

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 15<sup>th</sup> – 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 30<sup>th</sup>. We ask that you proactively extend these waivers until September 30<sup>th</sup> 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 30<sup>th</sup>.** 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