



STATE OF CONNECTICUT
DEPARTMENT OF EDUCATION



June 5, 2019

Ms. Jan Kallio
Branch Chief
Community Nutrition Programs Branch
USDA/Food & Nutrition Service/NERO
10 Causeway Street
Boston, MA 02222

Dear Jan:

Subject: Waiver request for approving sponsors prior to Summer Food Service Program (SFSP) operations

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

Connecticut State Department of Education (CSDE)
Bureau of Health/Nutrition, Family Services and Adult Education
Caroline Cooke, Caroline.Cooke@ct.gov, 860-807-2144

2. Region: Northeast

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

In summer 2018, Connecticut had two sponsoring organizations that started Summer Food Service Program operations one day prior to receiving written approval from the CSDE. Both organizations are experienced SFSP sponsors in good standing as evidenced through the administrative review process.

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. [Section 12(l)(2)(A)(iii) and 12(l)(2)(A)(iv) of the NSLA]:

The CSDE is requesting a State agency waiver to allow payment of meals served prior to written notification that the site had been approved for participation in the Program for the two sponsors impacted in summer 2018.

CSDE summer meals staffing level at the time of 2018 Summer Meals application approval lead to a delay at the State agency in timely approval of two sponsor application packets. The CSDE has since adjusted staffing to include a second Associate Education Consultant. Additionally, State agency contractual activities of the SFSP will shortly be supported by a third individual, a contract specialist that CSDE is in the process of on-boarding.

Finally, sponsoring organizations were educated at the annual summer meals training that two new procedures had been instituted to ensure timely written approval of all sponsor application packets: 1) that the CSDE would no longer return application packets at the request of sponsoring organizations for adjustments or additions until the initial application packet had been approved; and 2) that all application packets must be submitted by the sponsoring organization no less than two weeks prior to the anticipated first day of summer meals operations.

5. Specific Program requirements to be waived (include statutory and regulatory citations). [Section 12(l)(2)(A)(i) of the NSLA]:

The CSDE requests that exceptions to approving sponsors prior to program operations rescinded in SFSP 06-2018 be granted to Connecticut SFSP sponsors and sites in good standing with the CSDE. Statutory and regulatory citations include the following: 7 CFR 225.9(d).

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

Limiting the timeframe of adjustments and additions to the application packets, and timely submission of application packets by sponsoring organizations, in addition to increased CSDE staffing will result in the written notification of approval to participate prior to summer meals operations for all sponsoring organizations. The State systems, procedures, technology and monitoring are all in place to support compliance with federal regulation.

7. Description of any steps the State has taken to address regulatory barriers at the State level. [Section 12(l)(2)(A)(ii) of the NSLA]:

The CSDE has not taken any steps to address regulatory barriers. These program flexibilities were implemented previously as allowed by USDA policy guidance. There are no additional regulatory barriers at the state level in Connecticut to prevent implementation.

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

The only anticipated challenge the State agency will face with the waiver implementation is sufficient federal funds to sustain the CSDE summer meals staffing changes.

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. [Section 12(l)(1)(A)(iii) of the NSLA]:

The payment of meals served by these sponsors does not increase the overall cost of the Program, as these costs were planned and budgeted by both the local sponsoring organization and the CSDE in summer 2018 operations.

10. Anticipated waiver implementation date and time period:

The CSDE will implement this waiver immediately upon USDA approval, including the payment of meals served on 6/16/18 and 6/19/18.

11. Proposed monitoring and review procedures:

The CSDE will continue to conduct site visits and administrative reviews as outlined in 7 CFR 225.7(d). Both sponsoring organizations received an administrative review of summer 2018 operations by CSDE and found to be in compliance with approve sponsor and site applications.

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

The CSDE will continue to report all information and data as required by federal regulations. Additionally, the CSDE provides the following table of information regarding the impacted meals:

Sponsoring Organization	Date application received by the CSDE	CSDE Approval Date	Retroactive Reimbursement Requested for:	# of Affected Sites	Estimated number of meals
Change the Play	5/15/18	6/17/18	6/16/18	1	703
Community Renewal Team, Inc.	5/15/18	6/20/18	6/19/18	1	10

13. Link to or a copy of the public notice informing the public about the proposed waiver [Section 12(I)(1)(A)(ii) of the NSLA]:

<https://portal.ct.gov/SDE/Nutrition/Summer-Food-Service-Program>

14. Signature and title of requesting official :



Title: State Child Nutrition Program Director

Requesting official's email address for transmission of response: John.Frassinelli@ct.gov

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:**