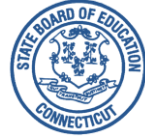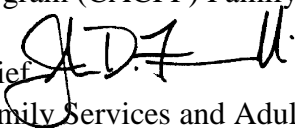# STATE OF CONNECTICUT
DEPARTMENT OF EDUCATION

TO: Child and Adult Care Food Program (CACFP) Family Day Care Home Sponsors

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

DATE: February 14, 2020

SUBJECT: Operational Memorandum No. 3H-20
School Area Eligibility Data for Day Care Home Tier I Determinations

Use of School Data

Attached is a listing of area eligible schools for making Tier I eligibility determinations for day care homes in the CACFP. The new list is based on public school data from the month of October 2019. As a reminder, the Healthy, Hunger-Free Kids Act of 2010 (Public Law 111-296) modified the requirements for using area eligibility data to make tiering determinations for family day care homes participating in the CACFP. Family and group day care homes may now be classified as tier I for purposes of reimbursement under CACFP if the home is located in an area served by *any* public school in which at least 50 percent of the enrolled children are certified eligible for free and reduced-price school meals. Previously, only the enrollment of the local public *elementary* school could be used to determine tier I eligibility.

The attached list includes 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 (NSLP). 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. When this occurs, either one of the schools may be used to make the Tier I determination.

The new school data is effective **February 1, 2020**, and impacts:

- the annual review of eligibility of providers sponsored by agencies with a policy of annual redetermination of all providers; and
- all providers new to the CACFP or those who have relocated as of February 1, 2020.

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

Town	Schools
Bristol	Northeast Middle School
EASTCONN	Scotland Elementary School

Town	Schools
Enfield	Enfield High School
	Enfield Street School
	John F. Kennedy Middle School
Manchester	Highland Park Elementary School
Milford	Pumpkin Delight School
Naugatuck	Cross Street School
	Maple Hill School
Shelton	Sunnyside School
Stafford	Stafford Elementary School
Stratford	Bunnell High School
	Second Hill Lane School
Thompson	Mary R. Fisher Elementary School
Vernon	Center Road School
Windsor Locks	Windsor Locks High School

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

Town	Schools
Chaplin	Chaplin Elementary School
East Windsor	Broad Brook Elementary School
Fairfield	McKinley School
Groton	Claude Chester School
	West Side Middle School
Hartford	Wish Museum School
Manchester	Washington School
New Haven	Quinnipiac Real World Math STEM School
	Strong 21st Century Comm. Magnet & Sciences Lab School
Stonington	West Broad Street School
Torrington	East School
Wallingford	Cook Hill School
West Hartford	Smith School
Windsor	Clover Street Elementary 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 educational 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 NSLP and School Breakfast Program (SBP). School districts electing the CEP must continue to provide to the Connecticut State Department of Education (CSDE) a list of schools under the district's 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 the 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. 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 the CEP collects alternate household income information to be used for other purposes, school data based on these applications cannot be used to determine area eligibility.

Use of Census Data

CACFP day care homes that establish eligibility using census data are required to use the most recent census data available. The Census Bureau annually estimates 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 the CACFP

CACFP regulations 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 estimated and released annually, this policy is no longer necessary. Therefore, the U.S. Department of Agriculture's (USDA) Food and Nutrition Service (FNS) amended this policy to allow the use of either school or census data for applicable area eligibility determinations in the CACFP. Sponsoring organizations are no longer required 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 five 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 USDA FNS issued guidance providing CACFP day care homes the 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. Recognizing that likelihood and allowing additional flexibility in the use of census data to establish area eligibility ensures that area eligibility determinations accurately identify areas in which poor economic conditions exist.

Therefore, based on analysis of the proposed location, with both CSDE and FNS Regional Office approval, up to three adjacent CBGs may be averaged, using a weighted average, to determine eligibility. In this 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 cannot 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, 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 valid 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

The Instructions for Determining Eligibility Based on Census Data offer two different tools that provide Census Tract and CBG data to determine eligibility:

- The USDA's FNS Area Eligibility Mapper tool is intended for state agencies and sponsors to determine area eligibility in the CACFP. It may also be used to conduct weighted averaging as described previously.
- The Food Research and Action Center (FRAC) developed the FRAC map, which is constructed from the same data files. It may also be used to determine eligibility.

Please contact Shannon Yearwood at 860-807-2050 if you have any questions about this information.

JF:shb

Attachment