

June 2, 2020

The Honorable Pamilyn Miller
Administrator, Food and Nutrition Services
U.S. Department of Agriculture
1320 Braddock Place
Alexandria, VA 22314

Dear Administrator Miller:

We appreciate the U.S. Department of Agriculture Food and Nutrition Service's (USDA-FNS) responsiveness as schools and sponsors continue to operate emergency meal programs in response to COVID-19. The decision to extend the four nationwide waivers on May 15th – including Non-Congregate Feeding, Parent and Guardian Pick-Up, Meal Service Times, and Meal Pattern Flexibility – will help ensure communities are able to safely meet the nutrition needs of the families being hardest hit by the ongoing crisis.

While we commend USDA's strong leadership in supporting meal program providers by extending these waivers, it is important that the additional waivers and flexibilities issued in response to COVID-19 also remain in place and an option for all programs that need them until September 30, 2020. We ask that you extend all of the waivers that you have granted and to make the transition to summer seamless for state agencies, sponsors, as well as the community. This includes the following:

- **The area eligibility waivers are critical to ensuring that impacted families in all communities are able to access summer meals. Currently, all state-approved area eligibility waivers expire on June 30th. We ask that you proactively extend these waivers until September 30th in order to reduce the administrative burden on state agencies to reapply.** Allowing sites to provide meals in communities that do not meet the 50% area eligible threshold has been essential to reaching the children that may be newly eligible. This is especially important when over 30 million Americans have filed for unemployment in the last six weeks. There is no mechanism to take into account the impact of the economic crisis and document a community's current eligibility for summer meals.
- **The unanticipated school closure waiver through the summer is needed to ensure that meal sites continue to operate through the summer.** Since schools closed, school nutrition departments, local government agencies, and nonprofit organizations have been operating the Summer Food Service Program or the Seamless Summer Option. The sponsors and the meal sites are already operational and serving the community. The easiest, simplest, and best way for children to continue to access much-needed meals this summer is to extend the Unanticipated School Closure Waiver so that meal sites can continue to operate as they are operating today: without any additional administrative burden or work upon sponsors and state agencies. Otherwise, we will lose sponsors and the sites they serve as they struggle to go through the administrative process of applying to operate the summer meal programs, while at the same time operating them.
- **The waiver of the enrichment requirements for afterschool meals and snacks through the Child and Adult Care Food Program also should be extended through**

September 30th. Afterschool meals and snacks are not available during a typical summer vacation, so an additional nationwide waiver that allows these programs to continue to operate through the summer may be needed, depending upon the language in the unanticipated school closure waiver.

We urge USDA to use its full authority to quickly extend the rest of the nationwide waivers, and state-specific waivers such as area eligibility, until September 30, 2020, or at least August 31, 2020. Extending the waivers is not only in the interest of public health, it also provides consistency for families and eases the administrative burden on state child nutrition agencies and FNS staff. The urgency of extending these waivers now cannot be understated. Schools, local government agencies, and private nonprofits are making decisions today about whether or not they will continue to operate these programs this summer.

We appreciate your consideration of this request.

Signed:

AASA, The School Superintendents Association
Academy of Nutrition and Dietetics
Advocates for Better Children's diets
African American Health Alliance
Afterschool Alliance
Alliance to End Hunger
American Academy of Pediatrics
American Commodity Distribution Association
American Federation of Teachers
American Heart Association
American Public Health Association
American Society for Nutrition
Asian & Pacific Islander American Health Forum
Association of School Business Officials International (ASBO)
Boys & Girls Clubs of America
Bread for the World
Catholic Charities USA
Center for Ecoliteracy
Center for Law and Social Policy (CLASP)
Center for Science in the Public Interest
Children's Defense Fund
Coalition on Human Needs
Common Threads
Congregation of Our Lady of Charity of the Good Shepherd, U.S. Provinces
Congressional Hunger Center
Council of Administrators of Special Education
Council of Chief State School Officers
D.C. Hunger Solutions
Disciples Center for Public Witness
Feed the Children
Feeding America

First Focus on Children
Food Research & Action Center
FoodCorps
Forum for Youth Investment
FPWA
Girls Inc.
Healthy Food America
Laurie M. Tisch Center for Food, Education & Policy, Teachers College, Columbia University
LunchAssist
MAZON: A Jewish Response to Hunger
Meals on Wheels America
NAACP
National Advocacy Center of the Sisters of the Good Shepherd
National Association of Elementary School Principals
National Association of Councils on Developmental Disabilities
National Association of Secondary School Principals
National Association of State Directors of Special Education (NASDSE)
National CACFP Sponsors Association
National Commodity Supplemental Food Program Association
National Education Association
National Farm to School Network
National Health Care for the Homeless Council
National Human Services Assembly
National Milk Producers Federation
National PTA
National Recreation and Park Association
National WIC Association
National Women's Law Center
NETWORK Lobby for Catholic Social Justice
Network of Jewish Human Service Agencies
Partnership for America's Children
Public Advocacy for Kids (PAK)
RESULTS
Revolution Foods
Save the Children
Save the Children Action Network
School Nutrition Association
SchoolHouse Connection
Share our Strength
Society for Nutrition Education and Behavior
St. Lucie Public Schools
The Children's Partnership
The Education Trust
The Forum for Youth Investment
Trust for America's Health
UnidosUS
Union for Reform Judaism

Union of Concerned Scientists
United Way Worldwide
Urban School Food Alliance
World Vision
YMCA of the USA
ZERO TO THREE