



Arizona Department of Education

Health and Nutrition Services Division

HNS 09-2019

MEMORANDUM

TO: Local Educational Agencies Operating the National School Lunch Program

FROM: Melissa Conner, Associate Superintendent
Arizona Department of Education, Health and Nutrition Services Division

DATE: May 31, 2019

SUBJECT: Streamlining At-Risk Afterschool Meals for School Food Authorities in Arizona

Original Signed

The purpose of this memo is to inform School Food Authorities (SFAs) of changes to At-Risk Afterschool Meals including the application, training, monitoring, Administrative Reviews, and the Food Program Permanent Service Agreement (FPPSA). USDA has streamlined the requirements for schools participating in At-Risk Afterschool Meals through the Child and Adult Care Food Program (CACFP) to be consistent with those of the National School Lunch Program (NSLP) to provide significant administrative relief without compromising the integrity of the program, per memo [SP 09-2013 CACFP 04-2013: Streamlining At-Risk Meal Participation for School Food Authorities](#). All information and guidance for SFAs operating At-Risk Afterschool Meals can be found on ADE's At-Risk Afterschool Meals for School Food Authorities (SFAs) webpage. The streamlining approach for SFAs operating At-Risk Afterschool Meals will become effective October of SY 2019-2020.

The At-Risk Afterschool Meals component of the CACFP offers Federal funding to Afterschool Programs that serve a meal or snack to children in low-income areas. SFAs may participate in At-Risk Afterschool Meals in schools where at least 50 percent of the children are eligible for free or reduced-price school meals or are located in the attendance area of an eligible school as required by 7 CFR §226.17a(a). Schools may offer an afterschool snack and afterschool meal to all eligible children. During weekends and breaks when school is not in session, schools are able to offer their choice of one meal (breakfast, lunch or supper) and one snack to eligible children.

Currently, SFAs operating At-Risk Afterschool Meals are approved through the CACFP for a program year spanning October through September. This overlaps the NSLP program year spanning June through July. During the transition of At-Risk Afterschool Meals for SY 2019-2020, SFAs will continue to operate and claim through the end of the CACFP program year (September 2019). To operate At-Risk Afterschool Meals from October

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2019 through June 2020, the SFA will revise their NSLP Site Application for SY 2019-2020. Starting SY 2020-2021, SFAs will apply for At-Risk Afterschool Meals during the annual submission of Site and Sponsor Applications in CNPWeb for the program year spanning July through June.

Agreements

Local Educational Agencies (LEAs) must have a signed FPPSA with ADE. ADE has updated the FPPSA to include At-Risk Afterschool Meals. SFAs wanting to participate in At-Risk Afterschool Meals must have a signed FPPSA that includes this new section. A FPPSA can be found on the Program Forms section of the ADE webpage: <http://www.azed.gov/hns/nslp/forms/>.

Additionally, the SFA will be required to complete the *LEA At-Risk Meals Responsible Principals Addendum*, which holds information specific to the CACFP requirements that would not normally be obtained in the FPPSA such as the names, mailing addresses, and dates of birth of the responsible principals of the At-Risk Afterschool Meals operation. This addendum must be updated if there is any change in the individuals listed as responsible principals.

Application

Through this streamlined process, SFAs will only be required to indicate participation by annually completing Section 10 of their CNPWeb Site Applications. ADE waives the requirement to submit a separate management plan.

Section 10 will obtain all required meal service information for At-Risk Afterschool Meals. SFAs will indicate which afterschool meal service operation(s) they will be electing, meal pattern, description of the enrichment activity, and meal service start and end times. Once the SFA has submitted all Site and Sponsor Applications in CNPWeb, the assigned School Nutrition Programs Specialist will review the applications for all Child Nutrition Programs (CNPs) that have been elected for the SY.

Schools have the option to serve one snack and/or one meal through At-Risk Afterschool Meals. If the school is operating the Afterschool Care Snack Program (ASCSP) through the NSLP, the school may only elect to participate in At-Risk Afterschool Meals to serve one meal.

While school is in session, all snacks and meals must be served after the school day has ended. The CACFP does not have required start and end times but does require a two hour minimum between snack and meal start times.

For additional guidance on how to apply, please review the *Step by Step Instruction: How to Apply for At-Risk Afterschool Meals for School Food Authorities* which will be available September 2019 in the [ADE Online Course Library](#).

Training

SFAs participating in the NSLP are familiar with operating CNPs and are not required to attend training prior to submitting an application for At-Risk Afterschool Meals. Food service staff who operate the NSLP are not required to attend separate CACFP training on meal services; however, all staff should be informed of program requirements and operations. ADE recommends that

food service directors and staff involved with At-Risk Afterschool Meals participate in the online training *Step by Step Instruction: How to Operate At-Risk Afterschool Meals for School Food Authorities*. The training is available now in the [ADE Online Course Library](#).

Meal Patterns

The regulation in 7 CFR §226.20(o) allows SFAs participating in the NSLP to choose to use either the CACFP or the NSLP meal pattern when serving At-Risk snacks and meals. Offer versus Serve (OVS) may be utilized during At-Risk Afterschool Meals using both the NSLP or the CACFP meal patterns. OVS is unallowable during snack meal services under the NSLP and the CACFP meal patterns. SFAs will be required to keep production records to support their compliance with the meal patterns.

Procurement and Contracting Requirements

SFAs may follow the NSLP procurement standards found in 7 CFR §210.21 in lieu of the CACFP procurement standards at 7 CFR §226.22. Please review memo [SP 09-2013 CACFP 04-2013: Streamlining At-Risk Meal Participation for School Food Authorities](#) for more information.

SFAs that have the food service operation contracted with a food service management company (FSMC) can utilize this management of the food service program for the same activities for At-Risk Afterschool Meals as they are completed under the NSLP.

SFA Monitoring Requirements

The requirement to monitor At-Risk Afterschool Meals sites aligns with the NSLP monitoring requirements. Each school year, SFAs are required to perform no less than one on-site meal service review of the At-Risk Afterschool Meals site by February 1st. This review must acknowledge the counting and claiming system and the readily observable general areas of the review identified in 7 CFR 210.18(h). If the review reveals problems with the site counting and claiming procedures, the SFA must implement corrective action and conduct a follow-up site review within 45 days to ensure the corrective action has resolved all errors. Documentation of the on-site review should be kept on file and will be required as part of the SFA's Administrative Review.

Administrative Reviews

At-Risk Afterschool Meals operators will be reviewed for their compliance every three years. This review process for SFAs will occur at the same time as the Administrative Review for the NSLP. SFAs will receive prior notification of the review date(s). The financial management portion of the review will be combined for all CNPs to ease the administrative burden and to ensure that the complete nonprofit food service account is reviewed. Any site selected for a review of At-Risk Afterschool Meals will be required to provide documentation demonstrating programmatic requirements such as eligibility, meal pattern compliance, and counting and claiming. If ADE identifies deficiencies, they must be addressed in alignment with the CACFP regulation including termination, disqualification, and submission to the CACFP National

Disqualified List. Overclaims will be assessed and collected in accordance to the CACFP regulation.

ADE hopes that these simplifying measures will provide administrative relief to SFAs as well as increase At-Risk Afterschool Meals participation for those who wish to serve meals and snacks to children after school. For questions regarding this memo, please contact your assigned School Nutrition Programs Specialist whose contact information is located on the NSLP CNPWeb home page or send an email to ADESchoolNutrition@azed.gov.

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