

Waiver Request – Meal Time Restrictions

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

State Agency: Hawaii Department of Education - Hawaii Child Nutrition Programs

State Agency Staff: Daniel Sutcharitkul – SFSP Program Specialist

E-mail: Daniel_Sutcharitkul@notes.k12.hi.us

Phone: (808) 587-3600

2. Region: Western Regional Office

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

All Summer Food Service Program (SFSP) sponsors approved to operate the SFSP in the state of Hawaii.

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]:

Challenge:

- Most sponsors reported that within the population they serve, children usually only attend one of the available meal services (i.e. children that attend the site for breakfast do not usually return to the same meal site for lunch, supper, or snack). At non-enrolled sites, like parks, community centers, and schools, children are coming and going throughout the day. Therefore, nutritionally speaking, there is not always a need for sites to operate within strict meal time limitations.

Goal:

- By removing meal time restrictions on duration between meals and length of meal times, SFSP sites can operate in a way that is more accommodating to the specific needs of their community and the type of site they are operating.

Expected Outcomes:

- Increase accessibility to meal sites for low-income children

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

HCNP requests to waive the required duration between meal times and the limitations on length of meal times under SP10 SFSP06-2017.

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

HCNP will not impose any requirements on the duration between meal times and the length of meal times. SFSP sponsors will report their planned meal times during the SFSP application process and any changes to meal times. Site meal times are reviewed as part of the application process.

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

HCNP had not addressed any Program regulatory barriers at the State level. There are currently no State level regulatory barriers related to this specific issue.

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

HCNP does not anticipate that the establishment of this state-wide waiver will pose any challenges at the state or sponsor level since this option was already well established in state and sponsor operations prior to the SFSP waiver rescission for SFSP-11 2011. Alternatively, we anticipate this waiver will reduce challenges faced by SFSP sponsors by reducing restrictions of meal service times that may hinder their ability to effectively serve meals to children in their community.

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(I)(1)(A)(iii) of the NSLA]:

The establishment of this state-wide waiver will not increase the overall cost of the Program to the Federal Government because HCNP has existing state-developed training and state-developed Program materials to support implementation of this waiver and no additional staff hours are needed at the state level to support implementation and monitoring for this waiver.

10. Anticipated waiver implementation date and time period:

The anticipated waiver implementation start date is April 1, 2019 and the waiver is to remain in place through March 31st, 2020.

11. Proposed monitoring and review procedures:

HCNP will require all SFSP sponsors to report their planned meal times during the SFSP application process and any time meal times are changed via the Hawaii Child Nutrition Programs System (HCNP_S) online SFSP application. Site meal times must be approved by HCNP before implementation of these meal times. Should sponsors serve meals during unapproved meal times, meals will be disallowed, except in the case of an unanticipated event reported by a sponsor to HCNP, as permitted in SP 10-2017, SFSP 06-2017.

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

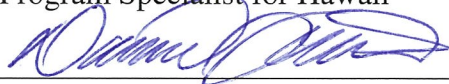
HCNP will annually report to FNS the following information by March 31st, each year the waiver is in place:

- Percentage of SFSP sponsors in Hawaii reporting continued need for site mealtime flexibility as would be permitted from this waiver.

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]:

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]:
<http://hcnp.hawaii.gov/overview/sfsp/>

14. Signature and title of requesting official: Daniel Sutcharitkul, Summer Food Service Program Specialist for Hawaii



Title: Summer Food Service Program Hawaii

Requesting official's email address for transmission of response:

Daniel_Sutcharitkul@notes.k12.hi.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:**