

HNS # 06-2025

Original Signed

MEMORANDUM

To: School Food Authorities Operating the National School Lunch Program

From: Melissa Conner, Senior Deputy Associate Superintendent

Arizona Department of Education, Health and Nutrition Services Division

Date: July 1, 2025

Subject: School Year 2025-2026 Updates and Reminders for SFAs

The purpose of this memorandum is to provide reminders and new information for School Food Authorities (SFAs) applying to operate the National School Lunch Program (NSLP), School Breakfast Program (SBP), Special Milk Program (SMP), and/or Afterschool Care Snack Program (ASCSP) and At-Risk Afterschool Meals component of Child and Adult Care Food Program (CACFP) during School Year 2025-2026 (SY 2025-26). This guidance also pertains to SFAs participating in the USDA Foods in Schools Program and the USDA Department of Defense Fresh Fruit and Vegetable Program (USDA DoD Fresh).

Annual Application Requirements

SFAs are encouraged to use the <u>School Meals Application Checklist</u> to ensure all application requirements are completed. SFAs will communicate with their assigned Health and Nutrition Services (HNS) Specialist to complete the annual application requirements for SY 2025-26. The contact information for the assigned specialist can be found at the top of the sponsor application in CNPWeb. SFAs are encouraged to prepare and submit all components of the application as early as possible and should allow three weeks for the application approval process to be completed. SFAs must ensure that all applications and all required components are submitted with adequate time for approval and meet claiming deadlines.

HNS created the *Step-by-Step Instruction: How to Submit Site and Sponsor Applications in CNPWeb* which guides the user through navigating CNPWeb and completing the fields required in the sponsor and site applications. The training is available in the NSLP Online Training Library.

CNPWeb Site and Sponsor Applications

Each school year, SFAs are required to submit a sponsor application and an application for each site via CNPWeb. The Sponsor application collects entity level information including contact information, program beginning and end dates, as well as indication of approved participation in one of the Special

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Provision Options (if applicable). The site application collects site level operational information including site contact information, meal service types, and identifies the site's intended participation in one or more of the Child Nutrition Programs.

The annual submission and approval of the site and sponsor applications is a required step for SFAs to submit reimbursement requests for meals served under the Child Nutrition Programs listed below.

- NSLP
- SBP
- SMP
- ASCSP
- At-Risk Afterschool Meals component of CACFP

SFAs electing to operate NSLP and/or SBP under a Special Provision Option must have completed the provision application process prior to CNPWeb application approval. As with prior years, applications for Provision 2, Provision 3, and Community Eligibility Provision (CEP) were due June 30, 2025. SFAs adding sites to the CNPWeb system must complete and submit the Add/Change/Delete Form to HNS. Additionally, sites that are legally separate from the SFA must include an Inter-Agency Partnership Agreement. Authorized signers can complete an Add/Change/Delete form through a HelpDesk ticket by accessing https://helpdeskexternal.azed.gov/ with the steps as follows:

- Click the icon for 'New Request'
- Locate Health and Nutrition Services templates
- Select 'HNS Add/Change/Delete Form'
- Complete all required fields and applicable optional fields within HelpDesk's Add/Change/Delete Form
- *User/Requestor submitting Add/Change/Delete form must be submitted by the Designated Official or an Authorized Signer listed on the Food Program Permanent Service Agreement
- At the bottom of the form, click the blue button: 'Add Request'

CNPWeb Checklist Items and Additional Documentation

Checklist items are generated based on the entity's operation and must be submitted for approval along with the CNPWeb application. Checklist items can be referenced within CNPWeb once the site and sponsor applications have been submitted. Applications will not be approved until all checklist items required for operation have been received and approved by your assigned HNS specialist. There are additional items that may not generate a checklist item within CNPWeb that must be reviewed; the HNS Specialist may request that they be submitted by the SFA to support the application. Operators shall be prepared with the following:

- Custom, scannable, or electronic household meal application, parent letter, and/or notification of meal benefits
- Contractual agreements for vended meal service (Food Service Management Company, Caterers, SFAs serving as caterers)
- At-Risk Meals Component Principal Addendum
- Department of Economic Security (DES)/ Department of Health Services (DHS) License
- 501(c)(3) tax-exempt status

- Area eligibility documentation for sites operating At-Risk/ASCSP that are using school level data other than the site
- Food Program Permanent Service Agreement (FPPSA): The FPPSA shall be reviewed by the SFA to ensure the Designated Official and all Authorized Signers are current. If the Designated Official or any of the Authorized Signers are no longer employed by the SFA, a new FPPSA must be initiated. The FPPSA Initiation Form can be started through the link provided and will be completed once all parties have signed using Adobe Sign. Any questions related to the submission or updating of the FPPSA should be directed to the assigned HNS Specialist.
- Free and Reduced-Price Policy Statement/Addendums: The SFA must review the free and reduced-price policy for substantive changes. The policy statement must be updated and resubmitted to their assigned HNS Specialist if there are any changes to the process or staff/position responsible for eligibility determinations. In all cases, the SFA must have an approved policy statement on file with ADE that accurately describes its current free and reduced-price policies. Amendments must be submitted for approval to their assigned HNS Specialist no later than October 15th each year. The Free and Reduced Price Policy Statement template can be accessed on ADE's National School Lunch Program and School Breakfast Program website under the Resources for Operators Program Forms and Resources area or by utilizing the link provided.
- Paid Lunch Equity (PLE) Tool or Exemption Request: SFAs with a positive or zero balance in their nonprofit food service account as of June 30, 2024, are exempt from the PLE requirement for School Year (SY) 2025-26 and may request an exemption from their assigned HNS specialist by submitting a Helpdesk ticket. SFAs with a negative balance in their nonprofit food service account as of June 30th, 2024, will need to complete the PLE Tool. Additional USDA guidance regarding PLE can be found here:
 - o SP 39-2011- Revised: Child Nutrition Reauthorization 2010: Guidance on Paid Lunch Equity and Revenue from Nonprogram Foods
 - o SP 12-2025: Paid Lunch Equity: Guidance for School Year 2025-2026

Access to CNP Applications via ADEConnect

ADEConnect provides a single sign-on for multiple applications used by ADE, for example, the *CNPWeb*. Access to *CNPWeb* is granted by the Entity Administrator established by and for the entity. Whether the Entity Administrator (EA) is listed as an Authorized Signer on the FPPSA or not, EAs, shall not grant child nutrition programs technology systems access to consultants, consulting firms or Food Service Management Companies (FSMCs) contracting with SFA. The child nutrition programs technology systems include:

- *myFOODS* (which is outside of the ADEConnect);
- FFAVORS (which is outside of the ADEConnect);
- *CNPWeb*:
- *CNP Direct Certification/Direct Verification*;
- *CNP Verification*;
- CNP Supplemental Payments; and
- CNP Summer EBT SUN Bucks SFA.

SFAs can review details in Section x of the FPPSA, which is agreed upon by the Designated Official when the FPPSA is signed. The Designated Official has the responsibility to ensure unauthorized

individuals, including consultants and employees of FSMCs, are not granted access to the child nutrition programs' technology systems.

Updates to the School Nutrition Standards

This is a reminder of the updates to the <u>school nutrition standards</u> that will help schools encourage healthy choices that lead to healthy outcomes through the National School Lunch Program (NSLP) and the School Breakfast Program (SBP), which serve around 30 million and 15 million children every school day, respectively. While some changes to the meal pattern requirements are phased in through School Year (SY) 2027-2028, several changes are effective July 1, 2025. Please refer to the <u>timeline</u> for more information on updated nutrition requirements in school meals.

The following NSLP and SBP meal pattern changes must be implemented by July 1, 2025:

- Added Sugars Schools must meet the following product-based added sugar limits:
 - **Breakfast cereals** must contain no more than 6 grams of added sugars per dry ounce (7 CFR 210.10(c)(2)(iii)(B)).
 - Yogurt must contain no more than 12 grams of added sugars per 6 ounces (2 grams per ounce) (7 CFR 210.10(c)(2)(iv)(C)).
 - Flavored milk must contain no more than 10 grams of added sugars per 8 fluid ounces, or 15 grams of added sugars per 12 fluid ounces for flavored milk sold as a competitive beverage for middle and high schools (7 CFR 210.10(d)(1)(iii)).
- NSLP Afterschool Snacks Schools serving NSLP afterschool snacks to children in grades K-12 must serve the meal components and quantities found at <u>7 CFR 210.10(o)(2)</u>. Two highlights include:
 - o No more than half of the weekly fruit or vegetable offerings at NSLP snacks may be in the form of juice.
 - At least 80 percent of the grains offered during the week for NSLP snacks must be whole grain-rich.
 - o Grain-based desserts, except for sweet crackers such as animal and graham crackers, do not contribute toward the grains requirement.
- **Meal Modifications** Schools must accept medical statements from registered dietitians requesting meal modifications on behalf of students with disabilities in the school meal programs. Refer to 7 CFR 210.10(m)(1)(i) for more information.
- Substitution of Vegetables for Fruits at Breakfast
 - o Schools that choose to substitute vegetables for fruit at breakfast <u>one day per school week</u> may offer any vegetable, including a starchy vegetable.
 - Schools that choose to substitute vegetables for fruit at breakfast on two or more days per week are required to offer vegetables from at least two different vegetable subgroups.
 Refer to SP 02-2025 and SP 13-2025 for more information.
- <u>Sodium</u> The current sodium limits at breakfast and lunch will remain in place until July 1, 2027. Schools are encouraged to gradually work toward meeting future sodium requirements (7 CFR 210.10(c)). Visit the following website for more information:

https://www.fns.usda.gov/school-meals/nutrition-standards/sodium-limits.

Buy American – Schools' non-domestic food purchases must not exceed 10 percent of total annual commercial food costs as outlined in <u>7 CFR 210.21(d)(5)(ii)(A)</u> and <u>7 CFR 220.16(d)(5)(ii)(A)</u>. As outlined in recent guidance, State agencies have the ability to approve a temporary accommodation to those school food authorities that demonstrate they cannot meet the threshold requirement for non-domestic purchases <u>HNS 05-2025 Buy American Accommodation Plan.</u>

To assist schools in meeting the updated nutrition standards, the following resources are available from Team Nutrition and the Institute of Child Nutrition:

- Crediting Tip Sheets in Child Nutrition Programs
- Offering Meats and Meat Alternates at School Breakfast
- Reducing Added Sugars at School Breakfast
- Serving School Meals to Preschoolers
- The Whole Grain Resource for the National School Lunch and School Breakfast Programs
- Nutrition Standards for Added Sugars Fact Sheets

Access to USDA Foods, Local Food Purchasing, and Updates to the School Nutrition Standards

USDA Foods In Schools myFOODS Activation

SFAs must have an active status in myFOODS to utilize their entitlement dollars provided through the USDA Foods in Schools program for SY 2025-26. myFOODS is the online portal that collects entity-level information, including contact and billing information, as well as site-level delivery information required by the ADE contracted warehouse responsible for receiving and distributing Direct Delivery products. Returning operators should use the School Meals Application Checklist to ensure all activation activities are completed. The myFOODS activation must be completed prior to ordering materials from USDA Foods Direct Delivery or DoD Fresh. For SY 2025-26, an approved CNPWeb application is *not* required prior to ordering.

SFAs that have not previously accessed their entitlement for USDA Foods in Schools may do so at any time. SFAs will contact HNS to discuss the entitlement program, obtain login credentials, and begin the process of establishing a myFOODS account and delivery site(s).

Procuring Local Foods using Geographic Preference Expansion

As detailed in <u>SP 22-2024: Geographic Preference Expansion Related to the Final Rule titled, Child Nutrition Programs: Meal Patterns Consistent With the 2020- 2025 Dietary Guidelines for Americans, beginning July 1, 2024, CNP operators are permitted to use "locally grown", "locally raised", or "locally caught" as a specification when procuring unprocessed agricultural products for program meals, snacks, and milk. The implementation memo provides the following:</u>

• Use local as a specification (i.e., the written description of a product or service that a vendor must meet to be considered responsive to a solicitation) for local unprocessed agricultural products;

- Use a defined scoring advantage (e.g., additional credit or points given to local unprocessed agricultural products during the evaluation of responses to a solicitation) for local unprocessed agricultural products;
- Adopt a mix of both strategies; or,
- Elect not to use any of these approaches.

Additional Updates

Training for School Nutrition Programs

Annual Requirements: Effective July 1, 2015, SFAs must ensure that all new and current school nutrition program staff meet the minimum annual training requirements per USDA's Professional Standards regulations. These requirements were set forth to help employees enhance their knowledge, skills, and abilities specific to their position in NSLP. Because the trainings offered are vast in quantity and diverse in content, HNS has drafted specialized NSLP Training Curriculum based on job duties to help directors get started creating training plans for the year. For more information on Professional Standards, visit the NSLP Training Webpage, under the "Build Your Employee Training Plans" accordion.

Civil Rights Training is required annually to ensure all staff are aware of and understand the civil rights requirements. CNP operators must train: Staff each year, new employees before participating in program activities, and volunteers as are appropriate to their roles and responsibilities. HNS provides a Civil Rights Compliance for Child Nutrition Operators ONLINE COURSE (English) (Spanish). This training can count towards Professional Standards requirements.

School nutrition program directors, management, and staff tasked with National School Lunch Program procurement responsibilities must complete training on Federal procurement standards annually. HNS provides a <u>Procurement Basics</u> ONLINE COURSE. This training can count towards Professional Standards requirements.

HNS continues to offer our monthly Staying on Track webinar series that reviews key HNS communications sent over the past month to ensure SFAs are aware of all program updates and required tasks. Additionally, HNS offers multiple in-person workshops for SFAs throughout the year. When available, these opportunities are highlighted in the HNS Events Forecast and in the monthly Staying on Track webinar. Webinars and workshops may be registered for in the <u>ADE Professional Learning and Development (APLD)</u>.

Farm Fresh Challenge

Each year, HNS invites operators to join the Farm Fresh Challenge. This initiative aims to empower program operators by cultivating excitement for fresh, locally sourced foods. Participants are required to complete a series of challenges that encourage tasting, teaching, and connecting individuals to Arizona's local foods. HNS will hold the Farm Fresh Challenge in the month of April. This will allow operators time to strategically plan their challenge success!

upLIFT

The SY 2025-26 upLIFT initiative, "Plate to Palate, Transforming School Meal Perceptions" will be introduced for operators to LEARN about overcoming preconceptions of school meals to positively

impact public knowledge and appeal. It also aims to INSPIRE operators to collaborate with each other and their communities, FEED participants healthy, locally sourced meals, and TEACH the community about offering "Fresh Perspectives" in their meal service programs to give Directors practical strategies on how to promote and paint their programs in a positive light. The goal is to assist operators in improving the overall perception of school meals for students, staff, and the community, as well as enhance Arizona school meals by incorporating less processed foods. Monthly upLIFT webinars may be registered for in the <u>ADE Professional Learning and Development (APLD)</u>.

HelpDesk to Connect with HNS

ADE uses the ticketing system, HelpDesk, to receive, track, and respond to requests for various types of assistance. In addition to current options in the Service Request Catalog, including one-time exception requests, reimbursement claim/attendance factor issues, and the Add/Change/Delete Form, HNS will be expanding the options for SFAs to select. SFAs are encouraged to use HelpDesk when in need of any assistance from HNS; requests can be routed to the assigned HNS Specialist for the SFA. Unlike individual email-based requests, the HelpDesk provides the requester, responder, and management visibility to the request status, ongoing communications, and notifications related to the request. Access the HelpDesk by using the link: https://helpdeskexternal.azed.gov/ and follow the steps listed below to complete the form fields.

- Click the icon for 'New Request'
- Locate Health and Nutrition Services
- Choose from the drop-down options
- Complete all required fields and applicable optional fields
 - o Providing more detail in the request will help it to be routed to the appropriate staff member.
 - o Some fields cannot be edited.
- Drag and drop any related items into the Attachment box
- At the bottom of the form, click the blue button: 'Add Request'

The HelpDesk is part of the ADEConnect. Those who do not have an ADEConnect account will be prompted to create one.

Confidentiality and Disclosure of NSLP Eligibility Information

Students' NSLP/SBP eligibility information shall not be made available to all school officials as a general practice. SFAs are encouraged to review the resources and guidance pertaining to confidentiality and disclosure of student eligibility information located in Section 5 of the <u>Eligibility Manual for School Meals</u>.

The SFA may disclose children's <u>eligibility status only</u> to persons determined to be "directly connected" with the administration or enforcement of a Federal education program, State education program, or a means-tested nutrition program, as well as to persons directly connected with the Comptroller General Office or law enforcement for an authorized activity [7 CFR 245.6(f)(3)]. Although a program or person may be authorized under the National School Lunch Act to access students' free and reduced-price eligibility information, there must be a legitimate "need to know" to provide a service or carry out an authorized activity. Local Educational Agencies must ensure data systems, records, and other means of accessing a student's eligibility status are limited to officials

directly connected with administration or enforcement of a Federal or State program or activity [7 CFR 245.6(f)(3)(i)].

Arizona Educational Data Standards (AzEDS)

Beginning in SY 2024-25, public school districts and charter districts that participate in the National School Lunch Program (NSLP) and School Breakfast Programs and that report to the ADE Arizona Educational Data Standards (AzEDs) reporting system via their student information system will be required to populate new data fields for each student via the AzEDS enrollment record.

The new data fields are in the AzEDS Student School Food Service Program Association (SSFSPA) section. The subsection descriptors are "Eligibility Source" and "Eligibility Status". Students determined eligible for free or reduced-price meals must be reported based on the data source the SFA used to establish eligibility for the NSLP/SBP. The data sources are "Direct Certification," "USDA Income Application," or "Other Source Categorically Eligible". The data reported in the new SSFSPA will be used to calculate percentages of students eligible for Free or Reduced-Price meal benefits and, if applicable, for purposes of determining individual, student-level eligibility for 2026 SUN Bucks (Summer EBT) benefits. SFAs are encouraged to communicate with district or school staff regarding the new Student School Food Service Program Associations data fields in AzEDS and establish a policy and procedure to ensure the secure transmission of NSLP/SBP information and that confidentiality measures are in place.

Reminders:

- Enrolled students with paid eligibility status are NOT required to be reported in the SSFSPA section
- CACFP students should not be reported in the SSFSPA
- The Alternative Form for Income Based Eligibility does not convey eligibility for the NSLP/SBP
- The carryover period in the school meal programs may not be used to confer eligibility [7 CFR 292.7(c)]

In accordance with Federal civil rights law and U.S. Department of Agriculture (USDA) civil rights regulations and policies, the USDA, its Agencies, offices, and employees, and institutions participating in or administering USDA programs are prohibited from discriminating based on race, color, national origin, religion, sex, disability, age, marital status, family/parental status, income derived from a public assistance program, political beliefs, or reprisal or retaliation for prior civil rights activity, in any program or activity conducted or funded by USDA (not all bases apply to all programs). Remedies and complaint filing deadlines vary by program or incident.

Persons with disabilities who require alternative means of communication for program information (e.g., Braille, large print, audiotape, American Sign Language, etc.) should contact the State or local Agency that administers the program or contact USDA through the Telecommunications Relay Service at 711 (voice and TTY). Additionally, program information may be made available in languages other than English.

To file a program discrimination complaint, complete the USDA Program Discrimination Complaint Form, AD-3027, found online at How to File a Program Discrimination Complaint and at any USDA office or write a letter addressed to USDA and provide in the letter all of the information requested in the form. To request a copy of the complaint form, call (866) 632-9992. Submit your completed form or letter to USDA by: (1) mail: U.S. Department of Agriculture, Office of the Assistant Secretary for Civil Rights, 1400 Independence Avenue, SW, Mail Stop 9410, Washington, D.C. 20250-9410; (2) fax: (202) 690-7442; or (3) email: program.intake@usda.gov.

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