

CHILD NUTRITION PROGRAM STATE WAIVER REQUEST TEMPLATE

Child Nutrition Programs are expected to be administered according to all statutory and regulatory requirements; waivers to the requirements are exceptions. However, Section 12(l) of the Richard B. Russell National School Lunch Act, 42 U.S.C. 1760(l), provides authority for USDA to waive requirements for State agencies or eligible service providers under certain circumstances. When requesting the waiver of statutory or regulatory requirements for the Child Nutrition Programs (CNPs), including the Child and Adult Care Food Program (CACFP), the Summer Food Service Program (SFSP), the National School Lunch Program (NSLP), the Fresh Fruit and Vegetable Program (FFVP), the Special Milk Program (SMP), and the School Breakfast Program (SBP), State agencies and eligible service providers should use this template. State agencies and eligible service providers should consult with their FNS Regional Offices when developing waiver requests to ensure a well-reasoned, thorough request is submitted. State agencies and eligible service providers are encouraged to submit complete waiver requests at least 60 calendar days prior to the anticipated implementation date. Requests submitted less than 60 calendar days prior to the anticipated implementation should be accompanied by an explanation of extenuating circumstances.

For more information on requests for waiving Program requirements, refer to SP 15-2018, CACFP 12-2018, SFSP 05-2018, *Child Nutrition Program Waiver Request Guidance and Protocol- Revised*, May 24, 2018.

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

Coordinating Agency: Iowa Department of Health and Human Services
Partnering Agency: Iowa Department of Education

2. Region: MWRO

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

Not applicable.

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]:

The Iowa Departments of Health and Human Services and Education are requesting

a waiver of the deadline for submitting the Summer Electronic Benefits Transfer (S-EBT) Intent to Administer with the interim Plan for Operations and Management (iPOM).

In May of 2025, Iowa HHS was granted a SNAP Food Restriction Waiver. The waiver restricts SNAP purchases of sugary drinks, candy, and some processed foods. Iowa HHS is on track to implement the changes starting January 1, 2026. The waiver evaluation will measure purchases and behaviors, with a long-term goal of improving health outcomes and reducing obesity.

Also in May of 2025, Iowa HHS received a grant from USDA to operate a demonstration project for summer 2025 called Healthy Kids Iowa. Healthy Kids Iowa provided food packages to families with children ages 4-18 each month for June, July and August. Iowa HHS is continuing to work with our evaluation partner to finalize the results of this project, which ended August 31, 2025. We successfully reached our target goal of 65,000 children during the three months of the project. Initial evaluation results show high satisfaction with the program as well as support for future implementation of SEBT.

Iowa sought these programmatic innovations because SNAP has historically been inefficient at delivering on the purposes of “promoting general welfare and safeguarding health and well-being” and “alleviating malnutrition.” The lack of nutritional focus on allowable items means that participants often spend their limited benefit amounts on objectively unhealthy and non-nutritious items like sugar-sweetened beverages and candy items.

Since operational planning and implementation were still underway for both the Food Restrictions Waiver and Healthy Kids Iowa this summer, Iowa was unable to anticipate programmatic changes and/or budget projections at such an early date.

With this waiver, Iowa respectfully requests the ability to submit the iPOM with the intent to implement a Healthy Summer EBT program for 2026. The insights gained from implementing Healthy Kids Iowa, along with the expected full implementation of the Food Restrictions Waiver, position us well for a successful SEBT program that supports our nutrition and access goals.

We are also submitting a separate waiver request to apply the Food Restrictions Waiver to SEBT and serve approximately 220,000 children in 2026. Implementing this program will allow Iowa to offer additional summer food programs as well as ensuring that purchases focus on health and nutrition.

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

7 CFR 292.8

§292.8 Plan for Operations and Management.

(a) Not later than August 15 of each year, the Summer EBT agency must submit to the FNS Regional Office its intent to administer the Summer EBT Program the following summer, along with an interim Plan for Operations and Management (POM) and expenditure plan for the Summer EBT Program for the upcoming fiscal year.

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

If this waiver for a Healthy SEBT program in Iowa is not approved, Iowa will not be able to implement S-EBT in 2026. If this waiver is approved, Iowa will continue to meet all other required deadlines. An application system will be implemented.

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]:

No regulatory barriers are expected at the State level. Summer EBT agencies are working collaboratively to determine the forecasted program participation, anticipated administrative funding needs, and other programmatic information.

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

No challenges are anticipated with waiver implementation.

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]:

The waiver will not increase the overall cost of the Summer EBT Program to the Federal Government. This will be Iowa's first year participating in the program.

10. Anticipated waiver implementation date and time period:

August 15, 2025 through full approval of the POM for Iowa's SEBT program.

11. Proposed monitoring and review procedures:

The Summer EBT agencies will monitor and review implementation of the waiver.

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

The Summer EBT agencies will report on implementation including a description of how the waiver was implemented and its impact on program administration.

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]:

The waiver will be posted along with a press release by 12/22/25:

<https://hhs.iowa.gov/assistance-programs/food-assistance/sun-bucks>

14. Signature and title of requesting official:

Title:

Date:

Requesting official's email address for transmission of response:

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:**