



Arizona Department of Education
Health & Nutrition Services Division

HNS 13-2021

MEMORANDUM

To: All School Food Authorities Operating the National School Lunch Program,
Seamless Summer Option

From: Melissa Conner, Associate Superintendent

Date: July 15, 2021

Original Signed

Subject: Applications for School Food Authorities Serving Meals During School Year 2021-2022

The purpose of this memorandum is to provide guidance for School Food Authorities (SFAs) applying to operate the Summer Seamless Option (SSO) during School Year 2021-2022 (SY 21-22) under the United States Department of Agriculture (USDA) *COVID-19 Child Nutrition Response #85: Nationwide Waiver to Allow the Seamless Summer Option through School Year 2021-2022*. This guidance will review the waivers Arizona Department of Education (ADE) has opted into and provide instructions for the CNPWeb application process for SY 21-22. This memorandum includes questions and answers intended to provide clarification to program operators when completing the CNPWeb application and to also answer common questions related to operating under the SY 21-22 waivers.

USDA Waivers for SY 21-22 Operations

ADE has opted into the following waivers issued by USDA specifically for school meal program operations in SY 21-22, effective through June 30, 2022.

- [#85 Nationwide Waiver to Allow the Seamless Summer Option through School Year 2021-2022](#)
- [#86 Nationwide Waiver to Allow Summer Food Service Program Reimbursement Rates in School Year 2021-2022](#)
- [#87 Nationwide Waiver to Allow Non-Congregate Meal Service for School Year 2021-2022](#)
- [#88 Nationwide Waiver of Meal Times Requirements for School Year 2021-2022](#)
- [#89 Nationwide Waiver to Allow Parents and Guardians to Pick Up Meals for Children for School Year 2021-2022](#)
- [#90 Nationwide Waiver to Allow Specific School Meal Pattern Flexibility for School Year 2021-2022](#)

- [#92 Nationwide Waiver to Allow Offer Versus Serve Flexibility for Senior High Schools in School Year 2021-2022](#)
- [#93 Nationwide Waiver of Area Eligibility in the Afterschool Programs and for Family Day Care Home Providers in School Year 2021-2022](#)
- [#94 Nationwide Waiver of Onsite Monitoring Requirements in the School Meals Programs – Revised – EXTENSION 3](#)
- [#95 Nationwide Waiver of Onsite Monitoring Requirements for State Agencies in the Child and Adult Care Food Program – EXTENSION 3](#)
- [#96 Nationwide Waiver of Monitoring Requirements for Sponsors in the Child and Adult Care Food Program – EXTENSION](#)
- [#98 Nationwide Waiver of Local School Wellness Policy Triennial Assessments in the National School Lunch and School Breakfast Programs](#)

ADE did not opt into the following waiver:

- [#91 Nationwide Waiver to Allow Specific Meal Pattern Flexibility in the Child and Adult Care Food Program for School Year 2021-2022](#)

Except for the onsite monitoring waivers, the waivers issued for SY 21-22 are new and are not extensions of previously issued waivers. Therefore, elections and approvals under previous SFSP/SSO and NSLP waivers for Parent Pickup, Area Eligibility (for sites operating either SFSP/SSO or At-Risk/Afterschool Care Snack Program), and approval for multiple day meal distribution are no longer valid for SY 21-22. Program operators must re-elect to operate under the new waivers in SY 21-22.

ADE has streamlined the waiver opt-in process by removing the external electronic opt-in form (SurveyMonkey) for each waiver and incorporating opt-in fields into CNPWeb. For SY 21-22, SFAs will need to indicate election of four waivers in Section 5 of the NSLP Sponsor Application: SSO (#85), Parent Pickup (#89), Specific Meal Pattern Flexibility (#90), and Local Wellness Policy Triennial Assessment (#98). The remaining waivers listed above (#86-#88, #92-#95, #96) apply to all SFAs without notifying the State agency. All SFAs will be required to report the use of each waiver (#85-#90, #92-94, #96, #98) and a description of whether and how this waiver resulted in improved services to Program participants. ADE will release a separate memorandum to describe the information operators will need when completing the reporting requirements.

USDA has issued #85 Nationwide Waiver to Allow the Seamless Summer Option through School Year 2021-2022 to facilitate the safe provision of meals by eliminating the need to collect meal payments, thereby speeding up meal service, and supporting the implementation of COVID-19 mitigation strategies, such as serving meals outdoors or in classrooms and social distancing. All schools and entities eligible to participate in the National School Lunch Program (NSLP) including Residential Child Care Institutions (RCCIs) and juvenile detention centers, are eligible to participate under this waiver, regardless of location, percentage of students eligible for free or reduced-price meals, or type of site. SFAs may choose to operate the SSO as closed enrolled sites, serving meals only to those enrolled in the school, or as open sites, where meals are available to anyone 18 years old or younger. Virtual academies or online-only schools defined as Arizona Online Instructions (AOIs) are not eligible to participate in the NSLP, and therefore, are not eligible to operate SSO. However, students (18 years old or younger) attending an AOI are eligible to participate at any open SSO site to receive free meals.

Recognizing the significant costs SFAs have incurred during COVID-19 operations, USDA released *COVID-19 Child Nutrition Response #86: Nationwide Waiver to Allow Summer Food Service Program Reimbursement Rates in School Year 2021-2022*, which allows sites operating SSO during SY 21-22 to receive the higher Summer Food Service Program (SFSP) reimbursement rates. Per [SP 15-2021](#), [CACFP 13-2021](#), [SFSP 08-2021: Questions and Answers for Child Nutrition Program Operations in School Year 2021-2022](#), USDA is allowing for States to pay all SFAs operating SSO in SY 21-22 the combined reimbursement rates established for rural or self-prep sites, regardless of location, from July 1, 2021-June 30, 2022. Please note that the [SFSP reimbursement rates](#) are effective January 1-December 31. Therefore, rates for sites operating SSO will be updated in January 2022.

USDA has clarified that the Afterschool Care Snack Program (ASCSP) and/or At-Risk Afterschool Meals component of the Child and Adult Care Food Program (CACFP) can be operated simultaneously with SSO during the regular school year. ([SP 25-2020](#) Q2 and [SP 01-2021](#) Q7). USDA released *COVID-19 Child Nutrition Response #93: Nationwide Waiver of Area Eligibility in the Afterschool Programs and for Family Day Care Home Providers in School Year 2021-2022*, which waives the requirement for sites to be in low-income areas in order to participate in the ASCSP or At-Risk Afterschool Meals. This waiver allows all afterschool care programs to operate these programs, regardless of location, and claim all meals and snacks at the free rate. Program operators must continue providing an enrichment activity for both ASCSP and At-Risk. SFAs will continue to apply to operate these programs in the NSLP site applications in CNPWeb.

USDA is offering certain meal pattern flexibilities for meals and snacks served under NSLP/SSO to ensure the safety of students, families, and food service professionals while schools continue to use alternative meal service models to support social distancing in the new school year. *COVID-19 Child Nutrition Response #90: Nationwide Waiver to Allow Specific School Meal Pattern Flexibility for School Year 2021-2022* provides flexibilities to the following meal pattern requirements: sodium targets, whole grains, vegetable subgroups, milk variety, low-fat flavored milk, and age/grade groups. This new meal pattern waiver is effective October 1, 2021-June 30, 2022; however, SFAs may begin operating under these flexibilities when the new school year begins ([SP 15-2021](#) Q22). Per the guidance in this waiver, SFAs must provide the State agency with the meal service safety accommodations that demonstrate the need for meal pattern flexibilities. SFAs will provide this information in the NSLP sponsor applications in CNPWeb. Please note that the SY 21-22 meal pattern waiver no longer offers flexibilities to operators who are unable to meet the meal pattern requirements due to issues with the supply chain/product availability. When the SY 20-21 meal pattern waiver expires on September 30, 2021, operators will be expected to meet the daily and weekly components in their full required amounts. Operators who wish to request a meal pattern waiver using the SY 20-21 waiver through September 30, 2021, must contact their HNS Specialist directly. They will no longer use the electronic form via SurveyMonkey to request use of the SY 20-21 when the new school year begins.

ADE did not opt in *#91 Nationwide Waiver to Allow Specific Meal Pattern Flexibility in the Child and Adult Care Food Program for School Year 2021-2022* that waived the daily requirement that at least one grain serving, across all eating occasions, must be whole grain-rich, that low-fat milk (1 percent) must be unflavored, and delayed the implementation crediting of grains by ounce equivalents (previously set to take effect October 1, 2021). Therefore, SFAs that operate At-Risk and use the CACFP meal pattern must ensure all snacks and meals served meet the meal pattern. SFAs may choose to follow the NSLP

meal pattern for At-Risk and operate under the flexibilities under #90: *Nationwide Waiver to Allow Specific School Meal Pattern Flexibility for School Year 2021-2022*.

ADE Health and Nutrition Services (HNS) hosted a webinar on May 21, 2021, titled *School Year 2021-2022 Waiver Review* ([Recording](#)) ([Slides](#)). This webinar is ideal for operators seeking a detailed explanation for each of the SY 21-22 waivers. Please note that the webinar does not cover waiver #98, as it was released after the webinar occurred.

CNPWeb Application Guidance for SSO

SFAs will need to submit and have the following CNPWeb applications approved to serve and claim SSO meals during SY 21-22:

- Program Year (PY) 2022 National School Lunch Program sponsor and all site applications that have enrolled students in SY 2021-2022
- Fiscal Year (FY) 2021 Summer Food Service Program sponsor and site applications
- FY 2022 Summer Food Service Program sponsor and site applications

All three applications will be available July 16, 2021. SFAs must first complete CNPWeb applications for NSLP. The assigned HNS Specialist will review and approve the applications. Once approved, SFAs will then be instructed to complete (or revise) the FY21 SFSP application for the beginning of the school year through September 30, 2021 and the FY22 SFSP application for October 1, 2021 through the last day of school. Please note that FY22 SFSP applications will not allow SFAs to apply under SSO without an approved PY22 NSLP CNPWeb application.

SFAs are encouraged to submit applications at least three weeks prior to the start of meal service to allow for processing and approval. Recognizing the timeframe ADE is releasing CNPWeb applications, SFAs should be aware that meal service of reimbursable meals prior to approval of CNPWeb applications is allowable and those meals may be claimed according to the 60-day claiming guidance.

Reminders

- The site application(s) must be submitted before the sponsor application.
- The NSLP application must be submitted before the SSO applications.
- Accuracy of contact information on the site and sponsor applications is critical for ADE to provide SFAs with program information throughout the year. Our primary method of communication will be via email, sent to the person listed as the School Food Authority Contact and Program Contact within the NSLP sponsor application for SY 21-22. If you are not the SFA or Program Contact and would like to receive communication from ADE HNS, complete the [e-mail subscription form](#).
- Review the application checklist to ensure that all of the required documents have been submitted. The sponsor application will not be approved until all the checklist items are submitted and approved.
- SFAs adding sites to CNPWeb must complete and submit the [Add/Change/Delete Form](#) to ADE to add a new school to the online application.

SFAs will communicate with their HNS Specialist for CNPWeb application approval and completion of checklist items. The contact information for the assigned specialist can be found at the top of the sponsor

application in CNPWeb. SFAs may also email ContactHNS@azed.gov or call 602-542-8700 to reach the Specialist of the Day when the assigned Health and Nutrition Services Specialist is not available.

Questions and Answers

Please review [SP 15-2021, CACFP 13-2021, SFSP 08-2021: Questions and Answers for Child Nutrition Program Operations in School Year 2021-2022](#) and [SP 16-2021, CACFP 14-2021: Previously Issued Questions and Answers Relating to Operation of the Child Nutrition Programs: Updated for School Year 2021-2022](#) where USDA has provided answers to frequently asked questions regarding Child Nutrition Program operations during SY 21-22. In addition, ADE has released answers to the following questions to further clarify guidance for SY 21-22 operations and CNPWeb applications.

General

1. If a site operates on a 4-day week and offers learning on Friday as a free study day, can the SFA offer SSO?

No. SFAs may only operate SSO on school days. However, if students are given work to do at home and the LEA considers it an instructional day, meals may be offered (SP 16-2021, Q8).

2. The site offers both a full-time virtual track (Monday through Friday) and full-time in-person track (Monday through Thursday). Can the full-time in-person students participate in the Friday meal service occurring for their virtual students?

Yes, if the site is operating as an open site. All children (18 years and younger) can participate in the SSO Friday meal service.

3. Can SFAs offer SSO during non-school days such as weekends or holidays?

In SP 15-2021, USDA has clarified for SY 21-22 and as part of the transition back to more traditional school year operations, SFAs may not provide weekend or holiday meals through SSO during the regular school year. Weekend and holiday meals can be served through At-Risk Afterschool Meals. If school were to close due to an outbreak of COVID-19 or other qualifying event, SFAs may follow the guidance in [SP 04-2020, CACFP 03-2020, SFSP 03-2020: Meal Service During Unanticipated School Closures](#) which allows for traditional Summer Food Service Program (SFSP) or SSO operations at a non-school site during the school closure. Weekend and holiday meals may be served while operating the SFSP or SSO during an unanticipated school closure only.

CNPWeb Applications

4. How do SFAs enter in the periods for FY21 SFSP and FY22 SFSP site applications?

SFAs that have unused period beginning and period ending fields for FY21 SFSP site applications will enter the first day of school as the beginning date and September 30, 2021 as the ending date. SFAs who have used all period fields will only revise the program end date of period 4 to September 30, 2021.

For FY22 SFSP site applications, SFAs are instructed to only complete Period 1—period beginning date of October 1, 2021, and end date of the last day of the school year. For SY 21-22, even though

SFAs are not allowed to serve SSO during weekends or holidays, SFAs are not required to enter multiple program periods reflecting pauses in meal service due to holiday breaks.

5. Do all sites listed in the NSLP CNPWeb applications need to be submitted to ADE for approval in PY22 if none of those sites are operating an afterschool feeding program (Afterschool Care Snack Program or At-Risk Afterschool Meals)?

SFAs must submit NSLP applications for all sites with active enrollment in SY 21-22 to record that they are considered an “NSLP school”. Sites must also have an approved NSLP status in CNPWeb in order for students to be eligible for future P-EBT. Additionally, the CNPWeb NSLP application approval generates site-level data in CNP Direct Certification / Direct Verification and CNP Verification Reporting.

6. How should SFAs be instructed to complete Section 8. Food Service Management Company (FSMC) on the NSLP Sponsor application?

SFAs must have an approved FSMC contract on file inclusive of all Child Nutrition Programs the sites are intending to operate. SFAs that operate the Afterschool Care Snack Program or At-Risk Afterschool Meals at any of their sites will need to complete this section on the NSLP Sponsor application to generate a Checklist Item for ADE to confirm the contract includes the afterschool feeding program(s). If none of the sites are operating either snack program, SFAs are instructed to leave Section 8 blank on the NSLP Sponsor application. ADE will confirm a contract is on file when processing the SSO Sponsor application.

7. How should SFAs be instructed to complete Section 4. General Information on the NSLP site application when the site has a contract with a caterer?

SFAs must have an approved vendor contract on file inclusive of all Child Nutrition Programs the site(s) are intending to operate. SFAs will select the drop-down option “Catered” in the field “Type of Food Service” and provide the name of the caterer on the site application for sites operating the Afterschool Care Snack Program or At-Risk Afterschool Meals. This will generate a Checklist Item for ADE to confirm the vendor contract includes the indicated afterschool feeding program(s) at the site. If a site is not operating either afterschool feeding program, SFAs are instructed to select the drop-down option “Self Preparation Kitchen” and leave the field “Name of Caterer” blank. ADE will confirm a contract is on file when processing the SSO site applications.

8. How should SFAs indicate Special Provision Option (SPO) participation on the NSLP site and sponsor applications?

SY 21-22 NSLP applications, Sections 8 and 9, are where SFAs indicate the intent to operate under a SPO: Special Assistance Provision 2, Special Assistance Provision 3, or Community Eligibility Provision. SFAs must also enter information in the remaining fields of Section 8 in order to submit a complete application. Approvals of NSLP applications with SPOs identified will be recorded and used to support eligibility for P-EBT for students attending a school approved to operate a SPO. Additionally, the SPO cycle information will be captured for SFAs who plan to operate the SSO during SY 21-22 but who are also eligible to operate a SPO and have indicated as such on the NSLP site applications.

9. How should SFAs apply in CNPWeb if choosing to provide meals through mobile routes/bus routes and home delivery?

Each route needs to be its own site in CNPWeb and must include either “Mobile Route” or “Home Delivery” in the site name. Mobile routes and delivery routes are allowed. Mobile routes are defined as public stops where meals are provided to any child in the area who choose to visit the stop. Home delivery routes are defined as routes where meals are delivered directly to students’ homes.

10. How would SFAs obtain State agency approval to deliver meals directly to students’ homes, per SP 16-2021, Q13?

ADE will approve delivery of meals to students’ homes through the site approval in CNPWeb. SFAs will use a single CNPWeb site application for representing specifically the delivery of meals to homes along a route.

Waiver Opt-ins

11. Do SFAs need to submit a Distribution Plan for Multiple Meals to ADE?

Since ADE has opted into Waiver #87: Non-Congregate Meal Service and Waiver #88: Meal Times Requirements, sites can distribute a maximum of a week’s worth of meals. A week’s worth of meals is defined as up to 5 breakfasts and lunches provided under the NSLP SSO, and up to 7 snacks and suppers through the At-Risk Afterschool Meals Program. ADE is no longer requiring SFAs to submit a Distribution Plan for Multiple Meals, but may request to review distribution procedures SFAs have implemented.

12. Are SFAs required to opt into Waiver #85: SSO Operations and served SSO instead of NSLP?

Under this waiver, all SFAs may choose to serve meals through the SSO or may opt to participate under the school meal programs. This waiver does not require, but highly encourages SFAs to participate under SSO in SY 21-22 in order to receive the higher SSO reimbursement rate and eliminate the need to collect payments from families.

13. If I make the decision to operate the NSLP for SY 21-22, will I receive the higher SSO reimbursement rates?

No. Operating the NSLP means the NSLP reimbursement rates will be in effect. The higher reimbursement rate of \$4.31 per lunch and \$2.46 per breakfast ([SFSP reimbursement rates](#)) is only provided to operators who apply and are approved to operate the SSO in SY 21-22. USDA has not yet released the NSLP rates for SY 21-22.

At-Risk Afterschool Meals Participation during SY 21-22

14. Can At-Risk snacks and/or meals be taken home by students?

Yes. Since ADE has opted into Waiver #87: Non-Congregate Meal Service, Waiver #88: Meal Times Requirements, and Waiver #93: Area Eligibility in the Afterschool Programs and for Family Day Care Home Providers, all sites can participate in At-Risk Afterschool Meals and allow students to take the snack and/or meal home with an available enrichment activity.

15. If the school day is on campus (in-person), can the school provide the student an At-Risk snack and meal to take home after the school day?

Yes, as long as the school provides an enrichment activity (i.e., printed-off activity included in bags). The waivers allow At-Risk snacks and meals to be taken home regardless of the instruction being offered in-person or virtually. All At-Risk snacks and meals must include an enrichment activity.

16. Can a school provide At-Risk snacks and meals to non-enrolled students?

Yes. A site that provides an enrichment activity can serve anyone age 18 or under whether they are enrolled in school or not.

17. Can a school serve At-Risk on weekends and allow parents to pick up meals and/or snacks with a take-home enrichment activity?

Yes. Waiver #87: Non-Congregate Meal Service, Waiver #88: Meal Times Requirements, and Waiver #89: Parent/Guardian Pickup allow At-Risk meals served on any day to be picked up by parents/guardians, as long as the intent is to provide one child with no more than the At-Risk meals allowed (one meal and one snack) each day.

18. Can a school provide At-Risk snacks and meals through a mobile route (i.e., bus stops or home delivery)?

Yes. Waiver #87: Non-Congregate Meal Service, Waiver #88: Meal Times Requirements, and Waiver #89: Parent/Guardian Pickup allow At-Risk meals to be delivered.

19. How does a school apply for At-Risk meals served on a mobile route?

SFAs will need to submit an [Add/Change/Delete Form](#) to have the mobile route added to CNPWeb as a PY22 NSLP site. SFAs will submit the site application and indicate participation in At-Risk.

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