

Moving and Consolidating Child Nutrition Program State Agencies

A Report on the Rationale and Process



SUMMARY

Several states have changed or consolidated the agencies that administer various nutrition assistance programs. In seven states, these changes have involved the child nutrition programs. This report summarizes these changes as well as the various reasons for them, which range from concerns around nutrition to promoting state agriculture to streamlining administration to increasing program participation, or some combination of those factors. This report also examines the methods for making these changes and the considerations involved in effective implementation. It is important to note that consolidating the child nutrition programs from multiple agencies into one agency is relatively rare, so it is still difficult to assess the impact. Most of the changes that have occurred to date have simply been moves to a different agency or consolidations of the child nutrition programs with food distribution and commodity programs. Regardless of the type of change, there has been limited examination of the costs and benefits associated with them. Based on research and interviews with officials and advocates familiar with the changes in these seven states, a variety of advantages as well as potential difficulties emerged. Due to the time and expense involved in any agency change, this decision should not be taken lightly. Moreover, agency and program leaders inevitably leave, so it is important to consider whether changes motivated and made by particular leaders could be sustained despite eventual transitions. Still, changing or consolidating agencies has the potential to enhance, streamline, and expand the child nutrition programs, particularly when other efforts to improve leadership and facilitate collaboration have not yielded the desired results.

OVERVIEW

The National School Lunch Program (NSLP), School Breakfast Program (SBP), Summer Food Service Program (SFSP), and Child and Adult Care Food Program (CACFP) are all crucial sources of support for children and families struggling with hunger. Together, these programs reach children year-round at their schools, child care providers, afterschool programs, and other locations throughout their communities, like libraries and recreation centers. Although the programs have a similar goal of nourishing hungry kids and serve many of the same children through the same institutions, each has slightly different objectives, target audiences, eligibility requirements for participating organizations, and other regulations. In some states, these programs may even be administered by different agencies. No Kid Hungry encourages high-level support from both federal and state officials to further collaboration in order to streamline operations, build capacity, and promote program utilization. One possibility for achieving these goals is changing which state agency administers one or more child nutrition programs or consolidating multiple programs into a single agency.

USDA NUTRITION PROGRAMS

Before considering the NSLP, SBP, SFSP, and CACFP specifically, it is important to note that these are just four of many [nutrition assistance programs](#) administered through the US Department of Agriculture's Food and Nutrition Service. In addition to the four child nutrition programs listed above, there is the Fresh Fruit and Vegetable Program (FFVP) and Special Milk Program, not to mention various program sub-components to the

NSLP and CACFP. There are also food distribution programs that provide commodity foods to organizations like food banks or Indian Tribal Organizations for allotment to charities or eligible individuals. In addition, there is a food distribution component to the child nutrition programs. Finally, there are programs like the Supplemental Nutrition Assistance Program (SNAP) that provide benefits directly to eligible consumers rather than schools or other organizations.

Although these programs are all administered by the USDA at the federal level, each state designates an agency to administer each program. Given the diversity of operational requirements as well as audiences served by these programs – both the eventual beneficiary and the organization or person who interfaces with the state agency – it is unsurprising that states have selected different host agencies for some of these programs rather than housing them all together.

CHILD NUTRITION PROGRAM STATE AGENCIES

There are numerous approaches to running the child nutrition programs across the country. One aspect of the approach is selecting the host agency for each program.

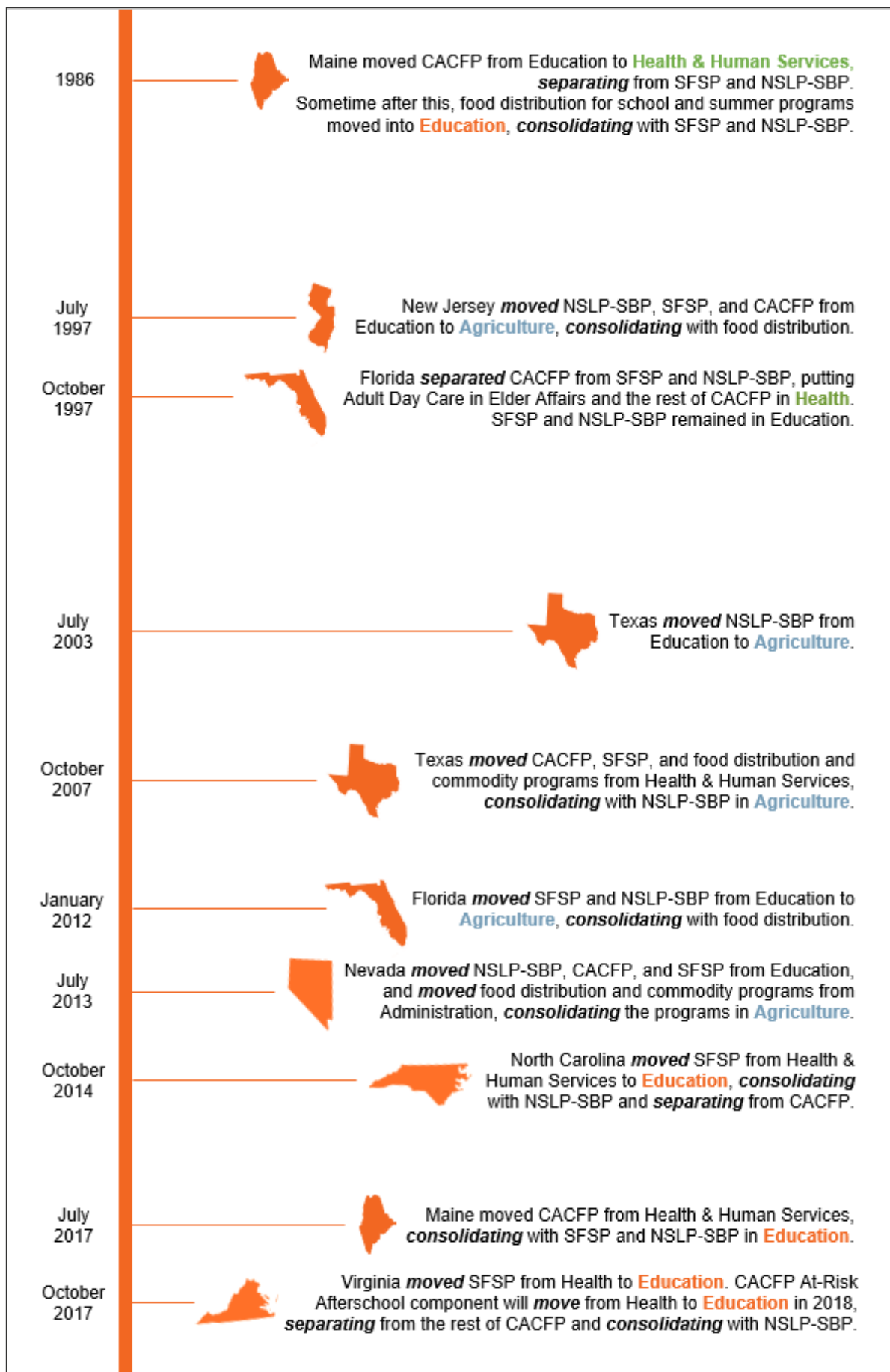
The mission, leadership, culture, and characteristics of the host agency may affect child nutrition program operations. For example, the budget and staff size of the child nutrition program relative to other programs in the agency may affect the level of attention it receives from senior leadership, as might the senior leadership's perception that administering the child nutrition program is a core function that contributes to the agency's mission. The overall size of the host agency may also affect the resources and support available to the child nutrition programs, such as administrative staff or facilities. Additionally, whether the child nutrition programs are run out of the same agency or separate agencies may impact the total administrative funding available as well as the nature of collaboration and streamlining between the child nutrition programs. Some areas for collaboration, like data sharing and joint procurement for technology, may require high-level buy-in from both agencies. However, the host agency may also facilitate or create barriers to other types of collaboration, such as with child care licensing officials or health officials who inspect food preparation sites. Because of these influences, some states have sought to change the agency that administers one or more child nutrition programs or combine multiple programs into a single agency.

The Richard B. Russell National School Lunch Act requires state education agencies to administer the NSLP. States that wish to place the NSLP in another agency must obtain a formal waiver from the USDA. The waiver request must specify the barriers to effective administration by the state education agency and how services would be improved, without additional cost, by the new agency. Once approved, the waiver must still be periodically reviewed and renewed. On the other hand, the authorizing legislation and regulations for the CACFP and SFSP do not specify the state agency, so states are free to choose the host agency and face fewer restrictions on changing it.

State Agency Changes to Date

This report focuses on the seven states detailed on the following pages that have changed the administering agency for one or more child nutrition programs¹. For more details, see the appendix at the end of this report.

¹ Illinois and Florida house the Adult Day Care component of the CACFP in a separate agency. This report will not address the administration of the CACFP's Adult Day Care component except as it relates to child nutrition programs.



- During agency restructuring in 1986, the CACFP was moved from **Maine**'s education agency to the Department of Health and Human Services. Food distribution for schools and summer programs moved into the education agency sometime after this; other food distribution programs are in the Department of Agriculture, Conservation and Forestry. In 2017, the CACFP was returned to the state education agency where it could join the other child nutrition programs.
- **New Jersey** consolidated in 1997, moving the child nutrition programs from the state education agency and combining them with commodity food distribution in the New Jersey Department of Agriculture.
- In 1997, **Florida** moved the CACFP from the state education agency, splitting it into the Child Care Food Program, housed in the Department of Health, and the Adult Care Food Program, housed in the Department of Elder Affairs. In 2011, Florida moved the NSLP, SBP, and SFSP from the state education agency and consolidated them with food distribution programs in the Department of Agriculture and Consumer Services. The CACFP remained split in the other two agencies.
- The NSLP and SBP moved from the **Texas** Education Agency (TEA) to the Texas Department of Agriculture (TDA) in 2003. The other child nutrition and food distribution programs moved to TDA from the Health and Human Services Commission (HHSC) in 2007. HHSC, not TEA, had administered the NSLP in residential child care institutions and private schools, and it did so until the 2007 consolidation.
- **Nevada** consolidated its child nutrition programs with commodity food distribution programs from two separate agencies into the agriculture department in 2013. The state's dairy commission was moved from a third agency into the agriculture department at the same time.
- In 2014, **North Carolina** moved the SFSP to the state education agency from the Department of Health and Human Services, where the CACFP remains housed.
- **Virginia** moved the SFSP to the state education agency in 2017. Virginia also directed the transfer of the CACFP's At-Risk Afterschool Meals component to the state education agency while leaving the rest of the CACFP in the Department of Health. That move is expected to occur in the spring of 2018.

Rationale for Changes

There were often a variety of reasons behind the decision to move or consolidate child nutrition programs. The reasons most often cited were streamlining administration, both to increase the agency's efficiency and ease the burden on participating organizations, promoting local agriculture, improving the nutritional quality of meals, and increasing program participation.

Linking Programs with Food Distribution and Supporting Local Agriculture

In Florida's second move as well as in New Jersey and Nevada, streamlining the child nutrition programs with food distribution programs and promoting local agricultural products in the child nutrition programs were among the primary reasons. Streamlining with food distribution programs was an initial goal in Virginia's consideration of consolidation, but that was ultimately abandoned in favor of a simplified transition process.

Simplifying Administration

Simplifying and streamlining administration of the programs was a key element in the decision to change agencies in Virginia and Maine. Virginia's goal was specifically to reduce the burden on schools participating in the SFSP and CACFP At-Risk Afterschool Meals component since those two programs were administered by a different agency than the NSLP and other school nutrition programs. Overall simplification was likely the intended goal in Maine since a resolve introduced in Maine's senate in 2015 sought to encourage a streamlined CACFP application and reporting process, and testimony in favor of it related to multiple sub-components of the

CACFP. Streamlining participation between the At-Risk Afterschool Meals component of the CACFP and the NSLP and SFSP was also noted in that testimony, which likely factored into the decision to move the entirety of the CACFP to the Department of Education where those programs were already housed.

Promoting Health and Nutrition

In Florida, New Jersey, and Texas, there were explicit references to the importance of promoting healthy eating in the child nutrition programs. For Florida, this emphasis also helped to build a coalition in favor of the move. In Texas, the initial move of the school nutrition programs from the education agency to the agriculture department seems to have been primarily motivated by a desire to address the childhood obesity epidemic. Shortly after a bill in the Texas legislature proved unsuccessful in limiting foods of minimal nutritional value, the school nutrition programs were moved to the agriculture department, where the elected Commissioner of Agriculture promptly established similar limits through agency rulemaking authority. (The move occurred years before the Healthy, Hunger-Free Kids Act directed the USDA to create nutrition standards for competitive foods served in schools.)

Increasing Program Participation

In Florida, Maine, Nevada, and Virginia, promoting program participation was a motivation, though the specific program or programs of interest varied. For example, boosting SFSP participation was a key motivator in Florida after years of stagnant participation despite rising need. Additionally, the Florida Department of Education had not been spending all of its administrative funding from the USDA, indicating untapped potential to grow and improve the programs. Reports from Nevada indicate an interest in increasing breakfast participation along with reducing food insecurity overall. In Virginia, structuring the programs to promote increased participation aligned with the governor's and first lady's initiative to end childhood hunger by expanding access to child nutrition programs. In Maine as well, moving the CACFP was intended to promote participation by reducing administrative barriers and burden. In New Jersey, press releases and reports indicate an awareness of the state's low school breakfast participation at the time and a desire to improve the state's ranking. Likewise, several press releases tout increased participation across programs in the year following the move.

Aligning Agency Capacity and Interest

The SFSP's move to the North Carolina Department of Public Instruction (DPI) reflected national and state momentum around engaging schools as sponsors and sites for summer meals. In addition to enhancing outreach to schools, a more immediate concern driving the move was staff capacity and agency interest. Following staff turnover at the Department of Health and Human Services (DHHS), DPI expressed interest in administering the SFSP. Rather than have to devote time and resources to build the capacity of its new staff, DHHS accepted DPI's offer to run the program instead. Agency interest also came into play in the second agency change in Texas. Streamlining and consolidating program operations is a common policy priority for the state of Texas, and around the time that the NSLP and SBP moved to TDA, the Department of Human Services was restructured and renamed the Health and Human Services Commission (HHSC). The Commissioner of Agriculture proposed further consolidation of the federal nutrition programs as a logical option that aligned with the HHSC restructuring and TDA's work. Both agency commissioners supported the move.

Method and Leadership

As indicated in Appendix 1, there were several different methods employed to achieve the state agency changes. Five of the seven states passed legislation to direct or codify the change, while the others used interagency agreements or executive orders to direct the moves. As noted earlier, any state that moved the NSLP out of the education agency also had to get USDA approval.

In three of the four states that moved the programs to the agriculture agency, the leadership of the agriculture commissioner was a key element. In New Jersey, the move to the agriculture agency also had the support of the governor, which allowed it to occur through executive action rather than legislation. Likewise, the governor of Texas requested the waiver for the initial move of the school breakfast and lunch programs for public schools. Legislation was later passed to move the other federal nutrition programs, and it also updated the Texas laws referencing the host agency for all of the nutrition programs that moved to TDA, including the school programs. In Florida, where there was some opposition to the move of the school and summer nutrition programs, the change was made through legislation supported by the agriculture agency and a broad coalition of partners. In Nevada, the fourth and most recent state to consolidate the programs in the agriculture agency, the move was recommended by the state food security council and done through legislation that had the governor's support.

The leadership of the governor was central to the effort in Virginia. The governor initially proposed a study of consolidation into the agriculture agency in the state's 2016 budget. Based on the findings of that study, the governor's 2017 budget called for moving the SFSP and CACFP At-Risk Afterschool component from the Virginia Department of Health to the Virginia Department of Education (VDOE). This change did not require a USDA waiver since the NSLP was remaining in the state education agency, nor did lawmakers have to amend the Virginia code that specified VDOE as the state agency. However, officials still had to work closely with the USDA on a transition and management plan in addition to negotiating an interagency agreement.

In North Carolina, it was also the state's appropriations bill that codified the move. In this case, however, the process began when state agency director and staff at DPI gained the support of leaders within the agency. Since the leadership at DHHS supported the move, the legislation and interagency agreement moved forward quickly. DPI pitched the move in July of 2014, the bill passed in August, and it took effect on October 1, 2014.

Advocates who wanted to see the programs consolidated in Maine began with legislation to direct the CACFP's move. A bill was introduced in April 2017, about a year after the governor vetoed the resolution to encourage CACFP application streamlining and simplification. However, during the process of committee hearings and consideration of the consolidation bill, the state opted to pursue consolidation with an interagency agreement. Although the consolidation bill formally failed in mid-May of 2017, the change took effect on July 1, 2017.

Considerations

To ensure a smooth transition and successful operation in the new agency, there are several important aspects of the process and prospective agency to weigh.

Leadership

The capacity and leadership of the host agency are perhaps the most crucial. Several states cited the importance of leadership in deciding whether or not to move the programs and in their successful administration. Any move requires learning and adjustment by the new agency, and its leaders must be ready and willing to adapt. While the USDA does not have formal guidelines for the leadership, size, or resources required of the new agency, USDA officials urge each state to consider whether it would be able to provide the same level of support. Virginia abandoned the initial proposal to move the programs to the agriculture agency in part because it is a much smaller agency that would require more assistance and infrastructure to take on several large programs. In other states with strong leadership from the agriculture agency and/or the political will to administer the child nutrition programs in the same agency as other agricultural programs, the size of the agriculture agency was not a problem, or at least not a determining factor. In contrast to the results of Virginia's study, the New Jersey governor's letter to the USDA regional office administrator requesting the move

referenced an internal study that concluded the move would enhance efficiency while achieving nutrition and nutrition education goals.

Staffing and Human Resources

Another part of agency capacity is the program staff. Retaining high-performing and experienced staff may be challenging but can ease the transition while reducing training and onboarding needs. Most states transferred existing employees to the new agency, though the law directing the CACFP's move out of the education agency in Florida simply indicated that the program employees would have a hiring preference rather than a guaranteed transfer. Virginia had the added difficulty of determining which employees to transfer since its staff had been function-specific working across the CACFP and SFSP rather than program-specific. An additional aspect of staff transfers is whether the agencies have the same job classification systems, pay scales, and benefits.

Transition Time and Planning

Any agency move brings the potential for service disruption. This is a primary concern for the USDA, which requires states to develop transition plans to mitigate the chance of delayed payments or blackout periods when staff are unavailable to provide assistance. In Florida, the plan entailed a staggered staff transition. A new director was hired at the agriculture agency about three months before the final transition in order to prepare. The last staff member to move from the education agency was the person responsible for processing claim payments, and the final transition was timed to occur during a period when few claims were received.

Budget Authority and Financial Management

There are numerous budgetary and finance issues related to agency changes, from the state administrative expense (SAE) and state administrative fund (SAF) plan to the multitude of forms and possible rule changes necessary to transfer budget authority from one agency to another. Due to the complex formula for determining the SAE and SAF amounts for each program, plus states' ability to use funds across programs, negotiating the plan between agencies could be difficult or have broader ramifications for the agencies and programs. Mid-fiscal year transfers bring additional considerations since the budget authority and payments must change seamlessly in the middle of the year. Several of the transfers shown in the table in the appendix did coincide with the start of the new federal fiscal year (October), though many of them took effect on July 1, which according to regulation is the start of the school year for school nutrition programs. In Maine, July 1 also marked the beginning of the state's fiscal year, but the Department of Health and Human Services retained budget authority for the program and processed reimbursements through the end of the federal fiscal year. Interestingly, the Texas Education Agency has retained budget authority for the school nutrition programs and cuts reimbursement checks for TDA.

Technology and Computer Systems

States must ensure that the host agency has the technology and computer systems needed to support program administration. As noted above, moving or changing systems should not disrupt service, either. Relicensing a commercial off-the-shelf product to a new agency could be a considerable expense, as could migrating data, integrating the systems used by separate agencies, or modifying one agency's current system to accommodate new programs. In some cases, the systems may be incompatible, requiring expensive modifications or a new system entirely. Officials in both Virginia and North Carolina noted the cost of moving the computer system to a new agency while officials in Florida noted the time and effort required of the agencies' IT staff.

Equipment and Moving Costs

There is also the one-time cost of moving staff, equipment, or offices to consider, as well as who pays for it. In addition, there is the consideration of what equipment or other physical assets move or stay. This is largely driven by the type of transfer being conducted. In North Carolina, the program moved without any staff

transferring since DPI already had a staff member with SFSP experience. In addition, as part of the interagency agreement, no equipment was moved. Most states, however, conducted what is known as a type two transfer in which all staff and any equipment purchased with program funds are moved to a new agency.

Physical Space and Facilities

The physical space available to new or transferring staff is a possible problem. Especially for larger states with a large child nutrition program staff, it could be tough to fit the entire staff within the agency's existing office space. If acquiring new office space for the incoming staff, the lack of physical proximity may reduce the benefits of administering the programs from within the same agency, not to mention add to the potential cost. However, in Nevada, the consolidation provided an opportunity to better utilize existing government-owned or leased space.

Impact

The states in this report have not released formal evaluations or impact analyses, so it is difficult to assess the outcomes. Moreover, impact analyses would be quite complicated because most states had multiple objectives that they hoped to achieve through the agency move or consolidation, and because the change impacted not only the programs themselves but also the old and new agencies as a whole. Nevertheless, anecdotal evidence and program participation numbers suggest that the moves have been beneficial. For example, the number of summer meals served in Florida has increased dramatically since the move, and schools are reportedly much more satisfied with the level of support that they receive from the customer service-driven agriculture agency. In North Carolina, after getting systems up and running during the SFSP's first summer in its new home, the number of participating schools doubled during its second summer, and there was significant overall growth. As noted earlier, New Jersey touted program increases following its consolidation, and now its statewide breakfast participation ranks in the top twenty nationwide rather near the bottom. Nevada also saw large increases in both school breakfasts and summer meals. However, both New Jersey and Nevada undertook other measures to increase school breakfast participation, so it is impossible to directly tie those increases to consolidation. Beyond participation, an official in Texas noted that consolidating the nutrition programs can yield economies of scale, such as having single teams for application and claims processing as well as support services like finance, IT, legal counsel, and design. Such economies can allow more resources to go toward other areas like outreach, nutrition education, and program analysis and improvements, many of which can assist other states in their operation of the programs. The same official also highlighted the benefit to participating organizations due to the consistent and streamlined communications, training, and processes for applications and monitoring. Not only does this make it easier for organizations to operate multiple programs, it enhances the state's oversight and ability to address concerns across programs, further strengthening their integrity and effectiveness.

CONCLUSION

While it may not be necessary for all states, moving or consolidating child nutrition program state agencies may be an effective tool for achieving programmatic goals, enhancing operations, and fostering new collaborations. There are many possible paths to moving or consolidating programs, and there is no single host agency, staffing approach, method, or transition plan that would be appropriate for every state. Still, any change requires careful consideration and planning. Establishing a clear purpose and objectives for the change can help to build consensus, set reasonable expectations, and determine the best option, such as selecting the agency with the most closely aligned mission or restructuring the staff to streamline operations. In addition, strong leaders are essential to ensure a smooth transition and improved operation in the new agency. Effective leadership is also necessary to drive systems changes and create an agency culture that facilitates lasting improvements in administration, partnerships, and participation, even after leaders leave.

Appendix 1: Summary of State Agency Changes

State	Program	From Agency	To Agency	Consolidated With	Initiated	Finalized	Effective	Method
Florida	CACFP	Education	Health	n/a (Separated from NSLP-SBP and SFSP)		May 30, 1997	Oct. 1, 1997	Stand-Alone Legislation (HB 1837)
	CACFP Adult Day Care	Education	Elder Affairs					
	NSLP-SBP SFSP	Education	Agriculture & Consumer Services	Food Distribution TEFAP	Feb. 2011	June 24, 2011	Jan. 1, 2012	Stand-Alone Legislation (CS/SB 1312)
Maine	CACFP	Health and Human Services	Education	NSLP-SBP SFSP	April 4, 2017 (Bill introduced)		July 1, 2017	Interagency agreement
North Carolina	SFSP	Health and Human Services	Public Instruction	NSLP-SBP (Separated from CACFP)	July 2014	Aug. 7, 2014 (Announced Sept. 23, 2014)	Oct. 1, 2014	Budget Legislation (SB 744)
Nevada	NSLP-SBB SFSP CACFP Food Distribution for Schools	Education	Agriculture	n/a	Mar. 25, 2013	June 1, 2013	July 1, 2013	Stand-Alone Legislation (SB 466)
	SFMNP TEFAP CSFP FDPIR Food Distribution for Child Nutrition	Administration	Agriculture	n/a	Mar. 25, 2013	June 7, 2013	July 1, 2013	Stand-Alone Legislation (SB 490)
	Dairy Commission	Business and Industry	Agriculture	n/a	Mar. 25, 2013	June 1, 2013	July 1, 2013	Stand-Alone Legislation (SB 469)
New Jersey	NSLP-SBP CACFP SFSP	Education	Agriculture	Food Distribution	1996 (Request to USDA dated Nov. 1996)		July 1, 1997	Executive Reorganization Plan (No. 002-1997)
Texas	NSLP-SBP	Education	Agriculture	n/a		July 2003 (Announced July 21, 2003)	July 2003	Interagency agreement
	SFSP CACFP TEFAP (TEXCAP) CSFP Food Distribution	Health and Human Services	Agriculture	NSLP-SBP	Apr. 3, 2007	June 15, 2007	Oct. 1, 2007	Stand-Alone Legislation (HB 4062)
Virginia	SFSP CACFP At-Risk Afterschool	Health	Education	NSLP-SBP (Separated from the rest of CACFP)	Dec. 16, 2016	Apr. 28, 2017 (Announced Sept. 14, 2017)	SFSP: Oct. 2, 2017 CACFP At-Risk: Spring 2018 (target)	Budget Legislation (HB 1500)

Appendix 2: Designated Agency for NSLP, CACFP, and SFSP in Each State and Territory

State	NSLP State Agency	CACFP State Agency	SFSP State Agency
Alabama	Education	Education	Education
Alaska	Education & Early Development	Education & Early Development	Education & Early Development
Arizona	Education	Education	Education
Arkansas	Education	Human Services	Human Service
California	Education	Education	Education
Colorado	Education	Public Health & Environment	Education
Connecticut	Education	Education	Education
Delaware	Education	Education	Education
District of Columbia	Office of the State Superintendent of Education	Office of the State Superintendent of Education	Office of the State Superintendent of Education
Florida	Agriculture & Consumer Services	Health ²	Agriculture & Consumer Services
Georgia	Education	Early Care and Learning	Early Care and Learning
Guam	Education	Education	N/A
Hawaii	Education	Education	Education
Idaho	Education	Education	Education
Illinois	State Board of Education	State Board of Education ³	State Board of Education
Indiana	Education	Education	Education
Iowa	Education	Education	Education
Kansas	Education	Education	Education
Kentucky	Education	Education	Education
Louisiana	Education	Education	Education
Maine	Education	Education	Education
Maryland	Education	Education	Education
Massachusetts	Elementary & Secondary Education	Elementary & Secondary Education	Elementary & Secondary Education
Michigan	Education	Education	Education
Minnesota	Education	Education	Education
Mississippi	Education	Education	Education
Missouri	Elementary & Secondary Education	Health & Senior Services	Health & Senior Services
Montana	Office of Public Instruction	Public Health & Human Services	Office of Public Instruction
Nebraska	Education	Education	Education

² The Adult Day Care component of the CACFP is administered through the Florida Department of Elder Affairs.

³ The Adult Day Care component of the CACFP is administered through the Illinois Department on Aging.

State	NSLP State Agency	CACFP State Agency	SFSP State Agency
Nevada	Agriculture	Agriculture	Agriculture
New Hampshire	Education	Education	Education
New Jersey	Agriculture	Agriculture	Agriculture
New Mexico	Public Education	Children, Youth, & Families	Children, Youth, & Families
New York	Education	Health	Education
North Carolina	Public Instruction	Health & Human Services	Public Instruction
North Dakota	Public Instruction	Public Instruction	Public Instruction
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	Social Services	Education
South Dakota	Education	Education	Education
Tennessee	Education	Human Services	Human Services
Texas	Agriculture	Agriculture	Agriculture
Utah	State Board of Education	State Board of Education	State Board of Education
Vermont	Education	Education	Education
Virginia	Education	Health ⁴	Education
Virgin Islands	Education	Education	Education
Washington	Office of the Superintendent of Public Instruction	Office of the Superintendent of Public Instruction	Office of the Superintendent of Public Instruction
West Virginia	Education	Education	Education
Wisconsin	Public Instruction	Public Instruction	Public Instruction
Wyoming	Education	Education	Education
American Samoa	Education	N/A	N/A

⁴ The At-Risk Afterschool Meals component of the CACFP will be administered by the Virginia Department of Education beginning in spring 2018.