



Angélica Infante-Green  
Commissioner

State of Rhode Island and Providence Plantations  
**DEPARTMENT OF ELEMENTARY AND SECONDARY EDUCATION**  
Shepard Building  
255 Westminster Street  
Providence, Rhode Island 02903-3400

November 5, 2020

Northeast Regional Office  
Community Nutrition Programs Branch  
USDA Food and Nutrition Services NERO  
10 Causeway Street, #501  
Boston, MA 02222-1069

**Subject of waiver request:** Request to waive certain regulatory requirements related to monitoring of the NSLP, CACFP and SFSP for FY21.

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

Stephen Carey  
Nutrition Programs Coordinator  
Office of Statewide Efficiencies  
Rhode Island Department of Education  
255 Westminster Street  
Providence, RI 02903

**2. Region:** Northeast Region

**3. Eligible service providers participating in waiver and affirmation that they are in good standing:** The Rhode Island Department of Education as well as all providers are in good standing with the FNS regional and national offices.

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

Prior to the COVID-19 global health crisis, Rhode Island would have anticipated to have 84 Sponsors participating in the NSLP, 88 Sponsors participating in the CACFP, and 25 Sponsors participating in the SFSP for FY21. Based on these numbers, our planned review cycles for each program would have included 10 NSLP Administrative Reviews, 30 CACFP Reviews, and 10 SFSP reviews.

With the recent flexibilities, which have allowed the majority of our traditional NSLP Sponsors to transition to the SFSP for the 20-21 school year, we are now have the following breakdown of Sponsors for the 20-21 school year:

- SFSP
  - 57 SFA Sponsors\*
  - 1 Government Sponsor
  - 4 Private Sponsors
- NSLP
  - 15 Independent/Charter School (non-SSO) Sponsors
  - 8 RCCI (non-SSO) Sponsors
- CACFP
  - 9 Adult Day Care Sponsors
  - 78 Child Care Sponsors
  - 1 Family Day Care Home Sponsor

\*Some existing SFAs elected to become sites under a different SFA's Sponsorship for the SFSP, so the total number of participating NSLP Sponsors plus the number of SFSP SFA Sponsors do not quite match

The majority of the SFA-based SFSP Sponsors as listed above are new to the program and these 62 Sponsors represent over 345 service sites. Based on our current participation rates we are now anticipating to have none of the original 10 scheduled NSLP Sponsors available to complete the Administrative Review process since they will all be participating in the SFSP. While our ability to conduct the full number of NSLP reviews required to remain on-cycle and in compliance has been impacted due to lack of participation, our SFSP review schedule has been significantly increased due to the high number of new Sponsors and we are now anticipating an SFSP review cycle that would include about 45 program reviews for FY21. The majority of these reviews would represent Sponsors that are not likely to continue SFSP participation in the future and/or Sponsors that if they were to continue with future SFSP participation, would not do so in circumstances not at all similar to the current operations. At this time our CACFP review cycle remains unchanged in terms of overall numbers, however, in order to comply with local COVID-19 restrictions, no CACFP reviews will be able to be conducted on site, which will make the entire review process both more cumbersome and less effective in terms of maintaining program integrity. Given the limited capacity of our office, which employees only 2 program FTE's, combined with the increased burden and limitations associated with the FY21 review cycle, we are requesting flexibility through the regulatory waiver process for all 3 Child Nutrition Programs both on the State Agency side as well as on the Sponsor side.

### CACFP

For the CACFP, Rhode Island is requesting to waive the requirement that State Agencies must annually review at least 33.3 percent of all institutions and the additional review frequency requirements found at 7 CFR 226.6(m)(6)(i) and (ii).

Due to the continually changing environment and challenges associated with operating child nutrition programs during COVID-19, CACFP providers, State Agencies, and all other federally funded child nutrition program Sponsors are facing an ambiguous and daunting workload that is anticipated to carry well into the federal fiscal year 2021. At the Rhode Island Department of Education (RIDE), we have only 1 FTE combined with 1.5 contractors that are tasked with the management and oversight of both the SFSP and CACFP, including creating all training materials, conducting training, on-boarding new Sponsors, reviewing program applications and renewals, conducting program reviews, and providing technical assistance to the field. With the extension of the SFSP through June 30, 2021, RI is anticipating to have over 60 active SFSP Sponsors for FY21, as opposed to our typical 25 Sponsors, meaning that over half of our SFSP Sponsors for FY21 are new to the SFSP and will require a higher level of support and technical assistance. In addition to this significantly increased workload associated with the SFSP, our team is simultaneously working to transition our CACFP and

SFSP training to a virtual platform in order to align with local and national policies and recommendations regarding large gatherings. We are also facing an increased request for technical assistance related to the CACFP while also working to manage the CACFP renewal process.

In order to provide the best the possible service to field, which will help us to increase and maintain program integrity, we are requesting the delay of our current CACFP review cycle by one (1) fiscal year. We do not feel that it is feasible for our team to manage the demands of both the SFSP and CACFP in a way that will provide meaningful support to the field while also driving program integrity. Further, since all CACFP reviews for FY21 would be conducted virtually, in accordance with local policies and federal waivers, we do not feel that this process would allow us to achieve level of rigor and scrutiny that we would normally reach through the program review process. Additionally, most of our CACFP providers are operating under vastly different conditions than they would typically and a review of the current procedures would not provide reviewers with an adequate picture of 'normal' program operations. Rather than conducting a review process that would not allow reviewers to gain a clear picture of standard program operations, allowing for the appropriate associated technical assistance and/or required corrective action to take place, and which would also leave our CACFP Sponsors scheduled for review this year with a 5 year period in which they will have not been subject to an on-site State Agency review, we feel that our Sponsors and program participants would be best served by pausing the review process for one (1) program year. By pausing our review cycle for one (1) year we will be able to more equitably serve our Sponsors and their participants and will be able to increase program integrity through improved/increased training, technical assistance, and future on-site monitoring for the CACFP.

If approved, we propose to shift our entire CACFP review cycle by one (1) fiscal year, meaning that Sponsors currently on-cycle for FY21 will instead be reviewed in FY22; Sponsors currently scheduled for review in FY22 will be moved to FY23; Sponsors currently scheduled for review in FY23 will be moved to FY24. This will result in Sponsors being reviewed once every four (4) years rather than once every three (3) years for one full review cycle. At the conclusion of FY24, RIDE will be on track to meet traditional review requirements associated with the CACFP. In lieu of traditional monitoring, RIDE proposes to offer increased, targeted technical assistance for those CACFP Sponsors that would have been up for review during FY21. These efforts are to include 3 live webinar trainings (1 per quarter, beginning in Q2), which will cover common review findings and will allow Sponsors ample time for Q&A. Participation in these webinars will be required for any Sponsors that were on the review cycle but will be open to all active CACFP Sponsors. Feedback and questions received from these trainings will drive additional trainings to be developed, as necessary, and/or additional individual technical assistance sessions for Sponsors with identified need. In addition to these sessions, we will also be asking all Sponsors that were due for review in FY21 to submit one week of served menus with supporting documentation (i.e. recipes, product formulation statements, etc.) for review. This process will be supported by our CACFP consultant working under our CACFP Meal Service Training Grant, which has been extended through June 30, 2021. Each Sponsor will receive individual, specific technical assistance based on the documentation that is provided. Maintaining documentation to support the CACFP meal pattern continues to be a challenge for our Sponsors and is one of our most common review findings, so this support is anticipated to be highly valuable in establishing and maintaining compliance going forward. Also as a part of our CACFP Meal Service Training Grant, during FY21 we will make the USDA's "Feeding Infants" training available to all Sponsors that would have been on cycle for review; infant feeding represents another common review finding area. Similar to our request for meal pattern documentation, RIDE will also request that each Sponsor that would have been on cycle for review in FY21 submit a sampling of attendance records, meal counts, and meal benefit applications that support the monthly claim for reimbursement. The sample size requested will be dependent on the size and scope of each Sponsor's operations. RIDE will provide targeted technical assistance, as necessary, based on the documentation provided and will also use this

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documentation to determine whether any further monitoring, training, or technical assistance measures are required.

In addition to the above referenced State Agency CACFP waivers, we are also requesting two regulatory waivers on behalf of our CACFP Sponsors. Specifically, we are requesting to waive the requirements found at 7 CFR 226.16(d)(4)(iii)(A),(B)&(D), which require that Sponsors conduct at least 2 of the 3 required reviews as unannounced visits, with at least one of those visits including an observation of meal service, and which require Sponsors to allow no more than 6 months to lapse between monitoring visits. Under the current nationwide waivers we have allowed Sponsors to request approval to conduct off-site monitoring visits for FY21. For those Sponsors electing to participate in off-site monitoring, conducting an unannounced review will not be feasible, as the alternate review methods proposed will require coordination with on-site staff. Additionally, even for those Sponsors that are continuing with on-site reviews, unannounced reviews may not be practical or safe with the current restrictions in place related to COVID-19. Lastly, while many of our Sponsors are operating, some are still closed or have suspended CACFP meal service for the time being due to COVID-19 and for these Sponsors we are requesting additional flexibilities related to the timing of reviews.

### **NSLP**

For the NSLP, Rhode Island is requesting a waiver of the requirements set forth in 7 CFR 210.18(c) and 7 CFR 210.19(a)(5) which dictate the timing and cycle of administrative reviews, as well as the review requirements for SFA's contracting with a Food Service Management Company (FSMC). RIDE is currently operating under an NSLP monitoring waiver that has allowed us to extend our typical 3 year Administrative Review cycle, which we conduct in tandem with our FSMC reviews, to a 5 year period. The current review cycle is SY 16-17 to SY 20-21. Fiscal year 2021 represents the 5<sup>th</sup> and final year of our current cycle. However, as previously stated, none of the anticipated 10 Sponsors due for review will be participating in the NSLP during the 20-21 school year. For this reason, we are requesting to pause the Administrative Reviews during FY21 and resume the 5<sup>th</sup> year of our review cycle in FY22. If approved, the new review cycle will be SY 16-17 to SY 21-22. If approved, all 10 Sponsors due for review in FY21 would be receive a full administrative review by the end of FY22, which would mark the conclusion of our current review cycle; FY23 would mark the start of a new review cycle and would be year 1 of that cycle. While the Sponsors that should have received an Administrative Review in FY21 will be delayed by 1 year, these Sponsors will be provided with targeted support and technical assistance under the SFSP during FY21, which will support the maintenance of program integrity while meeting the needs of our Sponsors and their participants. Additionally, since nutrition compliance is reviewed during the ARs, we request a waiver of the requirement to review trans-fat [7CFR 210.10(h)(2)], as well as the other requirements that fall under Administrative Review [7 CFR 210.18].

The need for a second review of applications is generally discovered during the AR. Also, 2 of the 3 sponsors currently obligated to perform a second review of applications are not participating in the NSLP, but are instead participating in the SFSP. Therefore, we request to waive the requirements found at 7 CFR 245.11(a)-(b). RIDE will require them to continue the second review of applications during FY22.

In addition to the aforementioned statement that the sponsors currently slated for an NSLP review will receive targeted support and technical assistance under the SFSP this year, the NSLP team will engage in enhanced training and technical assistance activities for these Sponsors and other NSLP Sponsors that are currently operating under the SFSP but will resume NSLP operations in SY21-22 as well. First, due to conditions at this time, many SFAs have had to deal with staff who are unable to continue to work and have needed to either hire new staff or distribute the NSLP responsibilities to staff that are unfamiliar with the program. For these staff RIDE will conduct a virtual New Sponsor Training. This training will include: An overview of the federal SNPs, MBA determination process, the verification process, eDC, meal patterns, OVS, counting and claiming, Smart Snacks, civil rights, wellness policy, resource management, required

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policies/procedures, professional standards, and additional requirements, such as, record retention, monitoring, Buy American, etc. In addition, RIDE will create additional webinars for sponsors, to be posted on RIDE's website for all NSLP sponsors. These webinars are to include: Resource Management and Professional Standards, as these two areas have resulted in common review findings during past ARs. RIDE currently has 23 out of 84 sponsors, representing 35 sites, participating in the NSLP in SY 20-21.

### **SFSP**

For the SFSP, Rhode Island is committed to providing increased training, technical assistance, and other supports to the field throughout the course of FY21. Given the increased use of the program and the number of new Sponsors, we recognize the need to dedicate additional time and resources to ensure that program integrity is maintained. If the above described CACFP and NSLP monitoring waivers are granted, RIDE will be able to dedicate the additional staffing resources needed to provide individual technical assistance to each of our SFSP Sponsors. We have found that because many of our current SFSP Sponsors are entirely new to the program and because the program is operating under such unique circumstances, it is difficult to convey all program requirements in a meaningful way via email communications and group virtual trainings. Sponsors tend to have individual, specific questions about program operations that are not able to be adequately addressed through a group training model and RIDE would like the opportunity to connect with each of our SFSP Sponsors individually to ensure that their questions are addressed and that program integrity is achieved and maintained. Therefore, RIDE is requesting a waiver of the monitoring requirements found at 7 CFR 225.7(d) which require: a review of new Sponsors within the first year of operating (7 CFR 225.7(d)(2)(ii)(A), an annual review of Sponsors whose reimbursements count as half the aggregate from the previous year (7 CFR 225.7(d)(2)(ii)(B), and a review of every Sponsor at least once every three years (7 CFR 225.7(d)(2)(ii)(D). In waiving these requirements, RIDE would not be conducting any Sponsor or site reviews as part of formal monitoring activities and therefore would not conduct reviews of at least 10 percent of each Sponsor's sites (7 CFR 225.7(d)(2)(ii)(E), conduct follow up reviews of Sponsors and sites as necessary (7 CFR 225.7(d)(2)(iii)(3), or inspect FSMC facilities (7 CFR 225.7(d)(2)(iii)(6). Similar to the circumstances described in the CACFP section of this waiver above, we do not feel that it is feasible for our team to manage the demands of both the SFSP and CACFP in a way that will provide meaningful support to the field while also driving program integrity through the formal monitoring process. Since all SFSP reviews for FY21 would be conducted virtually, in accordance with local policies and federal waivers, we do not feel that this process would allow us to achieve level of rigor and scrutiny that we would normally reach through the program review process. Further, since most of our SFSP Sponsors are operating under vastly different conditions than they would typically (and many will not participate in the SFSP in the future), a review of the current procedures would not provide reviewers with an adequate picture of 'normal' program operations. Rather than conducting a review process that would not allow reviewers to gain a clear picture of standard program operations, which would allow for the appropriate associated technical assistance and/or required corrective action to take place, we feel that our Sponsors and program participants would be best served by pausing the review process for one (1) program year.

If approved, we propose to shift our entire SFSP review cycle by one (1) fiscal year, meaning that Sponsors currently on-cycle for FY21 will instead be reviewed in FY22, if they continue to participate in the program; Sponsors currently scheduled for review in FY22 will be moved to FY23; Sponsors currently scheduled for review in FY23 will be moved to FY24. This will result in Sponsors being reviewed once every four (4) years rather than once every three (3) years for one full review cycle. This will also result in a two (2) year period (FY21 and FY22) in which the number of Sponsors reviewed does not account for half of the aggregate reimbursements from the prior year. At the conclusion of FY24, RIDE will be on track to meet traditional review requirements associated with the SFSP. In lieu of traditional monitoring, RIDE proposes to offer increased, targeted technical assistance for all SFSP Sponsors currently operating. These efforts are to include

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individual outreach to Sponsors to determine areas of needed additional training and technical assistance. The SFSP team, in conjunction with our NSLP counterparts, will individually reach out to each Sponsor to discuss current operations and areas of concern. This will give our staff the chance to assess compliance with and provide technical assistance both on standard regulation as well as on the implementation of the flexibilities currently available under the nationwide waivers. Based on these conversations, Sponsors will be asked to provide a sample of supporting documentation for any areas in which they expressed the need for additional support (i.e. sample menus, production records, meal count sheets, etc) and a technical assistance appointment will be scheduled with a member of the SFSP team. RIDE's SFSP staff will review the provided documentation prior to the technical assistance appointment and will provide specific recommendations, resources and other technical assistance during the live technical assistance session. If RIDE finds areas of common concern/confusion among Sponsors, additional training materials and/or recorded trainings will be created and shared with all SFSP Sponsors. In addition to these training and technical assistance sessions, RIDE will also focus on the continued transition of traditional SFSP training materials to a virtual format, which will leave us and our Sponsors better poised for success in future SFSP years.

Lastly, in addition to the above requested State Agency waivers related to SFSP, RIDE is also requesting a waiver of the requirements found at 7 CFR 225.15(d)(3) on behalf of our SFSP Sponsors, which requires that Sponsors review each site at least once during the first four weeks of operation. Though we have been encouraging Sponsors to plan to meet this timeframe for formal monitoring, given the timing that the available SFSP flexibilities were announced and the challenges that SFAs are facing in general to re-open schools during this global pandemic, we recognize that conducting formal monitoring at all sites within 4 weeks of the start of operation may not be feasible. Instead, we are requesting the flexibility to allow SFA's participating in the SFSP during the 20-21 school year to conduct all formal monitoring visits by February 1, 2021, as they would have been planning and expected to do had they continued operations under the NSLP.

After carefully reviewing the operations and requirements associated with each of our Child Nutrition Programs, RIDE feels that the above stated monitoring, training and technical assistance plan will serve to best utilize our available resources in a way that will support our Sponsors during these difficult times while maintaining the highest level of program integrity. Our SFSP, CACFP and NSLP teams will work closely to support the field while simultaneously developing high quality training materials and offering targeted technical assistance as necessary.

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

**CACFP:**

- 7 CFR 226.6(m)(6)** Frequency and number of required institution reviews. Annually review at least 33.3% of all institutions according to the schedule:
  - (i)** Review independent centers and sponsoring organizations of 1 to 100 facilities at least once every three years and include reviews of 10% of their facilities;
  - (ii)** Review sponsoring organizations with more than 100 facilities at least once every two years and include reviews of 5 percent of the first 1,000 facilities and 2.5 percent of the facilities in excess of 1,000; and
  - (iii)** Review new institutions that are sponsoring organizations of five or more facilities within the first 90 days of Program operations.
- 7 CFR 226.16(d)(4)(iii)** Frequency and type of required facility reviews. Review each facility three times each year, unless averaging. In addition:

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- (A) At least two of the three reviews must be unannounced;
- (B) At least one unannounced review must include observation of a meal service;
- (D) Not more than six months may elapse between reviews.

**NSLP:**

- 7 CFR 210.10(h)(2)** Requirement to review trans fat.
- 7 CFR 210.18** Administrative review:
  - 7 CFR 210.18(c)** Timing of administrative reviews and cycle.
- 7 CFR 210.19(a)(5)** Food Service Management Company (FSMC) review cycle requirements.
- 7 CFR 245.11(a)-(b)** Notification of second Review of Applications.

**SFSP:**

- 7 CFR 225.7(d)** Program monitoring and assistance:
  - 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)(ii)(E)** Conduct reviews of at least 10 percent of each sponsor's sites or one site, if that's greater.
  - 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)(3)** Review food service operations at each site at least once during the first four weeks of operation.

- 6. Detailed description of alternative procedures and anticipated impact on Program operations, including technology, State systems, and monitoring:** If approved, we propose to shift our entire CACFP review cycle by one (1) fiscal year, meaning that Sponsors currently on-cycle for FY21 will instead be reviewed in FY22; Sponsors currently scheduled for review in FY22 will be moved to FY23; Sponsors currently scheduled for review in FY23 will be moved to FY24. This will result in Sponsors being review once every four (4) years rather than once every three (3) years for one full review cycle. At the conclusion of FY24, RIDE will be on track to meet traditional review requirements associated with the CACFP. There are no anticipated technology or systems implications. We anticipate that these alternate procedures, in conjunction with increased training and technical assistance, will allow for increased program integrity as described in question 4.

If approved, we propose to extend the 5th year of our current NSLP Administrative review cycle to be completed over the course of the 2022 fiscal year, with fiscal year 2023 marking the start (year 1) of a new administrative review cycle. See question for additional details on alternate procedures related to monitoring, training, and technical assistance. There are no anticipated technology or systems implications.

If approved, we propose to shift our entire SFSP review cycle by one (1) fiscal year, meaning that Sponsors currently on-cycle for FY21 will instead be review in FY22 (if they continue to participate in the program); Sponsors currently scheduled for review in FY22 to will be moved to FY23; Sponsors currently scheduled for

review in FY23 will be moved to FY24. This will result in Sponsors being reviewed once every four (4) years rather than once every three (3) years for one full review cycle and will also result in two (2) fiscal years (FY21 and FY22) in which the Sponsors reviewed do not account for half of the aggregate reimbursements from the prior year. At the conclusion of FY24, RIDE will be on track to meet traditional review requirements associated with the SFSP. There are no anticipated technology or systems implications. We anticipate that these alternate procedures, in conjunction with increased training and technical assistance, will allow for increased program integrity as described in question 4.

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 no regulatory barriers at the state level.
8. **Anticipated challenges State or eligible service providers may face with the waiver implementation:** We do not believe that the state or eligible service provider will face any challenges with this waiver implementation. Rather, we believe that the implementation of this waiver will result in enhanced service to the field, which will serve to promote and maintain program integrity.
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]:** There would be limited programming changes needed that would not increase the overall cost of the Program to the Federal Government.
10. **Anticipated waiver implementation date and time period:** October 1, 2020 through September 30, 2024; this time frame encompasses the entire 3-year CACFP and SFSP review cycles as the state agency will continue to be out of compliance regarding the frequency of reviews (one every 3 years) until one full cycle has been completed. For the NSLP, administrative reviews will be paused for FY21, resulting in the extension of the current 5-year review cycle extending through FY22.
11. **Proposed monitoring and review procedures:** RIDE would conduct monitoring activities as outlined in question 4 of this waiver. Additional monitoring would be conducted on an as needed basis as determined through monthly claim monitoring, technical assistance requests, and/or program complaints. Claims monitoring will include monitoring for fraudulent activities, including monitoring to ensure that claims are not submitted under multiple programs for the same meals/days/participants. Our current claiming system has built in edit checks that will prevent Sponsors from claiming for unapproved sites, meal periods, and/or days, and in addition to those built in edit checks, RIDE also employs a fiscal technician who monitors all claim submissions for block claiming, suspicious patterns, etc. On the program side, RIDE staff will use technical assistance document reviews as an opportunity to look for any documentation that might indicate fraudulent activity and would require follow-up.
12. **Proposed reporting requirements (include type of data and due date(s) to FNS):** RIDE would continue to report as required by federal regulations. Reporting to include the number of Sponsor reviews scheduled, conducted and postponed as well as the number and type of training and technical assistance activities conducted throughout the program year. Reporting to be completed by October 31 of each year as required.
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]:**  
<https://www.ride.ri.gov/InsideRIDE/AdditionalInformation/News/ViewArticle/tabid/408/ArticleId/712/Public-Notification-Child-Nutrition-Program-Waiver-Requests.aspx>

14. Signature and title of requesting official: Stephen Carey, Child Nutrition Programs Coordinator

Stephen H. Carey

Title: Nutrition Programs Coordinator

Requesting official's email address for transmission of response: Jessica.patrolia@ride.ri.gov

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**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: 11/6/2020

X 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:

*FNS/NERO has reviewed and recommends approval for the RIDE request to waive monitoring requirements in the CACFP, SFSP and NSLP for FY 20-21 due to the operational challenges resulting from COVID-19. The RIDE waiver request addresses which RIDE programs are requesting monitoring waivers, how operating programs will be reviewed and the TA and training RIDE will provide in lieu of monitoring activities. The RIDE plan adequately addresses program oversight, fraud, data collection, program integrity and misuse of Federal funds.*