# SNP Memo #2024-2025-25

  
**COMMONWEALTH of VIRGINIA   
Department of Education**

DATE: September 19, 2024

TO: Directors, Supervisors, and Contact Persons Addressed

FROM: Sandra C. Curwood, PhD, RDN, ***Sandy***

## SUBJECT: Additional Guidance and Best Practices for Collecting Race and Ethnicity Data in the Child and Adult Care Food Program and Summer Food Service Program

The U.S. Department of Agriculture, Food and Nutrition Services (USDA-FNS) regulations require CACFP and SFSP sponsors to collect race and ethnicity data of program participants annually. The most recent USDA Memo CACFP 12-2024, SFSP 16-2024 provides clarity on why this data is collected and offers [examples of challenges](https://www.fns.usda.gov/sites/default/files/resource-files/cacfp12-sfsp16-2024-memo.pdf#page=11) program operators may encounter and best practices for collecting this information.

The USDA-FNS released memo [CACFP 12-2024, SFSP 16-2024, Questions and Answers Related to CACFP 11-2021, SFSP 07-2021 *Collection of Race and Ethnicity Data by Visual Observation and Identification in the Child and Adult Care Food Program and Summer Food Service Program – Policy Rescission* – Set 2](https://www.fns.usda.gov/cn/qas-collection-race-ethnicity-data-policy-rescission2) regarding additional guidance and best practices for collecting race and ethnicity data in the Child and Adult Care Food Program (CACFP) and Summer Food Service Program (SFSP). All information included in the USDA memo was reviewed in the Virginia Department of Education, Office of School and Community Nutrition Programs (VDOE-SCNP) fiscal year 2024–2025 CACFP programmatic training.

Below are previous USDA-FNS policy memos related to requirements around collecting race and ethnicity data in the CACFP and SFSP. The VDOE-SCNP has shared this guidance with SFAs and community organizations through Director’s memos and programmatic training.

* [USDA Memo CACFP 11-2021, SFSP 07-2021](https://fns-prod.azureedge.us/sites/default/files/resource-files/CACFP11_SFSP07os.pdf): Race and ethnicity data may no longer be collected through visual observation effective May 2021.
* [USDA Memo CACFP 09-2022, SFSP 05-2022](https://www.fns.usda.gov/cn/qas-related-collection-race-and-ethnicity): Updated guidance and best practices on collecting race and ethnicity data in the CACFP and SFSP.
* Race and ethnicity data can be collected from parents or guardians via verbal requests or enrollment forms. Parents or guardians should be made aware that providing this information is to ensure compliance with USDA nondiscrimination requirements and that failure to provide this information does not affect participants’ eligibility to receive meals. Participant names are not required as part of the collection requirement, and participants should never be asked to self-identify.
* Aggregate data may be used when individual data cannot be collected. Aggregate data must be specific to the program’s locality. Examples of acceptable aggregate data sources include local school databases, [U.S. Census Quick facts](https://www.census.gov/quickfacts/fact/table/US/PST045221), and the [National Center for Education Statistics Common Core of Data](https://nces.ed.gov/ccd/schoolsearch/).

### Recommended Action

1. Please review the USDA memo [CACFP 12-2024, SFSP 16-2024](https://www.fns.usda.gov/cn/qas-collection-race-ethnicity-data-policy-rescission2) for guidance and best practices for collecting race and ethnicity.

### For more information

If you have questions, please contact your assigned School and Community Nutrition Programs regional specialist or Community Nutrition Programs regional specialist.

SCC/MVP/cc