



McKenzie Snow, Director

Kim Reynolds, Governor  
Adam Gregg, Lt. Governor

July 18, 2024

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

RE: Home Sponsor Monitoring Review 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](mailto:kala.shipley@iowa.gov), 515-681-2307  
Cheryl Tolley, Administrative Consultant, [cheryl.tolley@iowa.gov](mailto:cheryl.tolley@iowa.gov), 515-681-2304

**2. Region:** Midwest

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

The Iowa Department of Education is requesting this waiver as the USDA Child Nutrition Program State agency and on behalf of all 14 home sponsor organizations participating in the Child and Adult Care Food Program during the 2024-25 program year, who are deemed by the Iowa State agency to be in good standing.

**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)(iiii) and 12(I)(2)(A)(iv) of the NSLA]:**

The State agency is requesting a state-wide waiver to allow home sponsors the opportunity to conduct one off-site monitoring review during the fiscal year. This waiver request would be available to the 14 home sponsors located in Iowa who monitor approximately 1,170 providers. In addition, the State agency is requesting one additional off-site review for providers who live 50 or more miles from the home sponsor office and in good standing. Home sponsor organizations are facing staffing shortages and increased operating costs. Travel time and distance for required monitoring is creating a hardship when multiple attempts or return visits are required. Some sponsors are traveling over two hours one way for a review. The end of the Keep Kids Fed Act and providers ending their CACFP agreements for additional reasons is adding to budget constraints. This is forcing home sponsor organizations to rethink their ability to sustain CACFP home sponsor operations.

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The goal of requesting this waiver is to alleviate staff time spent on travel and reduce the burden and financial strain on home sponsor organizations. The ability to conduct one off-site monitoring review for all providers would significantly reduce travel time and costs to the organization. Allowing an additional off-site monitoring review that requires travel over 50 miles to a home provider would reduce the costs associated with staff working additional hours and traveling for an on-site review.

The expected outcome of this waiver would allow organizations to reduce costs while still meeting monitoring requirements. It would also reduce the potential of home sponsors ending their agreements with the State agency. This would eliminate the need for other sponsors to take on additional providers when they already have limited resources within their own organizations. Home Sponsors have utilized the approved 2023-2024 monitoring waiver in Iowa and have reported that the waiver has had a positive impact in reducing staff burden and budget constraints. Continued flexibility in the 2024-2025 program year would continue to positively impact home sponsor organizations.

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

The Department is requesting a waiver to the following regulations and requirements to be performed offsite for one monitoring review per provider:

7 CFR 226.16(d)(4)(iii) Frequency and type of required reviews, specifically all three reviews must be conducted on-site.

USDA Guidance memo and attachment: CACFP07-2023

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

Interested sponsors must notify the Department of their intent to participate in the waiver by completing a request form. Once approval is granted by the State agency, the sponsor management plan will be updated to reflect their use of the waiver. Sponsor organizations will submit a list of providers over 50 miles from the organization's CACFP office to the State agency for review and approval. If more than one off site monitoring review is granted, one will be unannounced to comply with regulations. Sponsors will report on waiver usage at the end of the waiver period.

There will be no impact on program operations for the State agency or sponsor levels. There are some providers who may not have computers or the ability to utilize virtual platforms. In these cases, the sponsor would still need to complete an on-site visit.

**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 currently no state level regulatory barriers related to this specific issue.

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

There are no anticipated challenges with waiver implementation. Rather, it is anticipated that this waiver will allow sponsors to carry out their monitoring duties while saving the organization funding on mileage, gas, vehicle usage and staff time. This will allow organizations to implement cost saving measures and remain financially viable, while continuing to serve the home providers.

**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:**

This waiver will be implemented upon approval from USDA on October 1, 2024 and will be effective through September 30, 2025.

**11. Proposed monitoring and review procedures:**

The State agency will continue to carry out normal monitoring via administrative reviews. Accompanied provider reviews will mirror the sponsoring organization's review (virtual or in person). Sponsoring organizations found to have noncompliance issues as related to this waiver will receive technical assistance from the State agency. If implemented, the State agency will collect feedback on how the use of the waiver benefitted the home sponsor organization.

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

The Department will report to FNS all requested data for the waiver in the timelines required by USDA.

**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]:**

Public notice posted at: <https://educate.iowa.gov/pk-12/operation-support/nutrition-programs/child-adult-care-food-program>

**14. Signature and title of requesting official:**



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Title: Kala Shipley, Bureau Chief

Requesting official's email address for transmission of response:

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[cheryl.tolley@iowa.gov](mailto:cheryl.tolley@iowa.gov)