



August 14, 2020

The Honorable Sonny Perdue
Secretary of Agriculture
U.S. Department of Agriculture
1400 Independence Ave. SW
Washington, DC 20250

RE: Urgent Request to Address Child Hunger

On behalf of the District of Columbia, Maryland, and Virginia (DMV) region, we thank USDA for the agency's actions to extend the non-congregate, meal service time, meal pattern flexibility, and parent pick-up waivers through school year 2020-21. These flexibilities are critical to support schools and community-based organizations as they serve meals through the federal nutrition programs. However, additional key policies are necessary to allow schools, local government agencies, and community-based organizations to meet the unprecedented need of their communities.

Prior to the COVID-19 pandemic 77% of children in the District of Columbia, 43% of children in Maryland, and 46% of children in Virginia relied on free or reduced-price school meals for the nutrition needed to learn and thrive. This number has only increased as rates of unemployment escalate. From March 1 to July 4, 2020, more than 539,000 new unemployment insurance claims were filed in the region resulting in 16% of working age persons filing for unemployment.¹ Based on data from the Bureau of Labor Statistics, Feeding America estimates a long-term increase of 48% to 60% increase in food insecurity for the region.¹

Schools are a critical access point to nutritious meals for children and families. This fall, schools and public health officials are making difficult, but necessary, decisions to begin the 2020-21 school year with distance and hybrid models. Coupled with policies limiting travel outside the home and increasing food insecurity in the region (due in part to food cost inflation), all signs indicate that we must do everything possible to reduce barriers to federal nutrition programs for children or risk grave consequences.

We request urgent action from USDA to address the tremendous and rising rates of food insecurity among children and families in the DMV region and across the nation. Specifically, we

¹ Capital Area Food Bank. (2020). Hunger Report 2020: The State of Food Insecurity in Greater Washington. Retrieved from: <https://storymaps.arcgis.com/stories/e764da62715f4931985ee493e15e0dfc>

request that USDA use its existing waiver authority to take administrative action and make the following policy changes for the upcoming 2020-21 school year:

1) Allow the Summer Food Service Program (SFSP) and Seamless Summer Option (SSO) to be used to feed children during the upcoming school year.

- a. The School Breakfast Program (SBP) and National School Lunch Program (NSLP) are designed to provide meals to children at the school in which they are enrolled. However, when schools reduce the number of days students are physically in schools in response to pandemic related health concerns, children's access to school meals is greatly limited. Hybrid models of in-person and distance learning will be a reality for most schools in the DMV region this fall. For many of our students, their enrolled school is not the school nearest their home which creates additional barriers to accessing nutritious meals. USDA should allow schools, local government agencies, and private nonprofit organizations to provide meals through the child nutrition program that makes the most sense given the reality we face, and families should not have to be forced to travel long distances for access to school meals.
- b. In addition, limiting schools to the SBP and NSLP will require significant additional administrative burden than SFSP and SSO. Moreover, students certified for free or reduced-price meals will likely be those who take meals home for days not physically in school, thereby making it nearly impossible for schools to avoid the overt identification of these students.

2) Expand the non-congregate waiver to include SFSP and the SSO.

- a. Without a non-congregate option in SFSP and SSO, schools and non-school sponsors will face not only administration challenges but also safety concerns related to social-distancing in serving meals when children are not at school. Non-school sponsors across the DMV rose to meet tremendous need when schools unexpectedly closed in March. As mentioned, many of our students live far from the school in which they are enrolled, and with children likely to spend even more time out of school this fall, non-school sponsors must have the ability to meet the needs of their communities.
- b. Schools would be negatively impacted by the exclusion of the SFSP and SSO. Under the current flexibilities, schools must design and implement a system for connecting meals to families not physically present in schools. Additional costs related to delivery or the complexities of requiring families to pick-up meals are real. Additionally, families with children attending different schools would require multiple pick-ups burdening in both cost and risk of virus exposure.

3) Extend the Area Eligibility waiver for SFSP and SSO through the school year.

- a. Since March, the DMV region has seen the incredible benefit of providing meals in communities that do not meet the 50% area eligibility threshold. So many children are newly eligible due to the economic impacts of the COVID-19 pandemic that pre-pandemic eligibility cannot be relied upon for accuracy.

Moreover, this policy would ensure children are not overtly identified as eligible for free or reduced priced meals.

4) Waive the Afterschool Activity Requirement for the Afterschool Meal and Snack Programs available through the Child and Adult Care Food Program (CACFP) and NSLP.

- a. Children rely on schools and community-based programs for nutritious suppers and snacks. Requiring an activity component does not support necessary social distancing health and safety practices. By waiving this requirement, more sponsors would be able to serve meals and snacks to children in their communities. If waived, schools could also plan to provide suppers through non-congregate pick-up or delivery combined with breakfasts and lunches already being served.

The policies outlined above describe actionable ways the USDA can increase access to crucial, nutritious meals for children in the DMV region and across the nation immediately. Our region has seen a sizeable increase in need since the start of the pandemic without any decline, and we know children will continue to rely on schools, local governments, and community-based organizations for healthy meals throughout the school year. We must do better to protect the health and wellbeing of children while also curbing the public health and economic impacts of the COVID-19 pandemic. No child should go hungry, and with your leadership, we can ensure all children in the DMV region have enough food to eat so they can learn and thrive.

Respectfully,



Beverley Wheeler, Ed.D
Director
D.C. Hunger Solutions



Michael J. Wilson
Director
Maryland Hunger Solutions



Salaam Bhatti
Director
Virginia Hunger Solutions

CC: Pat Dombroski, Regional Administrator, USDA Mid-Atlantic Regional Office

Signed:

District of Columbia

Capital Area Food Bank
Children's Law Center
City Blossoms
DC Central Kitchen
DC Dyslexia DC
DC Family Council
DC Fiscal Policy Institute

DC Greens
DC KinCare Alliance
DC Senior Advisory Coalition
East River Family Strengthening Collaborative
Empower DC
Everyone Home DC
Food & Friends
Good Food Markets
Iona Senior Services
Martha's Table
Momentum Dance Theatre
Palisades Village
Posirtive Force DC
Restaurant Opportunities Centers Of DC
RESULTS DC
Roots Public Charter School
SOME, Inc. (So Others Might Eat)
SPACeS In Action
The Fair Budget Coalition
VeRT
Washington Area Women's Foundation
We Are Family Senior Outreach Network

Maryland

Allegany County Board of Education
Brookletts Place Talbot County Senior Center
CASH Campaign of Maryland
Charity Outreach, Inc.
Community Reach of Montgomery County
Critical Issues Forum
Crossroads Community Food Network
Healthy Harford
Hurlock United Methodist Church
Indigent Services Group, Inc.
Laurel Advocacy and Referral Services, Inc.
Main Street
Manna Food Center
Maryland Center on Economic Policy
Maryland Nonprofits
Marylanders Against Poverty
MHP Montgomery Housing Partnership
MOCO Movement Center
Montgomery County Community Action Board
Montgomery County Food Council

Prince George's County Food Equity Council
Public Justice Center
The Episcopal Diocese of Maryland
The People's Community Baptist Church
Up 2 Us Foundation
Virtues Matter
Wicomico County Public Schools Food and Nutrition Services Department

Virginia

Action in Community Through Service
Arlington Friends of Urban Agriculture
Federation of Virginia Food Banks
Greater Richmond Fit4Kids
Local Environmental Agriculture Project
Local Food Hub
Northside Strong
The Good News Community Kitchen
Virginia Academy of Nutrition and Dietetics