



Arizona Department of Education
Health & Nutrition Services Division

HNS # 39-2020

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

Original Signed

Date September 30, 2020

Subject: Procedures for Opting into National School Lunch Program (NSLP) Meal Pattern and Parent/Guardian Pickup Waivers and Providing Meals for Multiple Days in School Year (SY) 20-21 – UPDATED

The purpose of this memorandum is to provide guidance on the procedures for School Food Authorities (SFAs) to notify the Arizona Department of Education (ADE) of their decision to opt into the use of two NSLP waivers, Parent/Guardian Pickup and Meal Pattern Flexibility and to opt into providing meals for multiple days in SY 20-21. This memorandum updates and replaces HNS# 33-2020. All updates have been **bolded**.

NSLP Waivers

On June 25, 2020, the United States Department of Agriculture (USDA) announced the extension of waivers established in response to the novel coronavirus outbreak (COVID-19). The extended waivers are as follows:

- [Non-congregate Feeding](#)
- [Meal Service Times](#)
- [Parent/Guardian Pickup](#)
- [Meal Pattern Flexibility](#)

ADE has notified USDA that Arizona will elect to implement these four waivers for SY 20-21. SFAs who wish to implement the non-congregate feeding and meal service time waivers may do so without taking any further action. SFAs who wish to opt into the parent/guardian pickup waiver and the meal pattern flexibility waiver must notify ADE of their intent. ADE has implemented the following procedures:

Parent/Guardian Pickup: SFAs who wish to allow parents or guardians of eligible students to pick up meals without the children present must implement procedures to ensure that meals are distributed **only** to parents or guardians of eligible children, and that duplicate meals are not distributed to any child. *Remember: Only one meal per child can be claimed for reimbursement in the National School Lunch and School Breakfast Programs.*

ADE has created a Parent/Guardian Pickup Waiver Form for SFAs to provide details on how they will maintain accountability and Program integrity while distributing meals to parents or guardians without children present. SFAs only need to submit the form once for SY 20-21. The electronic form must be submitted before the SFA implements parent/guardian pickups. ADE will provide technical assistance and request clarification if an SFA's submission does not demonstrate that accountability and Program integrity will be maintained while implementing parent/guardian pickups.

Meal Pattern Flexibility: USDA has extended the nationwide waiver that waives the requirement to serve meals that meet the meal pattern in the NSLP/SBP resulting from unprecedented impacts of COVID-19, through June 30, 2021. Meal pattern flexibilities are available to address issues with food availability, an inability to meet the meal pattern due to the court ruling, or if access to safe and nutritious meals is impacted by the LEA's learning plan/food service model.

SFAs may submit a waiver for single instances and/or reoccurring instances in which the requirement(s) will not be met. For reoccurring instances, SFAs only need to submit the waiver one time so long as the timeframe is properly indicated. An instance is defined as 1) daily requirement not met; for example, a missing component at breakfast or incorrect milk type at lunch, and 2) a weekly requirement; for example, not meeting whole grain-rich or vegetable subgroup requirements. ADE has created a Meal Pattern Waiver Form for SFAs to report the instance(s) in which the meal pattern was not met. Meal pattern waivers submitted via the form will be approved on a case-by-case basis. Operators must indicate the reason(s) that prevented the meal pattern from being met and provide justification to support the necessity of the waiver.

ADE will review all requests and closely monitor submissions to ensure the intent of the flexibility is upheld. When there is a high number of submissions from a single SFA, ADE will reach out to provide technical assistance to address food availability and appropriate meal pattern substitutions.

Providing Meals for Multiple Days

The non-congregate feeding, meal service times and parent/guardian pickup waivers allow for SFAs to provide food items in bulk and to distribute meals for multiple days for pickup or delivery. To distribute meals for multiple days, USDA has instructed ADE to assess the SFA's capacity to execute such an approach effectively.

Multiple Days Meal Distribution Plan: ADE has created a Multiple Days Meal Distribution Plan Form for SFAs to provide details on how the distribution plan will be executed. SFAs only need to submit their distribution plan once for SY 20-21. The form must be submitted before the SFA distributes meals for multiple days. ADE will provide technical assistance and request clarification if a distribution plan does not demonstrate the SFA's capacity to provide meals for multiple days. **If a Program operator has an approved multiple days meal distribution plan under NSLP for SY 20-21, this approval does not apply for the Summer Food Service Program/Seamless Summer Option.**

The waiver and distribution plan forms described above can be found on the [COVID-19 Guidance to Child Nutrition Operators webpage](#) under the “Waivers” accordion. ADE has hosted a series of webinars discussing the latest USDA guidance for SY 20-21. The webinar recordings and slides can also be found on the COVID-19 Guidance to Child Nutrition Operators webpage under the “COVID-19 Communications Webinars” accordion.

Please contact your School Nutrition Programs Specialist with questions regarding this guidance. Your assigned specialist can be found at the top of the Sponsor application in CNPWeb. You may also send an email to ADESchoolNutrition@azed.gov or call 602-542-8700, option 2, for the NSLP Specialist of the Day.

This institution is an equal opportunity provider.