



American Public Human Services Association

1101 WILSON BOULEVARD, ARLINGTON, VA 22209

TEL (202) 682-0100

FAX (202) 204-0071

WWW.APHSA.ORG

March 12, 2020

Chairwoman Nita Lowey  
2365 Rayburn HOB  
Washington, D.C. 20515

Ranking Member Kay Granger  
1026 Longworth HOB  
Washington, D.C. 20515

**Re: H.R. 620 Families First Coronavirus Response Act**

Dear Chairwoman Lowey and Ranking Member Granger,

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. As state and local agencies take immediate steps to protect the health and well-being of all children and families in our communities, we appreciate the strong and decisive actions being considered by Congress to empower communities to prepare for and respond to potential outbreaks of COVID-19 (coronavirus) through the *Families First Coronavirus Response Act*.

Provisions in the proposed legislation will provide state and local health and human services agencies with the necessary policy levers to meet the basic needs of children and families as the pandemic evolves. Specifically, we are encouraged to see the following issues addressed in the legislation.

- **Authorizes Use of Pandemic SNAP Benefits** – As more schools shut down, many families with children will be unable to receive free or reduced school meals. Congressional authority for states to issue temporary SNAP benefits to affected families is critical to ensuring families have enough resources to meet their basic nutritional needs.
- **Provides Emergency Funding for Food Distribution** – Appropriations for emergency distribution of food through the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) and the Commodity Food Assistance Program are needed to ensure all families have access to meals.
- **Temporarily Enhances Medicaid FMAP** – Broader spread of COVID-19 will result in significant cost increase to the Medicaid program. A temporary increase in the Federal medical assistance percentage (FMAP) by eight percent will help states manage their financial burden in response to rising public health needs.
- **Waives Cost Neutrality Requirements for School Meals Waivers** – Waivers to the Richard B. Russell National School Lunch Act to respond swiftly and effectively to COVID-19 outbreaks are likely to increase federal costs in the short-term. Exempting these waiver requests from cost neutrality requirements empowers state and local agencies to advance the solutions needed to meet community needs.
- **Permits Non-Congregate Feeding** – Child and adult care centers in impacted areas may need to seek alternatives to traditional congregate settings for providing meals to eligible individuals. Waivers to provide

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.

INFLUENCE. BUILD. CONNECT.

non-congregate feeding to those eligible will help agencies maintain proper safeguards that facilitate social distancing.

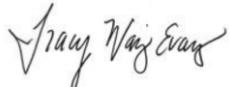
- **Waives SNAP Work Requirements in Impacted Areas** – In areas with public health emergency declarations, complying with work activities to access essential benefits may not be a safe or realistic option. The legislation’s proposal to temporarily waive work requirements in such areas is consistent with practices for exempting individuals for good cause, ensuring that people are not denied benefits due to circumstances beyond their control.
- **Provides Added Flexibilities in SNAP Administration** – During a state public health emergency or disaster declaration, greater flexibility is needed for states to issue emergency allotments to SNAP participants to address temporary food needs and to adjust benefit issuance methods based on circumstances on the ground. The legislation provides the necessary authority for states to utilize these flexibilities.
- **Increases Funding for Emergency Grants and Extended Unemployment Insurance** – Increased dislocated worker supports for communities experiencing higher rates of unemployment related to COVID-19 will provide needed emergency assistance to states in order to support unemployed constituents in reentering the workforce as quickly as possible.

As our country faces new and emerging challenges, it is paramount that we support the needs of those most at risk in our communities. With more anticipated closures of schools, child care centers, and adult day care centers, it is our shared responsibility to make sure that children and family have access to the nutritional, child development, economic assistance, and health services needed to ensure health and wellbeing in our communities. In the coming weeks, state and local agencies will be working to implement the legislative, regulatory, policy, and operational measures to respond to emerging needs in our communities. APHSA will continue to communicate emerging impacts and potential policy solutions to meet the needs of state and local health and human services agencies and the constituents they serve. During this time, APHSA and our members serve as a resource and 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