



North Carolina Department of Health and Human Services
Division of Public Health

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SFSP 14-09
CACFP 14-04

May 20, 2014

TO: Sponsors Participating in the Summer Food Service Program
Institutions Participating in the Child and Adult Care Food Program

FROM: Arnette Cowan, MS, RD, LDN 
Head, Special Nutrition Programs

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

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.

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Although sharing of aggregate data is always at the discretion of the CNP operators, 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.

Attached are Questions and Answers pertaining to sharing aggregate data. If you have any additional questions, please contact your regional consultant.

Attachment

c: SNP Staff

Frequently Asked Questions

1. I am a food service director in an SFA. May I share the percentage of students by eligibility who participate in the School Breakfast Program with a local advocacy group?

Yes. These percentages are aggregate data which may be shared provided that students cannot be identified through release of the aggregate data or by means of deduction (7 CFR 245.6(f))

2. As a sponsoring institution participating in the CACFP, may I share the site-level average daily participation data of my at-risk afterschool meals center with a local non-profit organization interested in hunger issues?

Yes. Aggregate participation data may be shared among operators of all Federal Child Nutrition Programs and partner organizations.

3. May I share the names of the children in my school who are eligible to receive free or reduced-priced meals with an organization operating the SFSP at a local camp?

Yes. Individual eligibility information may be shared among operators of all Federal Child Nutrition Programs to facilitate eligibility determinations.

4. I am the director of a local advocacy group and would like to conduct outreach to families whose children are certified for free or reduced-price meals but who do not participate. May I obtain names of eligible children and their parents to encourage them to participate?

No. Individual student eligibility information may not be shared for this purpose without informed, written consent of the parent.

5. I work for the State agency. An advocacy organization has requested school-level average daily participation and meal counts. Can this be shared?

Yes. School-level aggregate data may be shared with the public, including: average daily participation, number of meals served, site and sponsor information, aggregate free and reduced-price eligibility percentages and aggregate enrollment data. However, data relating to individual children may not be shared for this purpose.