



Arizona Department of Education

HNS# 21-2020

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

Original Signed

Date: April 15, 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 the United States Department of Agriculture (USDA) SP 08-2020, SFSP 04-2020: Child Nutrition Program Meal Service during Novel Coronavirus Outbreaks, [COVID-19 SFSP, SSO Meal Delivery Using Existing Authority Q/A guidance](#), and program waiver options [COVID-19 Meal Pattern](#) and [COVID-19 Parent Pickup of meals](#). This memorandum updates and replaces HNS# 18-2020.

ADE is providing updated information about our Governor's Executive order pertaining to COVID-19 and school closures under the Resources for School Leaders section of this website: <https://www.azed.gov/communications/2020/03/10/guidance-to-schools-on-covid-19/>. Please review information [here](#) pertaining to essential and critical services.

Per the instruction in SP 08-2020, SFSP 04-2020, the 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.

The attached updated Questions & Answers (Q&A) are grouped under Application Process, Meal Service, USDA Foods, and Menu/Meal Pattern. This updated version includes new questions ADE has received and reflects the most recent guidance issued by FNS. *[New/Revised]* appears next to the new or significantly revised questions.

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.

Questions & Answers
HNS 21-2020 Attachment

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.

Part 1: Send, via e-mail to your SFSP specialist, an “*Intent to Operate*” by indicating the following:

- Sponsor/SFA/Community Organization (CO) Name
- Sites and CTDS numbers where you intend to operate; the [non-associated site agreement](#) is needed in some cases
- Meals you will be serving
- Meal service operating dates and times
- Describe the 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. This is also where bus routes and/or meal delivery information should be provided.
- *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](#)), describe how the meal distribution will target low-income children,
- Methods for communicating with families about the availability of meals
- How the SFA or CO will ensure proper operation of the program including meal content, meal counts, food safety, oversight, etc.

Part 2: Complete your SFSP application in CNPWeb, indicating participation under the Seamless Summer Option or Simplified Summer Food Service Program. Participation in the USDA Foods program should be indicated in Question 5 of the CNPWeb sponsor application.

If you cannot access the SFSP section of CNPWeb, your Entity Administrator will need to update user permissions through ADEConnect.

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.

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

Yes. As long as an “*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 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?

Bus routes may be added as individual sites (rather than adding each stop as a site). The [Add/Change/Delete form](#) will need to be submitted to establish the route in CNPWeb, and the address of the first stop on the route should be listed as the site address. SFAs are responsible for clearly communicating route days and times to local families. Further, the non-associated site agreement will not be required for bus routes.

8. How do I document site eligibility for a bus route?

The free and reduced-price percentage for the school that is associated with the bus route should be used. If the school is not area eligible, the meals served must target students in low-income areas.

9. 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, however the spring break must be formally cancelled or postponed by the district. Please refer to Q. 22 for more guidance.

10. 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.

11. 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 CNPWeb site application. See question number 7 regarding bus route sites.

12. Is there a process to follow if meal services are no longer offered at a particular site?

Yes. The last date meals are served must be provided in the CNPWeb in section 4 of the SFSP site application. SFAs and COs must revise their CNPWeb site application as soon as they are aware that meal services will cease. Additionally, the community should be notified of the change.

If perishable food items remain available and cannot be used as part of the meal service program, the sale or donation of these items is permitted with the exception of USDA Foods, which may not be sold. SFAs or COs interested in donating perishable foods should communicate with the School Food Programs unit at ADE and [submit this form](#). If commercially purchased foods are sold, the funds associated with the sale must be credited back to the non-profit school food service account that was used to purchase the product.

Finally, commercial and USDA Foods orders for the remainder of the school year must be cancelled. Please log into myFOODS and FFAVORS to cancel all scheduled allocations. If you have remaining entitlement, please contact the School Food Program department at USDAFoods@azed.gov to have these funds reallocated, as these funds do not rollover to the next school year.

Meal Service

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

Yes. The “*Intent to Operate*” must clearly describe how the SFA/CO will ensure accurate counting and claiming of meals served and 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. If children are not at the site, may another participant take additional meals away from the site to provide to the children at home?

On March 25, 2020 USDA provided guidance ([national waiver for parents and guardians to pickup meals for children](#)) to State agencies that SFAs and COs **may** distribute meals to a parent or guardian to take home to their children once the State agency develops a plan for ensuring accountability and program integrity. This includes assurances that meals are only distributed to parents or guardians of

eligible children. The maximum number of meals that may be offered are up to two meals or one meal and one snack **per child, per day.**

If SFAs and COs elect to operate under the waiver for parents and guardians to pickup meals for children, they must communicate their intent with ADE. Based on unique circumstances within each community, the SFAs and COs are best suited to develop accountability measures regarding meal distribution in their localities. SFAs and COs are required to submit their meal distribution plan and assurances to ADE using [this link](#).

16. Would ADE provide some examples or suggestions on distribution plans for parent/guidance meal pickup that sites may choose to implement?

Yes. Local program operators have shared the following ideas with ADE for possible parent/guardian pickup requirements.

- Provide school or student ID cards, student pick up vehicle placards, other school-based documentation for the child(ren) at home waiting for the meal
- Parent/guardian could show a phone-based video stream of the child(ren) at home waiting for the meal
- Parent/guardian completes a form with students' name and grade or age; sanitizers included with this process
- Show a statement from a medical authority for children with health-related risk that are not in the vehicle.
- Limiting the number of meals per vehicle based on estimated and known family size within the community.

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 per child per day in any combination except lunch and supper (see question 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.

19. During the SSO/SFSP meal service for children, can adult meals be provided?

Yes, adult meals may be sold but are not eligible for reimbursement. Adult meals must be priced to cover the non-program costs associated with preparing the meals. The price charged for adult meals must be provided on the site application in CNPWeb.

20. I am going to operate a home-delivery meal service program under the COVID-19 SSO/SFSP Meal Delivery Using Existing Authority guidance, and I have obtained consent from households. What does ADE need to approve my delivery plan?

Please see Question 1 in this guidance. The “*Intent to Operate*” should describe the plan for home delivery as the meal distribution method. To establish the home-delivery route as a site in CNPWeb, the [Add/Change/Delete form](#) will need to be submitted, naming the site as such. Additionally, the single site application in CNPWeb submitted for the home-delivery route should designate it is “closed-enrolled” in Section 5.

ADE will consider the expected duration of the school closure and the capacity of the SFA to execute a home-delivery approach to meal service effectively including meeting food safety requirements.

21. My district is interested in offering one week’s worth of meals, once per week. Is such a distribution model allowed?

To distribute multiple days’ meals, USDA has instructed ADE to assess the SFA/Sponsor’s capacity to execute such an approach effectively. ADE will request the SFA/Sponsor to:

- Describe the meal service model
- Provide menus and/or process for following the meal pattern
- Address how participants will be instructed to properly store meals for food safety
- Detail the process for recordkeeping and ensuring the meals are provided to children
- Provide assurance that meal distribution will be equitable (meals will be prepared and available to all children without turning away participants due to meal shortages).

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](#).

22. [New/Revised] May Child Nutrition Program operators serving meals through the Summer Food Service Program or the National School Lunch Program Seamless Summer Option (SSO) during an unanticipated school closure serve meals on weekends or previously scheduled days off, such as spring break and teacher workdays?

Yes. Where schools are closed for an unanticipated school closure due to COVID-19, with State agency approval, SFSP and SSO service institutions may serve meals on days when schools had originally planned to be closed, including weekends, spring break, and other previously scheduled days off.

23. [New/Revised] May Child Nutrition Program operators provide food items in bulk, either through pick up or home delivery, without additional waivers?

When providing multiple meals at one time, Program operators may provide bulk items as long as individual meals are easily identifiable as a reimbursable meal. This does not require the submission of a waivers nor approval by ADE. For example, a bulk item could be a gallon of milk which contains 128 fluid ounces and thus is equivalent to 16 individual servings of 8 fluid ounces. In this example, the gallon provides enough milk for 4 breakfast meals and 4 lunch meals for two children (or 16 total meals) and thus, fulfills the meal pattern requirement of 1 cup (8 fluid ounces) of milk for 16 meals. When implementing such a delivery mechanism with bulk items, Program operators:

- Must include the required food components in the proper minimum amounts for each reimbursable meal being claimed;
- Must ensure that food items are clearly identifiable as making up reimbursable meals;

- Are strongly encouraged to provide menus with directions indicating which items are to be used for each meal and the portion sizes;
- Should consider whether households have access to refrigeration, stoves, microwaves, etc., when providing food that requires refrigeration or further preparation, such as reheating; and
- Should ensure that only minimal preparation is required and that food is not provided as ingredients for recipes that require chopping, mixing, baking, etc.

Additionally, pursuant to 7 CFR 226.6(i)(11), State agencies may approve requested flexibilities for unitized meals prepared by food service management companies or delivered to CACFP outside-school-hours care centers.

USDA Foods

24. 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.

25. 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.

Menu/Meal Pattern

26. The availability of food products for the USDA Child Nutrition Programs has been disrupted due to COVID-19 and now the USDA issued guidance on [waivers for the meal pattern requirements](#); what actions will ADE be taking?

ADE is required to review requests from SFAs and COs related to meal pattern flexibilities on a case-by-case basis. This means, there is not a one-time waiver for the meal pattern or for an extended period of time. ADE will consider requests that are targeted and justified based upon disruptions to the availability of food products resulting from unprecedented impacts of COVID-19. SFAs and COs are reminded to maintain and meet the nutrition standards for each Program to the greatest extent possible.

ADE has developed a process for SFAs and COs to request reimbursement for meals served which do not comply with the meal pattern.

Additionally, the School Food Programs unit is creating new processes to assist SFAs participating in the USDA Foods Program and the Department of Defense Fresh Produce program to modify food orders and donate excess foods, when appropriate.

27. What does ADE require from SFAs and COs who seek reimbursement for meals that do not comply with the meal pattern requirements?

SFAs and COs must maintain daily records of meals with meal pattern deficiencies by component, per meal service. To support the claim for reimbursement of meals, the SFA/CO is required to provide a meal pattern waiver request form to ADE using [this link](#). The request form is set up to collect daily the number of meals and type of component that was missing for each meal service.

ADE acknowledges the last-minute modifications with deliveries and the day-to-day changes in participation. Thus, it is recommended that SFAs and COs complete a meal pattern waiver request form daily at the conclusion of meal services that are impacted by the availability of food products.