



IOWA

Department of Education

Ann Lebo, Director

Kim Reynolds, Governor
Adam Gregg, Lt. Governor

July 28, 2020

Maged Hanafi
Food & Nutrition Service
Midwest Regional Office
United States Department of Agriculture
77 W. Jackson Blvd., 20th Floor
Chicago, Illinois 60604

RE: Child and Adult Care Food Program, Adjusted Review Frequency for CACFP At-Risk Program Sponsored by Schools

1. State agency submitting waiver request and responsible State agency staff contact information:

Iowa Department of Education
Robin Holz, Lead Consultant Centers
515-281-3484
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2. Region: Midwest

3. Eligible service providers participating in waiver and affirmation that they are in good standing:

Schools participating in the National School Lunch Program (NSLP) that wish to sponsor an area eligible At-Risk Meal Program site in good standing and have completed all required corrective action on their last review.

4. Description of the challenge the State agency is seeking to solve, the goal of the waiver to improve services under the Program, and the expected outcomes if the waiver is granted. [Section 12(I)(2)(A)(iii) and 12(I)(2)(A)(iv) of the NSLA]:

Challenges:

- Iowa was awarded a Technology Innovation Grant to streamline the application process for schools to apply for the CACFP At-Risk Program based on flexibilities described in USDA memo SP 09-2013 and CACFP 04-2013. The CACFP application process is very difficult and time consuming which creates a barrier for schools interested in serving eligible sites.
- In Iowa we have approximately 232 eligible buildings, but only 198 participate in the Afterschool Snack Program as an area eligible site and only one school currently participates in the CACFP At-Risk Program.
- The participating sites would be eligible to serve a CACFP supper/five component “super snack” instead of a two-component snack. Making it easier to apply for CACFP would better position schools to meet the needs of hungry children in after school programs in their communities.

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- Crossing Programs creates the challenge of coordinating reviews conducted by the State agency.

The goals are to serve more children and/or provide a more substantial meal by encouraging more schools on the NSLP to participate in the CACFP At-Risk Program; and, align the administrative review schedule for the SFA participating in two separate child nutrition programs in order to reduce the administrative burden of schools.

Anticipated Outcomes:

- Increased participation of schools in the CACFP At-Risk Program and additional children receiving more substantial afternoon/evening meal.
- Reduced administrative burden to the school due to aligned program applications and administrative review (AR) schedule.

5. Specific Program requirements to be waived (include statutory and regulatory citations). [Section 12(l)(2)(A)(i) of the NSLA]:

226.6(m)(6)(i) - Independent centers and sponsoring organizations of 1 to 100 facilities must be reviewed at least once every three years.

6. Detailed description of alternative procedures and anticipated impact on Program operations, including technology, State systems, and monitoring:

- The CACFP application will be completed by dynamically adding questions to the online school application for programs that check a box expressing interest in applying for the CACFP At-Risk Meals Program. This will replace the requirement to complete a separate CACFP application. Schools will update their permanent agreement to include CACFP At-Risk participation. Claims will be paid through CACFP. Reviews will be conducted cooperatively by CACFP and NSLP consultants.
- The Bureau of Nutrition and Health Services has a waiver to conduct NSLP reviews every five years. However, CACFP reviews need to be conducted more frequently, every three years. SP 09-2013 and CACFP 04-2013 states, "...monitoring of the financial management portion of the Child Nutrition Programs must be combined to ease the burden of SFA's and ensure that the complete nonprofit food service is reviewed." and "States are encouraged to combine CACFP and SNLP monitoring of programmatic requirements." To follow guidance provided in the memo and make the most efficient use of SFA and State agency resources, it makes sense to conduct the At-Risk reviews in coordination with the SFA reviews.
- The Bureau of Nutrition and Health Services is requesting At-Risk Meal Programs in schools participating in NSLP to be reviewed at the same frequency as the NSLP reviews (every 5 years). Coordination between the CACFP and NSLP consultants will minimize the impact on NSLP consultant workloads and facilitate compliance with the requirement to combine the financial management portion of the reviews.
- Reviews will be tracked on IowaCNP in NSLP Compliance. Schools participating in the CACFP At-Risk Program will be included in the total number of CACFP active organizations identified on the last day of the fiscal year that is used to determine how many CACFP reviews must be conducted in the new fiscal year. The NSLP reviews that include an At-Risk site will be included in the number of CACFP reviews conducted annually.
- Any additional CACFP reviews that need to be conducted to ensure at least 33.33% of organizations are reviewed each fiscal year will include new CACFP organizations (reviewed within the first year of participation, organizations declared seriously deficient, and those identified by consultants as needing additional follow up.) The Bureau Chief and lead CACFP

consultants for center-based organizations will monitor the completion of CACFP reviews at least quarterly.

- Training on procedures was conducted in May to ensure Bureau staff know requirements and expectations.
- Several CACFP and SNP reports, currently available in IowaCNP, will be revised to include the schools participating in the At-Risk Meals Program.

7. Description of any steps the State has taken to address regulatory barriers at the State level.

[Section 12(I)(2)(A)(ii) of the NSLA]:

- The school AR questions have been revised to include evaluation of the CACFP At-Risk Meals Program.
- Bureau staff have discussed procedures required to ensure application, monitoring, training and reporting requirements are met.

8. Anticipated challenges State or eligible service providers may face with the waiver implementation:

- NSLP consultants already have extended work hours so it would be burdensome to require they conduct supper meal observations in the evening. CACFP staff will complete this section of the review in the month prior to the administrative review, including a review of other available records. A school consultant will complete the financial and claim review as part of the NSLP administrative review, and review any other records that were not available during the site review.
- Consultants involved in the on-site review and AR will communicate with each other to coordinate review scheduling, findings, corrective actions and reporting. The NSLP and CACFP consultants will cooperatively complete the NSLP CACFP At-Risk Meal Program review questions.
- Service providers will need to work with two consultants.

9. Description of how the waiver will not increase the overall cost of the Program to the Federal Government. If there are anticipated increases, confirm that the costs will be paid from non-Federal funds. [Section 12(I)(1)(A)(iii) of the NSLA]:

The requested waiver does not impact the overall cost of the program to the State or Federal government.

10. Anticipated waiver implementation date and time period:

The requested waiver implementation date is October 1, 2020 and will be effective through the end date of the Iowa NSLP five year administrative review waiver, June 30, 2024.

11. Proposed monitoring and review procedures:

- At-Risk Meal Program in schools participating in NSLP will be reviewed every 5 years.
- Reviews will be completed cooperatively by CACFP and NSLP consultants. The CACFP consultant will conduct a site review in the month prior to the NSLP on-site review. The CACFP review will include as much recordkeeping as possible and a meal service observation. This information will then be reported to the NSLP consultant. The NSLP review will include a claim and financial review as well as a complete recordkeeping review during the school review.
- The school AR questions in the IowaCNP AR have been revised to include evaluation of the CACFP At-Risk program.

12. Proposed reporting requirements (include type of data and due date(s) to FNS):

IowaCNP reports will be available to track CACFP At-Risk Meal Program reviews under NSLP.

CACFP reviews are also monitored at least quarterly on an Excel tracking spreadsheet. The system has been enhanced to include the At-Risks meals on the FNS-44 monthly.

13. Link to or a copy of the public notice informing the public about the proposed waiver [Section 12(I)(1)(A)(ii) of the NSLA]:

[Iowa Department of Education CACFP Webpage](#)

For more information, please contact Robin Holz, Center Lead Consultant (robin.holz@gov)

1. We are requesting your consideration of the above waiver request.

Signature and title of requesting official:



Name: Kala Shipley
Title: Bureau Chief

Requesting official's email address for transmission of response:

kala.shipley@iowa.gov
robin.holz@iowa.gov
patti.harding@iowa.gov

TO BE COMPLETED BY FNS REGIONAL OFFICE:

FNS Regional Offices are requested to ensure the questions have been adequately addressed by the State agency and formulate an opinion and justification for a response to the waiver request based on their knowledge, experience and work with the State.

Date request was received at Regional Office:

- Check this box to confirm that the State agency has provided public notice in accordance with Section 12(l)(1)(A)(ii) of the NSLA**

- **Regional Office Analysis and Recommendations:**