



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

**HNS 31-2021**

**MEMORANDUM**

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**To:** School Food Authorities and Operators of the Summer Food Service Program  
**From:** Melissa Conner, Associate Superintendent  
**Date:** October 12, 2021  
**Subject:** Waiver Guidance for Operating the Summer Food Service Program during Unanticipated School Closures in School Year 2021-2022

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*Original Signed*

The purpose of this memorandum is to provide guidance on waivers issued by the United States Department of Agriculture (USDA) Food and Nutrition Services (FNS) for operating the Summer Food Service Program (SFSP) during unanticipated school closures in School Year 2021-2022. Unanticipated school closures only occur when instruction is not provided to children. If a school plans to offer virtual learning or a mix of in-person classes and virtual learning, the school is considered open and any meals provided to children must be offered through the Seamless Summer Option (SSO) or traditional National School Lunch Program (NSLP). If an unanticipated school closure occurs, Program operators, including community organizations (COs), may use these flexibilities to safely provide meal service under the SFSP.

Arizona has opted into the following waivers for use during unanticipated school closures:

- [COVID-19: Child Nutrition Response #101 – Nationwide Waiver to Allow Non-Congregate Meal Service for Service Institutions Operating the Summer Food Service Program during Unanticipated School Closures in School Year 2021-2022](#)
- [COVID-19: Child Nutrition Response #102 – Nationwide Waiver of Meal Times Requirements for Service Institutions Operating the Summer Food Service Program during Unanticipated School Closures in School Year 2021-2022](#)
- [COVID-19: Child Nutrition Response #103 – Nationwide Waiver to Allow Parents and Guardians to Pick Up Meals Served by Service Institutions through the Summer Food Service Program during Unanticipated School Closures in School Year 2021-2022](#)
- [COVID-19: Child Nutrition Response #104 – Nationwide Waiver of Area Eligibility Requirements for Service Institutions Operating the Summer Food Service Program during Unanticipated School Closures in School Year 2021-2022](#)
- [COVID-19: Child Nutrition Response #105 – Nationwide Waiver to Allow Service of Meals at School Sites during Unanticipated School Closures in School Year 2021-2022](#)

Operators experiencing an unanticipated school closure may use waivers for non-congregate meal service (#101), meal service times (#102), area eligibility (#104), and operation at a school site (#105) without notifying ADE. Operators wishing to use the parent pick-up waiver (#103) will request a link to the opt-in form from their assigned Health and Nutrition Services Specialist during the pre-approval process. The opt-in process for the parent pick-up waiver will include providing a description of how the operator will ensure meals are distributed only to parents/guardians of eligible children and duplicate meals are not distributed to any child. Waivers for non-congregate meal service, meal service times, parent pick-up, and area eligibility are in effect through June 30, 2022. The waiver to operate SFSP at a school site during an unanticipated school closure is in effect through April 30, 2022, consistent with the regulatory end date for SFSP during unanticipated school closures.

All operators will be expected to report on the use of these waivers and how the use improved meal service operations to meet USDA's reporting requirements.

### **Transitioning to SFSP during Unanticipated School Closures**

In the event of an unanticipated school closure, School Food Authorities (SFAs) will need to determine if meal service will continue during the closure. SFAs who will continue serving meals during the closure and are currently operating SSO will continue SSO and adjust operations as needed to ensure meals are safely provided. These SFAs must update the SFSP applications in CNPWeb to reflect any changes in operations. SFAs who will continue serving meals and are currently operating NSLP must transition to SSO by submitting CNPWeb Site and Sponsor applications for SSO and, if applicable, revising the NSLP Sponsor application to opt into the parent pick-up waiver. Any SFAs who will not provide meals during an unanticipated school closure are encouraged to work with the district and/or COs to identify alternate sites and operations to ensure meals continue to be available to students. In any closure situation, Health and Nutrition Services (HNS) strongly encourages SFAs to complete the [Temporary Campus Closure Survey](#) which will allow HNS to offer technical assistance to ensure meals are still made available to students.

All COs that have operated SFSP in the last two years and are in good standing may also operate SFSP during an unanticipated school closure. COs must work with the district(s) experiencing the closure(s) to establish meal service sites. Once sites are determined, COs must notify their assigned Health and Nutrition Services Specialist to receive written pre-approval prior to beginning meal service. If necessary, COs must also submit Add/Change/Delete forms with accompanying Non-Associated Site Agreements and the parent pick-up waiver opt-in form (link to be provided by the specialist as part of the pre-approval process) as quickly as possible. CNPWeb Site and Sponsor applications must be submitted and approved prior to submitting claims for reimbursement. Management plans and budgets will not be required for operations during an unanticipated school closure.

All operators are required to maintain accurate records during unanticipated school closures including but not limited to documentation for days of operation, meal counts, and meal pattern compliance.

HNS is prepared to work closely with COs and SFAs to ensure effective and efficient collaborations to minimize disruptions to meal service during unanticipated school closures.

Please contact your assigned Health and Nutrition Services Specialist with any questions regarding this guidance. You may also call (602) 542-8700, Option 1, or email [ContactHNS@azed.gov](mailto:ContactHNS@azed.gov) to reach the Specialist of the Day.

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