



310 South Street, 4th Floor
Morristown, NJ 07960
973 - 867 - 3213

CHILD NUTRITION PROGRAM/SFSP
NEW JERSEY STATE WAIVER REQUEST

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James C. Brady  
Raymond Chambers  
E.J. Foley  
Edward Franz

- 1. The LifeCamp Inc.**  
310 South Street Fourth Floor  
Morristown, NJ 07960

Sponsor: LifeCamp Inc.  
310 South Street, 4<sup>th</sup> Floor  
Morristown, NJ 07960  
Camp Director, Edward Franz

- 2. Region:**

Mid-Atlantic (MARO)

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

The waiver would apply to all campers at our one site.

- 4. Description of the challenge LifeCamp Inc. 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]:**

LifeCamp is requesting a waiver for the SFSP flexibility that was rescinded by FNS on October 11, 2018 as part of SFSP 01-2019; Summer Food Service Program (SFSP) Waiver for Closed Enrolled Sites November 17, 2002 which extended area eligibility to closed enrolled sites. This waived the statutory provision of Section 13(a)(1)(A)(i)(III) of the NSLA, 42 USC 1761(a)(1)(A)(i)(III), and the regulatory definition of closed enrolled sites, which required eligibility determinations to be made by submitting applications in accordance with 7 CFR 225.15(f). Under this waiver, closed enrolled sites could be determined eligible if located in areas where 50 percent of the children residing in the area are eligible for free and reduced-price meals under the National School Lunch Program and the School Breakfast Program.

We are a day camp that only allows campers from the greater Newark area to attend this camp. Nearly one hundred percent of the campers come from the following towns, Newark, Irvington, Hillside, Orange and East Orange, New Jersey which are all area eligible. These campers are bused to camp each day from three different locations in Newark and return to Newark each afternoon. So, despite the camp being in Pottersville, New Jersey virtually all our campers come from Newark.

The goal of this waiver is to reinstate the rescinded extension of area eligibility to closed enrolled sites and allow for efficient and cost-effective program management and reduction of the administrative burden for sponsors and the State Agency.

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

The State agency has recently required us to have our parents submit income eligibility verification so we may be able to qualify for the summer food program. Since nearly every child comes from the areas already mentioned above, the State agency is essentially asking our parents to verify something we already know. In addition, some of our families have not filled out the information correctly or not filled it out at all, thus jeopardizing our funding. LifeCamp is requesting to extend the use of names and addresses to verify our camper's eligibility as our families are already located in needy areas where 50% or more of the children residing in those areas mentioned are eligible for free and reduced-price meals under the National School Lunch Program. For this reason, we are requesting to waive the requirement of parents submitting eligibility applications.

Section 13(a)(1)(C) of the NSLA defines "areas in which poor economic conditions exist" as areas in which at least 50% of the children are eligible for free or reduced price school meals under the NSLA and the Child Nutrition Act of 1966, as determined by information provided from departments of welfare, zoning commissions, census tracts, by the number of free and reduced price lunches or breakfast served to children attending public and non-profit private schools located in the area of program food service sites, or from other appropriate sources, including statements of eligibility based upon income for children enrolled in the program.

42 USC 1761(a) (1)(A)(i)(III) defines an "area in which poor economic conditions exist" as (aa) an area for which the program food service site documents the eligibility of enrolled children through the collection of income eligibility statements from the families of enrolled children or other means; and (bb) at least 50 percent of the children enrolled at the program food service site meet the income standards for free or reduced price school meals under this chapter and the Child Nutrition Act of 1966 (42 USC 1771et seq.);

7 CFR 225.15(f) Application for free Program meals – (1) Purpose of application form.

The application is used to determine the eligibility of children attending camps and the eligibility of sites that are not open sites as defined in paragraph (a) of the definition of "areas in which poor economic conditions exist", in 7 CFR 225.2. In these situations, parents or guardians of children enrolled in camps or these other sites must be given application forms to provide information described in paragraph 7 CFR (f)(2) or (f)(3), as applicable. Applications

are not necessary if other information sources are available and can be used to determine eligibility of individual children in camps or sites.

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

Any site located in an area in which at least 50% of the children are from households eligible for free or reduced-price meals in the NSLP and SBP will be eligible for SFSP reimbursement for all meals served to eligible children, regardless of whether the site serves an identified group of children or is an open site.

As I stated in question 5, summer food funding will be jeopardized if we rely on parent income eligibility documents. In the past we have sent a full and detailed set of all our campers' addresses to the State agency to verify that our children come from area eligible locations

It is in hopes that this waiver will have a positive outcome on our program operations and monitoring by reducing the administrative burden of collecting eligibility applications from our families and losing funding.

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

LifeCamp has taken the step to reach out to our State agency to address this barrier which is affecting the funding of our program because again, our camper's come from area eligible cities and towns.

**8. Anticipated challenges LifeCamp Inc. or eligible service providers may face with the waiver implementation:**

LifeCamp does not anticipate any significant challenges upon approval of the waiver. If the waiver is not approved LifeCamp will experience challenges of receiving income eligibility applications from our parents, decrease in participation, the need to hire staff which will increase staff labor costs for collecting and reviewing applications and overall assisting our parents in completing the applications.

**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]:**

LifeCamp Inc. does not anticipate that this waiver will increase the overall cost of the program to the Federal government. This waiver will continue to assist our parents and allow us to continue maintaining a cost-effective program.

**10. Anticipated waiver implementation date and time period:**

This waiver would be implemented in June 2020. We are requesting a three-year waiver approval.

**11. Proposed monitoring and review procedures:**

LifeCamp Inc. will continue to follow standard monitoring and review processes. Should there be any noncompliance issues related to this waiver, the State agency will work with us on an individualized corrective action plan and will have follow-up reviews when applicable.

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

LifeCamp Inc. will report to the State agency any compliance issues noted with this flexibility during application approvals and administrative reviews.

**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]:**

The public notice will be located at [greaternewarklifecamp.org](http://greaternewarklifecamp.org)

**14. Signature and title of requesting official:**

Edward Franz  
Title: Camp Director  
Requesting official's email address for transmission of response: [efranz@mbs.net](mailto:efranz@mbs.net)

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**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:**