WAIVER REQUEST: WAIVER TO ALLOW NON-CONGREGATE FEEDING IN THE CHILD NUTRITION PROGRAMS

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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2. **Region:** Southeast Regional Office (SERO)

3. **Eligible Service Providers:** Georgia School Food Authorities (SFA) participating in the National School Lunch Program and National School Breakfast Program 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 requests a waiver extension to allow non-congregate feeding in Child Nutrition Programs. This waiver will be utilized by SFAs to distribute meals to students on virtual learning days. If this waiver is granted, it will allow SFAs to provide meals to all students regardless of the learning model utilized. Where applicable, meals would be counted and claimed by eligibility status.

   As a result of COVID-19, 185 (76%) Georgia SFAs participated in the non-congregate waiver as part of their participation in the Seamless Summer Option due to unanticipated school closures. As mentioned, districts are looking at many options to maintain social distancing when school resumes. This waiver would ensure consistent access to school meals for schools using hybrid methods of learning.
GaDOE SNP intends to request waivers for meal service times and parent pick-up ensuring that students receive school meals when students are participating in learning offsite.

5. **Specific Program Requirements:** Richard B. Russell National School Lunch Act at 42 U.S.C. 1753(b)(1)(A) and 42 U.S.C. 1761(a)(1)(D), and Program regulations at 7 CFR 225.6(e)(15) and 7 CFR 226.19(b)(6)(iii)

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 meals to students on virtual learning days, while maintaining accurate counting and claiming by eligibility status. Districts will be required to submit an application describing how this waiver will be used. GaDOE SNP will provide technical assistance to districts participating in this waiver to ensure compliance. 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 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:

   _______________________________
   _______________________________
       Dr. Linette Dodson

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

☒ Regional Office Analysis and Recommendations: