CHILD NUTRITION PROGRAM
WAIVER REQUEST
Submitted January 31, 2020
REQUEST FOR WAIVER TO ALLOW SPONSOR TO UTILIZE OFFER VS. SERVE AT MEALS
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@umcfood.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

“Offer versus serve” is an FNS approach to menu planning and meal services intended to help SFSP sponsors reduce food waste and costs while maintaining the nutritional value of SFSP meals. “Offer versus serve” allows children to decline some of the foods offered in a reimbursable breakfast, lunch or supper at SFSP sites. Providing this flexibility allows this sponsor (UMCFood) to be more responsive to the preferences of the children that they are serving and ensure that meals being offered are actually consumed and that children benefit from the nutrients provided. Food waste can be a significant program cost to the sponsor when children are served all components and not allowed to decline items. Allowing UMCFood to utilize this option will result in less food waste, thereby containing costs, and encourage participation as well since children have a say in which foods they choose.

Additionally, by allowing this sponsor to utilize “Offer Versus Serve” in their program will result in higher compliance with program regulations at the site level. Since the inception of OVS in the Summer Food Program, UMCFood has trained their sites on the use of OVS. Currently, OVS is utilized in the CACFP ARAS program with UMCFood. The majority of the non-child care sites served by UMCFood will be transitioning from the CACFP ARAS program directly into SFSP.
Removing the OVS option will create confusion at the site level, and is likely to result in issues of non-compliance with meal pattern requirements should this waiver not be approved.

5. SPECIFIC PROGRAM REQUIREMENTS TO BE WAIVED:

The waiver is to request the authorization of the OVS option for school food authority sponsors under section 13(f)(6) of the NSLA, 42 USC 1761 (f)(6), and 7 CFR 225.16(f)(1)(ii) be extended to UMCFood, a PNP sponsor.

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

UMCFood will continue to train all staff during their multiple SFSP training opportunities on OVS in order to ensure program integrity with regard to meeting the meal pattern. Impact on the state agency is the inclusion of detailed training on how to identify a reimbursable meal when using the OVS option. However, as ODE’s consultants are cross trained in NSLP, CACFP and SFSP, they are already familiar with OVS in those programs.

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 OVS 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 OVS in sponsor reviews, and minimal non-compliance issues with OVS found during sponsor level site reviews. No additional challenges are anticipated.

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 may reduce waste, and as a result, operating costs for this sponsor. No increase in overall cost of the Program will result from this waiver.

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 PROCEEDURES:
UMCFood will continue to monitor its sites on a regular basis for program integrity as part of the SFSP sponsor reviews. UMCFood is reviewed on a regular basis by the State Agency, and meal component integrity remains a significant portion of that review process.

12. PROPOSED REPORTING REQUIREMENTS (INCLUDE TYPE OF DATA AND DUE DATES TO FNS)

UMCFood is willing to report data to FNS as requested. Suggested data to report: Number of sites with UMCFood utilizing the OVS option. Suggested date: December 15, 2020

UMCFood will report review findings associated with OVS during their SFSP reviews. Suggested due date: September 15 annually

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


14. SIGNATURE AND TITLE OF REQUESTING OFFICIAL:

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