs were the only permissible geographical unit that could be used to assess eligibility for CACFP when using census data. In May 2014, the U.S. Department of Agriculture's Food and Nutrition Service (FNS) issued guidance providing CACFP day care homes flexibility to also use Census Tracts, geographical units that consist of one or more of the CBGs, to determine area eligibility.

Occasionally, a potential CACFP day care home is determined not to be area eligible, but is located immediately adjacent to an eligible area. This proximity suggests that the children residing in the area from which the home or site would most likely draw participants would have a likelihood of similar census demographics. In recognizing that likelihood and allowing additional flexibility in the use of census data to establish area eligibility, we can ensure area eligibility determinations accurately identify areas in which poor economic conditions exist.

Therefore, based on analysis of the proposed location, with both State agency and FNS Regional Office approval, up to three adjacent CBGs may be averaged, using a weighted average, to determine eligibility. In such a case, CACFP day care homes are considered area eligible if the percentage of children eligible for free or reduced-price meals in up to three adjacent CBGs when averaged is 50 percent or more, provided that at least 40 percent of children in each of the individual CBGs are eligible for free or reduced-price meals. Census Tracts may not be combined.

Reclassification of Day Care Home Providers

Sponsors must annually inform Tier II day care home providers that the providers may ask for a reclassification to be considered when new census data become available each year and that reclassification may be made at any time for Tier II homes. If a day care home is currently classified as Tier II, but the CBG data demonstrates that the home is now Tier I, then the sponsor may immediately change the status of that home to Tier I and pay the higher rate of reimbursement for the current and subsequent months. A reclassification to Tier I status is good for five years, at which time eligibility for this classification must be reconfirmed. When a home is reclassified, retroactive reimbursement at the higher Tier I rates will not be provided for any previous month.

Accessing the Data

Census Tract and CBG data are now available through the FNS Area Eligibility Mapper, which is located at <http://www.fns.usda.gov/areaeligibility>.

The FNS Area Eligibility Mapper was published in 2014 and is intended for State agencies and sponsors to determine area eligibility in CACFP. The map also can be used to conduct weighted averaging as discussed above. Instructions for determining eligibility using these data are available at: http://www.fns.usda.gov/sites/default/files/Census%20Instructions%202014_0.pdf. The instructions offer two different tools to determine eligibility: the FNS Area Eligibility Mapper and a map developed by the Food Research and Action Center (FRAC). The FRAC map is constructed from the same data files and also may be used to determine eligibility.

Please contact Celia Cordero at 860-807-2076 if you have any questions about this information.

JF:shb

Attachment

Important: This is a numbered Connecticut State Department of Education (CSDE) operational memorandum that contains important program information. Please read carefully and retain in a binder for future reference. All CSDE operational memoranda are posted on the CSDE's [Operational Memoranda for the CACFP Web page](#).