

*Child Nutrition Program Waiver Request
Maine Child Nutrition DOE
Master waiver request for multi-programs*

*Submitted November 6, 2020
Revised December 1, 2020
Revised December 14, 2020
Revised December 18, 2020*

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

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Walter Beesley
Child Nutrition DOE
136 State House Station
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2. Region: Northeast

3. Eligible service providers participating in waiver and affirmation that they are in good standing: This would be for the Maine State Agency, Maine Department of Education Child Nutrition (MDOE) and eligible sponsors of CACFP, NSLP, SFSP 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(l)(2)(A)(iii) and 12(l)(2)(A)(iv) of the NSLA]: In light of the exceptional circumstances of the COVID-19 Public Health Emergency, MDOE is requesting to waive several program monitoring and assistance and sponsoring organization monitoring requirements for the following USDA Programs: SFSP, CACFP, NSLP, and USDA Food Program.

This waiver would apply to monitoring of schools and institutions operating during this time of uncertainty and COVID-19. With sponsors adapting to COVID-19 outbreaks by shifting amongst remote, onsite and even closed statuses, flexibility is a must. Parents and family supporters may be unemployed, laid off or working reduced hours and, as a result, find it difficult to provide for their family. Maine still has several restrictions, which has resulted in closed businesses and customer limitations. With colder weather coming and a recent increase in cases, MDOE expects more restrictions and closures. The dining and tourist industries have taken a devastating hit, effecting the Maine economy. Many parents are working from home and having meals for their children has proved to be very important given the many thanks received. Flexibility is needed to ensure that children have access to good nutritious meals as much as possible. This also provides the children with comfort and some stability in their upside-down lives.

It should be noted that MDOE has accepted all Nationwide waivers.

MDOE is also asking to waive monitoring requirements 7 CFR 225.15(d)(2) & 7 CFR 225.15(d)(3) for SFSP sponsors. The documents traditionally used for the first week and comprehensive four-week visit forms for this process are no longer applicable due to the numerous waivers in place. Rather than have Sponsors complete these forms, MDOE will provide guidance and Technical Assistance on the need to monitor that program requirements and approved flexibilities are adhered to. The following is a sample of training and technical assistance opportunities:

- Weekly email communications to sponsors
 - A recent communication provided guidance on what must be in place for meals sent home, including waivers used.
- Webinars
 - Topics have historically included regular updates and overviews on flexibilities granted and processes to follow.
- Annual SFSP Sponsor Training
 - This will include training on the flexibilities in place
- SFSP review training
 - This will include training on the flexibilities in place and how they will be reviewed

It is important to note that sponsors are still instructed to safely monitor their programs to ensure regulations and waiver flexibilities are adhered too; this request is to remove the requirement that the traditional forms be completed as this is a burdensome process for sponsors at this time.

- Maine has 97 institutions with agreements to operate the CACFP in 222 centers and 655 family day care homes. The CACFP SA offers trainings and technical assistance to provide timely and relevant information to all institutions as they navigate the many changes and challenges that the public health emergency has presented. The number of institutions was adjusted from 99 to 97 because 2 institutions have not completed their 2021 CACFP agreement. Out of the 97 institutions with approved CACFP agreements for the 2021 year, 3 institutions are currently participating in SFSP instead of CACFP.
 - The CACFP SA had 103 participating institutions prior to COVID-19. The review schedule for the 2020 year consisted of 38 reviews, 16 were completed prior to COVID and the remainder were completed as desk audits. The centers portion of the audits was completed for 2 institutions that sponsor centers and family day care homes, and those 2 institutions are included in the total number of 38 reviews conducted in the 2020 year.
 - The 2021 review schedule consists of 45 reviews; this number is unusually large because 9 new schools have applied to participate in the CACFP At-Risk afterschool Program.
- NSLP Maine has 215 districts operating the NSLP. Districts not participating in the NSLP have their own unique challenges much like the SFSP. All have been in regular contact with MDOE as times change.
 - 195 SFA operating SFSP
 - 12 operating NSLP

1 SFA not filling claims
7 SFA are being supported by another entity
215 total SFAs

Pre-COVID, during Summer 2019, 122 sponsors operated SFSP and 56 received an SFSP Compliance Review. During COVID, 213 unique sponsors have been reimbursed for SFSP meals during calendar year 2020 SFSP operations. In July 2020 (which is one of the “traditional” SFSP months), 111 sponsors were reimbursed for meals. Currently operating SFSP there are:

195 school food authority (SFA) sponsors
2 non-non-profit sponsors
3 CACFP sponsors
0 SSO
200 total sponsors operating SPSP.

Maine currently has no Seamless Summer Option (SSO) programs nor had any past summers. Numbers are current but may change slightly as meal providers may move to summer programs.

Whereas only 12 NSLP programs are operating and none of them are on current cycle for an Administrative Review, the monitoring and other requirements related to such will not apply to SY21. The reference to school year is the graduation year. For example, SY21 is July 1, 2020 to June 30, 2021. This is true in all cases when a school year SY is given.

The NSLP Administrative Review timing and cycle on hold for one year during SY21. School Year SY is the year of graduation typically June. Will resume SY22 (July 1st, 2021), completing SY21 (July 1, 2020 to June 30, 2021) reviews. Maine will supply T/A, webinars, electronic materials and procurement reviews during SY21.

NSLP Administrative Review cycle

Pre-COVID	first year SY20 ending SY 24
Proposed cycle	first year SY20 ending SY25

The Each State Agency (SA) shall perform a review of each school food authority (SFA) contracting with a food service management company FSMC, at least once during each 3-year period. Maine is requesting an extension of one year for our one FSMC in Maine. They were schedule for SY21 (year 2 of cycle). Moved to SY22 which will be the new year 2 of the cycle. It will then stay on to the 3-year cycle. Again, Maine has only one FSMC operation in the NSLP.

FSMC NSLP Administrative Review cycle (1 district)

Pre-COVID	first year SY19 ending SY 21
Proposed cycle	first year SY19 ending SY22

- 7 CFR 245.11(a)-(b)** Notification of second review of Applications cannot happen as NSLP are not operating. Maine will resume this requirement SY 22 (July 1, 2021 to June 30, 2022).

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

SFSP

- [7 CFR 225.7(d)(2)(ii)(A)] Review new sponsors within the first year of operating.
- [7 CFR 225.7(d)(2)(ii)(B)] Annually review sponsors whose reimbursements count as half the aggregate from the previous year.
- [7 CFR 225.7(d)(2)(ii)(D)] Review every sponsor at least once every three years.
- [7 CFR 225.7(d)(2)(iii)(3)] Conduct follow up reviews of sponsors and sites as necessary.
- [7 CFR 225.7(d)(2)(iii)(6)] Inspect FSMC facilities.
- [7 CFR 225.15(d)(2)] Visit sites at least once during the first week of operation.
- [7 CFR 225.15(d)(3)] Review food service operations at each site at least once during the first four weeks of operation.

NSLP

The following are waiver requests for the NSLP Maine asks to waive:

- 7CFR 210.18 (c) The Administrative Review timing and cycle.
- 7CFR 210.19 (a)(5) Review of each school food authority contracting with a food service management company, at least once during each 3-year period.
- 7 CFR 245.11(a)-(b) Notification of second review of Applications

CACFP

MDOE requests that the following CACFP monitoring requirements be waived:

- 7CFR 226.17a (o)(1) the requirement that At-Risk sites maintain attendance records.
- 7CFR 226.6(m)(3)(vii) the requirement that monitoring of independent sites includes the observation of a meal service.
- 7CFR 226.6(m)(6) the requirement to annually review at least 33.3% of all institutions.
- 7 CFR 226.6(m)(6)(i) the requirement that independent centers and sponsoring organizations of 1 to 100 facilities must be reviewed at least once every three years.
- 7CFR 226.16(d)(4)(ii) the requirement that sponsoring institutions conduct a reconciliation of meal counts.
- 7CFR 226.16(d)(4)(iii)(A) the requirement that sponsors conduct unannounced visits.
- 7CFR 226.16(d)(4)(iii)(B) the requirement that sponsors observe a meal service.

- 7CFR 226.16(d)(4)(iii)(D)** the requirement that not more than 6 months elapse between sponsor reviews.

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

There are no anticipated impacts on technology or state systems. There will be an impact for all programs on staffing demands and unexpected tasks. Monitoring continues in all programs with constant communication and review of any requested documents. Daily MDOE staff meetings includes the sharing of information among the programs which has been very useful overall. It also creates the opportunity to share monitoring outcomes with Child Nutrition staff. In all cases the goal is to minimize contact and possible exposure to all. Maine has and is required to keep this as a focus for staff and children.

SFSP

Due to the public health emergency, MDOE is planning to conduct SFSP desk audits of summer sponsors and will use a claim as a review period (most recent claim). Paperwork will be submitted by sponsors as part of the review and the process will include regular communication with sponsors. Due to remote working locations, confidential material, such as meal benefit applications, are not allowed under Maine Data and Confidentiality policy. This will need to be considered when the reviews are planned.

MDOE understands that program integrity must be upheld during this time. So rather than meeting the traditional requirement, MDOE will review according to this plan:

- All experienced sponsors who are required to be reviewed based on the 3-year cycle (37 sponsors meet this requirement)
- Sponsors who experienced significant operational concerns the prior summer
- New sponsors who are operating in 2020 if:
 - o They are a non-SFA
 - o They are an SFA who has experienced operational concerns in the past

Using a similar plan in 2020, MDOE successfully reviewed sponsors off site.

Approximately 40 sponsors, or more, will receive a SFSP review based on the above plan. This includes the 37 on cycle plus any new non-SFA sponsors. To further ensure program integrity, additional reviews will be added for sponsors flagged as high risk, those with operational concerns brought forward by staff. Currently, one SFA sponsor uses a FSMC. The facility used is the school district, which has been inspected in the past as part of Administrative reviews. This year, the district is also getting a Procurement Review and, though MDOE is requesting to waive the onsite FSMC facility inspection, this sponsor will be added to the SFSP review schedule for an offsite review.

This plan will allow for review of program integrity and proper use of federal funds as questions related to these topics are included in the review process. For instance, documentation to support claims is requested and questions are asked about the meal counting and claiming process.

These questions also allow staff to assess compliance with regulations and flexibilities. For further information on how program integrity will be upheld please see details outlined in the following section.

NSLP

The NSLP Administrative Reviews will begin SY22 (July 1st, 2021) with any SY20 (July 1, 2019- June 30, 2020) Administrative Reviews not completed and SY21 (July1, 2020-June 30,2021) Administrative Reviews. During SY 21 procurement reviews continued which provided constant contact with sponsors and business offices.

Ensuring Program Integrity: For all programs (CACFP, SFSP, NSLP, and the USDA Food Program) staff provides T/A in several areas by phone, virtual meeting and webinars. Trainings are directed to Food Service Departments and sponsor Administration. Webinars take place at least monthly on current hot topics or recent USDA releases or areas we see a need. Virtual meetings occur as we see issues or districts struggling. The tentative plan is to hold these meetings monthly or more often as needed. This is determined by late reporting, changes in staff, and other high-risk indicators. Phone calls are as needed. Staff is in constant communications with our districts. Staff generate calls based on feedback from DOE, partners, paperwork submitted, media and social media. Staff and Food Service Directors have an excellent relationship and generally accept our calls as friendly and helpful. During the daily morning meeting at MDOE, staff shares any information about sponsors in all three programs and the director shares anything from the Department level about a district. MDOE feel we are in great communication with local sponsors to know what is happening and possible issues. MDOE has an excellent customer service program for all sponsors. We are also monitoring monthly claims that may look questionable. When a claim shows a significant variation (greater than 75%) in the reimbursement it is reviewed and contacted to verify. District's that have a large change in meals served or a large reimbursement compared to other months is flagged and a reviewer assigned to follow-up. This ensures program integrity is upheld and reimbursements are reviewed for potentially fraudulent activity or misuse of Federal funds.

CACFP

The CACFP SA is conducting a very thorough desk audit of institutions due for review in the 2020 and 2021 agreement years, (with the exception of family day care home sponsors). Integrity will be upheld through this review process as we are taking an in-depth look at all review components. As mentioned elsewhere in this document, we are requesting a waiver for the review of 2 family day care home (DCH) sponsors that were due for review in 2020 and 1 DCH sponsor that is due for review in 2021. As also explained elsewhere in this request, the DCH sponsors are all in good standing with the CACFP and re-scheduling those reviews to be completed in the 2022 agreement year is not a cause for concern. The CACFP SA requested, reviewed and approved written monitoring plans from DCH sponsors to ensure that their monitoring and oversight of the sponsored facilities ensures program integrity is maintained.

The CACFP SA offers regular webinars that cover CACFP updates and requirements. The webinars are recorded and are available on the DOE website for those who cannot listen to the live event. Webinar topics vary greatly and are often chosen by CACFP SA staff through the

review/desk audit process. When SA staff discover that a CACFP requirement is frequently identified as a review finding, technical assistance is given to the individual institutions and webinars are created to address common findings. Institutions that have numerous review findings and/or require a lot of technical assistance are targeted for a follow-up review in the next agreement year. CACFP Basic Training is also conducted on a quarterly basis; this training is an in-depth look at meal pattern and record-keeping requirements and helps new applicants as well as new staff at participating institutions by describing the day-to-day operation requirements of the CACFP. These trainings are required for new applicants and are offered to new staff members at participating institutions; the trainings are also required as part of a corrective action plan for staff with CACFP duties when an institution has review/audit findings that demonstrate a lack of the basic knowledge required to be compliant with CACFP requirements. The CACFP SA is currently creating ounce equivalents training, new on-site review software training and a training to help participants understand the annual in-house training requirements. In addition to the planned trainings and on-going assistance, the CACFP SA will monitor trends to determine areas that require additional training.

At-Risk Afterschool Programs require attendance and meal counts to be tracked separately. Tracking attendance when the required enrichment/educational activities have been waived is burdensome to the sponsors. Also, tracking attendance (First and Last names) generally requires some type of physical interaction, be it, a sign-in sheet or point of service pin pad system. The State Agency wants to protect our CACFP At Risk Sponsors by limiting exposure and keeping interactions with participants as brief as possible. Participants would be instructed that this was a temporary measure for public safety and that the importance of keeping accurate meal count records increases with the flexibility of not keeping attendance records. The SA would require that all interested At-Risk institutions complete a form to request the use of this waiver; the form would require them to detail their proposed plan of action to ensure accuracy, and those requests would be assessed by the SA before a request would be granted. Requiring that At-Risk sites keep separate meal count and attendance records would resume once it is safe to do so.

The CACFP SA conducts in-depth interviews in-lieu of observation of a meal service. The SA conducts in-depth interviews with each review, and these interviews include questions that require detailed answers regarding all review requirements that would normally be done by observation. This includes asking for specifics about how serving size requirements are ensured: Who measures the serving sizes for each child/age group? Have they been properly trained regarding the minimum serving size requirements? Do they use the food chart as a guide when measuring food? Do they use measuring cups and/or spoodles? These detailed answers are documented and the CACFP staff offers technical assistance if any answer is not sufficient to meet Program rules and regulations. We ask these types of questions (where an answer leads to an additional question) about all aspects of the review that were previously accomplished by observation. Some states are requiring pictures or videos of review components that would normally require observation; however, we prefer the in-depth interview for several reasons: 1. The Governor of Maine has allowed childcare providers to accept additional children in excess of their normal licensed capacity during this unprecedented time thus placing extra responsibility on the providers; 2. Many childcare providers, especially the independent institutions, do not have the technology required to submit photos or videos; and those that have the equipment are not always tech-savvy enough to understand how to use it; 3. Providers have the extra responsibility of assisting school-age children with remote learning, ensuring social distancing

for children who want to hug or hold hands with their friends and do not understand the need to avoid that behavior, ensuring that children keep masks on their faces and wash their hands more frequently than was required before the public health emergency, and the responsibility of disinfecting surfaces frequently throughout the day; and 4. Photos and videos are less apt to present a clear idea of the actual workings of the site due to poor lighting, shadows and camera angles. In-depth interviews that allow the SA staff to document clear and detailed descriptions of institution practices help SA staff to discover any gaps in required practices.

The CACFP SA requests the flexibility to review 20% of all institutions. Our plan is to conduct the 33.3% required, but the flexibility of conducting fewer reviews throughout the year would be helpful if unanticipated circumstances (such as institutions closing) prevent the completion of all the scheduled reviews. This would also be helpful in that we would not be held to a standard that may be difficult to meet as the year goes on and situations change.

MDOE is also requesting the flexibility to waive the 3-year review requirement and to delay the review of sponsors of family day care homes and of some other institutions in good standing that are due for review during the public health emergency to decrease the desk audit workload to 20% in the event that the waiver request to review 20% of all institutions is granted. A large portion of FDCH sponsor reviews involve the on-site review of FDCH providers, which is not currently feasible. These reviews also involve the examination of hundreds of pages of CACFP-related paperwork which is also not feasible to accomplish as a desk audit. FDCH sponsor are the most viable, capable and accountable institutions in the State of Maine, so there is no concern that they would not remain in good standing with the CACFP SA. All reviews that were not completed due to the granting of this request would be conducted in the 2022 year, or as soon as the public health emergency is no longer a concern.

Requiring sponsors to conduct a reconciliation of meal counts requires day of review observation of the children in attendance. The barriers regarding providers submitted photos or videos are the same as those presented above. Sponsors would be given a review form that is created by the SA to ensure that the questions they ask in-lieu of on-site observations are thorough and descriptive. Sponsors will offer immediate technical assistance for any sites/providers that fail to offer adequate answers. Sponsors would still be required to compare meal counts to attendance and enrollment but would not be required to verify day-of-visit attendance. Reconciliation of meal counts would resume with the resumption of on-site monitoring.

Most sponsors continue to conduct unannounced visits through desk audits; however, at least 1 FDCH sponsor has let us know that when they attempted to conduct unannounced phone interviews, providers were not answering their phones and were calling back after the FDCH staff had gone home for the day. This flexibility is requested to cover circumstances such as these where a sponsor has attempted to conduct unannounced visits unsuccessfully and has resorted to conducting those visits on a scheduled day and time. The importance of unannounced visits is understood and will be resumed as soon as possible.

The plan for observation of a meal service by sponsors is the same as the plan for observation of a meal service by the State Agency.

Sponsors may find the requirement that not more than 6 months elapse between monitoring visits to be impossible to meet because several sites and providers throughout the state have closed due to COVID-19 and have not yet re-opened.

Training Topics:

In addition to Technical Assistance being available, training topics are planned around areas necessary to uphold program integrity. Training topics have been chosen as a result of FNS SFSP Management Evaluation feedback, findings from SY2020 SFSP compliance reviews, and other criteria, including overall benefit for the field, and subjects surrounding program integrity and allowable use of Federal funds. Topics include:

- Completing the 2021 SFSP application packet, which includes guidance on how to complete a proper budget
- Informal Procurement
- Food Safety
- Local Foods
- SFSP meal pattern compliance
- Meal counting and claiming
- Waivers

Training for the few NSLP will consist of

- Annual Participation Packet
- Procurement
- Food Safety
- Local Foods
- NSLP meal pattern compliance
- Accountability/program integrity
- Meal Distribution
- Waivers
- Claim filing
- Wellness policy
- Civil Rights
- USDA Food

Oversite of SFSP Claims to monitor for any misuse of Federal funds, identify fraudulent activities and ensure program integrity is upheld

MDOE will include a comprehensive SFSP claim review for each SFSP sponsor receiving an offsite desk audit for Summer 2021 operations. Claim reviews were successful in 2020 and included MDOE staff reviewing daily and consolidated meal count documentation for all sites under the sponsor chosen for a compliance review.

In addition, the staff member who oversees the finances for MDOE Child Nutrition will monitor pending claims for reimbursement via the monthly manifest and communicate with the Child Nutrition Supervisor any concerns regarding pending payments. This information will be brought forward to the team at team meetings, which currently occur daily. For instance, areas of concern may be significant variances in month to month SFSP claim amounts or a significant increase in meal counts that deems follow-up from MDOE. At that point, the team will discuss next steps

and follow-up accordingly. A team member, most likely a Child Nutrition reviewer, will request information from the food service contact at the sponsoring organization to investigate further. Sponsor administration will be brought in if necessary, for example, if the food service contact is not able to provide information or is not able to be reached. In addition, NERO will be communicated with as needed. The current reporting system has built in edit checks as required by USDA regulations to ensure compliance as well. These are the same edit checks used in the traditional summer and have worked prior years during the summer.

7. Description of any steps the State has taken to address regulatory barriers at the State level. [Section 12(I)(2)(A)(ii) of the NSLA]: There are currently no state level regulatory barriers that would impact this issue.

8. Anticipated challenges State or eligible service providers may face with the waiver implementation: The only challenge is communication/training sometimes. Other than that there are no challenges anticipated.

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 only additional cost MDOE anticipates is the hiring of additional staff to review waivers and any follow-up USDA requests.

10. Anticipated waiver implementation date and time period: Start date upon approval by FNS/USDA for all programs. End date for NSLP June 30,2021, CACFP and SFSP September 30,2021.

11. Proposed monitoring and review procedures: MDOE staff will continue to monitor the implementation of this waiver. To ensure program integrity for all programs, MDOE will, to the maximum extent practicable, continue monitoring activities of program operations for misuse of funds and fraudulent activities. This includes continuing the Procurement Reviews during SY21, attending trainings conducted by sponsors, reviewing sample monthly claims for errors, regular sponsor communication, social media checks, and regional organization meetings. Staff is unable to make site visits due to Maine Executive Orders, employee safety and Maine directives. Staff will monitor claims and payment manifest monthly prior to payment release for consistent meal counts and reimbursement for fraudulent claims and program integrity. Child Nutrition (NSLP, SFSP, CACFP, and USDA Food Program) communicates daily at the Child Nutrition team level, weekly Department meetings, weekly MDOE leadership meetings and monthly MDOE directors' meetings. Information is about district changes and issues among the districts is shared at these meetings. The Director of Child Nutrition attends the weekly district business managers meeting currently and works with the Maine School Management Association.

Staff are not able to travel due to State restrictions because of COVID and DOE policy does not allow confidential material to be accessed when working remotely. Confidential material must be handled in the office with the limited staff on-site. Staff will do our best in talking to districts and attending functions. We also keep in touch with social media and parent comments/pictures. All State Agency work is being done remotely for sponsors, MDOE and

NERO. The small staff of Maine is at maximum capacity managing Federal and State requests, hunger advocates, local District administration and monitoring all of our programs, CACFP, NSLP, SFSP, and USDA Food. A list will be maintained by director of high-risk districts as defined in our Policy approved by NERO. Risks in part include staff turnover, media reports, parent reports, legal reports, vendor reports and audit findings. All districts deemed high risk will be recorded as such and appropriate action will be determined such as calls, desk audit and/or assigned to an on-site visit as soon as possible.

All trainings are posted on Child Nutrition COVID web page, <https://www.maine.gov/doe/schools/nutrition/unanticipatedschoolclosure>.

Maine feels the constant, rapid and different methods of communication is essential and the best method to prevent misuse of funds, fraudulent activities and maintain program integrity. We use all virtual methods discussed in this request as well as our Child Nutrition list serve and CACFP list serve which is two-way communication all can see. It also is used for our weekly updates to the more than 500 members. The list serve is for Maine school's food service staff and local administration. Maine staff has an excellent rapport with all Maine districts. MDOE Child Nutrition operates in a fair and friendly method, therefore we are well respected. The training topics offered address program integrity and proper use of funds.

12. Proposed reporting requirements (include type of data and due date(s) to FNS): Within 1 year after the date the waiver is approved, MDOE will report a summary of the use of this waiver by MDOE and a description of whether and how this waiver resulted in improved services to program participants.

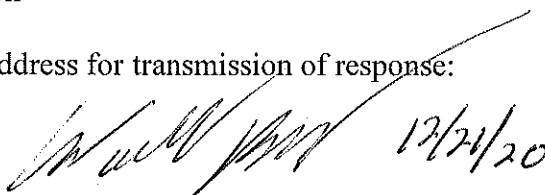
13. Link to or a copy of the public notice informing the public about the proposed waiver [Section 12(l)(1)(A)(ii) of the NSLA]: This will be shared on the MDOE Child Nutrition website. <https://www.maine.gov/doe/schools/nutrition/unanticipatedschoolclosure>

14. Signature and title of requesting official:

Title: Director Child Nutrition

Requesting official's email address for transmission of response:

walter.beesley@maine.gov



Handwritten signature and date: 12/24/20

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:

Child Nutrition Programs Monitoring and Oversight Plan Checklist

