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March 25, 2020

The Honorable Nancy Pelosi  
U.S. House of Representatives  
Washington, DC 20510

The Honorable Kevin McCarthy  
U.S. House of Representatives  
Washington, DC 20510

The Honorable Mitch McConnell  
U.S. Senate  
Washington, DC 20510

The Honorable Chuck Schumer  
U.S. Senate  
Washington, DC 20510

Dear Speaker Pelosi, Minority Leader McCarthy, Majority Leader McConnell, and Minority Leader Schumer:

We are writing today to express the need for urgent action to stabilize and secure the infrastructure that undergirds an effective human services system as Congress develops economic relief responses to the COVID-19 (coronavirus) public health emergency. This includes both resources to stabilize the network of community-based, faith-based, and private sector partners in the human services field, as well as the fundamental services needed to protect the health and well-being of children and families. The American Public Human Services Association (APHSA) is a bipartisan, nonprofit membership organization representing state and local health and human service agencies through their top-level leadership.

We appreciate the strong and decisive actions taken and being considered by Congress to invest in state and local efforts to respond to outbreaks of COVID-19. Specifically, we appreciate Congress' swift action to ensure increased access to nutritional supports by authorizing the U.S. Department of Agriculture (USDA) to enact emergency response measures and increased investment and flexibility in SNAP, WIC, child nutrition, and school feeding programs.

As state and local agencies take immediate steps to protect the health and well-being of all children and families in our communities, leaders are identifying operational and policy solutions to meet the complex needs surfacing across the nation. APHSA urges Congressional leaders to enact the following policies to better support the essential work of human services agencies to keep families healthy and safe during the emergency response so that they can thrive as our nation rebuilds.

### ***Sustaining Child Care Operations***

Early childhood education and care programs that support working parents and our economy every day by ensuring the safety, development, and well-being of children are being severely disrupted by this

The American Public Human Services Association advances the well-being of all people by influencing modern approaches to sound policy, building the capacity of public agencies to enable healthy families and communities, and connecting leaders to accelerate learning and generate practical solutions together.

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public health emergency at the very time that essential personnel called to serve the public during the emergency need child care for their children. Swift policy action, including fiscal infusion through the Child Care Development Fund (CCDF), is needed to meet the immediate needs of the child care industry through the emergency, as well as to support the transition to recovery when child care supply must quickly rebound to meet capacity. We urge Congress to give States options to prevent closures, including funding and authorization for CCDF lead agencies to make grants to providers who are at risk of closing but are providing care to families with high need, such as first responders and health care. Similarly, any funding going directly to states for immediate public health needs should also consider and fund the associated child care transitional supports needed. This should also include making child care funding available through FEMA's Public Assistance Program and Individual Assistance in areas with declared emergencies. Child care provider capacity must be supported through and post-emergency.

A lack of support for CCDF providers may result in families turning to informal child care arrangements not only in the short run, but in the long term if providers in their community are unable to weather the economic hit. The great gains achieved through the Child Care Development Block Grant Reauthorization to strengthen quality and safety of the nation's child care system as a whole are at peril if providers are unable to keep their doors open.

Child care providers who are staying open during the crisis must have the support needed to maintain operations and families of first responders, health care providers, and essential personnel need increased funding and flexibility. The Administration for Children and Families (ACF) has provided guidance for requesting waivers to regulatory requirements that constrain states' ability to quickly and nimbly stand up emergency child care options and be responsive to the shifting needs of first responders and essential personnel. ACF's guidance has been helpful to identify a number of creative and helpful options; however, they must comport with the existing statutory framework and states remain concerned that most of these processes are time and work intensive. Congress should consider working with the Administration to identify broader emergency authorities that allow states to pursue changes nimbly and swiftly without onerous bureaucratic requirements.

### ***Extension of TANF Block Grant***

Recognizing the important role Temporary Assistance For Needy Families (TANF) funding will play in meeting the immediate financial needs of families with children that suffer economically due to COVID-19, as well as supporting the broader ecosystem of community- and faith-based organizations delivering critical services promoting the workforce development, economic well-being, and health and child maltreatment prevention, we urge Congress to include an extension of the TANF program for no less than the remainder of FY2020 and FY2021.

### ***Supporting State and Local Efforts to Adapt SNAP Services During the Public Health Emergency***

The recently passed Families First Coronavirus Response Act provides state and local agencies with resources to address rising food insecurity in communities impacted by COVID-19. However, barriers remain for agencies to quickly and effectively provide these services. Authority provided by Congress to issue supplemental SNAP benefits up to the maximum household allotment, as interpreted by USDA, will result in a significant share of households already receiving the maximum benefit amount obtaining no additional assistance despite the intent of the legislation. Different approaches to operationalizing

this provision could ensure a more equitable issuance of benefits to all households in need. Additionally, authority to issue temporary benefits to households with children eligible for free and reduced price school meals will prove challenging for states to implement, particularly for non-SNAP households that will be required to submit separate applications and have issued new EBT cards. Greater flexibility in the methods by which SNAP agencies can partner with education departments and school districts to determine eligibility and provide benefits will help more states launch this program while extended school closures continue.

States have also been submitting a flurry of waiver requests to adapt SNAP program rules spanning applications, certifications, verification, benefit issuance, college student rules, QC reviews, outreach, eligible purchases, and administrative requirement procedures. These changes are necessary to ensure continuity of services for existing households and to address rapid increases in new applications while going through COVID-19-related service delivery disruptions. Flexibility for states to utilize blanket waivers to implement critical flexibilities based on conditions on the ground are essential. And assurances that states will be held harmless in QC review processes for cases processed based on the amended criteria will ensure SNAP agencies can continue to prioritize the immediate and urgent needs of SNAP recipients.

### ***Reinforcing the Community- and Faith-Based Service Delivery System***

Community- and faith-based organizations are at the front lines of human services delivery, providing child safety and family stabilization, health and behavioral health, workforce training and placement, and emergency assistance to families experiencing economic crisis. APHSA members rely on these providers of all sizes to deliver services to children and families, often using multiple funding streams to ensure health, behavioral health, and economic supports can be delivered seamlessly.

The provisions for the Small Business Loan Program in S.B. 3548 that exclude community-based organizations larger than 500 employees and those that access Medicaid funding to deliver any part of their service array presents significant concern to the public sector health and human services leaders. Excluding these organizations from relief would have the unintended consequence of limiting or suspending essential services to prevent and respond to child neglect and abuse and to provide workforce development services to support an economic recovery. We urge Congress to remove this exclusion and, further, to consider flexible emergency funding options through existing funding mechanisms so that public sector health and human services leaders can sustain business continuity for the critical community- and faith-based organizations meeting the urgent health and safety needs of children and families.

### ***Social Services Block Grant and Support for Elders***

During this time, we must utilize all available resources to ensure the health and safety of our senior adult population. One such resource is the Social Services Block Grant (SSBG). SSBG funding allows states and territories to invest in a variety of human service programs for elderly adults including but not limited to, day-time supervision, home delivered meals, and protective services for preventing abuse and

neglect. Increased funding for SSBG would allow states and territories to mitigate harm by addressing gaps in services due to diminished workforces and increased health risks caused by COVID-19.

In addition to increased supports for SSBG, other ways in which Congress might relieve the stress and hardship felt by the senior adult community include: providing emergency rental supports for at-risk older adults living in HUD-assisted senior housing and facilitating federal guidance on how nursing homes, skilled nursing facilities, and other home and community based providers may bill for telehealth services.

In the coming days and weeks, local and state health and human services leaders will be on the front lines to make sure the financial, health, and wellness needs of communities are being met. APHSA is committed to advancing the operational and policy solutions these leaders identify that are most pressing as the public health emergency evolves. We continue to monitor impacts as state and local agencies work to implement legislative, regulatory, policy, and operational measures and APHSA will continue to communicate emerging impacts and potential policy solutions Congress can enact to empower state and local health and human services to meet the needs of constituents. APHSA and our members continue to serve as a resource to your teams and is an ally in protecting the health and well-being of children and families throughout the country.

Please reach out to Matthew Lyons, Director of Policy and Research, at [mlyons@aphsa.org](mailto:mlyons@aphsa.org) with any questions and to discuss opportunities to work together in the coming weeks.

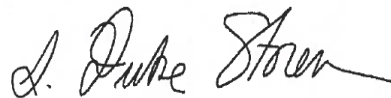
Sincerely,

Tracy Wareing Evans



President and CEO  
American Public Human Services Association

Duke Storen



Chair, APHSA Leadership Council  
Commissioner, Virginia Department of Social Services