

Wednesday, April 29, 2020

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

Ms. Pam Miller, Administrator  
Food and Nutrition Service  
U.S. Department of Agriculture  
3101 Park Center Drive  
Alexandria, VA 22302

Dear Mr. Secretary and Ms. Miller,

We, the undersigned organizations, thank you for the efforts you have already taken to implement important provisions within the Families First Coronavirus Response Act (FFCRA) and the Coronavirus Aid, Relief, and Economic Security Act (CARES Act) to ensure that kids have access to the nutrition they need to grow and thrive during this pandemic.

Summer meal sponsors are already planning for operations this summer and program participation deadlines are quickly approaching. In absence of certainty from USDA about whether various program requirements will continue to be waived, sponsors, especially those facing the risk of continued social distancing measures, may be forced to refrain from program participation this summer. As a result, vulnerable children will have decreased access to critical nutrition at a time of unprecedented need.

Therefore, we urge you to proactively and fully exercise the authority granted to you by the FFCRA to extend all of the COVID-19 Child Nutrition Response waivers listed below through September 30, 2020, allowing Summer Food Service Program (SFSP) and National School Lunch Program Seamless Summer Option (SSO) operators as well as care providers participating in the Child and Adult Care Food Program (CACFP) to continue serving meals in the summer months.

- Nationwide Waiver to Allow Meal Service Time Flexibility in the Child Nutrition Programs
- Nationwide Waiver to Allow Non-congregate Feeding in the Child Nutrition Programs
- Nationwide Waiver of the Activity Requirement in Afterschool Care Child Nutrition Programs
- Nationwide Waiver of Onsite Monitoring Requirements in the School Meals Programs
- Nationwide Waiver to Allow Meal Pattern Flexibility in the Child Nutrition Programs
- Nationwide Waiver to Allow Parents and Guardians to Pick Up Meals for Children
- Nationwide Waiver of Monitoring Requirements for CACFP Sponsors
- Nationwide Waiver of Onsite Monitoring Requirements for CACFP State Agencies
- Nationwide Waiver of Onsite Monitoring Requirements for SFSP Sponsoring Organizations
- Nationwide Waiver of Onsite Monitoring Requirements for SFSP State Agencies

Immediate action by USDA to extend these waivers is necessary to ensure that schools, sponsoring organizations and care providers can plan for the summer and continue serving children in these exceptionally challenging circumstances.

### **Exercise Existing Waiver Authority to Extend Current Waivers Until September 30, 2020**

While USDA has linked its current waivers to the federal public health emergency declared by the Secretary of Health and Human Services or Homeland Security, Congress did not similarly limit USDA's authority in FFCRA. Section 2202(a)(1)(B) of the COVID-19 Child Nutrition Response Act, Title II of FFCRA, authorizes nationwide waivers for the purposes of operating the child nutrition programs with appropriate safety measures with respect to COVID-19 as determined by the Secretary. This authority does not expire until September 30, 2020.

As we come to understand the long-term outlook and lasting effects of the coronavirus pandemic, we encourage USDA to proactively exercise its full authority to extend current waivers until September 30, 2020. Doing so will support vulnerable children and the organizations that have been working hard to "do right and feed everyone."

### **Local Flexibility Will Remain Necessary Throughout the Summer**

Although the federally-declared public health emergency may be lifted in the coming weeks, local social distancing requirements are likely to prevent schools and non-profit organizations from operating traditional summer meals sites, which require children to be served in group ("congregate") settings, into the summer months. And, once social distancing requirements are lifted, it will be too late to establish and initiate traditional summer meal site operations, especially since many states and localities are unable to process background checks or conduct health and safety inspections at this time and will face large backlogs. Similarly, local social distancing requirements may cause child care centers and homes to remain closed to all but the children of essential workers. As a result, the non-congregate waiver will need to be extended to ensure that children can continue receiving meals in ways that mitigate the spread of COVID-19—for example, through the receipt of multiple days of meals at one time.

Extending other waivers will also be necessary to support operations when social distancing measures are in place to protect staff and the public. This includes waivers from the meal service time requirements and the meal pattern requirements as well as the permission to distribute meals to parents or guardians on behalf of eligible children.

### **Proactive Action to Extend Waivers is Necessary Today**

In order to effectively plan, schools and organizations that have been working tirelessly to feed children during school closures due to COVID-19 need immediate certainty that these waivers will continue through at least September 30, 2020.

State application deadlines for SFSP and SSO are rapidly approaching, and organizations must make decisions about budgets, staffing levels, sites, vendors and other operational necessities as soon as possible. These decisions rely on timely, proactive guidance from USDA, especially when many schools and non-profit organizations are not in a position to take financial risks if any

of the waiver guidance changes before or during the course of their summer operations. Moreover, the continuity of these waivers will minimize confusion and ensure that hungry kids are able to safely access the nutrition they need in the coming months.

By extending existing child nutrition waivers, you will be ensuring that states, program operators and the children they serve have the certainty they need at this difficult time.

Thank you for your consideration and action on behalf of children across the country

Sincerely,

Academy of Nutrition and Dietetics, Washington, DC  
Action for Healthy Kids, Chicago, IL  
Alameda County Community Food Bank, Oakland, CA  
Alaska School Nutrition Association, Juneau, AK  
Alliance for a Healthier Generation, Portland, OR  
Alpine Union School District, Alpine, CA  
Ambridge Area School District, Ambridge, PA  
American Patriot Sales, Norwood, MA  
Apple Valley Unified School District, Apple Valley, CA  
Archdiocese of Philadelphia Nutritional Development Services, Philadelphia, PA  
Arizona Food Bank Network, Phoenix, AZ  
Arkansas Hunger Relief Alliance, Little Rock, AR  
Armstrong School District's Blessings in a Backpack Program, Ford City, PA  
ARTS-U's, Saint Paul, MN  
Arway LLC, Saint Paul, MN  
Ashland City Library, Ashland, KS  
Association of State Public Health Nutritionists, Tucson, AZ  
Avondale Elementary School District #44, Avondale, AZ  
Azusa Unified School District, Azusa, CA  
Baldwin Park Unified School District, Baldwin Park, CA  
Beaver County Library System, Aliquippa, PA  
BeechNut, Amsterdam, NY  
Berea Kids Eat, Berea, KY  
Berlin Recreation & Parks Department, Berlin, NH  
Big Brothers Big Sisters Twin Cities, St. Paul, MN  
Seaford School District Nutrition Services, Seaford, DE  
Boys & Girls Club of Greater Dubuque, Dubuque IA  
Boys & Girls Clubs of Larimer County, Fort Collins, CO  
Brandon Valley School District, Brandon, SD  
Bridgeport School District, Bridgeport, OH  
Bridges Back Pack Program, Valley City, ND  
Bright Local School District, Mowrystown, OH  
Bright Nutrition, Brownsville, TX  
Building a Better 2morrow, Marrero, LA  
Burke County Public Schools, Waynesboro, GA  
Burlington Methodist Church, Burlington, KS  
Caledonia Area Public Schools, Caledonia, MN

Cambria County Child Development, Ebensburg, PA  
Camp Chabad, Beachwood, OH  
Canton Calvary Mission, Canton, OH  
Caroline County Public Schools, Denton, MD  
Cecil County Public Schools, North East, MD  
Center for Ecoliteracy, Berkeley, CA  
Central Arkansas Library System, Little Rock, AR  
Central Community House, Columbus OH  
Centro Community Hispanic Association, Long Beach, CA  
Centro Tyrone Guzman, Minneapolis, MN  
Chambersburg Area School District, Chambersburg, PA  
Champaign Unit 4 School District, Champaign, IL  
Child Care Connections, Bozeman, MT  
Children's Aid, New York, NY  
Children's Hunger Alliance, Columbus, OH  
City of Columbus Recreation and Parks Department, Columbus, OH  
CitySquare, Dallas, TX  
Clearfield County League on Social Services, Hyde, PA  
Clintonville-Beechwood Community Resources, Columbus, OH  
Corporation for Ohio Appalachian Development/RSVP of the Ohio Valley, Jackson, OH  
Coffey County Library-LeRoy Branch, LeRoy, KS  
Coffey County Library-Gridley Branch, Gridley, KS  
Columbia Heights Library, Columbia Heights, MN  
Columbus Metropolitan Library, Columbus, OH  
Columbus Urban League, Columbus, OH  
CommonBond Communities, Saint Paul, MN  
Community Action Council of Portage County, Inc., Ravenna, OH  
Community Action Partnership of Strafford County, Dover, NH  
Community Compassion Network, Mt. Pleasant, MI  
Community Food Advocates NYC, New York, NY  
Community Food Bank of Eastern Oklahoma, Tulsa, OK  
Community Kitchen of Monroe County, Inc., Bloomington, IN  
Community Refugee & Immigration Services, Columbus, OH  
Connellsville Area School District, Connellsville, PA  
Cordova School District, Cordova, AK  
Culver City Unified School District, Culver City CA  
DataHash LLC, Ann Arbor, MI  
Delaware City Schools Food Services, Delaware, OH  
Delta Fresh Foods Initiative, Hernando, MS  
Delta Upsilon Fraternity - Wichita Chapter, Wichita, KS  
Departamento Educacion-Agencia Estatal, Region Hormigueros, PR  
Dillard University, New Orleans, LA  
Dixon School, Dixon, MT  
East Clinton Local Schools, Sabina, OH  
East Hampton Public Schools, East Hampton, CT  
East Haven Public Schools, East Haven, CT  
East St Tammany Rainbow Child Care Center, Inc., Slidell, LA  
Eatonville Family Agency, Eatonville, WA

Educational Empowerment Group, Rittman, OH  
EJs Warrior Karate Academy, Columbus, OH  
El Monte Union High School District, El Monte, CA  
El Puente High School, Milwaukee, WI  
End Child Hunger SC, Columbia, SC  
Equal Heart, Dallas, TX  
Escondido Union High School District, Escondido, CA  
Extended Hands Community Outreach, Inc., West Palm Beach, FL  
Fairborn City Schools, Fairborn, OH  
Fairfield Community School District, Fairfield, IA  
Farm to Institution Center at Community Health Improvement Partners, San Diego, CA  
Fayette County Public Schools, Lexington, KY  
Feeding Kentucky, Frankfort, KY  
Feeding San Diego, San Diego, CA  
Feeding Texas, Austin, TX  
Feeding the Gulf Coast, Theodore, AL  
Findlay City Schools Food Service Department, Findlay, OH  
First Lutheran Church, Enderlin ND  
First United Methodist Church, Norton, KS  
Florence Independent School District, Florence, TX  
Florida Impact to End Hunger, Tallahassee, FL  
Florida School Nutrition Association, Tallahassee, FL  
Food & Nutrition Solutions, Lufkin, TX  
Food Bank for Larimer County, Loveland, CO  
Food Bank for the Heartland, Omaha, NE  
Food Gatherers, Ann Arbor, MI  
FoodCorps, New York, NY  
Franklin Park Conservatory and Botanical Gardens, Columbus, OH  
Frederick County Public Schools, Frederick, MD  
Fremont City Schools, Fremont, OH  
Friendship Academy of the Arts, Minneapolis, MN  
Full Plates Full Potential, Portland, ME  
Gaffney Law Firm, P.C., Sewickley, PA  
Galax High & Middle Schools, Galax, VA  
Garvey Elementary School District, Rosemead, CA  
Genesis Garden, Macomb, IL  
Georgetown County School District, Georgetown, SC  
Gethsemane Church of God in Christ (Gethsemane LaPetite), Mt Rainier, MD  
Giles County Public Schools, Pearisburg, VA  
Girls First, Inc., Stockbridge, GA  
Glendale Unified School District, Glendale, CA  
Great Plains Food Bank, Fargo, ND  
Greater Chicago Food Depository, Chicago, IL  
Greater Cleveland Food Bank, Cleveland, OH  
Greater Fall River RE-CREATION, Fall River, MA  
Greater Pittsburgh Community Food Bank, Duquesne, PA  
Greenfield Exempted Village School, Greenfield, OH  
Greenville County Schools, Greenville, SC

Groundwork Ohio, Columbus, OH  
Hampton City Schools Food & Nutrition Services, Hampton, VA  
Harrisonburg City Public Schools, Harrisonburg, VA  
Hawai'i Alliance for Community-Based Economic Development, Honolulu, HI  
Hawaii Appleseed Center for Law and Economic Justice, Honolulu, HI  
Hawaii Community Foundation, Honolulu, HI  
Hawaii Island Food Alliance, Hilo, HI  
Hawthorne School District, Hawthorne, CA  
Healthy Communities of the Capital Area, Gardiner, ME  
Henry County Public Schools Nutrition Programs, Martinsville, VA  
Hillsboro City Schools, Hillsboro, OH  
Holly Creek School, Broken Bow, OK  
Houston Food Bank, Houston, TX  
HPC Foodservice, South Windsor, CT  
Hudson School District, Hudson, WI  
Hummingbird Child & Adult Nutrition, Mission, TX  
Hunger Free America, New York, NY  
Hunger Intervention Program, Seattle, WA  
Hunger Solutions New York, Albany, NY  
Hunger Task Force, Milwaukee, WI  
Illinois School Nutrition Association, DeKalb, IL  
Indiana Alliance of Boys & Girls Clubs, Indianapolis, IN  
Jackson Metropolitan YMCA, Clinton, MS  
Jamestown Parks and Recreation, Jamestown, ND  
Tri Valley Opportunity Council, Inc., Crookston, MN  
Jessamine County Schools, Lexington, KY  
Jewish Family Service of Colorado, Denver, CO  
JJ Cassone Bakery, Inc., Port Chester, NY  
Jump Start Breakfast Honolulu, HI  
Junior Millennium DCC, Baltimore, MD  
Kapiolani Community College Culinary Arts Department, University of Hawaii, Honolulu, HI  
Kalispell School District 5, Kalispell, MT  
Kansas Food Bank, Wichita, KS  
Karns City Area School District, Karns City, PA  
Kent County Public Schools, Rock Hall, MD  
Kentucky Youth Advocates, Louisville, KY  
Kids at their Best, Loglane, CO  
Kincaid Community Library, Kincaid, KS  
Kings Local School District, Kings Mills, OH  
Kiski Area School District, Leechburg, PA  
La Crosse Area Family YMCA, La Crosse, WI  
La Mesa-Spring Valley School District, Spring Valley, CA  
Labette Health, Parsons, KS  
Lake Andes Carnegie Public Library, Lake Andes, SD  
Lawrence County Social Services, Inc., New Castle, PA  
Lawrence County Community Action Partnership, New Castle, PA  
Leechburg Area School District, Leechburg, PA  
Lessie Bates Davis Neighborhood House Inc., East St. Louis, IL

Lide White Memorial Boys & Girls Club, Madison, IN  
Lincoln County Department of Education, Lynchburg, TN  
Lincolnview Local Schools, Van Wert, OH  
Little Rock School District, Little Rock, AR  
Live Well Geary County, Junction City, KS  
Local Food Dude, Torrington, CT  
Lockland School District, Cincinnati, OH  
Los Angeles Unified School District Food Services Division, Los Angeles, CA  
Louisa County Schools, Mineral, VA  
Louisiana Budget Project, Baton Rouge, LA  
Lowcountry Food Bank, Charleston, SC  
Lucia Mar Unified School District, Arroyo Grande, CA  
Lunch 4 Learning Parent Caucus, New York, NY  
LunchAssist, West Hollywood, CA  
Lynchburg City Schools, Lynchburg, VA  
Madison County Food Service, Richmond, KY  
Madison-Plains Local School District, London, OH  
Maine Children's Alliance, Augusta, ME  
Maine School Administrative District 52, Turner, ME  
Marion City Schools, Marion, OH  
Marquardt School District, Glendale Heights, IL  
MAZON: A Jewish Response to Hunger, Los Angeles, CA  
McHenry School District 15, McHenry, IL  
Meriden Public Schools, Meriden, CT  
Mesa County Valley School District 51, Grand Junction, CO  
Metro Nashville Public Schools Nutrition Services, Nashville, TN  
Metropolitan YMCAs of Mississippi, Flowood, MS  
Middletown City School District, Middletown, OH  
Milford Exempted Village Schools, Milford, OH  
Minneapolis Central Library, Minneapolis, MN  
Mollen Foundation, Phoenix, AZ  
Monroe Family YMCA, Monroe, MI  
Morgan County Schools, Wartburg, TN  
Morning Star Learning Center, Schoharie, NY  
Medical University of South Carolina, Charleston, SC  
Natchitoches Parish Office of Community Services, Natchitoches, LA  
National CACFP Sponsors Association, Round Rock, TX  
National Farm to School Network, Chicago, IL  
National Kidney Foundation of Michigan, Detroit, MI  
National School Boards Association, Alexandria, VA  
Glendora Unified School District, Glendora, CA  
Nebraska Appleseed Center for Law in the Public Interest, Lincoln, NE  
Nebraska Department of Education, Lincoln, NE  
Ness County Health Department, Ness City, KS  
New Hope Baptist Church, Windham, OH  
New Mt. Calvary MB Church, Chicago, IL  
Noble Network of Charter Schools, Chicago, IL  
North East Independent School District, San Antonio, TX

North Texas Food Bank, Plano, TX  
Northern Illinois Food Bank, Geneva, IL  
Northridge Local Schools, Dayton, OH  
Northwest Local School District, Cincinnati, OH  
Norwalk La Mirada School District, Norwalk, CA  
Oceanside Unified School District, Oceanside, CA  
Ohio Education Association, Columbus, OH  
Open Hands Outreach Ministries Inc., Shreveport, LA  
Orting Food Bank, Orting, WA  
Our Community Cares Camp, Inc., Richmond, VT  
Our Little Helpers, Inc., View Park, CA  
Our Savior's Lutheran Church, Hillsboro, ND  
Parents and Children Together, Honolulu, HI  
Partners Aligned Toward Health, Burnsville, NC  
Partners for a Hunger-Free Oregon, Portland, OR  
Pasadena Unified School District, Pasadena, CA  
Pec Pantry, Blanchardville, WI  
Pender County Schools, Burgaw, NC  
Philanthropy Ohio, Columbus, OH  
Pilgrim Rest Missionary Baptist Church, Union City, TN  
Piqua City Schools, Piqua, OH  
Prairie Ridge Community Coalition, Bonney Lake, WA  
Prince Edward County Public Schools, Farmville, VA  
Princeton City Schools, Cincinnati, OH  
Project Bread, Boston, MA  
Quabbin Regional School District, Barre, MA  
Rabun County Family Connection Clayton, GA  
Ramona Unified School District, Ramona, CA  
Ramsey County Library, Maplewood, MN  
Randolph County Caring Community Partnership, Moberly, MO  
RealTime Solutions, Becker, MN  
Regional Food Bank of Oklahoma, Oklahoma City, OK  
Rhode Island Department of Education, Providence, RI  
RI Healthy Schools Coalition, Barrington, RI  
Rialto Unified School District, Rialto, CA  
Rich Products, Buffalo, NY  
River Springs Charter School, Temecula, CA  
RSU #54/MSAD #54 School District, Skowhegan, ME  
San Antonio Independent School District, San Antonio, TX  
San Diego Unified School District, San Diego, CA  
San Ramon Valley Unified School District, Danville, CA  
Santa Clara Unified Santa Clara Unified School District, Santa Clara, CA  
Santa Rosa City Schools, Santa Rosa, CA  
Save the Children, Washington, DC  
Sbc Global Consultants Plc, Buffalo, NY  
Schealthness, Inc., Columbus, OH  
School District of Philadelphia, Philadelphia, PA  
School District of Superior, Superior, WI



School Nutrition Association of Connecticut, Glastonbury, CT  
Scott County Schools Nutrition Services, Georgetown, KY  
Second Harvest Food Bank of Northeast Tennessee, Kingsport, TN  
Second Harvest Heartland, Brooklyn Park, MN  
Selma Unified School District, Selma, CA  
Serving Our Neighbors Ministries Inc., Hilliard, OH  
Seven Baskets Community Development Corp., Hilliard, OH  
Seymour Public Schools, Seymour, CT  
Share Our Strength, Washington, DC  
Somali Community Association of Ohio, Columbus, OH  
SON Ministries, Upper Arlington, OH  
Southwest Human Development Services, Austin, TX  
Southwest Region Schools, Dillingham, AK  
Southwestern Ohio Educational Purchasing Council, Vandalia, OH  
Spotsylvania County Public Schools, Fredericksburg, VA  
Springboro Community City Schools, Springboro, OH  
Squaxin Island Tribe, Shelton, WA  
St. John AME Church, Eufaula, AL  
St. James Church, St. Louis, MO  
St. Leo Food Connection, Tacoma, WA  
St. Luke Memorial Church Kansas City, MO  
St. Michaels Community Center, St. Michaels, MD  
St. Vincent de Paul of Baltimore, Baltimore, MD  
Stokes County School Nutrition, Lawsonville, NC  
Stutsman County EFNEP and FNP, Jamestown, ND  
Sullivan County Head Start, INC, Woodbourne NY  
Taft City School District, Taft, CA  
Tarrant Area Food Bank, Fort Worth, TX  
Temple City Unified School District, Temple City, CA  
The Capital Area Food Bank, Washington DC  
The Food Basket Inc. - Hawai'i Island's Food Bank, Hilo, HI  
The Glades Initiative, Inc., Belle Glade, FL  
The Greater Boston Food Bank, Boston, MA  
The Idaho Foodbank, Boise, ID  
Thompson School District R2J, Loveland, CO  
Three Rivers Local Schools, Cleves, OH  
Three Square Food Bank, Las Vegas, NV  
Thurston Foods Inc., Wallingford, CT  
Tipton County Board of Education, Covington, TN  
Total Man Community Development Corporation, Kansas City, MO  
Trinity Area School District, Washington, PA  
Troup County Schools, LaGrange, GA  
Tusk Philanthropies, New York, NY  
Twin Cities RISE, Minneapolis, MN  
UMCFood, Latonia, KY  
United Methodist Church Union, Pittsburgh, PA  
United Way of Beaver County, Monaca, PA  
United Way of King County, Seattle, WA

United Way of Lawrence County, New Castle, PA  
United Way of Pierce County, Tacoma, WA  
Upper Arlington Lutheran Church, Columbus, OH  
Urban Minority Alcoholism and Drug Abuse Outreach Program of Franklin County,  
Columbus, OH  
Urban School Food Alliance, New York, NY  
Utahns Against Hunger, Salt Lake City, UT  
Valley Center-Pauma Unified School District, Valley Center, CA  
Valley of the Sun United Way, Phoenix, AZ  
Valley View School District 365U, Romeoville, IL  
Voices for Children in Nebraska, Omaha, NE  
Wade's Dairy Inc., Bridgeport, CT  
Wapakoneta City Schools, Wapakoneta, OH  
Washington Court House City Schools, Washington Court House, OH  
Washington Local Schools, Toledo, OH  
Watson Chapel School District, Pine Bluff, AR  
Wayne Trace Local Schools, Haviland, OH  
West Branch Community Schools, West Branch, IA  
West Fargo Educational Foundation, West Fargo, ND  
West Fargo Public Library, West Fargo, ND  
Western Plains USD 106 South, Bazine, KS  
Westerville Area Resource Ministry, Westerville, OH  
Willard City Schools, Willard, OH  
Windham Southeast Supervisory Union, Brattleboro, VT  
Windward Nazarene Academy, Kaneohe, HI  
Worthington Resource Pantry, Columbus, OH  
YMCA of Central Ohio, Columbus, OH  
YMCA of Greater San Antonio, San Antonio, TX  
YMCA of Metropolitan Chattanooga, Chattanooga, TN  
Youngstown City Schools, Youngstown, OH  
Youth Empowerment Project of Sharpsburg, Sharpsburg, PA  
Youthprise, Minneapolis, MN  
YWCA Ulster County, Kingston, NY