

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

State of Illinois / Illinois State Board of Education (ISBE)
Dean Held
1-800-545-7892

2. Region:

Midwest Region

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

The waiver request is for the review cycle FY 2020 through FY 2022. ISBE would like to extend the review cycle from 3 years to 5 years through FY 2024. At the present time, we have no issues related to sponsors that would exclude them from participating in the extended review cycle.

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]:

In recent years ISBE has been challenged incorporating the new review forms in addition to incorporating a new computer system and the retirement of 4 veteran monitors. ISBE has completed review cycle FY 2017 through FY 2019 in compliance with program regulations with the assistance of external contractors. ISBE has a goal to complete the training of 4 monitors newly hired to replace veteran monitors lost to retirement. In addition, ISBE has a goal to increase our training opportunities to our sponsors to better maintain compliance and improve program efficiencies. Under the last review cycle, we did not have the opportunity to fulfill sponsor requests for on-site technical assistance. We must refer SFAs to office staff for phone assistance or our website for previously recorded trainings. During the past review cycle we were able to maintain program regulations. However, the timeframes only allow our monitors to remain on-site approximately 2 days for a single site visit and 3 to 5 days for larger districts. Due to our review timeframes we currently have, there is not enough time for monitors to sit with the sponsors during the review for TA. Conducting a post review follow-up TA visit works better for the reviewer and the sponsor as the citations are known and have been reported and it allows the monitor to assess the amount of time needed for follow-up. The 5 year review cycle will allow our monitors to make return visits as needed to provide follow-up technical assistance to sponsors cited with substantial issues. Technical assistance is better received when it is provided outside of the compliance review and gives the sponsor time to prepare for one on one time with the monitor.

During the last three year review cycle, our outside contractor conducted 296 reviews. We believe with the 5 year review cycle that the reviews can be conducted by ISBE staff. We do not anticipate using an outside contractor for SNP reviews for the purposed 5 year review cycle. We hope to be fully compliant program cycle reviews with ISBE employees. The reduction of outside contractors will allow ISBE to redirect the approximate \$ 1 million spent on contract monitoring to other Child Nutrition needs.

With the additional review time provided under the waiver, ISBE will focus on providing on-site technical assistance and opportunities to conduct more regional based trainings to foster improvement and growth in CN programs. In addition, we would like to incorporate a technical assistance piece into the review process. We would provide a follow up technical assistance visit based on the number of questions generated on-site and/or non-compliance (citations) with program regulations. The referral for a technical assistance visit would be referred by the review monitor and approved by ISBE Nutrition Director, Division Supervisor or Monitoring Coordinator. The monitor is the best referral source since most of our monitors work within the same geographical region and conduct reviews over multiple cycles. Areas of technical assistance would follow topic areas from [ISBE's SNP Administrative Handbook](#) for ease of tying technical assistance to guidance readily available on our website to sponsors.

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

We are requesting a waiver of 7 CFR 210.18 (c). We would like extend the FY 2020 through FY 2022 3 year review cycle to a 5 year review cycle through FY 2024. The new review cycle would sync the procurement review cycle to the administrative review cycle to ensure compliance and ease of tracking. While we have completed a small portion of the procurement reviews in the previously approved 7 year cycle, we will continue our current process which will ensure every district will be reviewed upon completion of the new 5 year review cycle.

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

The review tracking will occur in the same manner it typically has however it will be drawn out and scheduled over five years instead of three. Additionally, the follow up reviews will be tracked by the monitoring checking a box in WINS indicating the need. The Monitoring Coordinator, Division Supervisor or Director will approve a follow up visit technical assistance visit to the sponsor. A technical assistance form will be documented and saved in the WINS system for review. The additional time available will be used by staff to provide more time at sponsors needing on-site technical assistance. It will allow our staff time to create and present trainings via webinar, regionally and upon request by sponsor's administration. Currently we are not able to conduct any significant assistance to sponsor's onsite and give phone assistance to sponsors with significant operating issues. Overall program operations are expected to improve as a result of the additional training opportunities we plan to provide as well as the additional technical assistance time staff will be able to spend with SFAs. Due to the anticipated

benefit to the SFAs, the change of review cycles was endorsed by the Illinois School Nutrition Association.

Our computer system (WINS) will produce a number of reports but we hope to increase the capabilities of the system to provide a better compliance and financial reporting with some regional comparisons. As time allows, WINS would be modified to better report the various reviews (AR and Procurement) to ensure compliance

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]:

ISBE has employed 3 resource management reviewers and maintained one procurement reviewer. We lost two employees to other job opportunities so we have had to retrain on the resource management reviews process and procurement process. The current training process allowed us to provide the review only. During the last review cycle, our contractor conducted 296 reviews to meet compliance guidelines. With the approval of the review cycle, we would eliminate the need for an outside contractor and redirect the money (approximately \$ 1 million) to other Child Nutrition needs.

With additional time from an extended review cycle, we would like to further develop the review process (both AR and Procurement) between field monitoring staff and office based reviewers. The process would allow for field staff to review material (detailed general ledgers, procurement documents, etc.) on-site and better coordinate with office based reviewers when more extensive assistance (poor procurements, financial losses, meal pattern improvements) or a more comprehensive review is needed. In Illinois, we have over 1,100 sponsors. Many are smaller dollar in reimbursement and managed by staff performing numerous roles within the organization. By doing so, this will allow office staff the opportunity to go out and review larger districts on-site when needed rather than providing scanned copies and providing TA over the phone.

The WINS system has been modified to make it easier for sponsors to provide responses and make changes to program participation details. We have worked to provide requests for data to the SFA in advance of the review in an effort to avoid extended time during reviews looking for paperwork etc. WINS loads numerous bits of data from our application and claiming modules into reviews so the burden of copying and transferring data has been reduced. We will continue work to improve efficiencies for ISBE reviewers and reducing paperwork burdens for our sponsors.

Illinois has been developing financial information on a site base level for all public schools. Since Illinois public schools are providing site based financial data, we would like to enhance the WINS system to assist districts with foodservice financial decisions using the financial guidance developed by ICN. The public and other sponsors could elect to provide data and we would be able to process the data and provide county-wide data for comparison purposes and against benchmark data.

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

We will have to modify our WINS system to track technical assistance visits and maintain documentation of the visits. The WINS system needs enhancements to ensure we coordinate all visits in a compliant and timely manner. In addition, we will have to incorporate procurement and resource management reviews into the system when work is conducted outside of the administrative review process. The system modification will ensure all providers are visited within the 5 year review cycle and TA visits are documented after the administrative review. The technical assistance piece will need to be incorporated into WINS to track the request made by the monitor. We hope to have the modifications completed within the first review year however we have provided detailed back up plans below in the event of an untimely delay.

Currently, we plan to have our WINS system updated to include a check box in which reviewers will select if they feel a follow-up visit is warranted. The check box selection will trigger notification to the monitoring coordinator, division supervisor and/or director. Upon approval, the reviewer will schedule the follow-up visit and complete documentation in WINS. In the event that the proposed change to WINS is not able to be done immediately upon approval of this waiver request, reviewers will notify the monitoring coordinator, division supervisor, and/or director of a need for a follow-up TA visit via email. The monitoring coordinator, division supervisor, and/or director will work with reviewers to approve and schedule TA visits. The reviewer will complete follow-up visit forms and scan into WINS system in order to keep all documentation with that specific SFA. The monitor will be able to request a follow-up technical assistance visit for shortly after the review or the following school year in the event there is a need to ensure the permanent fix has been maintained or in the event the AR occurs too late into the school year for a sooner visit. To ensure compliance with program regulations, excel spreadsheets maintained by the division supervisor will be used for procurement and AR reviews until the WINS system is modified.

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]:

We do not anticipate any additional cost at this time requiring the need for non-federal funds.

10. Anticipated waiver implementation date and time period:

We would begin the new review cycle as of October 1, 2019 through September 30, 2024 and all future review cycles as allowed by resubmitted and approved federal waivers of regulations.

11. Proposed monitoring and review procedures:

Same monitoring and review procedures would be used for administrative and procurement reviews. We will need to develop and document the technical assistance and limited follow up review process for documentation purposes. We envision having a simple review form with the areas indicated from the SNP administrative review guidance. The questions would allow a pop up box for the monitor to elaborate on the issue provided or touch upon during the technical

assistance visit. The review form would be scanned into WINS until a technical assistance review can be incorporated into WINS.

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

ISBE will continue to submit administrative review data through the 640 report and FPRS process. All administrative reviews will be reported as required by FNS guidance.

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]:

ISBE will post notice of the waiver request on its Nutrition website for public notice.

<https://www.isbe.net/nutrition>

14. Signature and title of requesting official :

A handwritten signature in black ink, appearing to be "Muelrath", with a long horizontal flourish extending to the right.