

March 12, 2020

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

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Chicago, Illinois 60606-6995
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The Honorable Alex Azar
Secretary
U.S. Department of Health and Human Services
200 Independence Avenue, SW
Washington, DC 20500

Dear Secretaries Perdue and Azar:

The Academy of Nutrition and Dietetics represents more than 107,000 registered dietitian nutritionists (RDNs);¹ nutrition and dietetic technicians, registered (NDTRs); and advanced-degree nutritionists, many of whom provide food and nutrition services to seniors and children, two of the most vulnerable populations during the COVID-19 pandemic. The Academy **urges both HHS and USDA to expand existing regulatory and programmatic flexibility for the administration of federal nutrition programs and direct sufficient funding necessary to meet the imminent needs of local communities.**

Current flexibility may not be sufficient to meet the anticipated number of programs and communities that will be impacted simultaneously. To facilitate a more nimble response, the Academy requests the following:

The Special Supplemental Nutrition Program for Women, Infants, and Children

- Disseminate specific and clear information among WIC clinicians on flexibilities during a pandemic; clinics report confusion from state to state on regulatory interpretations
- Consider directing emergency funds to increase WIC caseload given the potential for economic fallout from pandemic
- The Secretary of USDA and Secretary of HHS shall coordinate to support the important role of WIC in bringing families accurate and up-to-date resources and information on corona virus precautions, status and actions
- Urge state Medicaid directors to share the flexibility information with providers and other public health officials
- Give WIC the flexibility to extend certification periods beyond 30 days and offer virtual enrollment and re-certification

¹The Academy approved the optional use of the credential “registered dietitian nutritionist (RDN)” by “registered dietitians (RDs)” to more accurately convey who they are and what they do as the nation’s food and nutrition experts. The RD and RDN credentials have identical meanings and legal trademark definitions.

Child and Adult Care Food Program

- Issue a federal blanket waiver allowing for congregate feeding sites that serve either seniors or children to establish “grab and go” meal service to mitigate the risk of exposure and spreading of the virus
- Consider directing funds to provide transportation/delivery of meals to seniors and children who normally attend congregate sites who will not travel to avoid exposure to the virus or exposing others to it

Child Nutrition Programs

- Extend eligibility to provide meals through the Summer Food Service Program to all School Food Authorities with COVID-19 closures
- Extend eligibility for school meals to address families whose economic situation is impacted by school closures
- Issue a federal blanket waiver to allow for meal service at community sites used during pandemic response without prior approval
- Issue a federal blanket waiver allowing for non-congregate feeding sites, which will enable grab and go service and mitigate the risk of exposure to and spreading of the virus
- Provide children sufficient meals to feed them throughout the time that schools are expected to be closed

Supplemental Nutrition Assistance Program

- Provide supplemental benefits to SNAP recipients as needed to ensure individuals and families have sufficient food resources
- Delay implementation of proposed rule changes until the economic impact of the pandemic on communities throughout the United States is better understood

The Emergency Food Assistance Program, Commodity Supplemental Food Program, Food Distribution on Indian Reservations

- Provide a blanket national waiver to expand income eligibility for TEFAP and CSFP so that the charitable food network and states can utilize these programs as resources for impacted communities
- Provide a waiver for program eligibility verification and documentation to align with best practices established to limit exposure and spreading of the virus
- Provide opportunities and funding to deliver foods directly to eligible households
- Expand distribution on American Indian/Native American reservations

Older Americans Act Nutrition Programs

- Direct supplemental funding to senior nutrition programs to replenish and expand the supply of shelf-stable meals, frozen meals and other nutrition services that are being or have already been provided throughout communities
- Supplemental federal funding to cover the following potential needs:

- Additional transportation and personnel costs necessary if congregate meal sites have to close and participants are shifted to being home-delivered meals recipients
- Stocking sufficient quantities of hand sanitizers and moisturizers, masks and additional gloves at facilities that prepare, serve, or deliver meals to older adults
- Allow for congregate meals existing funds to be transferred to home-delivered meal allocations temporarily and expeditiously without impacting the regulatory restrictions on such transfers

In addition to these program specific requests, the Academy recommends that all programs provide handwashing and hygiene information to participants for the duration of the pandemic. We appreciate the USDA and HHS preparedness for these emergency situations and look forward to our continued partnership to meet the needs of the American public.

Sincerely,



Jeanne Blankenship, MS, RDN
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