CHILD NUTRITION PROGRAM
WAIVER REQUEST
Submitted January 31, 2020
REQUEST FOR WAIVER OF REQUIREMENT OF INCOME APPLICATIONS FOR CLOSED-ENROLLED SITES IN NEEDY AREAS, USING AREA ELIGIBILITY INSTEAD
Meal service Start Date: May 15, 2020

1. STATE AGENCY AND PNP (Private Non-Profit Sponsor) SUBMITTING WAIVER REQUEST AND RESPONSIBLE STATE AGENCY STAFF CONTACT INFORMATION:

Ohio Department of Education, Office of Integrated Student Supports, Andrea Denning (andrea.denning@education.ohio.gov), Director, on behalf of UMCFood Ministry, Lawrence Karow, CEO (Ceo@umcffood.org)

2. REGION

Midwest

3. ELIGIBLE SERVICE PROVIDERS PARTICIPATING IN WAIVER AND AFFIRMATION THAT THEY ARE IN GOOD STANDING

The eligible service provider participating in the waiver is UMCFood Ministry. This provider is confirmed to be in good standing with the Ohio Department of Education, Office of Integrated Student Supports, Division of Child Nutrition.

4. DESCRIPTION OF THE CHALLENGE THE SPONSOR IS SEEKING TO SOLVE< THE GOAL OF THE WAIVER TO IMPROVE SERVICES UNDER THE PROGRAM, AND THE EXPECTED OUTCOMES IF THE WAIVER IS GRANTED

In 2018, UMCFood provided meal service to the majority of YMCA’s and Boys and Girls Clubs in the greater Cincinnati area, accounting for approximately 50% of the meals served during that summer period by UMCFood. These sites operated as “closed-enrolled” sites. These sites are enrolled because of participation in day camp programs. All but 3 of the individual schools in service area of Cincinnati Public Schools (where the majority of these closed enrolled sites are located) are eligible for 50% or above free and reduced, and as such the participants in these sites are most likely eligible to receive Free or Reduced Priced meals under the NSLP program.

These closed enrolled sites in the area served by UMCFood serve some of the most vulnerable in the State of Ohio. According to a census report, as reported by wcpo.com on December 18 (https://www.wcpo.com/news/local-news/hamilton-county/cincinnati/new-census-data-show-greater-cincinnati-s-child-poverty-rate-improved-but-lots-of-work-remains), 2018, the statistics regarding child poverty (and thus child hunger) are staggering, and the inability of any of these closed enrolled sites to serve the children in their care would have a direct negative impact on the nutritional health of the children in our communities:
• Nearly 43 percent of children in the city of Cincinnati live below the federal poverty level -- a household income of $20,780 or less for a family of three. That amounts to 27,508 kids.

• In Hamilton County, nearly one in four children, or 24.8 percent, live in poverty. That represents 45,845 children.

• For the Tri-State as a whole, 18.4 percent, or nearly one in five children, live in households that are below the federal poverty level. That figure represents 93,447 kids.

Requiring UMCFood to collect and qualify income applications in an already established needy area creates a tremendous administrative burden. Without using area eligibility, there is a high probability that some of these sites may not participate in the program, as becoming an open site may not be an option because of the work of collecting income applications from the huge number of participants. The paperwork, coordination, and security of the income applications is likely to exceed the administrative capabilities of the sites.

Additionally, UMCFood would have to add the equivalent of two full time staff persons during the summer to collect, categorize and maintain weekly attendance for the individual camp programs, which would exceed the financial resources available to the sponsor under the 15% cap on administrative costs of their SFSP reimbursements. Additionally, the burden on the State Agency during a potential Management Review would be tremendous, and likely add hours, if not days to the review process, as income applications must be checked for completeness and correct eligibility determination. Since the area the sites serve can be determined to be eligible, it is an unnecessary burden for both this sponsor and the State Agency.

The request of this waiver is to extend area eligibility as a method to determine site eligibility for closed enrolled sites in needy areas. The goal of the waiver is to streamline the administrative work for the sponsor and encourage the meal service to targeted groups that need, or benefit from, the closed enrolled status of a site. 

5. SPECIFIC PROGRAM REQUIREMENTS TO BE WAIVED:

Section 13(a)(1)(A)(i)(III) of the NSLA; 7 CFR 225.15(f) "The application is used to determine the eligibility of children attending camps and the eligibility of sites that are not open sites as defined in paragraph (a) of the definition of "areas in which poor economic conditions exist", in Paragraph 225.2. In these situations, parents or guardians of children enrolled in camps or these other sites must be given application forms to provide information described in paragraph (f)(2) or (f)(3) of this section, as applicable. Applications are not necessary if other information sources are available and can be used to determine eligibility of individual children in camps or
sites.” Instead of income applications, UMCFood could use area eligibility to determine site eligibility if the waiver request is approved.

6. DETAILED DESCRIPTION OF ALTERNATIVE PROCEDURES AND ANTICIPATED IMPACT ON PROGRAM OPERATION, INCLUDING TECHNOLOGY, STATE SYSTEMS AND MONITORING.

The impact of this waiver approval is streamlining the administration burden for this sponsor and their sites by reducing paperwork. Additionally, this would be a time savings for the State agency as well, with the ability to determine site eligibility by area vs. verifying that individual household income applications were complete and correctly categorized upon Sponsor Review.

7. DESCRIPTION OF ANY STEPS THE STATE HAS TAKEN TO ADDRESS REGULATORY BARRIERS AT THE STATE LEVEL

There are no State level regulatory barriers for area eligibility in SFSP, as it has previously been implemented in SFSP and is currently allowed in CACFP ARAS at the state level.

8. ANTICIPATED CHALLENGES STATE OR ELIGIBLE SERVICE PROVIDERS MAY FACE WITH THE WAIVER IMPLEMENTATION:

This option has been offered and utilized by this PNP SFSP sponsor without issues in CACFP ARAS as well as the SFSP in previous years, have been no documented findings regarding area eligibility in sponsor reviews nor in the A133 audit which annually tests UMCFood for properly qualifying sites and participants.

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

Use of this waiver will reduce administrative and operating costs for this sponsor, and will not increase the overall cost of the program to the Federal Government. It will reduce the workload for the SA with regard to SFSP Sponsor reviews, since less time will be spent verifying income applications.

10. ANTICIPATED WAIVER IMPLEMENTATION DATE AND TIME PERIOD:

Implementation date: May 1, 2020

Time period: May 1, 2020 – April 30, 2021

11. PROPOSED MONITORING AND REVIEW PROCEDURES:

UMCFood will continue to verify the eligibility on each site as required under Federal Regulations. Additionally, UMCFood undergoes a “Program Specific Audit” (A133) which tests for eligibility determinations by its CPA Auditing Firm. UMCFood makes application to the State Agency, and includes the qualifying information on its application to participate in the SFSP program on an annual basis.

12. PROPOSED REPORTING REQUIREMENTS (INCLUDE TYPE OF DATA AND DUE DATES TO FNS)
The number of closed enrolled sites in needy areas of UMCFood service area is part of the application process for the SFSP program.

13. LINK TO OR A COPY OF THE PUBLIC NOTICE INFORMING THE PUBLIC ABOUT THE PROPOSED WAIVER


14. SIGNATURE AND TITLE OF REQUESTING OFFICIAL:

[Signature]

Rev. Dr. Lawrence Karow, CEO
UMCFood Ministry
Requesting official’s email address for transmission of response: Ceo@umfood.org

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(1)(1)(a)(ii) of the NSLA

Regional office Analysis and Recommendation