



IOWA

Department of Education

Ann Lebo, Director

Kim Reynolds, Governor
Adam Gregg, Lt. Governor

April 1, 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, Streamlined CACFP Application Process and Recordkeeping for Children of Essential Workers Enrolled in Child Care centers during COVID-19 Outbreak Waiver Request

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

Iowa Department of Education (Department), Bureau of Nutrition & Health Services

Kala Shipley, Bureau Chief, kala.shipley@iowa.gov, 515-281-4757
Robin Holz, Lead Center Consultant, robin.holz@iowa.gov, 515-681-2305

2. Region: Midwest

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

This waiver request is for all new and existing child care operators approved by DHS and designated to provide child care services for essential workers during the COVID-19 emergency.

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]:

Goals

The goal of this waiver is to allow new centers providing child care for children of essential workers a streamlined CACFP application process so child care organizations can easily apply and quickly be approved to receive CACFP reimbursement during the COVID-19 emergency and for recordkeeping requirements to be streamlined. This will include the potential of new center sites opened by existing CACFP center organizations to be approved for participation.

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Challenges

1. The CACFP center organization application process is usually a long and complex process taking an average of about two months to complete. The usual process is unreasonable in light of the immediate need of potential new child care centers opening to provide care for children of essential workers requested by the State of Iowa. The need is to provide support to child care operators who must feed these children in centers not already participating in CACFP.

Essential workers are more likely to come in contact with the COVID-19 virus. They are currently asked to pack lunches for their children, increasing the risk of spreading the virus through cross contamination. There are concerns related to the safety of food preparation and nutritional value of meals provided by families. Centers are also instructed they should be prepared to feed the children if parents do not provide a meal without funding to support the cost of the meals.

2. The centers already on the CACFP and designated by the State of Iowa to care for children of essential workers are caring for groups of children not previously enrolled in the center without the usual paper work including extensive enrollment information or income applications.
3. Usual monitoring requirements are not reasonable given the new centers will only operate during the crisis and may not likely continue CACFP participation during the next three years. Yet, accountability and integrity is still needed.

Expected Outcome

Organizations providing child care to essential workers will be able to:

- Easily apply and be quickly approved for CACFP participation
- Provide safe, quality meals to participants following CACFP meal requirements as closely as possible depending on availability of foods in local markets
- Receive reimbursement for meals served to all children at the free rate. Meet streamlined CACFP recordkeeping requirements.
- Submit CACFP documents electronically for a desk review.

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

The Department is requesting a waiver of CACFP regulations at:

7 CFR 226.6(b)(1) and (4) listing CACFP application requirements for new child care operations.

7 CFR 226.17(b)(8) requiring an income applications in order to claim meals at the free rate of reimbursement.

7 CFR 226.6 (m) requiring an onsite monitoring reviews of 33.3% of approved organizations covering all required review elements.

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

Alternative Procedures:

Program operations – The State agency will provide instructions to schools and other organizations with a Google [survey](#) to express interest in obtaining CACFP reimbursement for meals served to children of essential workers during the COVID-19 emergency. The survey will collect essential information to include on the application. If the organization is a school already participating on the NSLP, some information could be obtained from their IowaCNP NSLP application.

CACFP organizations having a current agreement with the State agency will complete a Google [survey](#) to inform the State of their CACFP recordkeeping variances for children of essential workers during the COVID-19 emergency. The survey results can be used to create a spreadsheet available for consultants to reference to support the reason for any streamlined or missing records they observe on reviews.

Technology – In order to submit meals for reimbursement, new organizations must have an approved online application on IowaCNP. A W-9 must be requested from the organization and used to create a profile in IowaCNP. Information collected on the survey will be entered by State agency consultants on the IowaCNP application.

Monitoring – The State agency or a contractor will conduct streamlined desk reviews of a third of COVID-19 approved organizations in FY 2020 and/or 2021 depending on workload, staffing and budget.

If this waiver is **not** implemented, the impact on Program operations include possible increased spread of the virus through cross contamination that could occur when parents provide lunches for their children, barriers to Program reimbursement, poorer diet quality when good nutrition is especially important, food insecurity and hunger for children of essential workers during the COVID-19 pandemic.

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]:

There are no regulatory barriers at the State level to providing the requested waiver.

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

Training challenge:

Usual training requirements are extensive but unrealistic given the immediate needs for child care centers to be available for children of essential workers.

Solution:

Training will be provided to new organization staff using selected online training modules already in existence covering enrollment, meal patterns, counting, claiming and infant feeding, if applicable. Recordkeeping forms are available within the

modules. All meals will be claimed at the free rate without income applications so this training will not be required.

Consultants will be trained on streamlined application processes via written instructions and Zoom.

Application challenge:

Usual application requirements are extensive, detailed, and time-consuming to complete. However, essential application information must still be collected in order to set up accounts for payment and accountability.

Solution:

Organizations submitting a survey to express interest in CACFP will be sent a W-9 form to complete and return. Upon receipt, consultants will submit it to internal operation staff who will provide the Headquarter and Vendor numbers. These will be given to IT who will set up a CACFP account in the profile.

After a profile is set up, information from the spreadsheet (obtained from the Google Survey) will be used by consultants to complete and approve the application. Since the agreement is temporary, a permanent agreement will not be signed. The survey includes certification statements the organization agrees to for meeting essential recordkeeping requirements.

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]:

While more children are claimed at the free rate in these sites, many centers are closed and not claiming meals on the CACFP during the emergency so the actual cost is unknown but may be neutral.

Additional State agency time will be required to conduct desk reviews as part of their assigned work requirements so this would be cost neutral. It may be necessary to contract with reviewers to conduct the extra reviews which could increase costs.

10. Anticipated waiver implementation date and time period:

This waiver will be implemented immediately upon approval for fiscal year 2019-2020 and end on June 30 or when the emergency child care sites are no longer needed, whichever is sooner. The waiver could be extended if it is needed beyond June 30.

11. Proposed monitoring and review procedures:

The State agency or a contractor will conduct desk reviews of 33.3% of COVID-19 approved organizations in FY 2020 and/or 2021 depending on workload, staffing and budget. A COVID-19 review form will be developed by the State agency.

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

No later than December 31, following the fiscal year, the Department will report to FNS a list of COVID-19 new CACFP organizations approved to provide child care for essential worker's children, and new centers added for existing CACFP organizations. Additional data from the sites can be obtained in reports available on IowaCNP.

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]:** The following public notice is located at:

[Department of Education CACFP webpage](#)

The Iowa Department of Education Bureau of Nutrition and Health Services is seeking a waiver from the United States Department of Agriculture, Food and Nutrition Service for new and existing organizations and facilities participating in CACFP and open for care during the COVID-19 pandemic, to serve meals with approved flexibilities until the pandemic is over.

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

14. 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

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:**