



**FOR YOUTH DEVELOPMENT[®]
FOR HEALTHY LIVING
FOR SOCIAL RESPONSIBILITY**

August 3, 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 Oregon Alliance of YMCAs, thank you for the nationwide child nutrition program waiver flexibilities offered in response to the coronavirus pandemic. Your leadership and actions have been critical to ensuring that children have access to the nutritious meals they need at a time of unprecedented food insecurity. We have provided nearly 200,000 meals during this crisis.

As schools and community programs prepare for the upcoming school year, it is becoming increasingly clear that most students will not be at school five days a week with consistent access to school breakfast and lunch each day. While USDA's timely leadership in extending several nationwide waivers until June 30, 2021 is an important first step, the current scope of the available flexibilities fails to address the reality facing many school nutrition departments and non-school child nutrition program sponsors like YMCAs.

With rates of food insecurity rising due to COVID-19 and many school districts implementing fully remote school models, communities urgently need additional flexibility to efficiently and to easily provide meals to children at school, to send meals home with children when they are not at school, and to provide meals at community sites closer to children's homes.

We ask that USDA use its existing waiver authority available through the Families First Coronavirus Response Act to extend the following waivers to ensure continued access to meals during this time:

1. **Allow the Summer Food Service Program (SFSP) and Seamless Summer Option (SSO) to be used to feed children during the upcoming school year.** As more states announce plans for remote or hybrid learning days, it is critical that schools, local government agencies, and private nonprofit organizations are able to provide meals through the child nutrition program that makes the most sense given the unprecedented circumstances.

Oregon Alliance of YMCAs

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Allowing schools and non-school sponsors to serve meals through SFSP or SSO will:

- limit overt identification; reduce the administrative burden;
 - allow efficient meal distribution at the location that makes the most sense for families;
 - support non-school sponsors that care for school-aged children during remote learning days; and
 - provide a level of reimbursement more commensurate with the costs of the service models required during a pandemic.
2. **Extend all nationwide waivers for SFSP and SSO, including the non-congregate and area eligibility waiver, through the school year.** Allowing sites to provide meals in communities that do not meet the 50% free or reduced-price threshold for area eligibility has been essential to reaching children who may be newly eligible during the pandemic. Extending all nationwide waivers for the SFSP and SSO -- including the non-congregate, meal service time, parent meal pick-up, and area eligibility waivers -- and allowing schools and sponsors to use these programs will help not only reduce barriers to participation during remote school days but also the administrative burden on sponsors and schools. It also will ensure that children who are certified for free or reduced-price school meals are not overtly identified.
 3. **Waive the Afterschool Activity Requirement for the Afterschool Meal Program and the Snack Programs available through CACFP and NSLP.** While the current non-congregate waiver extension includes the Afterschool Meal and Snack Programs, it does not waive the activity requirement for providing afterschool meals and snacks. To ensure access to the suppers and snacks provided through CACFP, it is imperative to waive the afterschool activity requirement when programming isn't possible. Waiving the afterschool activity requirement is also critical for those schools that plan on providing suppers through non-congregate methods on days when school is and is not in session, as they can be combined with the breakfasts and lunches already being provided.
 4. **Allow those providing meals through the Summer Food Service Program or Seamless Summer Option to also utilize Afterschool Meal and Snack Programs.** This approach, which was allowed through the unanticipated school closure waiver and further clarified through Q&A guidance issued by USDA, has been critical to ensuring that children receive three meals a day. If schools were operating under normal schedules, children are eligible for breakfast, lunch, supper, and snack through the child nutrition programs. This level of service should continue to be available.
 5. **Extend Fresh Fruit and Vegetable Program flexibilities and waivers through the school year.** Flexibilities and waivers issued by USDA allowed schools to continue to operate this program during COVID closures by waiving previous requirements including the snack needing to be served in a congregate setting, during the school day, with a child present, and only a single serving. As a result, schools were able to provide innovative ways to serve fresh produce including multi-day servings and fresh produce packs. USDA guidance issued in April 2020 indicated that unspent 2019-2020 dollars could be rolled over to 2020-2021 school year. However, as many schools will still be offering alternative meal distribution in the new school year, these dollars will be unable to be spent without waiver extension.

We appreciate your consideration of this request.

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