

April 10, 2020

Julie Mikkelson  
SNAP Director  
USDA FNS MWRO  
77 W Jackson Blvd 20th floor  
Chicago IL 60604

Dear Ms. Mikkelson:

This letter is to request a waiver of federal regulations at 2 CFR 200.430 and 7 CFR 272.2(d)(2)(vii)(B). These regulations dictate allowable SNAP-Ed activities and compensation.

Iowa has two implementing agencies, Iowa Department of Public Health (IDPH) and Iowa State University (ISU). This waiver would allow IDPH and their sub-grantees to support the emergency food system, including food banks, food pantries, senior meal sites, school meals and other food assistance sites who deliver emergency meals and food.

As of April 9, Iowa had over 1,200 confirmed cases of COVID-19. To combat the spread, Governor Reynolds has closed schools and many businesses through at least April 30, and unemployment and food insecurity rates are soaring. Approval of this waiver would allow SNAP-Ed educators, who are currently unable to conduct traditional activities, to help deliver food and nutrition to the most needy Iowans.

I appreciate your support in Iowa's efforts to improve access to nutritious foods through whatever channels we can utilize. I believe this waiver assists with those efforts, and therefore request approval thorough the duration of the pandemic. Although we are requesting approval through September 30, IDPH plans to resume normal SNAP-Ed activities as soon as it is safe to do so.

If you have questions, please contact Kari Lind at [klind@dhs.state.ia.us](mailto:klind@dhs.state.ia.us), or 515-281-7000.

Sincerely,

*Janee Harvey, by kl*

Janee Harvey  
Division Administrator  
Adult, Children and Family Services

JH/kl

cc: Kari Lind, Food Assistance Program Manager  
Tiffany Wickman, Food Assistance Team Lead

## STATE WAIVER REQUEST

**1. Waiver Serial Number (if applicable):**

**2. Type of request:** Initial

**3. Regulatory citation:**

2 CFR §200.430

7 CFR §272.2 (d)(2)(vii)(B)

**4. State:** Iowa

**5. Region:** Midwest

**6. Regulatory requirements:**

2 CFR §200.430 Compensation—Personal Services states that services rendered by an employee should be compensated during the period of performance under the federal award. This regulation clarifies that professional activities needing special consideration need to be authorized by the federal awarding agency.

7 CFR §272.2 (d)(2)(vii)(B) SNAP-Ed services are “a combination of educational strategies, accompanied by supporting environmental interventions, demonstrated to facilitate the adoption of food and physical activity choices and other nutrition-related behaviors conducive to the health and well-being of SNAP participants and low income individuals eligible to receive benefits under SNAP or other means tested Federal assistance programs and individuals residing in communities with a significant low income population.”

**7. Proposed alternative procedures:**

This waiver will allow the Iowa Department of Human Services to grant temporary approval to the Iowa Department of Public Health, one of the SNAP-Ed Implementing Agencies in the state, and their sub-grantees to compensate salary and benefits, in-state travel, and reasonable and necessary supplies (not including food except for food demonstrations) to support the emergency food system. This system includes food banks, food pantries, senior meal sites, school meals and other food assistance sites who deliver emergency meals and food.

**8. Justification for request:**

The emergency food system in Iowa is stretched beyond its capacity due to the impact of the COVID-19 pandemic. The closure of meal program sites combined with the economic hardships Iowans are facing as a result of the pandemic have caused more people to access the emergency food system. Food banks and pantries have a critical shortage of volunteers. Area Agencies on Aging need more support to distribute food to high-risk seniors isolated in their homes. School meal programs are

forced to adapt quickly, providing free grab-and-go meals to students and preparing for increased participation in the summer meal program.

Governor Reynolds has issued many mandates as part of the State Public Health Emergency Declaration. In accordance with these mandates, SNAP-Ed providers are prohibited from delivering in-person nutrition education. As a result, nutrition educators have time in their schedule to serve in other capacities. Additionally, nutrition educators have strong community partnerships and are skilled in the areas of food and nutrition. Their service in the emergency food system will help decrease the volunteer shortage and allow nutrition programs to serve more people.

**9. Caseload information, including percent of caseload and description of population expected to be affected by this waiver:**

The waiver is intended to support an increase in the caseload of other nutrition assistance programs, including school nutrition and senior meal programs. Since in-person nutrition education in SNAP-Ed is not possible at this time, the waiver allows another avenue for connecting with SNAP-Ed participants. In some cases, nutrition education materials will be delivered alongside the meal.

In 2019, the Iowa Department of Public Health's SNAP-Ed program served 25,502 people. Under the current situation, many, of these individuals, in addition to many other Iowans, are struggling to provide enough food for their families and are relying on the emergency food system. The high demand, yet lack of food and volunteers, is stressing the system. The waiver would allow nutrition educators to work in meal assistance programs, filling a volunteer gap, while providing SNAP-Ed participants with what they need most – food.

Like the rest of the nation, Iowa is experiencing unprecedented rates of unemployment. According to Iowa Work Force Development, a record number of unemployment claims were initiated for the week ending April 4, with 67,334 claims reported. This is a drastic increase from just one month earlier. For the week ending March 7, 221 initial claims were reported. Prior to the pandemic, based on data going back to 1987, the most unemployment claims initiated in one week was 14,201.

To address the financial hardship so many Iowans are experiencing right now, Governor Reynolds established the “Governor’s Feeding Iowa Task Force.” This group, which consists of members from state departments within the Executive Branch as well as the Iowa Food Bank Association and Volunteer Iowa, meets frequently to address food access. They launched a new website on April 10 to connect and support stakeholders in the fight against COVID 19 related poverty and food insecurity.

**10. Anticipated impact on households and State agency operations:**

The Iowa Department of Public Health's SNAP-Ed program has a solid network of partners who form the Iowa Nutrition Network. This multisector network includes partners from education, public health, agriculture, commodity groups, nonprofit

agencies, food systems, healthcare and government. In 2019, SNAP-Ed programming included 168 partners who contributed to nutrition education services. These existing relationships position SNAP-Ed staff to assist in the emergency food system and help Iowans impacted by the pandemic.

SNAP known as Iowa Food Assistance in Iowa, has seen a dramatic increase in applications since the onset of the pandemic. Applications have increased 86% over the same time period last year. To help Iowans most affected by the pandemic, Iowa implemented waivers to increase allotments to the maximum and extend certification periods for households.

This waiver allows SNAP-Ed staff to shift their work to where help is most needed. The need for food is urgent at this time. SNAP-Ed staff are well suited to assist with meal delivery and other activities to support the emergency food system. By doing so, they will be able to support Iowa's most vulnerable residents and strengthen community partnerships, which will benefit SNAP-Ed programming in the long run.

**11. Anticipated implementation date and time period for which waiver is needed (please indicate if the waiver approval is needed to make system adjustments):**

We request approval of this waiver effective immediately through the end of the pandemic or September 30, 2020, whichever happens first.

**12. Proposed quality control review procedures:**

The Iowa Department of Human Services (DHS) will continue requiring documentation of all expenses. SNAP-Ed sub-grantees will maintain records of time and effort and receipts of actual expenses incurred.

**13. Name, title, and email of requesting official:**

**Name:** Janee Harvey

**Title:** Division Administrator, Adult, Children and Family Services

**Email:** Jharvey1@dhs.state.ia.us

**14. Date of request:** April 10, 2020

**15. State agency staff contact:**

**Name:** Kari Lind

**Title:** Food Assistance Program Manager

**Email:** klind@dhs.state.ia.us

**16. Regional Office contact person (to be completed by FNS regional office):**