MEMORANDUM

Original Signed

To: School Food Authorities and Community Organizations

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

Date: March 20, 2024

Subject: Application for Summer Meal Programs

This memorandum provides School Food Authorities (SFAs) and Community Organizations (COs) application requirements and deadlines for the Summer Food Service Program (SFSP). This memorandum also reminds SFAs of their eligibility to apply for the National School Lunch Program (NSLP) Seamless Summer Option (SSO) or to extend the NSLP for any school that is hosting academic summer school. Attached are questions and answers (Attachment A) intended to provide clarification to entities applying for summer meal programs.

Applying for Participation in the Summer Food Service Program

In order to participate as a sponsor for the SFSP, schools and COs must submit a complete application to the Arizona Department of Education (ADE) Health and Nutrition Services (HNS) by May 31, 2024. Applying sponsors must submit the following by the deadline to be considered a complete application:
•   Management Plan
•   Budget
•   CNPWeb Sponsor and Site Applications

Any applications received after May 31, 2024, will not be considered for SFSP sponsorship. However, participation as a site under an approved SFSP sponsor may be an option. Each site participating in summer meal service must have an approved application prior to serving meals in order to claim the meals for reimbursement.

All organizations applying to operate the SFSP must demonstrate to the State Agency, compliance with the performance standards for financial viability, administrative capability, and program accountability, recently codified at 7 CFR 225.6(d). Compliance is demonstrated by sponsors through the submission of a management plan and a complete budget documenting the anticipated costs, revenues, and sources of revenues for the SFSP operation. The

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requirements and level of detail required in the management plan may vary for experienced sponsors and those with operational problems. The management plan and budget are submitted by sponsors in the *CNP Management Plans and Budgets* web-based system.

7 CFR 225.2 defines "good standing" as the status of a program operator that meets its Program responsibilities, is current with its financial obligations, and, if applicable, has fully implemented all corrective actions within the required period of time. For SFAs applying for SFSP, the successful operation of the NSLP may be considered sufficient evidence of compliance with administrative capability and financial viability. Therefore, SFAs in good standing that have not experienced operational problems, will not be required to submit a management plan, however, the State agency may request additional evidence of administrative capability sufficient to ensure the SFA can comply with the performance standards for the SFSP. SFAs must also submit an Annual Financial Report (AFR) to ADE to be considered in good standing and will be exempt from submitting a budget if financial viability is evident through the Food Service AFR.

Child and Adult Care Food Program (CACFP) Institutions are required to demonstrate compliance with financial viability, administrative capability, and program accountability; therefore, COs will still be required to submit a management plan and budget for SFSP participation.

ADE also requires all applying sponsors to submit an SFSP sponsor application and site applications for each meal service site. In general, the sponsor application gathers details on how the sponsoring organization runs its summer operations, such as general information about the sponsoring organization, menu and meal counting procedures, and anticipated revenues and costs. This information should align with the approved management plan and budget. Each site application will document meal service operations such as mealtime, location, site classification and eligibility. Sponsors must demonstrate how each site meets eligibility set forth in [SP 08, CACFP 04, SFSP 03-2017: Area Eligibility in Child](#) [Nutrition Programs](#). Sponsor and site applications will be submitted to ADE through the web-based application, *CNPWeb*.

SFAs and CACFP institutions familiar with operating a federal child nutrition program are not required to attend training prior to submitting the SFSP application. However, new organizations applying to SFSP are required to complete the State agency training during the prospective entity process. All approved SFSP administrative staff must be informed about program requirements and attend the necessary Sponsor-led training. Sponsoring organizations are required to provide training for their administrative and site personnel and must not allow a site to operate until personnel have attended training that covers the purpose of the SFSP, site eligibility, recordkeeping, site operations, meal pattern requirements, and the duties of a monitor.

Additional Summer Feeding Options for School Food Authorities

NSLP Seamless Summer Option

Schools participating in the NSLP or School Breakfast Program (SBP) are eligible to apply for the Seamless Summer Option to operate sites that meet the same eligibility requirements of SFSP. Once approved, the school serves meals free of charge to children, including teenagers through age 18. Meals are reimbursed at the free rates for school lunches, school breakfasts, and afterschool snacks, which are slightly lower than the SFSP Program rates.

ADE requires all applying SFAs to submit a sponsor application and site applications. In general, the sponsor application gathers details on how the sponsoring organization runs its summer operations, such as general information about the sponsoring organization, menu, and meal counting procedures. The site application documents site operations such as mealtime, location, site classification, and eligibility.

Sponsor and site applications will be submitted to ADE through the web-based application *CNPWeb*. All applications must be approved by HNS before meal service begins.

Extending the NSLP

SFAs may choose to operate NSLP and claim reimbursement for meals (lunches under NSLP and breakfasts under the SBP) served during the summer months to children enrolled in summer school, which USDA defines as an integral part of the curriculum or an extension of the local educational program. The SFA also has the option to operate the Afterschool Care Snack Program (ASCSP) through NSLP to provide snacks served in afterschool care programs used for children on days attending summer school. (*Afterschool Snacks, Questions and Answers, Edition 3 in response to SP 99-4 CACFP 99-4: Reimbursement for Snacks in After School Care Programs*). SFAs that intend to operate NSLP to provide meals during summer school, should contact the assigned HNS specialist to confirm eligibility and discuss application requirements.

As a reminder, the At-Risk Afterschool Meals component of the Child and Adult Care Food Program (CACFP) may only be operated during the academic school year. For further guidance, please review *[CACFP 08-2012: The At-Risk Afte school Meals Component of the Child and Adult Care Food Program, Questions and Answers](#)*.

Questions and Answers

Application Deadlines and Requirements

1. **Can sites be requested after May 31, 2024?**
   Yes, operators may notify ADE of new sites at any time if operating SSO or SFSP. To request new sites, operators will submit the Add/Change/Delete form and attach documentation including site's eligibility, and if applicable, a signed non-associated site agreement.

2. **Do SSO applications in the CNPWeb have a May 31, 2024 deadline?**
   SSO applications can be submitted after May 31. Applications must be submitted and approved prior to the start of meal service.

3. **Does the SFSP application need to be in submitted status or approved status by May 31?**
   The management plan, budget (if applicable), and *CNPWeb* applications must be submitted by May 31. If any part of the application needs revision or has a rejected status on or after May 31, the application may still be considered for SFSP sponsorship.

4. **Does the SFA need to complete a management plan or budget when applying for SSO?**
   No. SFAs applying for the SSO only submit *CNPWeb* Sponsor and Site applications.

Site Types and Eligibility

5. **What are the eligibility requirements for the different site types: open, open-restricted, closed enrolled, and camps?**
   SFAs and Community Organizations that are approved to operate SSO or SFSP may serve meals free of charge to all children 18 years and under. The types of sites are allowed to participate based on the eligibility described below:
   - Open sites: all children eat free in communities where at least 50% of the children are eligible for free/reduced-price school meals.
   - Restricted open sites: all children eat free in communities where at least 50% of the children are eligible for free/reduced-price school meals. Attendance is limited for safety, control, or security reasons.
   - Closed enrolled sites: sites within the community where only the <u>enrolled</u> group of low-income children eat free. The site must either be area eligible or at least 50% of the children enrolled must be low-income. Sponsors are required to keep enrollment records and participant eligibility documentation each month to verify that at least 50% of the children are eligible.
   - Camps: residential or nonresidential day camps that offer regularly scheduled food service as part of an organized program for enrolled children. Camps do not have to establish area eligibility. However, they must collect and maintain

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participant eligibility documentation. Camps are only reimbursed for meals served to enrolled children who meet the free and/or reduced-price eligibility standards.

6. **What year can school data be used to qualify sites for this summer?**

Current-year school data may be used to establish area eligibility for the SFSP and SSO, excluding camps. For a site to be determined area eligible, school data must indicate that the proposed meal site is in the attendance area of a school where at least 50 percent of the children are eligible for free or reduced-price school meals. Area eligibility determinations made using school data must be re-determined every five years, in accordance with the Richard B. Russell National School Lunch Act as outlined in *SP 08, CACFP 04, SFSP 03-2017: Area Eligibility in Child Nutrition Programs*. Therefore, school data from 2019-2020 through 2023-2024 may be used to determine area eligibility.

7. **Can a site applying for closed-enrolled (SSO or SFSP) operation use census data to qualify for participation?**

Yes, the site may use any of the following to qualify: school data, participant income application data, or census data. If census data or school data does not support area eligibility, closed-enrolled sites may collect income applications for the enrolled students and are considered eligible if 50% or more of the enrolled students are free or reduced eligible. Entities may use the CACFP and SFSP Area Eligibility Mapper.

8. **Can a high school-only district use area eligibility information from an area elementary school?**

Area eligibility may be established for a site that does not have at least 50 percent of the children enrolled at the site eligible for free or reduced-price meals under the NSLP or SBP if the site's physical address is located within an official school boundary of another site that is 50% free or reduced-price eligible. Sites using this method to support area eligibility would obtain an official school-boundary identifying map, match the site's addresses to the map's boundaries, and retain the map as documentation. Entities may use the Hometown Locator.

9. **Are sites eligible and approved to operate the summer meal programs before 2024 still eligible?**

Sites previously determined area eligible based on school data or census data are effective for five years; SY 2019-20, SY 2020-21, SY 2021-22, or SY 2022-23 approvals are applicable and do not need to redetermine eligibility.

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10. What is a site cap for each meal service?

Sites participating in SFSP or SSO will have a site cap applied to each meal service in line with the requirements found in SFSP 16-2015. The purpose of a site cap is to ensure that a site does not purchase and/or produce meals outside the capability of the site and the needs of the community, thereby reducing waste and protecting the integrity of the Program. Sponsors may seek an upward adjustment in the approved level for its sites by requesting a site review or by providing the State agency with evidence that the number of meals served exceeds the sites' approved levels. The sponsor may request an upward adjustment at any point prior to submitting the claim for the impacted reimbursement period.

Academic Summer School

11. What is the difference between extending the academic school year and offering summer school that counts towards graduation?

Summer school is an additional session for select students who seek or need academic credits for graduation or promotion to the next grade. This documentation would need to be provided to the assigned HNS specialist before approval. Extending the school year would mean the end date of the current school year has been extended for an additional period, with all students being required to attend.

12. If a summer school site is not area eligible for SSO or SFSP, can the school provide meals at no cost to the student?

Sites operating both a summer school program and the National School Lunch Program (NSLP) will serve and claim meals following NSLP program regulations, which include counting and claiming the meals served based on the student's eligibility. Students certified for free meal benefits will receive meals at no cost. Due to the reduced-price subsidy currently in place in Arizona, students certified as reduced will receive meals at no cost as well. The cost of meals served to students who are not eligible for a free or reduced-price meal would need to be covered by the student/family or through other district funding, where permitted by the funding source.

13. If a site does not qualify to serve all meals free this summer and is not operating a program that meets the definition of summer school, what are other scenarios/options the school can do to feed the children?

This is dependent on what programming is being offered at the site. The program may qualify as a camp or may qualify to operate a closed enrolled site under the SSO or SFSP.

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Sites operating closed enrolled will make meals available to only the enrolled children attending the site, as opposed to the community. Closed enrolled sites must support area eligibility either by attendance area or may be located outside of an eligible attendance area. However, at least 50% of the children enrolled must be considered low-income.

When the site is not area-eligible, sponsors and SFAs must keep enrollment records and participant eligibility documentation each month to verify that at least 50% of the children are eligible.

Camps can be residential or non-residential, must have a regularly scheduled food service, must obtain or collect income applications to determine eligibility for enrolled participants and must maintain such records. Only the meals served to free or reduced- price eligible children at a site approved as a camp will be reimbursed under the SSO and SFSP. Camps may charge for meals provided to participants who are ineligible for free or reduced-price meal benefits.

14. Can a site that is area eligible be open while offering a summer school?

Yes, an area-eligible school can operate SSO or SFSP as an open site to reach the community, while the school location also has an enrolled group of students on the campus for summer school. Like the children in the community who come to the open site, the students in the summer school would also be able to obtain meals from the SSO/SFSP meals service at the site.

15. If an SFA offers a summer school and does not want to open the campus to the community, can the SFA operate SSO closed-enrolled or restricted open sites?

No, summer school is not an acceptable reason to operate as a closed-enrolled or restricted open site. Per USDA memorandum, SP 09-2017: 2017 Edition of Questions and Answers for the National School Lunch Program's Seamless Summer Option, summer school is ineligible to operate as a closed-enrolled for SSO. The site is still considered open and will serve on a first-come, first-served basis. Restricted open sites may limit attendance for security, safety, or control reasons. Alternatively, the site may consider continuing to operate the NSLP during academic summer school.

16. Can a site that is area eligible be open while offering a summer school?

Yes, an area-eligible school can operate SSO or SFSP as an open site to reach the community, while the school location also has an enrolled group of students on the campus for summer school. Like the children in the community who come to the open site, the students in the summer school would also be able to obtain meals from the SSO/SFSP meals service at the site.

17. If a program is referred to as summer school, but it is actually enrichment with no credit received, does the program have to offer meals to those students as a closed- enrolled site?

No, the program may apply for either SSO or SFSP and operate as an open site if the site is area eligible. The students attending the enrichment program can be served meals at this site in the same way the site serves the community.

18. Can a school or site participating under the SSO as an open site serve meals at staggered times for the community children and the school children attending summer school?

Yes, schools or sites participating under the SSO must ensure community children have the same access to the meals and meal services as the children enrolled in summer school. If meal service times are staggered, the same meal service opportunity (e.g. a lunch) must be provided to both groups, meaning the same meal is served for the same length of time for both groups. Sites requesting to offer staggered meal service times will need to communicate the meal service times as part of the application process by contacting the assigned HNS specialist.

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