



Public Health  
HEALTH AND HUMAN SERVICES

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CACFP 16-21

## Memorandum

To: Institutions Participating in the Child and Adult Care Food Program

From: Arnette Cowan, Head   
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Subject: Area Eligibility in Child Nutrition Programs

The purpose of this memorandum is to revise guidance on the use of school and census data to establish area eligibility in the Child and Adult Care Food Program (CACFP) and the At-Risk Afterschool component of CACFP. In 2014, Food Nutrition Service (FNS) consolidated previous guidance, simplified the area eligibility determination process to reduce administrative burden on State agencies and Program operators, and clarified how the Community Eligibility Provision (CEP) relates to area eligibility determinations. This memorandum further streamlines program administration by removing the requirement that FNS Regional Offices approve weighted average calculations. This memorandum supersedes: CACFP 14-13, *Area Eligibility in Child Nutrition Programs*, December 9, 2014.<sup>1</sup>

### Data Sources and Establishing Area Eligibility

The two primary sources of data that may be used to determine whether a site is area eligible are school data and census data. The Richard B. Russell National School Lunch Act (NSLA) allows the use of school data to establish area eligibility in the CACFP [42 U.S.C. 1766(f)(3)(A)(ii)(I)(bb)]. The NSLA also allows the use of census data to establish tier I eligibility for CACFP day care homes [42 U.S.C. 1766(f)(3)(A)(ii)(I)(aa)]. The most recent guidance on the

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<sup>1</sup> The 2014 guidance superseded 7 earlier memoranda on area eligibility: CACFP 14-05, Area Eligibility Using Census Data, May 20, 2014; CACFP 14-01, Use of School and Census Data, December 6, 2013; CACFP 13-17, Census Data Release: Fiscal Year 2014, November 25, 2013; CACFP 14-10, Eligibility Based on Census Data: 2013 Data Release, September 2, 2014; CACFP 12-09, Eligibility Based on Census Data: Revision of 2012 Data Release, June 15, 2012; and CACFP 12-04, Eligibility Based on Census Data: 2012 Data Release, April 15, 2012.



use of school and census data for area eligibility determinations in CACFP is available at:  
[http://nutritionnc.com/snp/pdf/NCDPI-2014-15freereduceddata\(LEA\).pdf](http://nutritionnc.com/snp/pdf/NCDPI-2014-15freereduceddata(LEA).pdf).

Area eligibility determinations made using either school or census data must be re-determined every five years, in accordance with the NSLA. Once a site establishes area eligibility, the eligibility is effective for a period of five years, regardless of any transition from one Child Nutrition Program to another. However, because area eligibility for CACFP at-risk afterschool meals must be based on school data, SFSP sites that established eligibility using census data must provide additional documentation indicating that they are area eligible based on school data to participate in CACFP at-risk afterschool meals.

### **Use of School Data**

School data may be used to establish area eligibility for the CACFP. In order for a site to be determined area eligible, school data must indicate that the proposed meal site is located in the attendance area of a school where at least 50 percent of the children are eligible for free or reduced price school meals. To determine area eligibility in situations where public schools routinely bus children from their neighborhood school to other schools or school choice policies are in place, please see memorandum CACFP 13-01, *Determining Area Eligibility Based on School Data*, January 1, 2013,  
<http://nutritionnc.com/snp/pdf/cacfp/memos/131DeterminingAreaEligibilityBasedonSchoolData.pdf>

CACFP regulations require State agencies to coordinate with their State's NSLP administering agency to obtain a list of schools, including elementary, middle, and high schools in the State where at least 50 percent of their enrolled children are eligible for free or reduced price school meals.

In situations where data from a more recent month in the school year is available and would establish area eligibility for an otherwise ineligible location, school data from that month may be used to establish 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 [7 CFR 226.6(f); 7 CFR 225.6(c)]. 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.

In 2012, FNS announced the release of these ACS data annually via memorandum. FNS annually announces the release of these data to State agencies via CACFP subscriptions on GovDelivery at <https://public.govdelivery.com/accounts/USFNS/subscriber/new?pop=t>. These data are released in October to encourage early recruitment and increase Program access.

### Prioritizing Data in CACFP

CACFP regulations currently require institutions to first make reasonable efforts to establish area eligibility with school data prior to using decennial census data [7 CFR 226.15(f)]. Census data are now annually estimated and released therefore 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 [7 CFR 226.15(f)].

### 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. CACFP day care homes are considered area eligible if they are located in a CBG or Census Tract that qualifies under CACFP.

Occasionally, a potential CACFP day care home site is determined not to be area eligible, but is located immediately adjacent to an eligible area. This suggests that children in eligible census block groups may be served by and benefit from a CACFP day care home located in a neighboring census group in close proximity. In recognizing that likelihood and allowing additional flexibility in the use of census data to establish area eligibility, FNS can ensure area eligibility determinations accurately identify areas in which poor economic conditions exist.

Therefore, based on analysis of the proposed location, and with State agency 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 the “referent” CBG and up to two additional 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. Due to successful training and implementation of this flexibility, this memorandum removes the requirement that the FNS Regional Office must also review and approve weighted average calculations.

State agencies must consider the following before approving a home to be area eligibility using weighted averages:

- ✓ There are 3 or fewer CBGs in the calculation including the “referent” CBG where the facility is located.
- ✓ All CBGs in the calculation have at least 40% children eligible for free or reduced price meals.
- ✓ All CBGs in the calculation are adjacent to the “referent” block group where the home is located.
- ✓ The calculation uses the same age groups (i.e., 0-12 or 0-18 year olds) across CBGs.
- ✓ Make sure calculations are done correctly:

- **Do use weighted averages.**
  - Add numerators of each CBG.
  - Add denominators of each CBG.
  - Divide the sum of numerators and sum of denominators.
- **Do not** average the percentages of free or reduced price meals in each CBG.

#### Reclassification of Day Care Homes

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.

#### Area Eligibility Established Using Census Data between February 13, 2012, and April 6, 2012

The Census Bureau incorrectly categorized children with missing poverty information as eligible for free and reduced price meals in the dataset released by FNS on February 13, 2012. This coding error resulted in an overestimate of the number of children eligible for free or reduced price meals in the affected block groups.

State agencies monitoring CACFP sponsors that determined area eligibility using census data released between February 13, 2012, and April 6, 2012, will ensure that eligibility was re-determined for FY 2013. For purposes of CACFP, eligibility redeterminations for tier I day care homes located within the affected block groups were required by September 30, 2012. Eligibility determinations for CACFP day care homes for which eligibility was determined after April 6, 2012, must have been made using the corrected data.

#### 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 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.

State agencies and sponsors may view, filter and download these data in a variety of formats, and at any time, through the Open Data Portal, at [http://data.cacfp-sfsp.opendata.arcgis.com/datasets/3f2d86cd76d44fe39cec3b96a9417bbc\\_0](http://data.cacfp-sfsp.opendata.arcgis.com/datasets/3f2d86cd76d44fe39cec3b96a9417bbc_0). Please be aware of the long download times, due to the large file size.

Two independent organizations have developed online mapping tools that may help State agencies and sponsors identify potentially eligible CBG. These maps are constructed from the same data files and sponsors may use these sites to determine if a site is potentially eligible. However, sponsors are still required to show the weighted average calculation to and secure the approval of the State agency for all weighted average area eligibility determinations. The two tools are:

- Food Research and Action Center's (FRAC) Summer Food Mapper, <http://www.fairdata2000.com/SummerFood/>
- Share Our Strength's No Kid Hungry Averaged Eligibility Map, <https://bestpractices.nokidhungry.org/sponsor-center/averaged-eligibility-map>

Instructions for determining eligibility using these data and tools are available at: [http://www.fns.usda.gov/sites/default/files/Census%20Instructions%202014\\_0.pdf](http://www.fns.usda.gov/sites/default/files/Census%20Instructions%202014_0.pdf).

If you have questions, please contact the State agency employee assigned to your region.

c: SNP Staff