

August 4, 2021

Tamika Boone
DECAL
2 Martin Luther King, Jr. Drive, SE
Suite 754, East Tower
Atlanta, GA 30334
VIA EMAIL



RE: Child Nutrition Program Waiver Request to Allow the Summer Food Service Program through School Year 2021-2022

Dear Ms. Boone:

As an administrative sponsor for the Summer Food Service Program in South Georgia, we respectfully request continuance of the recently discontinued waiver allowing sponsors to operate SFSP outside of the traditional summer window. As requested in *USDA Policy Memorandum CACFP 12-2018/SFSP 05-2018*, below is a detailed explanation of the need for the waiver.

- **Description of the challenge that the waiver would solve, the goal of the waiver to improve services under the program, and the expected outcomes if the waiver is granted:**
Recently, USDA allowed the Nationwide Waiver to Allow Summer Food Service Program and Seamless Summer Option Operations (COVID-19: Child Nutrition Response #56) and its extension (#59) to sunset. In April, a separate waiver was granted to School Food Authorities to continue to operate SFSP/SSO throughout the 2021-2022 school year (COVID-19: Child Nutrition Response #85). We applaud USDA's responsiveness to the needs of sponsors and the children we serve during the COVID-19 pandemic. We ask that SFSP sponsors be granted parity with SFAs by allowing us to operate through the 2021-2022 school year.

CHALLENGE:

Our 26-county service area is seeing a drastic uptick in COVID cases. 1/3 of the counties in our area are considered hot spots – with case increases ranging from 960% to 3,500%. Hospitals here are overloaded with patients and are closing ERs to additional patients. We have low vaccination rates here – with 80% of our area reporting less than 1/3 of its residents being fully vaccinated. The pandemic continues to complicate our already existing food insecurity crisis. The following are specific problems that could be alleviated by extending the waiver allowing SFSP sponsors to operate during the 2021-2022 school year:

- 1. We are already seeing delays in school openings in counties/school systems that do not operate SSO. Without a waiver to operate SFSP through the school year 21-22, we are unable to step in to help feed these children while school is delayed or closed. We are also already hearing from school systems that are approved to operate SSO but are anticipating needing our help if/when they delay or close. Despite their best efforts, they were unable to serve to a large portion of their students. This waiver would enable us to fill in the gaps in service and to help serve the same children that are eligible to be served by NSLP/SSO but have been unserved. **It is imperative that we be able to immediately step in and start feeding children when schools begin to close or delay their starts.***
- 2. The vast majority of the children we serve through our Child Nutrition Programs are ineligible for the vaccine due to age. Making them participate in an enrollment-based program like CACFP puts them at greater risk of exposure to the infection. With our rapidly climbing virus rates, we need to take steps to limit exposure. **Parents shouldn't have to choose between feeding their child and risking their health.***
- 3. CACFP, as an enrollment-based program, drastically limits our ability to reach children in our rural area. Partner sites are difficult to find even in the best of times. The vast majority of children in our service area do not have access to a CACFP-participating program due to lack of sites, lack of funding, lack of transportation, or distance from a site. This requirement may be feasible in urban areas where sites are within easy walking distance, but that is not the case here. **Rural children do not have equitable access to meals – especially during the pandemic.***
- 4. Our current CACFP sites are beginning to close again due to COVID (in the last two weeks). We anticipate further closures soon. CACFP will not be an option for feeding children when they do close – leaving children with few or no options for meals.*

GOAL: *To continue to meet the needs of children in rural Georgia in light of COVID resurgence and continuing economic impact of the pandemic. To be able to immediately begin feeding children if/when schools delay and/or close again due to COVID.*



OUTCOMES:

This waiver will help further USDA's goal of increasing access to meals while minimizing risk. Allowing sponsors like Second Harvest of South Georgia to operate SFSP during the 2021-2022 school year will aid in getting much-needed nutrition to children in need without putting these children and their families at risk. This waiver will give our local SFAs a back-up plan for feeding their students if/when their nutrition staff is unable to serve due to COVID (a real-world example from one of our systems last spring) and if they cannot/choose not to operate SSO.

- **Specific program requirements to be waived:**
 1. 7 CFR 225.6(b)(1), the requirement that applications for participation be submitted "by June 15"; and
 2. 7 CFR 225.6(e)(1) in its entirety.
- **Detailed description of alternate procedures and anticipated impact on program operations:**

If granted a renewal of the elapsed waiver, Second Harvest of South Georgia (and other sponsors) will continue to operate the program as we have for the last 15 months – in compliance with the program regulations and waivers that are still in effect.
- **Description of any steps the State has taken to address regulatory barriers at the State level.**

To be determined by DECAL
- **Anticipated challenges State or eligible service providers may face with waiver implementation.**

We do not anticipate any challenges to implementing the waiver since it was in place until recently.
- **Description of how the waiver will not increase the overall cost of the program to the federal government.**

The waiver will not increase program costs to the federal government. The waiver has been in place until recently.
- **Anticipated waiver implementation date and time-period:**

We request that the waiver be reimplemented immediately for the upcoming/current school year.
- **Proposed monitoring and review procedures:**

We will conduct monitoring and review procedures in accordance with SFSP Administrative Guidance published by USDA and waivers that are in effect now.

Thank you for your assistance in pursuing this waiver and for your continued partnership. It is essential to ensuring the children of South Georgia have the nutritious meals they need even in these uncertain times. If I can provide additional information or do anything to expedite the consideration of this request for waiver, please do not hesitate to contact me at (229) 630-7195 or EMcCall@FeedingSGA.org.

Sincerely,

Eliza R. McCall
CMO
Second Harvest of South Georgia

cc: Rian Ringsrud, Willie Taylor