

CHILD NUTRITION PROGRAM

IL CNP Waiver 21-001

Waiver Request of the Carryover of Student Eligibility at Sites Participating in the National School Lunch Program

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

Illinois State Board of Education
100 N First Street
Springfield, IL 62777-0001

Mark Haller, Director
Nutrition Department
mhaller@isbe.net
217-782-2491

2. Region:

Midwest

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

The Illinois State Board of Education (ISBE) is requesting the waiver on behalf of all NSLP sponsors determined to be in good standing in the State of Illinois operating during the ongoing COVID-19 outbreak.

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]:

This request is to waive the regulatory requirement for 30 days of meal benefit carryover and extend that carryover to the entire SY20-21, through June 30, 2021, with the 30 days of meal benefit carryover into SY21-22 due to the COVID-19 outbreak. Such carryover statuses will be exempt from verification as well.

During this ongoing pandemic, schools have reported concerns about processing paper household eligibility application submitted from families. There may be delays as households are not opening mail immediately due to COVID-19 concerns, and then schools are also not processing as promptly due to the requirements to hold mail for a period of time once received at the school. This carryover option would lessen the number of households impacted by these safety precautions put in place to keep school staff safe.

There could be an increased burden of documentation on households impacted by the ongoing pandemic. If the household was eligible for free or reduced-price meals based on the completion of the household eligibility application prior to the pandemic it is highly likely that the household would continue to qualify during the ongoing pandemic. This will simply waive the requirement that the household submit a new application. With limited

staff in many food service operations, and the necessary time to rework program operations to meet the ever-complicated school day situations, this will assist school nutrition program professionals.

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

NSLA Citations	7 CFR Citations	Requirement
42 USC 1758(a)	245.6 (c)(2) 245.6a	Meal benefit carryover for 30 operating days and verification of such applications.

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

If approved, sponsors in Illinois would be notified of this option,. Monitoring procedures would be written to allow HEA dates from prior school year without fiscal penalty to the sponsor.

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 provide the requested waiver.

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

There are no anticipated challenges at the State and sponsor level. This would provide much needed reduction of paperwork burden to non CEP participating sponsors.

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]:

It is not anticipated that this will increase the overall cost of the Program to the Federal Government, as during this pandemic

10. Anticipated waiver implementation date and time period:

Implementation date requested: July 1, 2020.

Time period requested: June 30, 2021.

11. Proposed monitoring and review procedures:

Current NSLP monitoring of sponsors is included in the administrative review. This practice will continue as it is consistent with 7 CFR 210.18 requirements.

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

No later than December 31, 2021, ISBE will report to USDA the number of sponsors and sites that used this waiver.

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]:**

<https://www.isbe.net/Documents/CNP-State-Waiver-Request.pdf>

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



Title: Mark Haller, Director
Nutrition Department
Illinois State Board of Education

Requesting official's email address for transmission of response: mhaller@isbe.net

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:**