

Child Nutrition Program (CNP) Waiver Request

State Agency (SA) and Region: South Carolina Department of Education (SCDE) Southeast Region	SA Contact Person and Title: Ronald Jones Director Office of Health and Nutrition (OHN)	Date of Request Submission: March 24, 2020
Email Address: rfjones@ed.sc.gov	Phone Number: 803-734-8205	Name and Title of SA Authorizing Official: Ronald Jones Director Office of Health and Nutrition
Program/ Waiver Type: All SFAs/ Parent Pick-up at any SSO or SFSP Sites	Waiver Request #: SC-4	
<p>Provide the justification for why the Program waiver is necessary. Include details on how the waiver will improve services under the Program and/or address or remove impediments to the efficient operation and administration of the Program.</p> <p>Due to the continued spread of COVID-19, and to reduce social contact as much as possible, the SC Department of Education (SCDE) is requesting a waiver to allow parents to pick up meals without their children present under the following circumstances:</p> <ul style="list-style-type: none"> • Parents can pick up meals without their children present at any SSO or SFSP site. • The site documents that the child(ren) was not present to receive the meal. 		
<p>Identify the statutory or regulatory requirements requested to be waived.</p> <p>Children being present at meal service is implied in the already waived requirements for congregate feeding. By allowing parents of the children to pick up these meals, definitions per 7 CFR 225.2(d) would need to be modified.</p>		
<p>Description of any steps taken to address statutory and regulatory barriers at the State level.</p> <p>Statutory and regulatory barriers have been addressed via the nationwide Child Nutrition Program congregate feeding waivers. SCDE is proactively asking USDA to expand on this waiver to allow verified parents/guardians of eligible children to pick up meals at any SSO or SFSP sites in efforts to promote social distancing.</p>		

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Provide a description of the alternative procedures to be followed by SA staff in order to carry out the requested waiver of Program requirements and the anticipated impact these procedures will have on Program access and agency operation, including technology, SCDE systems, and monitoring, if the waiver is granted.

SCDE will ensure that minimal negative impact to the Program will occur by:

- Verifying that all sites for which a waiver is granted is operating SSO or SFSP in accordance with regulation.
- Providing proactive technical assistance to sites as required, including providing instructions on how the sites should document the meals served specifically to parents without their children present.

SCDE does not anticipate a negative impact on Program access or agency operation.

Describe anticipated challenges SCDE may face when implementing the waiver.

Given the many unknowns regarding the COVID-19 outbreak, at this time, it is difficult to anticipate the potential impact an outbreak will have across the state of South Carolina on our large number of CNP operators. Most of the burden will exist on the sponsor/site level, as they enact procedures to accurately verify parent identity and document meals served to parents without children. SCDE believes that any additional burden will be minimal compared to the value of promoting social distancing in this situation.

Provide the anticipated implementation date and time period for which the waiver is needed.

SCDE is requesting the discretion to allow parent-only pick up of meals at any SSO or SFSP sites effective immediately and to maintain that authority until further guidance is issued by USDA regarding COVID-19-related issues. SCDE is proactively making this request based on the best available information to date.

Description of how the waiver will not increase the overall costs of the Program. If the waiver will increase the overall costs, provide details on how the costs will be paid from non-Federal funds.

SCDE does not anticipate an increase to Program costs.

Provide the SA's proposed monitoring review procedures that will ensure proper oversight and integrity of the Program. If applicable, include monitoring details on how the agency will ensure increased costs of the Program will not be paid from Federal funds.

SCDE will maintain a tracking system to identify all CNP operators serving meals at any SSO or SFSP site. SCDE will follow-up with operators routinely to verify that the conditions underlying the waivers continue to exist. SCDE will also provide technical assistance throughout the duration of the waivers to ensure that sites are collecting data on meals served only to parents; that data will be collected and analyzed by SCDE to determine any negative or positive effects on Program integrity.

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Provide the SA's proposed reporting requirements of the outcome of the waiver implementation, if it is approved. Include details on how the effect of the waiver on the efficient operation and administration of the Program will be evaluated by the agency. The SA will report this information to FNS after the end of Program operation for the current year.

SCDE will track and report the following to USDA as required:

- Number of operators and associated sites serving meals at any SSO or SFSP sites
- Number of meals served/claimed by parents without children present
- Any technical difficulties and/or findings for those sites that served meals to parents only.
- Analysis of how allowing any SSO or SFSP sites to serve parents without children present impacted Program integrity

Provide information to support how the agency has provided notice and information to the public regarding the proposed waiver.

Public notice and information of this waiver request is posted on SCDE OHN's web site at <https://ed.sc.gov/districts-schools/nutrition/meal-programs/request-for-waiver-covid-19/>

This CNP waiver request applies to: All CNP Program Operators All CACFP Institutions
 All SNP SFA All SFSP sponsors

If not all then specify all that apply:

Signature of SA Authorizing Official

Date

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Regional Office Response

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.

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

Approved

Effective date of approval _____ Expiration date of approval _____

Denied

Reason for denial:

Signature

Title

Date