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Food Nutrition Service
United States Department of Agriculture
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Alexandria, VA 22314
Submitted via www.regulations.gov



The CACFP Roundtable appreciates the opportunity to submit comments to the U.S. Department of Agriculture's Food and Nutrition Service related to Agency Information Collection: Family Day Care Home Participation Study in the Child and Adult Care Food Program (CACFP).

The CACFP Roundtable is a nonprofit organization that works directly with the CACFP community to support equitable access to the nutrition program and to foster a community of leaders. We respectfully submit the following comments:

Whether the proposed collection of information is necessary for the proper performance of the functions of the agency, including whether the information shall have practical utility.

The CACFP Roundtable supports the efforts of USDA to better understand the experience of family child care providers' participation or lack thereof in the CACFP. A better understanding of the challenges in participation creates opportunities for policies that could increase access to the meals served through CACFP to children in family child care homes.

Accuracy of the agency's estimate of the burden of the proposed collection of information, including the validity of the methodology and assumptions that were used

Stipends for Participation

The CACFP Roundtable supports USDA's efforts to minimize the burden of the study on state agencies, CACFP Sponsors and family child care provider study participants. The CACFP Roundtable strongly recommends valuing the time the family child care providers will spend providing USDA with the desired information and compensating participants for their time with stipends.

Previously participating family child care provider data

CACFP Roundtable recommends not only relying on CACFP Sponsor data when seeking contact information from providers who participated in the CACFP prior to 2019. USDA should consider working with child care resource and referral agencies, state licensing agencies and/or family child care associations.

Outreach Resources for CACFP Sponsors

The CACFP Roundtable recommends the USDA FNS and the researchers conducting the study be aware of the burden of outreach to family child care homes on the CACFP Sponsors. Outreach materials about the survey to assist the CACFP Sponsors as they work to engage family child care homes for participation in the survey will reduce the burden as well as strengthen the efforts and reach of the survey.

Ways to enhance the quality, utility, and clarity of the information to be collected

Language Justice

In order to get a complete and accurate view of the experiences of family child care providers throughout the nation, the study should be conducted in *multiple* languages reflecting the diversity of communities and cultures that family child care providers serve. Investigating the language and cultural barriers to the CACFP by family child care providers who speak languages in addition to English and Spanish is absolutely necessary to capture fair, accurate, and meaningful data.

Barriers by Region

The CACFP Roundtable often hears anecdotes about the differences in participating in the CACFP based on where in the nation one works and lives; even within states, the diversity by region can be significant. We encourage the researchers to stratify their findings by urbanicity, congressional districts, and other regional factors.

Providers who have never been on the CACFP

CACFP Roundtable recommends that USDA include family child care providers in the study who have never participated in the CACFP and do not intend to participate. This perspective could help USDA understand the challenges of messaging, misconceived notions or policies that could be revisited to increase access to the CACFP for children and families of family child care providers who choose not to participate.

CACFP Roundtable commends the USDA for its efforts to explore and understand the barriers of participation in the CACFP for family child care providers. Please contact Samantha Marshall, samantha@ccfproundtable.org, with any questions or requests for additional information.

Respectfully,



Samantha Marshall
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CACFP Roundtable