Child Nutrition Program State Waiver Request

1. State agency/SFSP sponsor submitting waiver request and responsible State agency staff contact information: Rebekah Dawson, Director of Child Nutrition Programs Feeding the Gulf Coast 1501 34th Street Gulfport, MS 39501 Phone: 251-653-1617, ext. 128 rdawson@feedingthegulfcoast.org

2. Region: Southeast

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 NSL AJ:

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 eleven 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. We do not have adequate staff to cover all of those visits. 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 prior years.

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): None

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 prior year.

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 the prior years.

10. Anticipated waiver implementation date and time period: May 1, 2022 – April 2023
11. Proposed monitoring and review procedures: The proposed monitoring and review procedures will be that of the SFSP program in the prior years, 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. All sites will receive a fourth week review. 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 previous years.

13. Link to or a copy of the public notice informing the public about the proposed waiver {Section 12(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:

Rebekah Dawson, Director of Child Nutrition Programs,
Feeding the Gulf Coast rdawson@feedingthegulfcoast.org