



April 11, 2022

The Honorable Stephanie Bice
U.S. House of Representatives
1223 Longworth HOB
Washington, DC 20515

Dear Representative Bice,

Thank you for your concern about child nutrition in Oklahoma. Oklahoma made significant progress over the past two years ensuring children can access important meals over the summer months. Unfortunately, the end of many of the child nutrition waivers put us at risk of losing this progress on feeding children. We need your swift action to remove red tape by ensuring programs aren't forced to revert to the previous operation requirements that limit the ability to feed children. We collected first-hand accounts (listed below) from providers who witnessed the benefits of the waivers every day and fear the consequences that come with reverting to the previous burdensome regulations.

The child nutrition waivers granted by the USDA during the pandemic not only helped our network of partners better serve thousands of hungry children safely and efficiently but demonstrated program innovations that should continue. The waivers removed administrative red tape for providers and allowed them to reach more hungry children in the hardest to serve areas. Resorting back to the way things were will literally take food out of the mouths of children. The absence of waivers will keep too many summer feeding site operators, who have made huge impacts in their communities, from participating this year.

Based on what we've heard from summer feeding providers, the following waivers are most critical to restore or retain:

- **Area Eligibility Waivers** remove the limitation that "open site" meal service must operate in areas where at least half of the children come from low-income households. Expanding area eligibility by allowing service in areas that previously were not eligible as sites led to more meal sites reaching at-risk children and serving more children as a result.
- **Meal Time Waivers** give providers the opportunity to serve multiple meals to children on one day. This flexibility has helped providers serve meals to children who may not be able to access meals during the typical meal time requirements. Many parents work during the day and lack adequate transportation, which often creates barriers for rural families.

- **Non-Congregate Meal Service Waiver** allows meals to be served in non-group settings to support social distancing and allows meals to be delivered to children. Some site locations in rural parts of the state only operate because of this waiver. The expiration of this waiver would cause these sites to shut down since there is no physical building to allow for food distribution in a congregate fashion. Several operators reported that if waivers expire, they will have to scale down, suspend, or close meal service operations because the waivers helped reduce the constraints of staffing or limited facility capacity. Oklahoma is already the worst in the nation at feeding children during the summer. Having fewer sites operate as a result of restrictions further reduces the ability to feed children.
- **Parent/Guardian Meal Pick Up Waiver** allows parents/guardians to pick up meals to take home to their children. While the waiver was initially introduced to reduce the risk of COVID-19 exposure, the benefits of serving in a 'grab-n-go' style have allowed sites to run and feed more children and coincide with the non-congregate meal service waiver. Without waivers, many rural and low-income families would lose access to meals. Children in rural areas often face long distances and obstacles, like busy streets and highways, which make walking to a site dangerous. Working parents often do not have the time or resources to drop-off and pick up their children at a meal site twice a day. Rural families, particularly, face constraints of the distance they travel to and from meal sites. It becomes impractical for families, especially those facing poverty.

In the coming weeks, we will be in touch with your staff about having direct conversations with child nutrition providers about their urgent needs. We urge you to continue to fight for common sense solutions that remove red tape and facilitate hungry children getting the nutrition they need.



Calvin A. Moore
 Chief Executive Officer
 Community Food Bank of Eastern Oklahoma



Chris Bernard
 Chief Executive Officer
 Hunger Free Oklahoma



Stacy Dykstra
 Chief Executive Officer
 Regional Food Bank of Oklahoma

Child Nutrition Stories

YMCA of Greater Oklahoma City, Summer Food Service Program (SFSP) operator, finds the Area Eligibility, Non-Congregate Meals and Meal Time Requirement Waivers most beneficial.

Through these waivers, children have been able to attend their program and depend on healthy meals. They have seen situations where parents did not have food at home to provide for their children and would come to their operation seeking help. The program director has also seen improvement in children's food security by allowing children to try different meal options. The waivers are crucial for children in the summer when school is not open to provide regular meals. The end of waivers would affect some of their sites due to kids congregating to eat instead of families being able to utilize the Parent/Guardian Pick Up waiver. Additionally, staff won't have the ability to provide lunches and snacks for children that do not bring their own. These waivers have allowed the organization to feed thousands of children during the summer. The YMCA of Greater Oklahoma is undetermined on its plan to continue operating, as these waivers have been instrumental in feeding children over the past two summers.

Shared by Yesica Gonzalez, Y Clubhouse Program Director, and
Destini Solomon, Youth and Family Director

Grand Nation, Child and Adult Care Program (CACFP), and Summer Food Service Program (SFSP) operator, found the Meal Time Requirements and Non-Congregate Meal Service waivers highly beneficial to their programs.

These flexibilities allowed children in rural parts of their service location, such as Afton, White Oak, and Sportsman Shores, access to nutritious meals through their feeding programs. Grand Nation delivered 7,614 meals in 2020. In 2021, 29,178 meals were delivered to families within their service location. Operating SFSP without waiver flexibilities will create a cliff for rural children primarily fed through school nutrition programs. Not being able to deliver to rural areas will be devastating for these children, and once again, our rural Oklahoma children will come in last. As of right now, the staff is hoping their Oklahoma congressional delegation will make it a priority to continue waivers beneficial to feeding operations. For this summer, Grand Nation asks for waiver continuation, and for the future, they ask for permanent regulation changes to the SFSP, so all children will have access to nutritious meals throughout the entire year.

Shared by Shannon Baker, Grand Nation Community Mobilizer

Sapulpa Public Library operates the Summer Food Service Program for those who live, work or attend school in Creek County and the surrounding areas. The library found the Area Eligibility and Meal Pattern Flexibility Waiver were crucial to feeding more children in their area. The most important factor in caring for young patrons was the option for a parent, guardian, or caretaker to pick up the meal for the child. As a library, meeting rooms are an option but are not equipped with a full kitchen or lunchroom for the kids. While the meeting room is large, it is booked with programs and community events, and there is no set time that kids can eat on site. Also, food is not allowed inside the library - the to-go option was crucial for harried parents who needed to pick up meals and then head home to feed their children. If the Non-Congregate Meal

waiver is not available, staff fears children will ultimately face times of food insecurity. On the heels of a global pandemic, they do not want further restraints to impact their well-being. If the waivers expire, the program may close down. The library is looking at possibly offering a meal during their weekly storytime, but that would negate the storytime/learning program. The providers at Sapulpa Public Library implore lawmakers to listen to their constituents and provide waivers to ensure the nutritional needs of our children, as their future depends on it.

Shared by Melodie Reader, Children and Young Adult Librarian

Pryor Public Library, Summer Food Service Program (SFSP) operator, valued the flexibilities granted by the Meal Times Requirement and Non-Congregate Meals waivers.

The child nutrition waivers allowed children in our community to eat in the same way that food-secure people often choose to eat: at their convenience or when they are hungry, in their homes, and with their families. We were able to serve more children with the waiver due to time, space, and social considerations. Requiring children to eat on-site contributes to the stigma attached to food insecurity. Additionally, it does not serve families who need to pick up food and leave to meet other schedule requirements. Requiring children to eat on-site alienates them and may contribute to fewer children having access to food. The Pryor Public Library staff asks to consider permanently doing away with the on-site requirement as it does not meet the community's needs. If the waivers expire, the provider will not be able to participate in SFSP this year due to space limitations. The library is in a temporary building for the duration of its remodel project, which will extend into the fall. They have limited storage space for food and no accommodations to revert to congregate-style feeding.

Shared by Haley Poulos, Adult Services Librarian

Regional Food Bank of Oklahoma, Child and Adult Care Food Program At-Risk (CACFP) and Summer Food Service Program (SFSP) operator, found the following waivers most beneficial: Area Eligibility, Meal Time Requirements, Non-Congregate Meals, and Parent/Guardian Meal Pick Up. The flexibility granted allowed RFBO providers to reach more children than under normal circumstances. Families could pick up multiple days' worth of food at once, which was especially beneficial for families in rural areas who did not have the means to drive to a site daily or multiple times per day for different meals. Many teens are hesitant to eat in a congregate setting but are more willing to grab a meal and take it with them. The flexibilities also eased the workload of the sites' RFBO sponsors by reducing the number of staff members needed to oversee meal services and not requiring them to provide a seating area or open their building up to the public for prolonged times. Sites who have experienced the waivers are simply unwilling to go back to pre-covid measures, as they have seen how much easier operating these programs can be. Therefore, the number of sites participating in the program is drastically decreasing, and in turn, so will the number of children served. With gas prices on the rise, families will not have the means to travel to sites for one meal per day. RFBO staff is conducting outreach to partners who have not operated under waiver flexibilities and treating it as though the waivers never existed, but forging new partnerships is difficult and takes time and resources. Staff continues to recruit sites willing to host summer feeding programs and remains diligent in serving as many children as possible regardless of the circumstances.

Shared by Chelsea Casso, Director of Childhood Hunger Programs

Noble County YMCA operates the Child and Adult Care Food Program (CACFP) and Summer Food Service Program (SFSP). The Non-Congregate Meals and Parent/Guardian Meal Pick Up waivers have had a tremendous impact on their community.

Families who need critical services like USDA food programs will not access these programs because of the optics - they don't want to feel embarrassed about their socioeconomic standing. Participation rates are significantly higher when food is distributed in a grab-and-go fashion. Poverty and food insecurity has been a consistent challenge in the community for decades. We are seeing over 50 kids on average receive nutritious meals each day. Children who were not receiving meals anywhere else before these waivers were in place. In the summer of 2021, we added a second feeding site and doubled our service numbers, hitting a daily record of 157 youth served. Indicating access is a barrier for families receiving food in the area. Without the ease of access, a majority of the youth served through these operations would not feel comfortable coming to participate in the meal programs.

The staff acknowledges there is a great deal of work to be done around de-stigmatizing access to USDA Child Nutrition programs in our community and much trust-building that must happen to do so. Removing the waivers unravels any of the work that has been done to welcome people into safe spaces where having a need is not seen as a moral failure. Allowing the waivers to end means more hungry children throughout their community.

The Noble County YMCA staff is working on marketing the shift to congregate eating as a daily community program, a place to gather. The program providers are working on marketing the shift to congregate eating as a daily community program, a place to gather. Staff is seeking funding to support additional employees to facilitate fun activities that attract kids to participate in their meal program.

Shared by Caity King, Director of Community Impact

White Oak in Craig County operates the Summer Food Service Program (SFSP) and found the Non-Congregate Meals waiver most beneficial in meeting the demands of their community.

The organization currently delivers meals to 41 children. The parents are either working or have unreliable transportation to bring children to a feeding site - common issues in White Oaks rural community, which does not have a gas station nor a convenience store. Failure of waiver extension or permanency means the site will have to shut down, leaving these children more vulnerable to food insecurity during the summer months.

Shared by Nancy Kinsley, Chairman of White Oak in Craig County