

**CHILD NUTRITION
PROGRAM
IOWA CACFP WAIVER
REQUEST**

Child Nutrition Programs are expected to be administered according to all statutory and regulatory requirements; waivers to the requirements are exceptions. However, Section 12(l) of the Richard B. Russell National School Lunch Act, 42 U.S.C. 1760(l), provides authority for USDA to waive requirements for State agencies or eligible service providers under certain circumstances. When requesting the waiver of statutory or regulatory requirements for the Child Nutrition Programs (CNPs), including the Child and Adult Care Food Program (CACFP), State agencies and eligible service providers should use this template. State agencies and eligible service providers should consult with their FNS Regional Offices when developing waiver requests to ensure a well-reasoned, thorough request is submitted. State agencies and eligible service providers are encouraged to submit complete waiver requests at least 60 calendar days prior to the anticipated implementation date. Requests submitted less than 60 calendar days prior to the anticipated implementation should be accompanied by an explanation of extenuating circumstances.

For more information on requests for waiving Program requirements, refer to SP 15-2018, CACFP 12-2018, SFSP 05-2018, *Child Nutrition Program Waiver Request Guidance and Protocol- Revised*, May 24, 2018.

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
robin.holz@iowa.gov

2. Region: Midwest

3. Eligible service providers participating in waiver and affirmation that they are in good standing: Waypoint Services has participated in CACFP for many years. The program is in good standing with the CACFP.

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(l)(2)(A)(iii) and 12(l)(2)(A)(iv) of the NSLA]:

A water main broke and caused about three inches of water, dirt and sand to flood the basement. It cause cracks in the floor, cracks in the walls and the ceiling tiles came down in places. The program lost

CACFP records for Aug-October 2017, January-March 2018 and January-March 2019. They have confirmed records for the remaining months in the last three fiscal years are still on file.

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

7 CFR 226.15(e)(4) Daily records indicating the number of participants in attendance and the daily meal counts, by type (breakfast, lunch, supper, and snacks), served to family day care home participants, or the time of service meal counts, by type (breakfast, lunch, supper, and snacks), served to center participants.

226.15(e)(6) Copies of invoices, receipts, or other records required by the State agency financial management instruction to document: (i) Administrative costs claimed by the institution; (ii) Operating costs claimed by the institution except sponsoring organizations of day care homes; and (iii) Income to the Program.

226.15(e)(7) Copies of all claims for reimbursement submitted to the State agency.

226.15(e)(10) Copies of menus, and any other food service records required by the State agency.

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

The organization has made the necessary repairs but is unable to use the basement until everything is rebuilt. The remaining paperwork from past years is being sorted and will be moved to a storage company. The current fiscal year records are kept on site. Accounting is moving toward electronic records and has assisted CACFP in setting up a paperless sign in and record keeping system. Parents now use a kiosk to sign their children in and out and teachers use tablets to keep all of the information updated. Paper copies of the CACFP sheets are still being generated until the transition is complete.

7. Description of any steps the State has taken to address regulatory barriers at the State level. [Section 12(l)(2)(A)(ii) of the NSLA]: The State has provided guidance that allows centers to utilize electronic means of maintaining records, as long as they are available for review and procedures can be observed if this is the only means of tracking. Two spreadsheets have also been provided for center use. The first allows the program to maintain an electronic copy of the monthly summary of free and reduced price eligibility, daily meal participation counts, the CNP-50 monthly meal counts and the meal count claim. The second is a spreadsheet that includes a menu and food production records.

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

The biggest challenge would be providing specific documentation for any additional audits conducted by other organizations or

agencies.

- 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(l)(1)(A)(iii) of the NSLA]:** There are no additional costs associated with this waiver. The center has assumed the responsibility of keeping records in a dry, accessible location and using electronic means of recordkeeping.
- 10. Anticipated waiver implementation date and time period:** Anticipated waiver implementation date will be as soon as approval is granted. The time period will cover the 2016-2019 fiscal years.
- 11. Proposed monitoring and review procedures:** The organization was reviewed in fiscal year 2019 and March 2019 was the test month. All records that were reported to be destroyed were on file during 2019 review, so we know the organization had the records. On the next review the assigned consultant will check records storage to ensure it is maintained in an acceptable location with systems that would reduce loss if more water damage were to occur.
- 12. Proposed reporting requirements (include type of data and due date(s) to FNS):** If the center experiences additional loss of records, they will be required to report the loss to the state agency within one week of the occurrence. The State Agency will require this reporting to be documented in writing with date of occurrence and specific records that have been impacted.
- 13. Link to or a copy of the public notice informing the public about the proposed waiver [Section 12(l)(1)(A)(ii) of the NSLA]:** Posting on [DE website](#).
- 14. Signature and title of requesting official :**

Title:

Requesting official's email address for transmission of response:

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:
Regional Office Analysis and Recommendations: