May 29, 2020

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

Re: Child Nutrition Program Flexibilities

Dear Secretary Purdue:

On behalf of the Arizona Food Bank Network (AzFBN), I am writing to thank you for extending key waivers allowing Child Nutrition Program flexibilities through August 31, 2020. Based on feedback from our school nutrition partners across Arizona (see survey details below), I also urge you to extend the Meal Pattern waiver nationally and approve the Arizona Department of Education’s (ADE’s) request to extend the Area Eligibility waiver.

We appreciate the announcement on May 15 that USDA extended flexibilities for emergency meals to continue through summer, extending the critical non-congregate feeding, meal time, and parent pickup waivers through August 31, 2020. With hundreds of thousands of Arizonans finding themselves suddenly unemployed amid the economic crisis caused by the COVID-19 public health emergency, the availability of these meals has become even more crucial. The work by the ADE, the School Nutrition Association of Arizona (SNAAZ), school districts, food service employees, food banks, community partners, and other stakeholders in converting school and summer meal programs to grab-and-go models has been a bright spot in the effort to prevent hunger during these unprecedented times.

In a survey AzFBN sent to all Arizona school sites participating in the National School Lunch Program, roughly 85 percent of the 210 sites that responded supported the extension of the non-congregate feeding waiver and the ability for parents to pick up meals on their child’s behalf. More than two-thirds of respondents support extending the meal pattern waiver and more than half want to see the area eligibility waiver extended as well. Many districts have had difficulty sourcing certain items or types of food, and the meal pattern waiver allows them to supplement while still maintaining nutritional standards. The area eligibility waiver has allowed sites to distribute meals in areas that have fewer than 50 percent of their students receiving free or reduced-price meals. Many of these are still in “areas in which poor economic conditions exist.” A school nutrition director in one of Maricopa County’s more middle class neighborhoods stated that her busiest meal site is one that would not be eligible were it not for the Area Eligibility waiver. Letting the area eligibility waiver expire will result in disrupting meal service to children, including those newly affected by COVID-19-related economic hardship. To maintain
children’s access to meals and support families experiencing financial hardship, AzFBN urges the USDA to approve ADE’s request to waive the regulations at 7 CFR 225.14(c)(3) regarding area eligibility.

Many schools responded that the uncertainty of continuing their meal programs is a concern for both school finances and household food security for the families they serve. “It’s confusing to our parents to make this sudden change. This new feeding model has been really successful.” Schools also support Pandemic EBT as a way to “allow our families some flexibility in how, when, and where to source the nutrition they need to keep their kids healthy” and an ability ‘to give our families options, because our school is in a very food-limited area.”

**AzFBN therefore urges the USDA to extend the Meal Pattern waiver nationally and approve the Area Eligibility waiver requested by ADE.** These are critical to continuing to safely feed our children.

Thank you for your work to prevent hunger, especially child hunger, during the COVID-19 public health emergency and beyond. We look forward to your favorable consideration of this request so that schools may focus on their plans to safely reopen in the fall.

Sincerely,

Angie Rodgers
President and CEO