



The Child and Adult Care Food Program

MEMORANDUM

TO: All Institutions Participating in the Child and Adult Care Food Program (CACFP) and Summer Food Service Program (SFSP, or DC Free Summer Meals Program)

FROM: *Norma Birckhead*
Norma Birckhead, Manager, CACFP and SFSP

SUBJECT: Sharing Aggregate Data to Expand Child Nutrition Program Access and Services

DATE: April 25, 2014

STATE AGENCY MEMO: CACFP #8-2014 / SFSP #5-2014

The purpose of this memorandum is to remind State agencies, school food authorities (SFAs), schools, and sponsoring organizations operating in the National School Lunch Program (NSLP), the School Breakfast Program (SBP), the Child and Adult Care Food Program (CACFP), and the Summer Food Service Program (SFSP) about data sharing requirements and opportunities. This memorandum also includes frequently asked questions regarding data sharing.

Child Nutrition Program (CNP) operators may disclose student-specific eligibility status to other CNP operators to expedite children's eligibility certification for these programs. Additionally, CNP operators may disclose aggregate information about students eligible for free and reduced price meals to any party without parental notification provided that an individual or group of students' eligibility cannot be identified through release of the aggregate data or by means of deduction [7 CFR 245.6(f)]. For example, release of data relating to specific classrooms is a very small subset of school data and could lead to identification of individual children.

Generally, aggregate data on the percentage of students eligible for free and reduced-price meals is considered public information. Often the aggregate data also may be posted on the school or district website. Examples of aggregate data include: average daily participation, number of meals served, site and sponsor information, aggregate free and reduced-price eligibility percentages and aggregate enrollment data.

Although sharing of aggregate data is always at the discretion of the CNP operators, U.S. Department of Agriculture (USDA) Food and Nutrition Service (FNS) encourages operators to share aggregate data with partners, such as anti-hunger advocacy organizations. The sharing of aggregate data will assist partnering organizations in targeting underserved areas and expanding participation in the Programs. For example, the sharing of aggregate data is especially helpful to FNS partners seeking to increase access to summer meals served through the SFSP.

Partner organizations have duties that range from recruitment of new program operators and sites, technical assistance, outreach, analyzing program trends and conducting research. These activities are vital to increasing participation and strengthening the integrity of all the CNPs. Providing partners with aggregate data can assist



them in effectively targeting their efforts in unserved and underserved areas.

Please note, however, that under the CNPs, data relating to individual children is strictly regulated. For a discussion of the statutory and regulatory requirements for disclosure of information concerning individual children who are eligible for free or reduced-price meals in any of the CNPs, see statutory requirements in the Richard B. Russell National School Lunch Act at section 9(b)(6), and in regulations at 7 CFR245.6(f).

In addition, the Eligibility Manual for School Meals, Part 7

(<http://www.fns.usda.gov/sites/default/files/EliMan.pdf>) and policy memorandum SP 31-2010, *Disclosure Requirements for the Child Nutrition Programs*, August 23, 2010

(http://www.fns.usda.gov/sites/default/files/SP_31_CACFP_17_SFSP_15-2010_os.pdf) also provide guidance on disclosure policies.

If you have questions regarding the information contained in this guidance, please contact your CACFP or DC Free Summer Meals Program Specialist. Or, contact me at (202) 442-4010 or norma.birckhead@dc.gov.