

## SUMMARY

State agencies play a crucial role in expanding access to afterschool meals and snacks. State agency staff are critical gatekeepers and sources of information. How state agencies structure the staff who work on child nutrition programs influences how organizations learn about, apply for, and operate the afterschool nutrition programs. Based on interviews with 46 state agency officials and information from nearly every state, this report explores differences in administration across the country and the impact on the administration of child nutrition programs. As elected officials, policy makers, and state agency leaders have the opportunity to reconsider the operation of these programs to increase participation and achieve greater efficiencies, this information can provide new ideas and foster connections between states.

## UPDATE

This report was initially released in April 2017. As of 2019, several changes in state agency staffing are known to have occurred: Maine moved the administration of the Child and Adult Care Food Program (CACFP) to the Department of Education, and Virginia moved both the Summer Food Service Program and the At-Risk Afterschool component of the CACFP to the Department of Education. Other changes may have occurred as well. Other than Appendix 1, the report as follows does **not** reflect any changes and otherwise appears as it did originally.

## OVERVIEW

Afterschool nutrition programs are a vital source of support for kids and teens, low-income families, and afterschool enrichment programs. However, far too few children struggling with hunger have access to an afterschool meal: for every 100 free or reduced-price school lunches served to kids in need, there were less than five afterschool meals served in fiscal year 2016. Even when considering afterschool meals and snacks combined, only one was served for about every nine free or reduced-price lunches.<sup>1</sup> No Kid Hungry is committed to reducing barriers and increasing participation in afterschool meal and snack programs so that children have the nutrition they need to grow, learn, and play after school. Among the barriers are limited information, assistance, and streamlined processes for schools and other organizations that could reach more kids. No Kid Hungry encourages high-level support from both federal and state officials to further collaboration in order to build capacity and promote program utilization.

## AFTERSCHOOL SNACK AND MEAL PROGRAMS

The At-Risk Afterschool Meals component of the Child and Adult Care Food Program (CACFP), or Afterschool Meals Program, grew out of National School Lunch Program (NSLP) Area-Eligible Snacks and CACFP At-Risk Afterschool Snacks, both of which were authorized by Congress in 1998. NSLP Area-Eligible Snacks were intended for schools and school-sponsored locations, while CACFP At-Risk Afterschool Snacks were intended for community-based organizations. In some respects, these free snack programs were extensions of existing

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<sup>1</sup> Based on calculations using data retrieved from the US Department of Agriculture National Data Bank in January 2017 and data accessed on the USDA website in February 2017.

options within the NSLP and CACFP that provide reimbursement to afterschool programs according to each child's household income eligibility.

Congress authorized pilots to allow afterschool programs in selected states to serve full, five-item meals beginning in 2000. This funding was only available through the CACFP, regardless of whether the meals were served by a school or community-based organization. This held true when Congress made the Afterschool Meals Program permanent and nationwide in 2010. The ability to serve afterschool snacks still exists through both the NSLP and CACFP.

More details on the history of these afterschool nutrition programs is in the report brief, [To Meet Need, Growth in Afterschool Snacks and Meals Must Continue: A Report on History and Trends.](#)

Organizations that operate or want to operate the Afterschool Meals Program often run other child nutrition programs. Such organizations must navigate different regulations for each program and often different management at the state level. In response, the US Department of Agriculture (USDA) issued several memoranda to promote streamlining and simplification for schools that also participate in the NSLP as well as for organizations that participate in another child nutrition program, the Summer Food Service Program (SFSP). The SFSP allows both schools and community organizations to provide meals to children in low-income areas when school is not in session. While these memoranda acknowledge differences in administration and management across the country, to date there has not been a comprehensive examination of these differences.

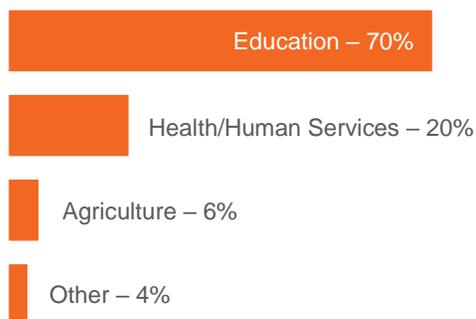
## CHILD NUTRITION PROGRAM ADMINISTRATION

The CACFP is administered at the federal level by the Policy and Program Development Division within the USDA Food and Nutrition Service. USDA staff in the national and regional offices guide and oversee state implementation. In more than two-thirds of states and territories, the education department administers the CACFP, but about 20 percent of states house it within the department of health or human services and the remainder within the state department of agriculture or another agency. In many cases, when the CACFP is housed within the department of health or human services or another

agency, it is the same agency that issues child care licenses, which can help create a streamlined user experience for care providers. In two states, Florida and Illinois, a separate agency administers just the Adult Day Care component of the CACFP in addition to the agency counted above as the host agency. Although the mission, priorities, and leadership of the host agency may impact the CACFP staff, regardless of where the program is housed, they are responsible for processing applications for prospective participants, providing training, making payments, and monitoring compliance.

The NSLP is also administered federally by the USDA Food and Nutrition Service's Policy and Program Development Division but by a separate team. In most states, the state department of education administers it, although some states designate another agency, like the state department of agriculture. Similar to the CACFP staff, the NSLP staff at state agencies processes applications from schools that wish to participate, provides training, issues reimbursement payments, and monitors compliance. The School Breakfast Program is typically administered in the same manner by the same staff.

### CACFP Host Agency Across States



Thirty-seven states plus the District of Columbia, the Virgin Islands, and Puerto Rico house the NSLP and CACFP together in the same agency along with SFSP. In six states, the CACFP and SFSP are in the same designated agency while the NSLP is housed separately. In seven states, the NSLP and SFSP are together in the same agency while the CACFP is located in another agency. Appendix A shows the host agency for each program in every state and territory.

### Number of States Where Child Nutrition Programs Are Co-Located



Whether these programs are housed together or in separate agencies can impact several key aspects of administration, including allocation and use of state administrative expense funds, staffing structure, and computer systems for applications, reporting, and payment processing. For example, if the programs are within the same agency, it is more likely that they can pool state administrative expense funds from the USDA to pay for expensive products or services that benefit all programs, such as upgrades to computer systems. However, pooling these funds could also mean that one program or another does not see the full value of the state administrative expense funds in the same way that it would if it received the funds separately in another agency. If all three nutrition programs are housed within the same agency, it is often easier to share application information so that an organization that participates in multiple programs does not need to resubmit the same documents. Housing all of the programs together does not guarantee collaboration and streamlined operations, nor is housing the programs separately an insurmountable barrier, but there are implications for where the programs start the process of collaboration and streamlining.

## STATE AGENCY INTERVIEWS

To learn more about how state agencies are administering the Afterschool Meals Program, No Kid Hungry conducted interviews with 46 agency officials throughout late 2015 and early 2016.<sup>2</sup> Interviews were typically with the CACFP staff manager but were sometimes with a higher-level official, a specialist who works with Afterschool Meals Program participants, or multiple staff members. The interviews covered topics such as the division of various administrative responsibilities across the CACFP and other child nutrition program staff, collaboration across child nutrition programs, application processes, and data systems.

### Staffing Across Child Nutrition Programs

These interviews revealed a diversity of approaches to structuring the staff who administer the CACFP and other child nutrition programs. In some respects, no state is the same. Moreover, staffing structure looks dramatically different in small states with one or two staff members for each program when compared to large, populous states with dozens of staff members. However, five major categories of staffing patterns emerged:

1. The CACFP is in a separate agency from both SFSP and NSLP, so there is a completely separate staff for all aspects of CACFP administration.
2. The CACFP is in the same agency as SFSP and/or NSLP, but there is limited integration in staffing across programs.

<sup>2</sup> No interviews were done with representatives from the District of Columbia, Hawaii, Kentucky, New Jersey, or Tennessee. The District of Columbia, Hawaii, and New Jersey later contributed to this report, and information known about Tennessee was included where possible. Puerto Rico and other territories are not addressed beyond the program host agencies.

3. The CACFP and SFSP staff are integrated to some degree.
4. The CACFP, SFSP, and NSLP staff are integrated to some degree.
5. The CACFP, SFSP, and/or NSLP have specialized office staff but shared field staff who conduct monitoring visits and administrative reviews for all programs.

It was also clear through the interviews that staffing patterns often shift over the years as workloads change or staff members retire, opening up opportunities to reconsider job roles or simply requiring experienced staff to cover certain responsibilities. In some cases, the programs were moved into other agencies, providing new support staff or options for restructuring. The information here reflects the staffing pattern reported during the interview and confirmed or updated for the publication of this report brief. Three states reported making some changes to the staffing structure since the initial interviews, and another reported plans to change.

### CACFP in a Separate Agency

The seven states in which the designated state agency for the CACFP is different than both the NSLP and SFSP are:

- Colorado
- Florida
- Maine
- Montana
- New York
- North Carolina
- South Carolina

As noted earlier, housing the CACFP in a separate agency does not preclude collaboration and streamlining. For example, the agency that administers the NSLP and SFSP in Florida gave the CACFP staff viewing privileges for their application system such that the CACFP staff does not need to request certain information when NSLP or SFSP participants apply for the Afterschool Meals Program. Colorado is exploring a shared computer system for all of the programs across both agencies. In 2016, North Carolina made strides in the inter-agency collaboration effort and formalized the responsibilities of each agency in promoting and administering Afterschool Meals for schools through a memorandum of agreement. The state of Maine is currently planning to consolidate the state agencies in 2017.

### CACFP in the Same Agency as SFSP and/or NSLP with Limited Staff Integration

In 12 states, the CACFP is administered by the same designated agency as one or both other child nutrition programs, but the CACFP staff operates fairly independently. Many agencies do have shared support staff for functions like information technology or accounting. The programs usually operate under common leadership at some level but with a separate CACFP manager and staff.

The 12 states in this group are:

- Arkansas
- Connecticut
- District of Columbia
- Hawaii
- Indiana
- Louisiana
- Michigan
- New Hampshire
- New Jersey
- Vermont
- Washington
- Wyoming

Again, collaboration and streamlining are still possible with separate teams for each child nutrition program. Many of these states have taken steps to shorten the application process for SFSP and NSLP participants as well as conduct coordinated outreach. In Wyoming, the only Afterschool Meals Program participant is a school,

so the NSLP lead actually oversees it. Similarly, NSLP specialists in Washington include Afterschool Meals in their school reviews, and the CACFP specialist in Hawaii helps with SFSP site reviews when needed for large sponsors. Michigan plans to increase staff integration by having CACFP specialists begin assisting with SFSP compliance monitoring in addition to conducting cross-program procurement reviews. In contrast, the District of Columbia reduced staffing integration when the SFSP workload grew and required a year-round specialist.

### CACFP and SFSP Integrated to Some Degree

In many states, the CACFP and SFSP are housed within the same agency, and the programs have some degree of overlap in administration. This ranges from having separate managers for each program but sharing the work of compliance reviews and nutrition training, as in the case of New Mexico, to having a designated specialist work with organizations participating in both programs, to having a fully integrated, functionally-specialized staff working on both programs.

The 10 states in this group are:

- Alaska
- Arizona
- Georgia
- Mississippi
- Nevada
- New Mexico
- Oregon
- Tennessee
- Virginia
- Wisconsin

Having one or more staff members work with both SFSP and CACFP sponsors is the most common arrangement. In many cases, this was a relatively recent change as states recognized the natural overlap between the programs. Usually, the cross-program staff handles most administrative duties for a group of participants. In Georgia, Tennessee, and Virginia, the staff duties are primarily organized according to function rather than by program or participant. As with other staffing patterns, collaboration can still occur; although the NSLP staff in Oregon operates separately under another manager, they do SFSP reviews during the summer.

### CACFP, SFSP, and NSLP Integrated to Some Degree

In addition to integrating the CACFP and SFSP, 14 states have also taken steps to integrate NSLP.

The 14 states in this group are:

- Delaware
- Idaho
- Iowa
- Kansas
- Maryland
- Massachusetts
- Minnesota
- Nebraska
- North Dakota
- Ohio
- Rhode Island
- Texas
- Utah
- West Virginia

Of this group, Maryland, Ohio, and West Virginia are the most heavily integrated. In Maryland, the staff specialize by function, such as program administration, finance, training, and compliance monitoring. In West Virginia and Ohio, staff members have some programmatic specialization or other expertise, but they administer all three programs in an assigned region. Other states have a range of methods, from a mix of specialization by function, region, and program in Texas to a collaborative, cross-trained staff under a single manager in Delaware. North Dakota has a separate manager for CACFP and another for NSLP and SFSP along with field staff who conduct training and compliance reviews for all programs. Iowa recently moved from having a shared monitoring staff across all three programs to having specialists work on either one program or different

combinations of two programs out of the three. Similarly, Nebraska has program-specific leads but additional specialists who work across programs. Utah recently placed oversight of NSLP Afterschool Snacks under the CACFP and SFSP manager so that all out-of-school-time programs have a single contact.

### Specialized Office Staff but Shared Monitoring Staff with SFSP and/or NSLP

Seven states have specialists administer the CACFP but deploy field staff who conduct compliance reviews for multiple programs. The field staff is typically assigned to a geographic area such that an organization that participates in multiple programs would work with one field staff member. These states may also have central office clerical or accounting staff with responsibilities across programs.

The seven states in this group include:

- Alabama
- California
- Illinois
- Missouri
- Oklahoma
- Pennsylvania
- South Dakota

Since the NSLP is in a separate agency in Missouri, this only applies to the CACFP and SFSP.

Collaboration across programs at the administrative level occurs to varying degrees. For example, the SFSP and CACFP Afterschool Meals leads in Alabama work closely on application streamlining and outreach while the NSLP staff works more independently.

### CACFP Staff Specialization

Just as there are many systems for structuring staff roles across child nutrition programs, the interviews showed that there are numerous approaches to distributing responsibilities within the CACFP or Child Nutrition staff. Most states have one or more elements of specialization by function, region, or program sub-component, like Afterschool Meals or Family Day Care Homes. About a dozen states have limited staff specialization beyond shared support staff like claims processing or accounting, and those are mainly smaller or less populous states.

The most common functional specialization is compliance reviews or monitoring: eighteen states reported having staff responsible for conducting reviews, usually with limited additional duties. However, a few states have much more extensive functional specialization with positions in areas like nutrition education, training, outreach, policy, and financial oversight of CACFP participants.

Regional specialization or assignments are most common when there is a separate monitoring team, whether for the CACFP alone or multiple programs. About ten states have regional offices or assignments for additional teams or the entire staff.

Family Day Care Homes is the most common sub-component specialization. Twelve states reported that at least one dedicated staff member focuses on administration and/or monitoring for homes, and an additional six states said that a staff member has additional responsibilities or a lead role related to homes.

Only two states specifically mentioned having a dedicated staff member for the Afterschool Meals Program. Six additional states said that a staff member has additional responsibilities or a lead role related to Afterschool Meals, and seven have staff members dedicated to working on both SFSP and CACFP, which usually entails

working with Afterschool Meals Program participants. Oregon reported that there used to be a designated Afterschool Meals lead during the period of program initiation and rapid expansion following the authorization of the pilot in 2000, but the staff had since moved to a more generalist approach. The agency currently has state funding for a part-time staff member to focus on outreach for both CACFP Afterschool Meals and SFSP.

### **Child Nutrition Program Streamlining and Outreach Efforts**

Although the interviews were not focused on the issue of program streamlining efforts, several aspects of this work became evident in the course of questions regarding staffing and collaboration across programs, application processes, and computer systems.

More than half of states interviewed said that there is some kind of information and document sharing between the CACFP and SFSP, such as only requiring a single submission of a document needed for both applications. Several others said that there is limited or informal information sharing. A few noted that they found sharing documents to be more work than it is worth, especially since the supporting documents submitted for the SFSP application could be outdated by the time the organization starts Afterschool Meals.

It is slightly less common for document sharing to occur between the CACFP and NSLP, likely since it is less common to house the programs in the same agency. However, more states said that they had undertaken simplification or streamlining efforts for schools applying for Afterschool Meals than for SFSP sponsors. Several other states said that schools are relatively new to the CACFP, so they are just beginning work on streamlining.

Application and claims processing systems appear to be a major barrier to streamlining. Many systems were designed prior to the implementation of the Afterschool Meals Program and subsequent streamlining measures, and updating or replacing technology is expensive and time-consuming. Most reported that they cannot share data across program-specific modules or waive duplicative sections. Since approval and payment often rely on complete modules, applicants must reenter information. Sometimes program-specific staff cannot view information or documents submitted to a module for another program, even within the same system. To address this concern, some states have given viewing privileges to staff from other programs, and a few have improved their systems to facilitate information sharing and minimize redundant submissions. Many noted that information does at least stay in the system from year to year, so the heavy lift is only during the initial application process.

States reported limited formal collaboration on compliance reviews, mainly due to differing review cycles and schedules. Conducting a comprehensive financial review for schools was most commonly noted, and other states were aware of the need to begin doing this. Some states offered schools the option for a fully combined NSLP and CACFP compliance review but found that schools often prefer them to be separate. Other states found that combined reviews do not save a significant amount of time, or that the organization's staff for the CACFP Afterschool Meals Program is often different from the staff responsible for the NSLP or SFSP.

The majority reported some form of outreach or cross-promotion with the SFSP and/or NSLP, but the type and extent varied from a one-time mailing to ongoing, multi-channel marketing efforts. States' outreach methods include webinars for schools or SFSP sponsors, paper or electronic mailings, announcements in newsletters aimed at NSLP and SFSP participants, presenting at trainings or meetings for NSLP and SFSP participants, and having a booth or presenting at state school nutrition association or afterschool association meetings. A few states rely primarily on informal outreach efforts. A few also noted that their limited staff time for outreach meant that they rely on non-profit partners to take over this role or extend their efforts. Others realized that there is a potential for growth in Afterschool Meals and hope to start engaging in outreach.

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## CONCLUSION

There are many different approaches to structuring the staff within and across child nutrition programs, which has implications for program administration and particularly for organizations participating in multiple programs. There is no one-size-fits-all staffing approach as states seek to balance the need for deep programmatic and functional knowledge with the relationships and consistency that come from working with sponsors across programs, all within the unique context of their host agency, geography, and size. Regardless of the staffing structure, states should ensure that the staff works collaboratively to maximize opportunities for outreach and training as well as supporting strong sponsors. This brief can help states identify opportunities to make improvements that work for their budget and host agency. Similarly, states can better identify peers who can share the pros and cons of changing the staffing structure. States could also connect with others that have a similar structure in order to share ideas on implementing existing streamlining options and fostering deeper partnership within their current staffing structure. Many states have taken steps to restructure the staff or streamline the programs, but there are still many untapped opportunities that would help to improve and expand afterschool snack and meal programs through better coordinated outreach, consistent messaging and training, simplified applications, and streamlined administration.

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## Appendix 1: Designated Agency for NSLP, CACFP, and SFSP in Each State and Territory

The table lists the category of department first, and if the actual name of the agency within the state is different, the actual name is listed after in parentheses and italics.

State	NSLP State Agency	CACFP State Agency	SFSP State Agency
Alabama	Education	Education	Education
Alaska	Education ( <i>Education &amp; Early Development</i> )	Education ( <i>Education &amp; Early Development</i> )	Education ( <i>Education &amp; Early Development</i> )
Arizona	Education	Education	Education
Arkansas	Education	Health & Human Services ( <i>Human Services</i> )	Health & Human Services ( <i>Human Services</i> )
California	Education	Education	Education
Colorado	Education	Public Health & Environment	Education
Connecticut	Education	Education	Education
Delaware	Education	Education	Education
District of Columbia	Education ( <i>Office of the State Superintendent of Education</i> )	Education ( <i>Office of the State Superintendent of Education</i> )	Education ( <i>Office of the State Superintendent of Education</i> )
Florida	Agriculture ( <i>Agriculture &amp; Consumer Services</i> )	Health & Human Services ( <i>Health</i> ) <sup>3</sup>	Agriculture ( <i>Agriculture &amp; Consumer Services</i> )
Georgia	Education	Early Care and Learning	Early Care and Learning
Guam	Education	Education	N/A
Hawaii	Education	Education	Education
Idaho	Education	Education	Education
Illinois	Education ( <i>State Board of Education</i> )	Education ( <i>State Board of Education</i> ) <sup>4</sup>	Education ( <i>State Board of Education</i> )
Indiana	Education	Education	Education
Iowa	Education	Education	Education
Kansas	Education	Education	Education
Kentucky	Education	Education	Education
Louisiana	Education	Education	Education
Maine	Education	Education <sup>5</sup>	Education
Maryland	Education	Education	Education
Massachusetts	Education ( <i>Elementary &amp; Secondary Education</i> )	Education ( <i>Elementary &amp; Secondary Education</i> )	Education ( <i>Elementary &amp; Secondary Education</i> )
Michigan	Education	Education	Education
Minnesota	Education	Education	Education
Mississippi	Education	Education	Education
Missouri	Education ( <i>Elementary &amp; Secondary Education</i> )	Health & Human Services ( <i>Health &amp; Senior Services</i> )	Health & Human Services ( <i>Health &amp; Senior Services</i> )

<sup>3</sup> The Adult Day Care component of the CACFP is administered through the Department of Elder Affairs.

<sup>4</sup> The Adult Day Care component of the CACFP is administered through the Department on Aging.

<sup>5</sup> Changed since report originally released in 2017

State	NSLP State Agency	CACFP State Agency	SFSP State Agency
Montana	Education ( <i>Office of Public Instruction</i> )	Health & Human Services ( <i>Public Health &amp; Human Services</i> )	Education ( <i>Office of Public Instruction</i> )
Nebraska	Education	Education	Education
Nevada	Agriculture	Agriculture	Agriculture
New Hampshire	Education	Education	Education
New Jersey	Agriculture	Agriculture	Agriculture
New Mexico	Education ( <i>Public Education Department</i> )	Children, Youth, & Families	Children, Youth, & Families
New York	Education	Health & Human Services ( <i>Health</i> )	Education
North Carolina	Education ( <i>Public Instruction</i> )	Health & Human Services	Education ( <i>Public Instruction</i> )
North Dakota	Education ( <i>Public Instruction</i> )	Education ( <i>Public Instruction</i> )	Education ( <i>Public Instruction</i> )
Ohio	Education	Education	Education
Oklahoma	Education	Education	Education
Oregon	Education	Education	Education
Pennsylvania	Education	Education	Education
Puerto Rico	Education	Education	Education
Rhode Island	Education	Education	Education
South Carolina	Education	Health & Human Services ( <i>Social Services</i> )	Education
South Dakota	Education	Education	Education
Tennessee	Education	Health & Human Services ( <i>Human Services</i> )	Health & Human Services ( <i>Human Services</i> )
Texas	Agriculture	Agriculture	Agriculture
Utah	Education ( <i>State Board of Education</i> )	Education ( <i>State Board of Education</i> )	Education ( <i>State Board of Education</i> )
Vermont	Education	Education	Education
Virginia	Education	Health & Human Services ( <i>Health</i> ) <sup>6</sup>	Education <sup>6</sup>
Virgin Islands	Education	Education	Education
Washington	Education ( <i>Office of the Superintendent of Public Instruction</i> )	Education ( <i>Office of the Superintendent of Public Instruction</i> )	Education ( <i>Office of the Superintendent of Public Instruction</i> )
West Virginia	Education	Education	Education
Wisconsin	Education ( <i>Public Instruction</i> )	Education ( <i>Public Instruction</i> )	Education ( <i>Public Instruction</i> )
Wyoming	Education	Education	Education
American Samoa	Education	N/A	N/A

<sup>6</sup> Since this report was initially released in 2017, the At-Risk Afterschool component of the CACFP and the SFSP moved to the Department of Education. The other components of the CACFP are still administered by the Department of Health.

## Appendix 2: Staffing Structure by State

State	Separate CACFP Agency	Limited CACFP Integration	CACFP-SFSP Integration	CACFP-SFSP-NSLP Integration	Program Specialists / Cross-Program Monitors
Alabama					X
Alaska			X		
Arizona			X		
Arkansas		X			
California					X
Colorado	X				
Connecticut		X			
Delaware				X	
District of Columbia		X			
Florida	X				
Georgia			X		
Hawaii		X			
Idaho				X	
Illinois					X
Indiana		X			
Iowa					
Kansas				X	
Louisiana		X			
Maine <sup>7</sup>	X				
Maryland				X	
Massachusetts				X	
Michigan		X			
Minnesota				X	
Mississippi			X		
Missouri					X
Montana	X				
Nebraska				X	
Nevada			X		
New Hampshire		X			
New Jersey		X			
New Mexico			X		
New York	X				
North Carolina	X				
North Dakota				X	
Ohio				X	

<sup>7</sup> The type of staffing structure has NOT been updated since the CACFP changed agency.

State	Separate CACFP Agency	Limited CACFP Integration	CACFP-SFSP Integration	CACFP-SFSP-NSLP Integration	Program Specialists / Cross-Program Monitors
Oklahoma					X
Oregon			X		
Pennsylvania					X
Rhode Island				X	
South Carolina	X				
South Dakota					X
Tennessee			X		
Texas				X	
Utah				X	
Vermont		X			
Virginia <sup>8</sup>			X		
Washington		X			
West Virginia				X	
Wisconsin			X		
Wyoming		X			
<b>Total States</b>	<b>7</b>	<b>12</b>	<b>10</b>	<b>14</b>	<b>7</b>



This series of report briefs has been made possible through the generous support of our innovation partner, Tyson Foods, Inc.

<sup>8</sup> The type of staffing structure has NOT been updated since the CACFP At-Risk component and SFSP changed agency.