# Arizona Department of Education

**HNS# 08-2020**

## MEMORANDUM

**To:** Local Educational Agencies and Community Organizations (Sponsors) of the Summer Food Service Program

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

**Date:** March 16, 2020

**Subject:** Operating Summer Food Service Program (SFSP) and Seamless Summer Option (SSO) during Unanticipated School Closures due to Coronavirus Outbreaks

The purpose of this memorandum is to provide guidance on the application process for school food authorities (SFAs) and community organizations (COs) choosing to serve through the Summer Food Service Program (SFSP) or Seamless Summer Option (SSO) during unanticipated school closures and to provide clarification regarding the policy memorandum released by United States Department of Agriculture (USDA) SP 08-2020, SFSP 04-2020: Child Nutrition Program Meal Service during Novel Coronavirus Outbreaks. This memorandum updates and replaces HNS# 07-2020.

Per the instruction in SP 08-2020, SFSP 04-2020, Arizona Department of Education (ADE) had submitted and received approval from USDA Food and Nutrition Services (FNS) to waive the requirements for serving meals in a congregate setting and the requirement to serve meals at a non-school site for COVID-19-related SFSP or SSO meal service operations. Therefore, non-school and school sites may apply to operate SFSP or SSO during a school closure and food may be taken and consumed off-site.

All other requirements of the SFSP or SSO must be followed while operating the program during an unanticipated school closure or dismissal. This includes but is not limited to maintaining a point of service with separate meal counts for each meal served, adherence to the meal pattern requirements, site monitoring, food safety and record keeping. Additionally, Offer vs Serve is not to be used during this time of non-congregate meal service, as all meals must be unitized.

The attached updated Questions & Answers (Q&A) are grouped under Application Process, Meal Service, and UDA Foods. This updated version includes new questions ADE has received. *[New/Revised]* appears next to the new or significantly revised questions.

**Kathy Hoffman, Superintendent of Public Instruction**
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Please contact your Programs Specialist at ADE with questions concerning this guidance. Your assigned specialist can be found at the top of the Sponsor application in CNPWeb. You may also send an email to SFSP@azed.gov or call 602-542-8700, and select option 1.

This institution is an equal opportunity provider.

**Application Process**

**1. How do I apply for SFSP/SSO during an unanticipated school closure due to COVID-19?**

SFAs and non-profit organizations who wish to operate their meal programs during this unanticipated school closure will need to submit an "Intent to Operate" and complete SFSP Site and Sponsor applications in CNPWeb.

As soon as possible, email your SFSP specialist your "Intent to Operate" by indicating the following:

- Sponsor/SFA/Community Organization (CO) Name
- Sites and CTDS numbers where you intend to operate
- Meals you will be serving
- Meal service operating dates and times
- What meal distribution method(s) the SFA/CO will use. Please indicate if you plan on serving two meals (breakfast and lunch) at the same time
- How the meal distribution will target low-income children, if the school does not have 50 percent or more free or reduced-price children enrolled (see questions 6 and 9 in SP 08-2020 SFSP 04-2020)
- Methods for communicating with families
- How the SFA or CO will ensure proper operation of the program including meal content, meal counts, food safety, oversight, etc.

Once CNPWeb is available on Tuesday, March 17th, complete your application in CNPWeb, indicating participation under the Seamless Summer Option or Simplified Summer Food Service Program. Completing the online Management Plan and Budget is **not required**. Please note this streamlined application process is only effective during COVID-19 related unanticipated school closures.

Once you have notified your specialist of your intent to operate, you will be allowed to start your meal service on Monday, March 16th for all currently area eligible sites. Your specialist will provide a response indicating your intent was received. Creditable and reimbursable meals served on Monday, March 16th will be eligible for reimbursement.

**2. Can I serve meals even though my CNPWeb application has not been approved?**

Yes. As long as the intent to operate has been submitted to ADE, the sites may begin serving and claiming creditable and reimbursable meals for reimbursement.

**3. Do I need to wait to begin meal service until my "Intent to Operate" has been received by my Specialist?**

No. You may begin meal service as long as the "Intent to Operate" has been emailed to ADE.

**4. What do I need to do for a site that has not operated SFSP before and is not in CNPWeb?**

You will need to submit an Add/Change/Delete form to your assigned SFSP specialist. If it is a non-associated site that is not in the CNPWeb, you will also need to submit documentation of area eligibility.

**5. Can I only begin meal service for sites that have been approved for SFSP in previous program years?**

No. You may operate SFSP for any area eligible sites. Any sites not yet listed in CNPWeb will need to be added using an Add/Change/Delete form.

**6. What if my program end date is unknown or changes?**

CNPWeb site application information should reflect the effective dates for program operations and can be modified as needed.

**7. How does the application process change if the meals will be served at bus stops or along a route?**

Site applications for each stop are required. If the bus stop/site is new, you will need to submit an Add/Change/Delete form to your assigned SFSP specialist. If it is a non-associated site that is not in CNPWeb, documentation of area eligibility must also be submitted.

**8. *[New/Revised]* My district is currently on Spring Break and will be closed the following week due to the statewide school closure. Is my district eligible to operate the SSO/SFSP under the COVID-19 waiver?**

Yes.

**9. *[New/Revised]* Can a site that is not area eligible operate SFSP/SSO during the COVID-19 related school closure?**

At this time, the ADE will review requests to operate the SFSP/SSO during the COVID-19 related school closure at sites that are not area-eligible. The SFA will need to clarify in their intent to operate how they will target the subpopulation of children from low-income households. Additionally, ADE recommends the SFA/CO consider providing the meal service in a location that will best reach the population most in need.

For example, a school with a 30% Free/Reduced rate may elect to serve meals at a location near the school that is easily accessible by children from low-income households.

**10. *[New/Revised]* Is a non-associated site agreement required during the SSO/SFSP operation due to COVID-19 school closure, for all non-associated sites?**

Yes, all non-associated sites will need a non-associated site agreement. This agreement is to be submitted by email to SFSP@azed.gov within 48-hours of meal service beginning and in conjunction with the CNP Web site application.

**11.** *[New/Revised]* **When establishing a site that is a stop along a scheduled school bus route, will the non-associated site agreement be required?**

No, a non-associated site agreement is not needed during the SSO/SFSP operation due to COVID-19 school closure, if the stop is part of the site's normal bus route when school is in session.

**12.** *[New/Revised]* **If a site is established that is part of a mobile route to provide meals during the SSO/SFSP operation due to COVID-19 school closure and it is not part of normal bus route when school is in session, is the non-associated site agreement required?**

If the route includes a stop that is not part of the normal bus route when school is in session, a non-associated site agreement may be required. ADE recommends working directly with your assigned program specialist to address this need.

## Meal Service

**13. Can I provide two meals at one meal service time?**

Yes. SFAs/COs must clearly describe how they will ensure accurate counting and claiming of meals served, as well as how they will monitor that children receive one meal per meal service type.

**14. If a site provides a child with a lunch and breakfast together at 12pm, how should these meals be counted and claimed? Would both meals be claimed on the day the meals were provided at the POS or would it be claimed on the day the meal is intended to be consumed?**

The counting records for the meals must align to the day the meal is intended to be consumed.

**15.** *[New/Revised]* **Can I provide one week's worth of meals in a single pick-up?**

At this time, the ADE will review case-by-case requests to deviate from a daily meal service model and may approve a distribution approach that includes meals for multiple days. ADE will consider the capacity of the SFA or CO to execute such an approach effectively, including written menus, adherence to the meal pattern, meeting food safety requirements, and ensuring meals are provided to children.

If participants are in need of access to meals that exceeds the capacity of the SSO/SFSP, information and resources are available through community partners such as Arizona Food Bank Network and Pinnacle Prevention.

**16. If children are not at the site, may another participant take additional meals away from the site to provide to the children at home?**

No. All children receiving a meal need to be physically present at the time the meal is provided. The maximum number of meals that may be offered are up to two meals or one meal and one snack per child per day in any combination except lunch and supper (see questions 7 in SP 08-2020 SFSP 04-2020).

**17. Can a site open for two meal services offered as a block of time in the morning and then again in the afternoon and offer two meals at each meal service?**

ADE does not recommend this practice as it would be difficult for the SFA or CO to ensure a participant only receives the maximum number of meals allowed. Again, the maximum number of meals that may be offered are up to two meals or one meal and one snack <u>per child per day</u> in any combination except lunch and supper (see questions 7 in [SP 08-2020 SFSP 04-2020](#)).

**18. Is there a set amount of time that is required for or in between meal services?**

No.

**<u>USDA Foods</u>**

**19. *[New/Revised]* Will additional USDA foods be available?**

SFAs have been cancelling orders that will not be used in a timely manner. ADE is going to inquire with SFAs cancelling their orders as to whether these materials should be declined on the available materials list to create surplus which can then be accessed during SSO/SFSP operation due to COVID-19 school closures.

**20. *[New/Revised]* Will additional DOD funds be allocated if needed? I am worried about the fruit and veggie requirements**

SFAs may request additional DoD funds by contacting Regan.Garner@azed.gov.