Child Nutrition Program State Waiver Request

1. State agency/SFSP sponsor submitting waiver request and responsible State agency staff contact information:
   Feeding the Gulf Coast
   Eugenie Sellier, Director of Child Nutrition Programs
   Feeding the Gulf Coast
   1501 34th Street
   Gulfport, MS 39501
   Phone: 251-653-1617, ext. 126  Cell: 228-323-1834
   esellier@feedingthegulfcoast.org

2. Region: George County, Green County, Hancock County, Harrison County, Jackson County, Pearl River County, Perry County, Stone County, Mississippi

3. Eligible service providers participating in waiver and affirmation that they are in good standing:
   Feeding the Gulf Coast is in good standing with the Mississippi State Department of Education.

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]:

   Meal Service times: Feeding the Gulf Coast seeking a waiver for the meal service time requirements stated in the SFSP 02-19 USDA memo. Without a waiver, the challenges we face will include:
   a. Each summer program has its own unique schedule that meets the needs of the program’s educational and recreational components.
   b. If a site has a need for a snack closer than 3 hours to lunch time or breakfast, we will not be able to serve as many nutritious snacks to children in these programs. This will result in our social enterprise serving fewer healthy meals to children.
   c. Because some of our sites have physical activity as a main component of the summer program and therefore a second meal in the form of snack is an important element.
   d. In particular, older children need more food than is accounted for in the lunch and supper meal program. Having a snack in addition to the meal is important especially to middle school and high school youth.

   If a waiver is implemented, we will be able to continue serving an appropriate amount of nutrition to children at our sites in a timely manner. This allows us as a SFSP sponsor to accommodate the varying schedules of our summer meal sites.
5. **Specific Program Requirements to be waived (include statutory and regulatory citations).** [Section 12(1)(2)(A)(i) of the NSLA]:

7 CFR 225.16(c)(1) Three hours must elapse between the beginning of one meal service, including snacks, and the beginning of another, except that 4 hours must elapse between the service of a lunch and supper when no snack is served between lunch and supper. The service of supper shall begin no later than 7 p.m. unless the State agency has granted a waiver of this requirement due to extenuating circumstances. These waivers shall be granted only when the State agency and the sponsor ensure that special arrangements can be made to monitor these sites. In no case may the service of supper extend beyond 8 p.m. The time restrictions in this paragraph shall not apply to residential camps.

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

If our waivers are implemented, there will be no anticipated impact on Program operations because it will operate as it did in summer 2019.

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]:

Mississippi State Department of Education said they will not be applying for waivers.

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

We do not foresee any challenges, because waiver implementation would keep our SFSP operations functioning the same as they were in Summer 2019.

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 program to the Federal Government because they will keep operations the same as they were in 2019.

10. **Anticipated waiver implementation date and time period:**

May 25, 2020 – August 7, 2020

11. **Proposed monitoring and review procedures:**

The proposed monitoring and review procedures will be that of the SFSP program in Summer 2019.

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

The proposed reporting requirement will be the same as the SFSP program in Summer 2019.

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]:
Our public notification will be posted on our organization's website page and it is attached for your review.
https://www.feedingthegulfcoast.org/learn-more/our-programs/child-nutrition-programs

14. Signature and title of requesting official:

Eugenie Sellier, Director of Child Nutrition Programs, Feeding the Gulf Coast
esellier@feedingthegulfcoast.org
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3. Eligible service providers participating in waiver and affirmation that they are in good standing:
   Feeding the Gulf Coast is in good standing with the Mississippi State Department of Education.

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(1)(2)(A)(iii) and 12(1)(2)(A) (iv) of the NSLAJ:

   Monitoring: Feeding the Gulf Coast is seeking a waiver for the monitoring requirements stated in the SFSP 02-19 USDA memo. Without a waiver, the challenges we face will include:
   a. We will need additional staff members, which we cannot afford with the reimbursement amount. Our current staffing for SFSP may not be adequate to ensure that all sites receive a first week visit. Start dates may have to be staggered to meet this requirement. Prioritizing the sites for start-up would be inequitable. Feeding the Gulf Coast has been serving students over eight years during the summer. Our community has relied on us as a source of nutrition in the summer.
   b. Our sites are geographically spread far throughout our serving area. We are unable to physically reach all of the sites in the first week. This means we would have to serve less sites, and therefore, less children.
   c. Due to this regulation, for sites that are operating a short time period, such as the Country Acres Christian Camp, Church Alive, and Waveland Elementary, sites that serve for one week, we will have to go to these sites multiple times in one week. We do not have adequate staff to cover all of those visits.
   d. Some of our sites are only open for a short period of time each day, so it will not be possible for our staff to get to all in one week while the sites are open.

   If a waiver is implemented, we will be able to continue our service in a more efficient way, and we would not have to discontinue meal service in sites we have served previously. Our
communities rely on us as a trusted source for nutritious meals in a safe environment that is accessible to them.

5. Specific Program requirements to be waived (include statutory and regulatory citations). (Section 12(1)(2)(A)(i) of the NSLA):

   1. SFSP 12-2011, Waiver of Site Monitoring Requirements in the Summer Food Service Program, April 5, 2011
      • Waived regulatory requirement at 7 CFR 225.15(d) for sponsors to conduct site visits during the first week of program operations for returning sites that operated successfully during the previous summer and had no serious deficiency findings.

6. Detailed description of alternative procedures and anticipated impact on Program operations, including technology, State systems, and monitoring:
   If our waiver is implemented, there will be no anticipated impact on Program operations because it will operate as it did in summer 2018.

7. Description of any steps the State has taken to address regulatory barriers at the State level. (Section 12(1)(2)(A) (ii) of the NSLA):
   Mississippi State Department of Education said they will not be applying for waivers.

8. Anticipated challenges State or eligible service providers may face with the waiver implementation:
   We do not foresee any challenges, because waiver implementation would keep our SFSP operations functioning the same as they were in summer 2018.

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(1)(1)(A)(iii) of the NSLA):
   The waiver will not increase the overall cost of the program to the Federal Government because they will keep operations the same as they were in summer 2018.

10. Anticipated waiver implementation date and time period:
    May 25, 2020 – August 7, 2020

11. Proposed monitoring and review procedures:
    The proposed monitoring and review procedures will be that of the SFSP program in summer 2018, in which all new sites and prior year sites that were found not to be in compliance were reviewed within the first week of operation. There will be no changes due to a waiver being implemented.

12. Proposed reporting requirements (include type of data and due date(s) to FNS):
    The proposed reporting requirement will be the same as the SFSP program in summer 2018.

13. Link to or a copy of the public notice informing the public about the proposed
waiver {Section 12(1)(1)(A)(ii) of the NSLA}:
Our public notification will be posted on our organization's website page and it is attached for your review.
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14. Signature and title of requesting official:

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