



CACFP Family Childcare Home Sponsor Perspectives - Serious Deficiency Challenges

Research Brief • June 2024

BACKGROUND

Childcare plays an important role in ensuring young children have access to nutritious food during the critical early years of development.¹ The Child and Adult Care Food Program (CACFP) impacts childcare nutrition in the US for over 4.2 million children, mostly from families with low income.²

Busy, working families can be sure that their children are fed nutritious foods while in childcare at CACFP participating sites, which offer healthier meals and snacks than those not in CACFP or than what most children eat at home.^{3,4} CACFP may also reduce child food insecurity.⁵

Despite the benefits, not all qualifying childcare providers participate in CACFP. Research suggests numerous barriers hinder CACFP participation, including the serious deficiency process.⁶

WHAT IS SERIOUS DEFICIENCY?

The serious deficiency process in CACFP is intended to be a tool to ensure integrity and provide due process to CACFP operators, to make sure operators follow CACFP laws, rules, and regulations. If operators are placed in serious deficiency and cannot correct the errors, they will be terminated from the program and will not be able to participate in the CACFP for seven years. Infractions that place operators on the serious deficiency path could be inadvertent human error such as mistakes on paperwork to outright fraud. The process has been reported to be applied inconsistently from state to state, sponsor* to sponsor and even staff person to staff person.^{7,8}

*Sponsors are public or nonprofit private organizations that administer CACFP for licensed family childcare homes and childcare centers that do not choose to operate the program directly through the state.

STUDY OVERVIEW

Ten California CACFP sponsors completed semi-structured interviews with Nutrition Policy Institute researchers between August 2023 - January 2024 to understand challenges family childcare home (FCCH) providers face participating in CACFP.⁹ Interview transcripts were analyzed for themes using the grounded theory method.¹⁰



A family childcare home provider helps a young child serve sliced watermelons during a meal.

KEY FINDINGS

Serious deficiency hinders CACFP participation. Sponsors identified the serious deficiency process as a hindrance for FCCH providers' CACFP participation.

"Some of the regulations are a little too harsh as far as if you're found to be non-compliant and you're put in the serious deficiency process. The seven years of being on the national disqualified list... it becomes a hindrance to them [FCCH providers], just knowing the possibilities."

- FCCH Sponsor A

Serious deficiency is often ‘too harsh’. Sponsors perceive the serious deficiency process to be too harsh, noting that providers can be too easily disqualified for simple mistakes.

“If you're [provider] going on a field trip, technically, you're supposed to notify the office that you're going to be away... you're busy trying to get everything organized and that might slip your mind... you're sent a warning letter saying that you didn't follow the regulation... if that were to happen again, that puts you into serious deficiency. And if you're terminated from the full program, then you're not eligible to claim from the CACFP if you're placed on the National Disqualified List for seven years. I think that those regulations are a little too harsh... seven years for not calling the office. I think that is a little too severe.”

- FCCH Sponsor A

Serious Deficiency creates equity issues for childcare providers with limited technological capacity and whose first language is not English. Sponsors report that providers whose first language is not English have difficulty completing the required daily reporting for CACFP, which if done incorrectly, can lead to serious deficiency. This results in an equity issue when resources are not available in languages other than English.

“For some of them [FCCH providers], they have to engage their grandkids or their kids to help them input their meals and snacks every day, and sometimes we've found that that leads to discrepancies and misalignment between meals and children that were actually served versus what was recorded. We also see that with the language barrier too... if they don't speak and read English, and are also not tech savvy, they'll usually have a partner or someone else do it, which again, leads to those errors and non-compliance.”

- FCCH Sponsor B

Serious Deficiency is subjective, unclear and time-consuming for sponsors. Sponsors perceive the serious deficiency process to be subjective, unclear and time-consuming, and request the USDA revise the process.

“The way that process [serious deficiency] is set up is very not user friendly. It's very subjective. It's not clear. It's difficult. It's time consuming, and it really needs a rework... as a sponsor who has to take those steps and

administer those processes, it's not good. It's not a good process at all.”

- FCCH Sponsor C

CONCLUSION

CACFP sponsors perceive the CACFP serious deficiency process as a hindrance to program participation because it is too harsh, creates equity issues for providers whose first language is not English and creates challenges for sponsors due to the lack of clarity, subjectiveness and time-consuming nature of the serious deficiency process.

RECOMMENDATIONS

The USDA should consider revising the serious deficiency process to better support childcare providers and sponsors in order to improve CACFP participation and retention.

References: [1] Larson N, et. al. What role can child-care settings play in obesity prevention? A review of the evidence and call for research efforts. *J Am Diet Assoc.* 2011;111:1343-1362. [2] USDA Food and Nutrition Services, Child and Adult Care Food Program, available online at <https://www.fns.usda.gov/cacfp>. Accessed on 23 May 2024. [3] Ritchie LD, et al. Participation in the Child and Adult Care Food Program is associated with more nutritious foods and beverages in child care. *Child Obes.* 2012;8:224-229. [4] Gurzo K, et al. Child care sites participating in the federal Child and Adult Care Food Program provide more nutritious foods and beverages. *J Nutr Educ Behav.* 2020;52:697. [5] Heflin C, et. al. The Child and Adult Care Food Program and food insecurity. *Soc Serv Rev.* 2015;89:77-98. [6] Jana B, et. al. "It Has a Lot to Do With the Cumbersome Paperwork": Barriers and Facilitators of Center-Based Early Care and Education Program Participation in the Child and Adult Care Food Program. *J Acad Nutr Diet.* 2023;123(8):1173-1186.e1. [7] Issue Brief: Serious Deficiency in the CACFP. CACFP Roundtable. March 2024. [8] Serious Deficiency Process in the Child and Adult Care Food Program and Summer Food Service Program, 89 Fed. Reg. 13,150 (February 21, 2024) (to be codified at 7 C.F.R. Parts 210, 215, 220, 225, and 226). [9] This was part of a larger research study to evaluate the impacts of COVID-19 pandemic-related CACFP reimbursement changes. [10] Foley G, et. al. Using Grounded Theory Method to Capture and Analyze Health Care Experiences. *Health Serv Res.* 2015;50:1195–1210. **Photo credit:** USDA.

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