



**COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF HUMAN SERVICES  
OFFICE OF INCOME MAINTENANCE**

**P.O. Box 2675  
Harrisburg, Pennsylvania 17105-8018**

**Lisa M. Watson  
Deputy Secretary for  
Office of Income Maintenance**

**Telephone: 717-783-3063  
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Eric Ratchford, Director  
Supplemental Nutrition Assistance Program  
USDA, Food and Nutrition Service  
300 Corporate Boulevard  
Robbinsville, New Jersey 08691-1598

Dear Eric Ratchford:

The Department of Human Services (DHS) is requesting a waiver of the 2 CFR § 200.405(c) and 2 CFR § 200.405(d) which prohibit rule that SNAP-Ed paid staff from distributing meals funded by the National School Lunch Program. Based on guidance previously received from the Food and Nutrition Service (FNS), actual food distribution and feeding is not allowable for SNAP-Ed. However, due to the Coronavirus (COVID-19), the need for support in the daily distribution of meals is extremely important in many areas throughout the state. The need to support healthy food access to students and SNAP recipients during this health crisis is vital and takes a tremendous amount of staff to operate.

The approval of this waiver would allow the SNAP-Ed partners to provide assistance and help distribute meals to some of the most vulnerable citizens of Pennsylvania.

If you have any questions regarding this request, please contact Cathy Buhrig, Director, Bureau of Policy, at (717) 787-4081.

Sincerely,

A handwritten signature in cursive script, appearing to read "Lisa M. Watson".

Lisa M. Watson, J.D.

c: Cathy Buhrig

## WAIVER REQUEST

**1. Waiver Serial Number:**

**2. Type of Request:**

Initial

**3. Primary Regulation Citation:**

2 CFR § 200.405(c)

**4. Secondary Regulation Citation:**

2 CFR § 200.405(d)

**5. State:**

Pennsylvania

**6. Region:**

Mid-Atlantic

**7. Regulatory Requirements:**

2 CFR § 200.405(c) states, "Any cost allocable to a particular Federal award under the principles provided for in this part may not be charged to other Federal awards to overcome fund deficiencies, to avoid restrictions imposed by Federal statutes, regulations, or terms and conditions of the Federal awards, or for other reasons. However, this prohibition would not preclude the non-Federal entity from shifting costs that are allowable under two or more Federal awards in accordance with existing Federal statutes, regulations, or the terms and conditions of the Federal awards."

Additionally, 2 CFR § 200.405(d) states, in part, "Direct cost allocation principles. If a cost benefits two or more projects or activities in proportions that can be determined without undue effort or cost, the cost must be allocated to the projects based on the proportional benefit. If a cost benefits two or more projects or activities in proportions that cannot be determined because of the interrelationship of the work involved, then, notwithstanding paragraph (c) of this section, the costs may be allocated or transferred to benefited projects on any reasonable documented basis."

Under 7 CFR 272.3(c), upon request of the State agency, the Food and Nutrition Service (FNS) may waive the requirement that SNAP-Ed staff not serve meals or preform food service duties.

#### **8. Proposed Alternative Procedures:**

Under the waiver, SNAP-Ed Staff would be able to assist in serving meals and assist in performing food service duties as needed in numerous food delivery sites.

The Department of Human Service (DHS) is requesting this waiver to assist Pennsylvanians due to the Coronavirus (COVID-19). COVID-19 has quickly become a health crisis, continues to grow daily, and the Centers for Disease Control and Prevention is requesting those at high risk take precautions, some of which include staying out of public areas. DHS wants to assist as many individuals as possible during this crisis and ensure individuals are receiving access to healthy and nutritious meals during this time. Allowing our SNAP-Ed partners to assist in the distribution of food to those in need would be extremely helpful as many food service sites do not have enough staff alone to meet the need and demand for the numerous meal distribution sites.

#### **9. Justification for Request:**

The approval of this waiver would allow DHS to reach as many individuals that need access to food during this health crisis. It will also assist in providing help to food service sites and staff that have been working tirelessly to distribute meals daily across the state. Many SNAP-Ed staff are certified with the same credentials as food service staff and would be extremely beneficial to helping prepare and distribute meals to Pennsylvania's most vulnerable citizens.

#### **10. Anticipated Impact on Households and State Agency Operations:**

This waiver has a positive impact on SNAP recipients by ensuring they receive healthy nutritious meals during this time.

In FY 2020, there are 1,130 PA SNAP-Ed approved food assistance sites (Food Pantry or Food Assistance Site, Soup Kitchen, USDA Summer Meals Site) that may serve any number of meals to the SNAP-eligible audience.

School Meals, Estimate of Impacted Population for Waiver:

- FY20 PA SNAP-Ed Schools Total Number of PDE Buildings = 638
- FY20 PA SNAP-Ed Schools Total Enrollment per PDE Building Data Report = 341,821

- FY20 PA SNAP-Ed Schools Free/Reduced Price Meals Enrollment per PDE Building Data Report = 330,735

**Senior Center Meals, Estimate of Impacted Population for Waiver:**

- FY20 PA SNAP-Ed Senior Center Total Number of Locations = 156
- FY19 PA SNAP-Ed Senior Center Participants Total = 2,776

**Early Childhood Meals, Estimate of Impacted Population for Waiver:**

- Note: Early Childhood Intervention includes Preschools, Childcare Centers & Daycare Homes, and Head Start Sites.
- FY20 PA SNAP-Ed Early Childhood Total Number of Locations (excluding preschools in schools): 672
- FY20 PA SNAP-Ed Early Childhood Total Participants Year-to-date (excluding preschool participants in schools) = 15,995

**11. Caseload Information, Including Percent, Characteristics, and Quality Control Error Rates for Affected Portion:**

Pennsylvania currently serves 949,787 SNAP households as of January 2020. This waiver could impact many SNAP recipients ensuring they receive healthy nutritious meals timely and daily.

**12. Anticipated Implementation Date and Time Period for which Waiver is Needed:**

Beginning Immediately

**13. Proposed Quality Control Review Procedures:**

No Special QC procedures. Cases will be reviewed using the standard review procedures outlined in FNS handbook 310.

**14. Signature and Title of Requesting Official:**

Lisa M. Watson  
Deputy Secretary for Income Maintenance



**15. Date of Request: April 1, 2020**