



Arizona Department of Education

Health and Nutrition Services Division

HNS# 22-2020

MEMORANDUM

To: Sponsors of the Child and Adult Care Food Program in Child Care Centers, Head Start Programs, Adult Day Care Centers, and Emergency Shelters

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

Date: April 17, 2020

Subject: Revised Guidance for CACFP Participation During Unanticipated School Closures due to COVID-19- Version 3

Original Signed

This revised guidance replaces and updates HNS 16-2020. USDA has released several nationwide waivers to support meal service for children and students in need during school closures due to COVID-19. The following waivers apply to operators of the CACFP:

- Meal pattern flexibility
- Allow meals to be served in a non-congregate setting,
- Allow for flexibility with meal times (for those organizations serving non-congregate meals)
- Monitoring requirements for sponsoring organizations (for those with multiple sites)

The following questions and answers outline requirements for requesting use of the waivers, as well as additional guidance for operations during this time.

MEAL PATTERN FLEXIBILITY WAIVER

1. What does the meal pattern flexibility waiver allow me to do in my CACFP operation?

This waiver allows sponsors to request a waiver from the State Agency to claim meals served that do not meet the meal pattern beginning on March 25, 2020. ADE will review and approve these waiver requests on a case-by-case basis. USDA and ADE still expect program operators to maintain and meet the nutrition standards for each meal to the greatest extent possible. These waivers will be approved for specific meals, dates, and requirements; they will not be blanket approvals for use across the entire menu.

2. How do I request a meal pattern waiver?

Sponsors must complete this [meal pattern waiver request](#) for each day a flexibility is requested. Sponsors will need to indicate the flexibility requested, by meal service, and report how many meals were impacted by the shortage/flexibility.

Centers will continue to take meal counts for meals served that do not meet the meal pattern. Once a Meal Pattern Waiver is submitted for that meal, the meals can be included in the monthly meal count summary and claimed for reimbursement, unless ADE notifies you otherwise. ADE maintains the authority to deny a meal pattern waiver request on a case-by-case basis and will notify the sponsor of any denial.

3. How will I know if my waivers are approved so I can claim those meals?

ADE will review the requests before April 10th and notify you via email if they are approved to be included in your March claims. ADE will also request additional information as needed so that we can approve as many requests as possible, while also maintaining program integrity and highest meal quality possible.

4. Is dry, nonfat milk creditable?

Under normal operations, dry, nonfat milk is not creditable. However, CACFP regulations at 7 CFR 226.20 (e) and (f) allow for this type of milk to be creditable in emergency situations. This milk option is creditable for all age groups during the national emergency period due to COVID-19.

5. *[New/Revised]* When do I have to submit a waiver request for milk?

The meal pattern waiver request is required if you do not have enough milk, or if you are using milk fat contents that don't meet the requirements (i.e. serving whole milk to children 2 years and older). You do not need to submit the waiver request if you are using dry, nonfat milk.

6. Where can I get dry, nonfat milk?

The Dairy Council of AZ will provide a 50-pound bag of dry milk for \$60, and it can be reconstituted to make 63 gallons of milk. Email Pat Johnson at pjohnson@dairycouncilofaz.org to request an order form. The delivery includes instructions for how to reconstitute the powder to make fluid milk.

7. Are meal pattern flexibilities available for infants?

No. Infants must continue to receive breastmilk or iron-fortified formula. Infants who are developmentally ready for solid foods must also be served food in accordance with their established eating patterns.

8. Do I need to notify ADE if I stop serving meals in family-style meal service?

You do not need to notify ADE of this change. ADE aligns with Arizona Department of Health Services (ADHS) guidance to suspend of family-style meal service and a shift toward the provision of unitized or pre-plated meals and snacks. Handwashing and frequent cleaning are also recommended.

NON-CONGREGATE MEAL SERVICE

9. What does the waiver for non-congregate feeding (grab and go) allow me to do in my CACFP operation?

The nationwide wavier allows for meals to be served to enrolled children at CACFP centers in a grab and go or pick up distribution method. This option is available for centers who have closed but would like to continue providing meals to the children they serve.

10. Can sponsors operate congregate and non-congregate meals at the same time (for example, feed children in attendance in the center and provide grab and go meals to children not in attendance)?

No. USDA has clarified that this is not allowed.

11. [New/Revised] How do I apply for the waiver to do non-congregate feeding?

If your center has closed but you would still like to provide meals to enrolled participants, email your plan for meal distribution to the CACFP Inbox (CACFP@azed.gov). The plan should include the following information:

- Sponsor and site(s) name
- Date center closed
- Schedule for meal distribution
- Description of how families will be notified of closure and meal distribution
- Description of how accurate meal counts will be maintained
- Description of how food will be prepared, packaged, and distributed (including details about how many days of meals will be provided if providing multiple days' worth of meals in one pick up)

- Description of how food safety will be maintained

ADE will review your plan and provide approval on a case by case basis

The following requirements continue to apply:

- Meals may only be served to *enrolled* participants
- Meals served may not exceed 2 meals and 1 snack per day
- Children must be present to receive meals.

12. [New/Revised] Can I provide meals for more than one day at a time for enrolled participants?

USDA has clarified that CACFP sponsors can provide up to 5 days' worth of meals (Monday through Friday) for enrolled participants at one time. This should be included in the plan emailed to ADE if requesting this distribution method. ADE will consider requests for this type of operation on a case by case basis. Approval for this distribution method will be based on the sponsor's ability to demonstrate they have the capacity to safely serve meals that meet the meal pattern and maintain accurate records.

13. [New/Revised] Do participants need to be present to receive meals in a non-congregate setting?

Yes. USDA has provided a waiver for this requirement and ADE has opted in. However, Arizona is choosing to only utilize this waiver for operators of the Summer Food Service Program.

14. [New/Revised] Can I deliver meals to enrolled participants' homes?

USDA has clarified that this is allowable for CACFP operators. ADE will consider requests for this meal distribution method on a case by case basis. Sponsors must demonstrate they can execute this distribution method while maintaining accurate recordkeeping and food safety requirements, along with the capacity to manage meal packaging and distribution. Contact your specialist for one on one guidance if you are planning to apply to do this.

MONITORING REQUIREMENTS FOR MULTI-SITE SPONSORING ORGANIZATIONS

The following questions and answers only apply to multi-site operations, and those owners who have multiple centers operating the CACFP.

15. What does the monitoring requirements waiver mean for my sponsoring organization?

The waiver for monitoring requirements makes the following changes:

- Conduct 2 monitoring visits this program year
- Conduct only 1 monitoring visit as unannounced
- Conduct monitoring visits without a meal service observation
- Allow more than 6 months to elapse between monitoring visits

- Allows sponsoring organizations to conduct desk audits for new sites prior to participation

16. Does this mean I do not have to do monitoring for the remainder of the year?

No. This does not waive monitoring requirements for the remainder of the year. It provides flexibility for meeting the requirements due to social distancing necessity during the COVID-19 national emergency.

Additionally, sponsoring organizations are strongly encouraged to conduct desk audits and off-site reviews to the extent possible. Sites can scan and email meal counts, menus, rosters and attendance documents etc.. USDA and ADE remind sponsors that program integrity is still important.

17. How do I request use of this waiver?

Sponsoring organizations can opt into this waiver by emailing the following information to the CACFP Inbox at CACFP@azed.gov :

- Sponsor Name
- Number of sites needing the waiver
- Statement that you are opting into the Sponsoring Organization Monitoring waiver.

This waiver does not need to be approved. Once you opt in, it will be in effect until June 30, 2020 or the end of the national emergency declaration, whichever occurs first.

ADDITIONAL OPERATIONAL GUIDANCE

18. I am going to close my facility and I am not continuing meal service. What does ADE need to know?

Send an email to the CACFP Inbox (CACFP@azed.gov) with the following information:

- Sponsor and site(s) name
- Closure dates
- A copy of the notice sent to families.

Sponsors are to inform families that they can receive meals for children up to age 18 at nearby schools. The list of sites serving meals is available through local school district websites and is available on the [ADE website](#) under the School Meals tab.

19. What should I do if my facility has to close but I still have food available and want to help my enrolled families?

Please follow the guidance listed in question 8 for facility closures and question 2 for non-congregate meal service. You can combine the information in one email.

20. We have multiple centers and all have low attendance. If we consolidate and only offer care at one location, can we transfer the children’s eligibility status?

Yes. For multi-site facilities who are consolidating operations due to low attendance, participant eligibility can transfer with the participants.

Meals must be documented at the point of service where they are served, and that site is responsible for maintaining documentation of eligibility and attendance (the children must be on a roster at the facility, and sign in/sign out records must also be available at that facility).

21. *[New/Revised]* Will ADE still be conducting compliance reviews during this time?

Yes. ADE is still required to conduct the compliance reviews this year. The review will include a phone interview and review of a percentage of documents that will be emailed to your specialist, for an operating month between November and February. An ADE specialist will communicate what, how, and when to submit necessary documents and will schedule the phone interview for facilities receiving a compliance review.

All participating sponsors are encouraged to continue visiting the [HNS memos webpage](#) for updated guidance regarding CACFP operations during these unanticipated closures.

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