Leveraging the Child & Adult Care Food Program to Promote Healthier Out-of-School Time Settings in Illinois

Children and youth spend up to 15 hours per week in afterschool and other out-of-school time (OST) activities when school is in session, or as many as 40 hours per week during the summer or other extended school breaks. While the evidence for the effectiveness of physical activity and nutrition guidelines in OST programs is still growing, multiple studies have found that OST programs can make modest improvements in unhealthy weight gain in children and youth. A focus on OST environments must be part of a comprehensive strategy to prevent childhood obesity. To support healthier OST settings, the YMCA of the USA, with the National Institute on Out-of-School Time and the University of Massachusetts/Boston, formed the Healthy Out-of-School-Time Coalition and developed a national set of healthy eating and physical activity (HEPA) standards tailored specifically for OST providers.

One tool that states can use to implement healthier meals and snacks for more children and youth in early care and OST settings is the federal Child and Adult Care Food Program (CACFP). This resource provides an overview of the program and how it works in Illinois, suggests ideas for how it could be leveraged, and highlights some key considerations.

What are the early care and OST settings in Illinois?

The Illinois Department of Children & Family Services licenses child care providers, and divides early care and education into three settings: 1) Day Care Centers 2) Day Care Homes 3) Group Day Care Homes. Certain types of providers that serve only children over the age of three, and many types of OST providers, are exempt from licensing.
What is the Child and Adult Care Food Program?

The Child and Adult Care Food Program (CACFP) is a federally funded U.S. Department of Agriculture (USDA) program designed to improve the diets of children and vulnerable adults. Since 1968, CACFP has helped to support child care providers by reimbursing them for snacks and meals. In 1994, Congress extended CACFP reimbursement to a few afterschool programs providing snacks in areas of high rates of violence or substance abuse. In 2010, the Healthy Hunger-Free Kids Act expanded CACFP’s reach by authorizing reimbursements for meals and snacks provided by afterschool programs who serve at-risk youth in all 50 states.

States are leveraging the CACFP standards in various ways to improve the quality of early learning and OST program meals and snacks provided to children, including by enhancing the nutrition standards, incorporating the CACFP nutrition standards into the state’s child care licensing regulations or voluntary quality programs so they apply to more providers, and by providing additional reimbursement for participation.
CACFP reimbursement is not calibrated to actual food expenses. Instead, a predetermined amount of money is provided for each meal and snack served regardless of the cost associated with procuring, preparing and serving the meal or snack.

How does CACFP work?

CACFP is directly administered at the state level. In Illinois, the Nutrition & Wellness Program in the Division of Specialized Instruction under the State Board of Education administers the program for child care settings. Please see the state’s webpage for additional information: http://www.isbe.net/nutrition/htmls/child_adult.htm. For CACFP purposes, the Illinois State Board of Education groups early care and education into two settings: 1) Child Care Institutions (public, non-profit, and for-profit, nonresidential child care centers; Head Start/Early Head Start centers; preschool programs, before and afterschool hours programs; afterschool programs in low income areas; and emergency shelters) and 2) Family Day Care Homes (public and non-profit institutions sponsoring family day care homes). Licensed and license-exempt center-based programs are eligible to participate in CACFP. License-exempt home-based child care providers can participate in CACFP if they are registered to care for children receiving child care subsidies.

CACFP reimbursement is not calibrated to actual food expenses. Instead, a predetermined amount of money is provided for each meal and snack served regardless of the cost associated with procuring, preparing and serving the meal or snack. Participating providers are eligible for reimbursements for up to three eating occasions — either two meals and a snack, or two snacks and a meal — so long as those meals and snacks meet the program’s requirements. The amount of reimbursement varies as does the manner in which reimbursement rates are determined. Center-based programs must submit income eligibility applications, which are used to establish the reimbursement rate per participant. Home-based providers receive either the higher tier or lower tier of reimbursement based on the geographic location of their home, their own household income or the household income of the children in their care.

How can OST programs participate in CACFP?

Afterschool or OST programs can participate in CACFP as either an “Outside-School-Hours Care Center” or as an “At-Risk Afterschool Care Center.” These centers may be public or private nonprofit institutions or facilities (except child care homes), that are licensed or approved to provide organized nonresidential child care services to children during hours outside of school. Federal law does not require these centers to be licensed unless licensure is required by state or local law. However, unlicensed programs must comply with applicable state or local health and safety laws.

Nonprofit Outside-School-Hours Care Centers are all eligible to participate in CACFP. For-profit Outside-School-Hours Care Centers are eligible to participate if 25% or more of the youth enrolled in the program are eligible for free or reduced-price meals as verified by income eligibility forms.

“At-Risk Afterschool Care Centers” are public or private nonprofit organizations that provide nonresidential child care to children after school through approved afterschool care programs located in public school attendance areas where at least 50% of the student population is eligible for free and reduced price meals. Illinois refers to this as the “At-Risk Afterschool Meals” program. Emergency shelters that run afterschool programs with educational or other enrichment activities for
homeless children and youth are eligible for at-risk reimbursements no matter where they are located.\textsuperscript{16}

At-Risk Afterschool Meal program participants can get reimbursed for one snack and supper at the highest reimbursement rate (the “free” rate) during the school year.\textsuperscript{17} In addition to being located in an eligible public school attendance area, an afterschool program or center must:

- Be operated by a public agency, nonprofit organization, or a for-profit organizations that meets certain requirements;
- Provide care for kids and teens up to age 18 (including those who turn 19 during the school year) who are enrolled in school, after school or on the weekends, holidays, or during school vacations on a regular basis during the school year;
- Provide organized activities in a supervised environment;
- Include education or enrichment activities; and
- Be licensed or certified license-exempt.\textsuperscript{18}

At-Risk Afterschool Meal program providers can serve meals to children that are not enrolled in their programs. For example, if an At-Risk Afterschool Care Center is located in a community center that has unsupervised open-gym basketball, the youth using the open gym can be served meals.

CACFP currently does not provide reimbursement for food served by OST programs during summer breaks, except for programs located in the attendance area of a school that operates year-round.\textsuperscript{19} For programs not located in year-round school area, participation in the USDA’s Summer Food Service Program may be a good option.\textsuperscript{20}

**What are the CACFP standards?**

CACFP does not apply nutritional standards. Rather, to be eligible for reimbursement, meals and snacks must meet the following meal pattern requirements:

- **Breakfast:** milk, a vegetable or fruit, and a bread or grain product made with whole-grain or enriched flour/meal.
- **Lunch and supper**: milk, two servings of fruit and/or vegetables, bread or grain product made with whole-grain or enriched flour/meal, and lean protein.

- **Snacks**: at least two out of four possible components: milk, meat/meat alternative, fruit or vegetable, and a whole-grain or enriched bread or grain product.


A proposed rule is pending that would update the federal CACFP nutrition requirements to better align with current nutrition recommendations for children, but a final rule has not yet been released.

- To read the proposed rule, please visit: [https://federalregister.gov/a/2015-00446](https://federalregister.gov/a/2015-00446).

- For more information on how the proposed rule could change existing standards, please visit the Food Research and Action Center’s (FRAC) website: [http://frac.org/federal-foodnutrition-programs/child-and-adult-care-program/](http://frac.org/federal-foodnutrition-programs/child-and-adult-care-program/).

### How many programs in Illinois participate in CACFP?

As of March 2015, there were 2,463 licensed child care centers participating in the CACFP.\(^{21}\) Based on 2014 data, Illinois has 3,314 licensed child care centers,\(^{22}\) indicating a participation rate of about 74%. For home-based family child providers, 7,064 participate in CACFP out of 9,563 total licensed providers,\(^{23}\) for a 74% participation rate.\(^{24}\)

No data is available for participation rates for OST programs because they are not licensed by the Department of Children and Family Services nor is there a registration system to track the number of programs.

### Options for Leveraging CACFP

There are multiple strategies to leverage CACFP to provide healthy snacks and meals to more children in child care and OST programs. Below are approaches that could be explored in Illinois:

- Update the nutritional standards in Illinois’s licensing requirements to expressly incorporate CACFP. Illinois regulations do not specifically mention the CACFP, but tend to take a similar approach. The regulations for day care homes and group day care homes require providers to serve nutritionally balanced meals, and snacks...
with specific components, and with age-specific requirements as well. Meal pattern guidance and portion size requirements are provided in charts contained in appendices. The regulations for child care centers are similar, but include more specific standards as well, including encouraging providers to avoid salty and high fat foods, and prohibiting serving of beverages with added sweeteners, and cakes, pastries, cookies and other foods with high sugar and/or fat content. The Illinois meal pattern charts are designed so that meals provide one-third of children’s daily nutritional requirements, similar to the CACFP meal pattern. If CACFP standards were expressly incorporated into Illinois licensing requirements (including any future amendments), then the Illinois guidelines would automatically update when changes are made to the CACFP meal pattern requirements.

- Leverage the ExceleRate Illinois program. Illinois is currently transitioning to a new quality rating and improvement system. Quality Counts, the old system, is being replaced by ExceleRate Illinois. ExceleRate Illinois has three “circles of quality.” The Bronze level is earned largely through the completion of ExceleRate-approved training. To earn the Silver or Gold level, programs must achieve a minimum score on an assessment tool that includes nutrition, active play and screen time components at a basic level, but no minimum standards on these topics are specifically required for Silver or Gold ratings. There are several potential ways ExceleRate Illinois could be leveraged:
  - Include CACFP participation as one of the metrics used to assess program quality for ExceleRate. CACFP participation for all eligible programs could be required at the Bronze level, with the Silver level requiring compliance with certain best practices recommended in
the CACFP proposed rule, and the Gold level requiring compliance with all or most of those best practices.

- Inclusion of OST programs in the ExceleRate system. Out-of-school time programs were included in the Quality Counts system, and a statewide initiative through the Illinois Afterschool Network promoted its uptake with OST programs.\textsuperscript{33} Therefore, it is puzzling that they are not eligible for ExceleRate. Given that the primary ExceleRate tool used to assess program quality for early care and education settings has a version for OST programs (SACERS: the School-Age Care Environment Rating Scale), extending ExceleRate to OST programs should be straightforward. Specific to CACFP, OST programs could receive points toward ExceleRate ratings if they participate in CACFP.

- Development of a healthy eating and physical activity “Award of Excellence.” To supplement the ExceleRate Circles of Quality, programs can also apply for additional recognition on several topics.\textsuperscript{34} Best practices identified in the CACFP proposed rule and/or HEPA standards could be used as the foundation for a new ExceleRate Award of Excellence

- Establish enhanced CACFP standards. At least 13 jurisdictions (including the states of Florida, Maryland, and Wisconsin) have implemented enhanced recommended or required CACFP nutrition standards.\textsuperscript{35} States may add requirements as long as the additional requirements are consistent with the federal requirements and do not deny access to the program to eligible institutions, subject to approval by the applicable Food and Nutrition Service regional office.\textsuperscript{36} States may not disallow meals that are otherwise reimbursable based solely on the violation of an additional state requirement, but may require providers to take corrective action.\textsuperscript{37} In setting enhanced standards, states have generally focused on standards that will be relatively easy for providers to meet, without incurring additional costs (such as disallowing sugary beverages, or limiting high-sugar content grain products.) States with enhanced standards typically promote implementation through recognition programs and by offering incentives and support such as grants and technical assistance.

- Another way to incentivize CACFP participation is increase the reimbursement available for providers participating in CACFP. California law provides for an additional reimbursement of $0.1674 per meal for most meals.\textsuperscript{38} (Family home child care providers are only eligible to receive state reimbursement for 75% of the breakfasts and lunches served to participating children and youth.\textsuperscript{39}) Unfortunately, California’s governor has line-item vetoed appropriations to fund this reimbursement every year since 2012.\textsuperscript{40}

- Last year, Washington D.C. passed a law providing supplemental local CACFP reimbursement of $0.10 for each eligible breakfast, lunch, and supper.\textsuperscript{41} The law also provides an additional $0.05 per lunch and supper to eligible child development facilities that serve a locally grown, unprocessed food as part of the meal (excluding milk).\textsuperscript{42} This law also permits CACFP meal reimbursement for three meals — making Washington D.C. the only jurisdiction in the U.S. to provide CACFP reimbursement for each meal of the day (as opposed to two meals and a snack). The law also provides for annual $300 grants to family home providers who participate in CACFP “to help pay for costs associated with licensing, renewal, and other related expenses.”\textsuperscript{43} The law appropriated $3.2 million in funding.

- One concept to help a CACFP supplemental payment engender more support is to make it conditional on meeting enhanced CACFP
standards. This may be an especially useful approach if the enhanced CACFP standards will significantly increase costs for buying, storing, and preparing foods, including staffing and training needs. This approach was used with the implementation of updated standards for the USDA’s national school meals programs. Schools that demonstrated compliance with the new standards prior to the implementation deadline could receive an additional $0.06 for each meal served. The additional payment was authorized and funded by the Healthy Hunger-Free Kids Act and became available to school districts starting October 1, 2012.

**Key considerations**

Some of these approaches would require new legislation, or amendments to existing laws. Others would require the Illinois Board of Education and/or the Department of Children and Family Services to amend existing regulations, or to make programmatic changes in how CACFP is administered. Most of these approaches would have limited impact on non-licensed providers. All of the approaches would require an appropriation to fund either additional reimbursements and/or technical assistance. Technical assistance would be especially important if nutrition standards are strengthened, and to expand OST provider participation in CACFP to ensure success and minimize unintended consequences such as providers choosing to stop serving food or dropping out of licensed care.

In the 2011 final report *CACFP At-Risk Afterschool Meals Best Practices*, training, technical assistance, and other administrative responsibilities are listed as among the greatest barriers to CACFP participation by afterschool programs. In recognition of these barriers, some states provide additional technical assistance and resources specifically tailored for school age care providers, and address specific needs, such as safe food service, record keeping, nutrition, menu plans, and recipe ideas. Addressing these concerns could greatly increase participation rates.

**Conclusion**

Federal nutrition programs such as CACFP are a useful tool for promoting the availability of healthier meals and snacks in child care and OST programs. There are a variety of ways that Illinois could expand participation and coverage of the CACFP to reach even more kids and youth.
Endnotes


3 The complete standards are described in Nat’. AfterSchool Ass’n, HEPA STANDARDS, http://www.niosh.org/images/host/Healthy_Eating_and_Physical_Activity_Standards.pdf.


15 See 7 C.F.R. § 226.2 (2015) (definitions of “at-risk afterschool care center” and “eligible area”).


17 During non-school days (i.e., weekends or vacation days), the “supper” meal can be served at any time of day approved by the state agency. At-Risk Afterschool Meals, Handbook, supra note 7, at 10.

18 At-Risk Afterschool Meals Handbook, supra note 7, at 8-11.


22 Data was taken from the Univ. of Illinois at Urbana–Champaign’s Illinois Early Childhood Asset Map. http://iecam.illinois.edu/cgi-bin/iecam/search.asp (last visited Jan. 20, 2016).


24 This calculation is based on data taken from the Univ. of Illinois at Urbana–Champaign’s Illinois Early Childhood Asset Map. http://iecam.illinois.edu/cgi-bin/iecam/search.asp (last visited Jan. 20, 2016).

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32 The Environment Rating Scales from the Frank Porter Graham Child Development Institute, available at http://ers.fpg.unc.edu, are the recommended tools, although programs can select from several evidence-based assessments.


35 In addition to Florida, Maryland, and Wisconsin, these jurisdictions include: Arizona, Colorado, Connecticut, Kentucky, Missouri, New York, North Carolina, Texas, West Virginia, and Washington D.C.


39 Cal. Educ. Code § 49550 (a) (2015) (stating “Notwithstanding any other provision of law, each school district or county superintendent of schools maintaining any kindergarten or any of grades 1 to 12, inclusive, shall provide for each needy pupil one nutritionally adequate free or reduced-price meal during each school day, except for family day care homes that shall be reimbursed for 75 percent of the meals served.”)


