



**Arizona Department of Education**  
Health & Nutrition Services Division

**HNS # 40-2020**

**MEMORANDUM**

**To:** Sponsors of the Child and Adult Care Food Program operating in child and adult care centers, Head Start Programs, and emergency shelters

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

**Date:** October 9, 2020

**Subject:** Waiver Extensions and Guidance for CACFP Operators

*Original Signed*

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The purpose of this memorandum is to provide updated guidance for Child and Adult Care Food Program (CACFP) sponsors on available waivers for operating during the COVID-19 pandemic and the procedure to notify the Arizona Department of Education (ADE) of their decision to opt into the use of the extended waivers.

The United States Department of Agriculture (USDA) announced the extension of waivers established in response to the coronavirus outbreak (COVID-19). This specific information may be accessed on the FNS website <https://www.fns.usda.gov/disaster/pandemic/covid-19/cn-waivers-flexibilities>.

**Meal Pattern Flexibility – Available through June 30, 2021**

The meal pattern flexibility waiver applies to all CACFP facilities: Childcare Centers, Adult Day Care Centers, Head Start facilities and Emergency Shelters. It 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. The 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.

Sponsors must complete a [meal pattern waiver request](#) for each day a flexibility is requested. Sponsors must indicate the flexibility requested, by meal service, and report how many meals were impacted by the shortage/flexibility. Centers must 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. ADE will review the requests each week and notify sponsors via email if the waiver request is approved and the meals can be included in the monthly claim. ADE will also request additional information as needed to ensure approval of as many requests as possible, while also maintaining program integrity and highest meal quality possible.

This waiver does not apply to infants. 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.

### **Meal Service Time Flexibility – Available through June 30, 2021**

The meal service time flexibility waiver applies only to Head Start facilities. All Childcare Centers, Adult Day Care Centers and Emergency Shelters must follow Traditional CACFP meal service time requirements.

This waiver allows Head Start facilities to request a waiver from the State Agency to claim meals served outside of the traditional CACFP meal service times. The USDA and ADE still expect program operators to maintain and meet all other meal service standards. This flexibility will support safer access to nutritious meals while Head Start programs are implementing virtual learning prior to a return to the classroom.

To opt into the meal service time flexibility waiver Head Start facilities must send an email to the CACFP inbox ([CACFP@azed.gov](mailto:CACFP@azed.gov)) with the following information:

- A. Sponsor name
- B. Site(s) requesting waiver
- C. Description of meal service and times children are being served.
- D. Date range of expected flexibility
- E. Description of recordkeeping procedure to ensure only enrolled children are receiving a credible meal.

### **Non-Congregate Feeding – Available through June 30, 2021**

The non-congregate feeding waiver extension applies only to Head Start facilities who are utilizing virtual learning. All Childcare Centers, Adult Day Care Centers and Emergency Shelters must follow Traditional CACFP meal service requirements.

This waiver is intended for programs that are providing instruction virtually through Head Start operations, and allows for meals to be served to enrolled Head Start children in a grab and go or delivery distribution method. Meals for multiple days can be served at one time. Programs that are providing hybrid models of in-person and/or virtual instruction can also utilize these waivers to provide meals in non-congregate settings for children in virtual learning. Meals can only be provided for the days when the program is in operation. This means meals cannot be provided for weekends if the Head Start program doesn't operate on the weekends. These waivers do not apply to onsite meal service to participants in attendance, or those who are temporarily absent. Children must be present to receive meals unless facility has opted into the parent/guardian to pick-up meals for children waiver.

To opt into the non-congregate feeding waiver head start facilities must send an email to the CACFP inbox ([CACFP@azed.gov](mailto:CACFP@azed.gov)) with the following information:

- Sponsor Name
- Name of each site where these waivers will be utilized
- Description of enrollment processes for the site/program
- Description of distribution plan including when the meals will be available for pick up, how many meals will be provided at one time, and who will be distributing them, and who will be conducting the point of service meal counts
- Description of recordkeeping plans that includes how the sponsor will ensure meals are only served to enrolled participants, meals are accurately counted and claimed, and that each participant receives no more than 2 meals and 1 snack per day
- Description of meal service and food safety processes that ensure the meal pattern is met and food is maintained at safe temperatures

An ADE Program Specialist will notify the sponsor when approval is granted. Sponsors must maintain documentation to support accurate meal counts, meal pattern compliance, and appropriate costs/purchasing practices.

USDA has clarified that home delivery of CACFP meals is allowable. 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. Sponsors interested in home delivery of CACFP meals should contact an ADE specialist for one on one guidance.

### **Parent/Guardian Pick-Up of Meals for Children – Available through June 30, 2021**

The waiver to allow parent/guardian pick up of meals for children applies only to Head Start facilities implementing virtual learning. All Childcare Centers, Adult Day Care Centers and Emergency Shelters must follow Traditional CACFP meal service requirements.

This waiver allows for a parent or guardian to pick up meals without children present when meals are distributed in a grab and go style meal service. Programs that are providing hybrid models of in-person and/or virtual instruction can also utilize this waiver. Meals can only be provided for the days when the program is in operation. This means meals cannot be provided for weekends if the Head Start program doesn't operate on the weekends. This waiver does not apply to onsite meal service to participants in attendance, or those who are temporarily absent.

To opt into the parent/guardian to pick-up meals waiver Head Start facilities must send an email to the CACFP inbox ([CACFP@azed.gov](mailto:CACFP@azed.gov)) with the following information:

- Sponsor Name
- Name of each site where these waivers will be utilized
- Description of enrollment processes for the site/program
- Description of distribution plan including when the meals will be available for pick up, how many meals will be provided at one time, who will be distributing them, and who will be conducting the point of service meal counts
- Description of recordkeeping plans that includes how the sponsor will ensure meals are only served to enrolled participants, accurately counted and claimed, and that each participant receives no more than 2 meals and 1 snack per day

- Description of meal service and food safety processes that ensure the meal pattern is met and food is maintained at safe temperatures

An ADE Program Specialist will notify the sponsor when approval is granted. Sponsors must maintain documentation to support accurate meal counts, meal pattern compliance, and appropriate costs/purchasing practices.

### **Onsite Monitoring – Available through September 30, 2021**

The Onsite Monitoring waiver extension applies only to multi-site operations in the CACFP.

Multi-Site sponsors must continue to conduct monitoring; however, onsite monitoring has been suspended. This waiver allows for the following adjustments to the Traditional CACFP monitoring regulations to support the suspension of onsite monitoring:

- Sponsors must conduct two reviews of each facility (instead of three);
- Only one review must be unannounced (instead of two);
- The meal observation on the unannounced review is not required;
- More than six months can elapse between visits;
- Review of new facilities can be conducted as a desk audit.

To opt into the onsite monitoring waiver Multi-site sponsors must send an email to the CACFP Inbox ([CACFP@azed.gov](mailto:CACFP@azed.gov)) with the following information:

- 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 by ADE. Organizations who previously indicated intent to utilize this waiver are not required to submit anything additional. All sponsors must maintain documentation of **all** monitoring visits conducted for each site this year.

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 monitoring visits to the maximum extent practicable, including on-site meal observations possible and/or via photos of meal service and the kitchen. Sites can scan and email meal counts, menus, rosters and attendance documents, and other records that are typically reviewed on site. As community health begins to improve, sponsors are encouraged to conduct on-site visits when possible. The USDA and ADE remind sponsors that program integrity and accountability are still required.

Please contact your Community Nutrition Program Specialist with questions regarding this guidance. Your assigned specialist can be found at the top of the Sponsor application in CNPWeb. You may also call 602-542-8700, select option 1, for the CNP Specialist of the Day.

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