

**South Carolina Department of Social Services
Child and Adult Care Food Program (CACFP)
Waiver Request Template
State Agency Monitoring FFY21**

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

Agency- [South Carolina Department of Social Services](#)

Contact Name and Title- [Cheryl Evans-McDonald, CACFP Program Compliance Manager](#)

Contact Phone Number- [\(803\) 898-0971](#)

Contact Email- cheryl.evans-mcdonald@dss.sc.gov

2. Region: [Southeast](#)

3. Eligible service providers participating in waiver and affirmation that they are in good standing: [NA; this waiver request only applies to the State Agency \(SA\).](#)

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]:

For FFY2020, the SA has paid the following CACFP reimbursements:

Institution Type	Number of Institutions	Reimbursement Paid
Adult Care	38	\$2,116,621.61
At-Risk	52	\$7,925,400.73
Child Care	216	\$18,731,435.60
Emergency Shelter	5	\$65,263.49
Grand Total	311	\$28,838,721.43

The level of COVID-19 infection rates in South Carolina have resulted in quarantine and travel restrictions, and institutions and SA staff processes have been greatly impacted as follows:

- To protect the health and safety of citizens, SC Governor Henry McMaster has directed state agencies to take proactive measures to help safeguard the health and well-being of staff by maximizing telecommuting, reducing staff in-person contact with providers as well as with other SA staff members and performing tasks virtually as much as possible.
- Child and Adult Care institutions have now varied their operating hours and days, and some are functioning on limited staff.
- Institutions have heightened health and sanitation protocols in the event of a confirmed infection. Institutions have had to sporadically close due to COVID-19 infections amongst staff and participants.
- Institutions have instituted heightened protocols for visitors (physical distancing, wearing masks, hand washing, length of stay, and only allowing visitations by authorized persons)
- Monitoring staff have verbally expressed and have experienced that when requesting CACFP related documents for an off-site review, some institutions do not have all the technological capabilities that facilitate the most efficient, accurate, and cost-effective methods of making records available off-site to the SA. Completing reviews has taken more time than usual.

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- Due to the rollover of some FFY20 reviews into FFY21, the customary full year is not available to conduct the FFY21 reviews. Therefore, the approval of the waiver request will allow the FFY21 reviews to be completed by September 30, 2021 as required.

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

State Agency Monitoring Requirements	Waiver Request	State Agency Comments
<input type="checkbox"/> [7 CFR 226.6(m)(2)] Review priorities. In choosing institutions for review, in accordance with paragraph (m)(6) of this section, the State agency must target for more frequent review institutions whose prior review included a finding of serious deficiency.	Yes	In the past, SCDSS performed a full program compliance review of institution records during the 2 nd year after the institution had a finding of serious deficiency (SD). For FFY 2021, SCDSS will perform target reviews of the areas of serious deficiency instead of performing a full program compliance review. The next full review of these institutions will be in FFY2022 according to the 3 year review cycle. There are 22 institutions scheduled for an SD review.
<input type="checkbox"/> [7 CFR 226.6(m)(6)] Frequency and number of required institution reviews. Annually review at least 33.3% of all institutions according to the schedule:	Yes	SCDSS is requesting to waive the 33.3% <u>total</u> number of reviews performed requirement but will still review institutions according to the review cycle schedule of once every 3 years, large sponsors every 2 years, and new sponsors with 5 or more facilities. If the number of reviews based on the review schedule do not equate to 33.3% of the total number of institutions receiving reimbursement for the FFY2019 program year, additional institution reviews will not be added to the review list to bring the total number of reviews conducted up to the 33.3% total. See the calculations below: <ul style="list-style-type: none"> • Number of reviews <i>required</i> based on 33.3%—111 institution reviews based on data that shows that 332 institutions received a FFY2019 program year reimbursement • Total Reviews <i>requested</i> to be performed—68+22=90 Number of reviews due based on the review cycle cited in 7 CFR 226.6(m)(6)]—68 Number of reviews due based on 7 CFR 226.6(m)(2) for SD institutions—22

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		Due to the unexpected carryover of the FFY20 reviews into FFY21, the waiver to perform only 90 reviews for FFY21 along with the waiver for review content will allow the State Agency to complete the FFY21 reviews by September 30, 2021
<input type="checkbox"/> (i) Review independent centers and sponsoring organizations of 1 to 100 facilities at least once every three years and include reviews of 10% of their facilities;	No	
<input type="checkbox"/> (ii) Review sponsoring organizations with more than 100 facilities at least once every two years and include reviews of 5 percent of the first 1,000 facilities and 2.5 percent of the facilities in excess of 1,000;	No	
<input type="checkbox"/> (iii) Review new institutions that are sponsoring organizations of five or more facilities within the first 90 days of Program operations.	No	
<input type="checkbox"/> [7 CFR 226.6(m)(3)] Review content:	Yes	See #6 below

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

[7 CFR 226.6(m)(3)] Review content:

SCDSS Institution Types	Waiver Request	State Agency Comments
Adult Care-Independent	Yes	<p>Participant “enrollment” documentation will not be reviewed. The risk of an adult participant not being “enrolled” is minimal. Too, there is no standard form for adult participant enrollment; therefore; the type and volume of documentation can vary from one institution to another.</p> <p>Participant Plans of Care will only be reviewed for those participants under the age of 60 years. This is to focus on the requirement that participants under 60 years must be impaired and have a Plan of Care on file.</p> <p>The income eligibility determination will only be reviewed for those participants whose free/reduced-price meal eligibility is based on income. The majority of adult participants are categorically eligible as free based on Medicaid.</p> <p>This will lessen the volume of documents that will need to be transmitted to the State Agency and lessen the amount of time the State Agency spends on reviewing documents.</p> <p>There are 6 Adult Care independent institutions scheduled for review</p>

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Adult Care- Sponsor	Yes	<p>The review of the sponsored facility's records will focus on the sponsor's oversight of facilities by examining sponsor monitoring documentation of facilities.</p> <p>The review of sponsor records will encompass a review of the sponsor administrative staff and facility staff training, sponsor operating and administrative costs, and sponsor meal count reporting on the Claim for Reimbursement.</p> <p>The State Agency will also conduct scheduled training sessions and institution technical assistance for sponsors.</p> <p>This will lessen the volume of documents that will need to be transmitted to the State Agency and lessen the amount of time the State Agency spends on reviewing documents.</p> <p>There are 6 Adult Care sponsor institutions scheduled for review</p>
At-Risk- Independent	Yes	<p>If the institution is a school district, a review of CACFP expenses will not be performed. School districts are experienced in meal service protocols and accountability and are subject to other USDA financial and administrative reviews. All other areas will still be reviewed.</p> <p>This will lessen the volume of documents that will need to be transmitted to the State Agency and lessen the amount of time the State Agency spends on reviewing documents.</p> <p>Currently there are no At-Risk independent institutions due for review</p>
At-Risk- Sponsor	Yes	<p>The review of the sponsored facility's records will focus on the sponsor's oversight of facilities by examining sponsor monitoring documentation of facilities.</p> <p>The review of sponsor records will encompass a review of the sponsor administrative staff and facility staff training, sponsor operating and administrative costs, and sponsor meal count reporting on the Claim for Reimbursement.</p> <p>The State Agency will also conduct scheduled training sessions and institution technical assistance for sponsors.</p> <p>If the sponsor is also a school district, a review of CACFP expenses will not be performed except for the 15% administrative cost limitation. School districts are experienced in meal service protocols and accountability and are subject to other USDA financial and administrative reviews. For most school institutions, the only CACFP expense is the vended meal cost.</p> <p>This will lessen the volume of documents that will need to be transmitted to the State Agency and lessen the amount of time the State Agency spends on reviewing documents.</p> <p>There are 13 At-Risk sponsor institutions scheduled for review</p>

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SCDSS Institution Types	Waiver Request	State Agency Comments
Child Day Care- Independent	Yes	<p>For the review of participant enrollment and the participant free/reduced-price meal eligibility, a total of 20% of the reported participant enrollment will be reviewed. The 20% will then be proportionately allocated to the number of participants determined to be eligible for free and reduced-price meals. This will only focus on the free/reduced participants. If the test results show that 50% or more participants have invalid enrollment or free/reduced-price meal eligibility forms, the testing will be expanded to 100% of the participants.</p> <p>Example:</p> <p>Review Month Data---A total of 76 participants were reported with 21 being paid, 45 being free and 10 reduced. Reviewing 20% of the total enrollment of 76 would equate to 16 and will be allocated as follows.</p> <ul style="list-style-type: none"> • The total of free and reduced participants is 55. Of the 55, 82% were in the free category and 18% reduced • Therefore; the review sample will consist of: 13 free participants (82% *16) and 3 reduced participants (18% * 16) for a total of 16 <p>This will lessen the volume of documents that will need to be transmitted to the State Agency and lessen the amount of time the State Agency spends on reviewing documents.</p> <p>There are 31 Child Day Care independent institutions scheduled for review</p>
Child Day Care- Sponsor	Yes	<p>The review of the sponsored facility's records will focus on the sponsor's oversight of facilities by examining sponsor monitoring documentation of facilities.</p> <p>The review of sponsor records will encompass a review of the sponsor administrative staff and facility staff training, sponsor operating and administrative costs, operating payments to unaffiliated facilities and sponsor meal count reporting on the Claim for Reimbursement.</p> <p>The State Agency will also conduct scheduled training sessions and institution technical assistance for sponsors.</p> <p>This will lessen the volume of documents that will need to be transmitted to the State Agency and lessen the amount of time the State Agency spends on reviewing documents.</p> <p>There are 4 Child Day Care sponsor institutions scheduled for review</p>

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Child Care Home-Sponsor	Yes	<p>The review of the sponsored facility's records will focus on the sponsor's oversight of facilities by examining sponsor monitoring documentation of facilities.</p> <p>The review of sponsor records will encompass a review of the sponsor administrative staff and facility staff training, sponsor administrative costs, child care home tiering determination, payments to homes and sponsor meal count reporting on the Claim for Reimbursement.</p> <p>The State Agency will also conduct scheduled training sessions and institution technical assistance for sponsors.</p> <p>This will lessen the volume of documents that will need to be transmitted to the State Agency and lessen the amount of time the State Agency spends on reviewing documents.</p> <p>There are 3 Child Care Home sponsor institutions scheduled for review</p>
Emergency Shelter-Independent	No	Currently there are no independent Emergency Shelter institutions due for review
Emergency Shelter-Sponsor	Yes	<p>The review of the sponsored facility's records will focus on the sponsor's oversight of facilities by examining sponsor monitoring documentation of facilities.</p> <p>The review of sponsor records will encompass a review of the sponsor administrative staff and facility staff training, sponsor operating and administrative costs, and sponsor meal count reporting on the Claim for Reimbursement.</p> <p>The State Agency will also conduct scheduled training sessions and institution technical assistance for sponsors.</p> <p>This will lessen the volume of documents that will need to be transmitted to the State Agency and lessen the amount of time the State Agency spends on reviewing documents.</p> <p>Currently there are no sponsor Emergency Shelter institutions due for review</p>
Head Start-Independent	Yes	<p>For the review of participant enrollment and the participant free/reduced-price meal eligibility, a total of 20% of the reported participant enrollment will be reviewed. The 20% will then be proportionately allocated to the number of participants determined to be eligible for free and reduced-price meals. This will only focus on the free/reduced participants. If the test results show that 50% or more participants have invalid enrollment or free/reduced-price meal eligibility forms, the testing will be expanded to 100% of the participants.</p> <p>Example:</p> <p>Review Month Data---A total of 76 participants were reported with 21 being paid, 45 being free and 10 reduced. Reviewing 20% of the total enrollment of 76 would equate to 16 and will be allocated as follows.</p> <ul style="list-style-type: none"> • The total of free and reduced participants is 55. Of the 55, 82% were in the free category and 18% reduced • Therefore; the review sample will consist of:

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SCDSS Institution Types	Waiver Request	State Agency Comments
		<p style="text-align: center;">13 free participants (82% *16) and 3 reduced participants (18% * 16) for a total of 16</p> <p>This will lessen the volume of documents that will need to be transmitted to the State Agency and lessen the amount of time the State Agency spends on reviewing documents.</p> <p>There is 1 independent Head Start institution scheduled for review</p>
Head Start- Sponsor	Yes	<p>The review of the sponsored facility's records will focus on the sponsor's oversight of facilities by examining sponsor monitoring documentation of facilities.</p> <p>The review of sponsor records will encompass a review of the sponsor administrative staff and facility staff training, sponsor operating and administrative costs, and sponsor meal count reporting on the Claim for Reimbursement.</p> <p>The State Agency will also conduct scheduled training sessions and institution technical assistance for sponsors.</p> <p>This will lessen the volume of documents that will need to be transmitted to the State Agency and lessen the amount of time the State Agency spends on reviewing documents.</p> <p>There are 2 Head Start sponsor institutions scheduled for review</p>
Outside School Hours- Independent	Yes	<p>For the review of participant enrollment and the participant free/reduced-price meal eligibility, a total of 20% of the reported participant enrollment will be reviewed. The 20% will then be proportionately allocated to the number of participants determined to be eligible for free and reduced-price meals. This will only focus on the free/reduced participants and will lessen the volume of documents that will need to be transmitted to the State Agency and lessen the amount of time the State Agency spends on reviewing documents. If the test results show that 50% or more participants have invalid enrollment or free/reduced-price meal eligibility forms, the testing will be expanded to 100% of the participants.</p> <p>Example:</p> <p>Review Month Data---A total of 76 participants were reported with 21 being paid, 45 being free and 10 reduced. Reviewing 20% of the total enrollment of 76 would equate to 16 and will be allocated as follows.</p> <ul style="list-style-type: none"> • The total of free and reduced participants is 55. Of the 55, 82% were in the free category and 18% reduced • Therefore; the review sample will consist of: 13 free participants (82% *16) and 3 reduced participants (18% * 16) for a total of 16 <p>This will lessen the volume of documents that will need to be transmitted to the State Agency and lessen the amount of time the State Agency spends on reviewing documents.</p>

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		Currently there are no independent Outside School Hours institutions due for review
Outside School Hours- Sponsor	Yes	<p>The review of the sponsored facility's records will focus on the sponsor's oversight of facilities by examining sponsor monitoring documentation of facilities.</p> <p>The review of sponsor records will encompass a review of the sponsor administrative staff and facility staff training, sponsor operating and administrative costs, and sponsor meal count reporting on the Claim for Reimbursement.</p> <p>The State Agency will also conduct scheduled training sessions and institution technical assistance for sponsors.</p> <p>This will lessen the volume of documents that will need to be transmitted to the State Agency and lessen the amount of time the State Agency spends on reviewing documents.</p> <p>There are 2 Outside School Hours sponsor institutions scheduled for review</p>

Notes:

If the institution is a new sponsor with 5 or more facilities; a waiver of review elements is not being requested. The State Agency will perform a full scope review of the sponsor and facilities according to regulations.

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 SA does not foresee any regulatory barriers at the state level for this waiver.**

8. Anticipated challenges State or eligible service providers may face with the waiver implementation: **The SA does not foresee any challenges at the state level for this waiver.**

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]: **There will not be an increase in costs**

10. Anticipated waiver implementation date and time period: **The waiver request is applicable to the FFY21 monitoring requirements for October 1, 2020 through September 30, 2021**

11. Proposed monitoring and review procedures: **The State Agency will utilize training sessions, technical assistance, review of monitoring activities if a sponsor, and claims verification techniques to assess and improve program operations. These activities will be performed via phone, virtual, desk review, and in-person (if needed).**

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12. Proposed reporting requirements (include type of data and due date(s) to FNS): [The SA will provide the list of reviews to be performed during FFY21 and provide an update on the status of the performance of reviews for the periods ending May 31st, August 31st, and September 30, 2021.](#)

13. Link to or a copy of the public notice informing the public about the proposed waiver [Section 12(l)(1)(A)(ii) of the NSLA]: <https://scchildcare.org/news-and-announcements/cacfp-covid19-waivers.aspx>

14. Signature and title of requesting official:


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Name: Michele Bowers

Title: Director, Division of Early Care and Education, South Carolina Department of Social Services

Requesting official's email address for transmission of response:

Michelle.bowers@dss.sc.gov
