WAIVER REQUEST: MEAL SERVICE TIMES WAIVER

Request Submission Date: June 17, 2020

1. **State Agency:** Georgia Department of Education

   **Contact Information:** Dr. Linette Dodson, RD, LD, SNS, FAND
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   Georgia Department of Education
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2. **Region:** Southeast Regional Office (SERO)

3. **Eligible Service Providers:** Georgia School Food Authorities (SFA) participating in the National School Lunch and National School Breakfast Programs will participate in this said waiver. All are in good standing.

4. **Description of Challenge:** The Georgia Department of Education, School Nutrition Program (GaDOE SNP) seeks to support streamlined access to nutritious meals as districts restart school in the wake of COVID-19. School structure will not look the same as in years past, schools will be using hybrid methods to provide learning to students which will impact traditional meal service. Schools are considering blended models which include a combination of in-person and virtual learning. Schools in high risk areas and secondary schools are considering 100% virtual school. The GADOE SNP request a waiver extension to allow meals to be served to students at non-traditional service times and for students to be able to pick-up meals for multiple days at one time for virtual learning school days. If this waiver is granted, it will allow SFAs to provide multiple days’ worth of meals at one time to interested students to consume on virtual learning days. This allowance would ensure consistent access to meals while maintaining the integrity of the social distancing techniques utilized by the school. Schools would establish approved pick-up schedules or delivery plans with designated times for distribution. Only one breakfast and/or lunch would be provided to students each school day. Where applicable, meals would be counted and claimed by eligibility status.

As a result of COVID-19, 185 (76%) Georgia SFAs participated in the meal service times waiver as part of their participation in the Seamless Summer Option due to unanticipated school closures. As we mentioned, districts are looking at many options to minimize potential student and staff
exposure to the novel coronavirus. This waiver would ensure consistent access to meals for schools using hybrid methods of learning.

GaDOE SNP intends to request waivers for non-congregate feeding and parent pick-up ensure that students receive meals when students are participating in learning offsite.

5. **Specific Program Requirements:** Citation Memos 7 CFR 210.10(l), 220.8(l), 225.16(c)(1) and (2), and 226.20(k), Child Nutrition Program meals must follow meal service time requirements.

6. **Detailed Description of Alternative Procedures/Anticipated Impact:** The allowance of said waiver request would provide the flexibility to current SFAs operating the National School Lunch and National School Breakfast Program to distribute multiple days meals at one time to students to consume on virtual learning days, while maintaining accurate counting and claiming by eligibility status. Schools would establish approved pick-up schedules or delivery plans with designated times for distribution. To participate schools would need to fill out an application that includes their request and method(s) used to accurately count and claim meals. GaDOE SNP will provide technical assistance to districts participating in this waiver to ensure accuracy. See additional information provided in #4 above.

7. **Description of any steps the State has taken to address regulatory barriers at the State level:** GaDOE SNP does not anticipate any barriers at the State level upon approval of the said waiver request.

8. **Anticipated challenges State or eligible service providers may face with the waiver implementation:** GaDOE SNP does not anticipate any barriers at the State level or eligible service provider level upon approval of the said waiver request.

9. **Description of how the waiver will not increase the overall cost of the Program to the Federal Government:** GaDOE SNP does not anticipate any increased cost to the Federal Government upon approval of the said waiver request.

10. **Anticipated waiver implementation date and time-period:**
    
    *Requested Waiver Timeframe:*
    
    - Waiver Request Start Date: September 1, 2020
    - Waiver Request End Date: May 31, 2021

11. **Proposed monitoring and review procedures:** GaDOE SNP will follow the review procedures in accordance with 7 CFR 210.18. Training, technical assistance, and off-site monitoring will be conducted in accordance with USDA regulations.
12. Proposed reporting requirements to FNS: All FNS required reports will be submitted in a timely manner as governed by USDA requirements. GaDOE SNP will also provide any and all additional reporting requirements that might be needed as a result of approval of said waiver.

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

   a. A copy of the public notice can be found on the GaDOE SNP website at: http://snp.wpgadoe.org/

14. Signature and title of requesting official:

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   Title:  Dr. Linette Dodson, RD, LD, SNS, FAND
          State Director, School Nutrition
          Georgia Department of Education

   Requesting official’s email address for transmission of response: ldodson@doe.k12.ga.us

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(I)(1)(A)(ii) of the NSLA

☒ Regional Office Analysis and Recommendations: