

Child Nutrition Program Waiver Request
SPONSOR: MUSC SF6380
Waiver for Offer versus Serve 7CFR225.16(f)(1)(ii)

February 8, 2019

1. State agency submitting waiver request and responsible State agency staff contact information:

South Carolina Department of Education
Division of District Operations and Support, Health and Nutrition
Ron Jones, Director (rfjones@ed.sc.gov)
1429 Senate Street
Columbia, SC 29201
Phone: 803-734-8500

2. Region:

Southeast Region

3. Eligible service providers participating in waiver and affirmation that they are in good standing:

Medical University of South Carolina (MUSC) is the sponsor (SF 6380) requesting the waiver. This sponsor began operating SFSP during 2015 and has successfully completed the first year administratively review and a second Administrative Review in 2018 as outlined in 7 CFR 225.7.

4. Description of the challenge the State agency is seeking to solve, the goal of the waiver to improve services under the Program, and the expected outcomes if the waiver is granted:

MUSC is requesting a waiver for Summer Food Service Program (SFSP) flexibilities and policies that were rescinded by the USDA Food and Nutrition Services (FNS) on October 11, 2018 through SFSP 01-2019 *Summer Food Service Program Memoranda Rescission*.

As a healthcare facility that operates 24 hours per day and 365 days per year, MUSC strives to provide access to food for patients, families, visitors and employees at all hours. We have been thrilled to participate in SFSP, serving both breakfast and lunch, since 2015 and have served more than 18,000 meals as part of SFSP over the years. Part of the success of our program is utilizing offer-versus-serve (OVS) which allows us a tailored approach to meet the nutritional needs of children, promote choice in meal selection for children (which improves consumption), minimize food waste and reduced food cost. Additionally, OVS starts lifelong habits for children to select nutritious food that they will consume. Offering children the power of choice is an important building block in developing healthy eating habits.

5. Specific Program requirements to be waived:

MUSC is requesting a waiver of 7 CFR225.16(f)(1)(ii) which states:

Offer versus serve. School food authorities that are Program sponsors may permit a child to refuse one or more items that the child does not intend to eat. The school food authority must apply this “offer versus serve” option under the rules followed for the National School Lunch Program, as described in part 210 of this chapter. The reimbursements to school food authorities for Program meals served under the “offer versus serve” must not be reduced because children choose not to take all components of the meals that are offered.

6. Detailed description of alternative procedures and anticipated impact on Program operations, including technology, State systems and monitoring:

As a non-school food authority sponsor in good standing, we wish to utilize OVS following follow the SFSP OVS requirements outlined in SFSP 05-2016 *Meal Service Requirements in the Summer Meal Programs, with Questions and Answers*, Nov. 12, 2015. We have only participated in SFSP using OVS and administrative reviews have found zero findings related to OVS implementation.

7. Description of any step the State has taken to address regulatory barriers at the State level:

The South Carolina Department of Education has submitted a state waiver for 7 CFR 225.16(f)(1)(ii).

8. Anticipated challenges State or eligible service providers may face with the waiver implementation:

We do not anticipate that this waiver will present any challenges to the state agency or MUSC as these flexibilities have already been successfully implemented and in place during previous summers.

The challenges that we may face if the waiver is NOT approved include:

- Increased burden to change to the format and operational design of the program
- Increased burden to update training materials and re-train sites
- Increased cost to update customer facing promotional and educational material
- Increased food waste (local health department rules forbid us from utilizing the “share table” and recycling milk or food once it has been served to a child).
- Increased food costs and program costs
- Loss of choice for children in meal selection, resulting in decreased participation and an increase in childhood hunger South Carolina.

9. Description of how the waiver will not increase the overall cost of the program to Federal Government. If there are anticipated increases, confirm that the cost will be paid from non-Federal funds:

The Federal Government will not incur any additional cost should the waiver be approved.

10. Anticipated waiver implementation date and time period:

This waiver will be implemented immediately upon approval for program year 2019. Further, we request the waiver remain in effect for a period of ten years.

11. Proposed monitoring and review procedures:

MUSC will follow the monitoring requirements as identified in 7 CFR 225. Internal processes and procedures are already in place to ensure program integrity with extended meal service hours.

12. Proposed reporting requirements (include type of data and due date to FNS):

MUSC will provide program data to SCDOE in a timely fashion as identified in 7 CFR 225.

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

www.musc.edu/kids-eat-free

Signature and title of requesting official:

A handwritten signature in black ink, appearing to read "Susan L. Johnson". The signature is fluid and cursive, with a long horizontal stroke at the end.

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