



July 21, 2020

The Honorable James Inhofe
The Honorable James Lankford
United States Senate
U.S. Capitol
Washington, D.C. 20510

The Honorable Kevin Hern
The Honorable Markwayne Mullin
The Honorable Frank Lucas
The Honorable Tom Cole
The Honorable Kendra Horn
United States House of Representatives
U.S. Capitol
Washington, D.C. 20515

Dear Members of the Oklahoma Congressional Delegation:

We appreciate your continued work and leadership to ensure Oklahoma children have access to school meal programs as Oklahoma schools face uncertainty due to COVID-19. The nationwide and state waivers issued by the USDA to date have been instrumental in supporting Oklahoma families and program operators as they adjust to the impacts of the pandemic. Child nutrition programs are vital components of food access for Oklahoma children. For example, Oklahoma schools served over 1.7 million meals during the early weeks of the pandemic.

As we prepare for a new school year, it is clear child nutrition programs will continue to face new and changing circumstances for the foreseeable future. Oklahoma will need new and continued access to several flexibilities for the Federal Child Nutrition Programs to ensure children maintain access to these critical and nutritious meals despite the instruction method their school or family has chosen.

Food insecurity rates are dramatically increasing due to the pandemic. Extending Pandemic EBT and certain child nutrition programs and flexibilities are key priorities shared by the

undersigned groups. We are asking you to include these items in the next COVID-19 response package considered by Congress to ensure the Federal Child Nutrition Programs are flexible and responsive to the needs of our state and our communities and the challenges presented by the pandemic. Though the USDA has the authority to extend child nutrition program waivers, we believe including these flexibilities in the next response package will provide much-needed longer term clarity and stability for families, schools, and decision makers.

Pandemic EBT

The Pandemic EBT (P-EBT) program provides much-needed grocery assistance for households with children and provides much needed stimulus to local economies. The program is currently approved to issue funds to cover missed school meals from March to May 2020. P-EBT should be extended through the 2020-2021 school year to ensure students have access to this benefit should accessing school meals prove difficult.

Recommendations:

1. Extend the P-EBT program through December 31, 2021.
 - P-EBT can be especially beneficial to rural Oklahomans, as school bus routes will likely not run when/if a school is closed and driving to a school meal site miles away from home may not be possible for families. In addition, a school may need to temporarily close due to a COVID-19 outbreak, leaving Oklahoma children without adequate meal access.
2. Remove the requirement that schools must first be closed for a minimum of 5 days in order to issue the benefit.
 - Schools are taking a myriad of different approaches to instruction methods during the upcoming school year. Schools are less likely to broadly shut down as they did this Spring, so a different approach will be necessary to ensure children can still access meals despite the uncertainty in school operation levels.
3. Extend the P-EBT program to children accessing meals through the Child and Adult Care Food Program (CACFP).
 - Access to enough nutritious food is especially critical for young children and infants. child care centers will likely face similar closures and reduced capacities. These full or partial closures can lead to further loss of income for families that are already struggling with the economic impacts of the pandemic.

COVID-19 Child Nutrition Program Waivers

The USDA has already extended some of the most critical waivers through the 2020-2021 school year, including serving meals in a non-congregate setting and outside of normal service times, serving meals that do not meet meal pattern requirements, and parent or

guardian pick-up of school meals. While these waivers are critical to continued service, there are additional options needed to ensure continued program response to changing conditions.

Recommendations:

1. Ensure the ability of schools and community organizations to provide meals to children via the program that makes the most sense for their operations through the extension of the Summer Food Service Program (SFSP) and Seamless Summer Option (SSO).
 - Oklahomans will likely turn to close family or friends for childcare when the school year begins. This could mean a child who attends school at Yukon Public Schools might stay with a grandparent in the Oklahoma City Public Schools area, but will still need access to a nearby school meal grab-and-go site. Both SFSP and SSO programs, allow for cross-district meal access, which, since the beginning of the pandemic, allowed students to access these programs despite their location. However, both the National School Breakfast Program (SBP) and the National School Lunch Program (NSLP) do not currently allow schools to provide meals to students from other districts.
 - Utilizing SFSP/SSO through the upcoming school year ensures vital access to meals when families are not able to reach a school meal site. Maintaining use of SBP and NSLP does not allow non-school organizations to access federal reimbursement for meals provided.
 - Schools that utilize a remote or hybrid learning model this year will be negatively impacted if they are unable to utilize SFSP or SSO. Within the current scope of the waivers, schools will need to implement a system for allowing families to access meals when children are not physically present in school buildings, which could include asking families to pick-up meals. For families that have children attending different schools, this could mean picking up meals from multiple schools that are miles from home and miles from each other, an added burden and cost for struggling families that may face transportation barriers or who might be unable to access the meals due to parent or guardian work schedule.
2. Extend the afterschool activity waiver through August 31, 2021 to allow service of afterschool snacks and meals in a non-congregate setting and without the need for an enrichment activity.
 - While the non-congregate waiver extension includes CACFP and NSLP, it does not specifically mention the afterschool nutrition programs, nor does it waive the activity requirement for providing afterschool meals and snacks. When schools closed in the spring, a waiver of the afterschool enrichment activity was quickly issued. This ensured that schools, non-school sponsors, and out-of-

- school time programs were able to easily implement meal service even as they remained shuttered or at limited capacity.
- Although some school and community-based programs will be able to resume programming in the fall, many will not be able to operate at full capacity. To ensure access to the suppers and snacks provided through CACFP, it is imperative that the afterschool activity requirement be waived to allow sponsors to adjust their programming based on the status of COVID-19 in their community. 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.
3. Extend the area eligibility waiver through August 31, 2021 to allow open site meal service in areas with fewer than 50% of households being low-income households.
 - Allowing sites to provide meals in communities that do not meet the 50% area eligibility threshold has been essential to reaching children that may be newly eligible during the summer months. This is especially important considering the ongoing economic impact of COVID-19 on families and communities. Currently, all state-approved area eligibility waivers for SFSP and SSO have only been extended through August 31, 2020. Extending the area eligibility waiver – in conjunction with the option to use SFSP or SSO – through the 2020-2021 school year will help not only reduce barriers to participation during remote school days, but also the administrative burden on sponsors and schools.
 4. Allow those providing meals through SFSP or SSO to also participate in afterschool meal and snack programs.
 - This approach has been allowed during the pandemic, and it has been critical to keeping hunger at bay by 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 access should be maintained at this time of unprecedented food insecurity.

Schools, families, and other decision makers need more certainty to allow effective planning during an uncertain time. We have seen a sizeable expansion in the number of children accessing these crucial, nutritious meals and want to ensure these resources remain available to Oklahomans throughout the upcoming school year. Based on Feeding America's most recent Map the Meal Gap report, more than 1 in 5 Oklahoma children was food insecure prior to the COVID-19 pandemic.¹ Additionally, based on new 2020 projections from Feeding America, our child food insecurity rate will jump to nearly 1 in 3 Oklahoma children.² Now is

¹ <https://map.feedingamerica.org/county/2018/child/oklahoma>

² <https://www.feedingamericaaction.org/the-impact-of-coronavirus-on-food-insecurity/>

the time to ensure these vital programs remain flexible and accessible for the near future. With your leadership, we believe we can ensure Oklahoma children have enough food to eat as we navigate our new normal.

Respectfully,

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