



January 12, 2021

Mr. Robert Bonnie
Team Lead
Biden-Harris Transition
U.S. Department of Agriculture

Dear Mr. Bonnie:

Congratulations on your appointment to head this important Federal transition team. We are writing on behalf of our colleagues and members of the Food and Agriculture Regional Member Ad Hoc Committee (FARM) at the Metropolitan Washington Council of Governments (COG) as its Chair and Vice Chairs.

Purpose of Correspondence

Based on our collective experience as elected officials, organizational leaders, and subject matter experts (SME) in two states and the District of Columbia, we are writing to share some of our insights into how federal nutrition programs have been implemented in the region. We highlight how some of the changes made by USDA during COVID-19 have both hampered and expanded food security and access during this challenging time. We also note programmatic changes that should be continued into the new administration and beyond the pandemic.

In addition, we share some of our emerging priorities related to supporting small farmers, including those identifying as Black, Indigenous, and people of color (BIPOC), and support for regional food systems development.

COG and FARM Background

COG is an independent, nonprofit association, with a membership of 300 elected officials from [24 local governments](#), the Maryland and Virginia state legislatures, and U.S. Congress. Every month, more than 1,500 officials and experts connect through COG to share information and develop solutions to the region's major challenges.

FARM is COG's newest Committee, with 10 local elected officials from the District of Columbia, suburban Maryland, and Northern Virginia, and 12 SMEs in food and agriculture from the District, State of Maryland and the Commonwealth of Virginia. FARM is charged with making policy recommendations to support a more resilient, connected food and farm economy in metropolitan Washington, along with several other critical matters which are outlined [in this Resolution](#). Although the launch of FARM was being planned prior to the onset of COVID-19, the food security crisis exacerbated by the pandemic is a key focus for our committee.

Federal Nutrition Programs in the Metropolitan Washington Region

A priority for FARM is to support federal, state, and local initiatives to increase food and cash assistance programs for residents in need, increase participation in programs among eligible residents, and streamline program administration. This includes the Supplemental Nutrition

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Assistance Program (SNAP), the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC), school meals, and other federal nutrition programs.

We applaud USDA's action to allow our jurisdictions to participate in *online SNAP* through authorized retailers. Online SNAP has expanded grocery access in the region, particularly during the pandemic. We hope to see expansion to additional retailers as quickly as possible. This includes increased assistance to independent and small grocers to be able offer this service, as well as retailers able to offer home delivery. Further, although SNAP is "interoperable" between states, which allows customers in our region to cross state lines for greater choice and convenience (crucial in a region as interconnected as ours), online SNAP is not currently allowed across state lines. We urge USDA to establish a pilot program with several regional grocers to move toward interoperability for online SNAP.

Programs like SNAP are one of the nation's—and our region's—most important defenses against hunger. We commend the expansion of Pandemic Electronic Benefits Transfer (P-EBT), the continued ability for SNAP program participants to receive the state emergency allotment benefit, and the flexibilities provided for recertification for SNAP and WIC participants during COVID-19. Along these lines, we oppose any efforts to narrow eligibility for SNAP or take away states' flexibility to facilitate access as was affirmed in this recent, successful [legal action taken by the Attorneys General of the District of Columbia, Maryland, Virginia](#), and other states. We encourage USDA to instead use its authority to maximize access.

We urge the Transition Team to recommend, for programs administered by USDA's Food and Nutrition Service (FNS) especially, a prompt assessment of whether the range of administrative flexibilities allowed by Congress to increase access to all federal nutrition benefit programs during COVID-19 should be incorporated into program design and implementation more permanently.

Our jurisdictions face incredible financial uncertainty and without further action from Congress, we may need to make painful decisions to balance our budgets. Anything USDA can do to reduce administrative delays in implementation (e.g. providing guidance on, and approving, P-EBT plans) will help maximize the positive and timely impact of these programs on participants. Additionally, maintaining predictability of future resources availability will assist our local jurisdictions with long-term financial planning and resource management. Finally, streamlining program implementation requirements, where appropriate, will allow us to focus more of our resources on ensuring that eligible residents have access to benefits for the food they need until their households reach more stable financial footing.

We also ask that this assessment specifically include a review of the administration of *school meal programs*. We were relieved when the USDA acted on its authority to extend the Summer Food Service Program and Seamless Summer Option for the entire 2020-2021 school year, including options to allow parents and guardians to pick up meals for children, meal service time flexibility, the allowance of non-congregate feeding in the child nutrition programs, and meal pattern flexibility in the child nutrition programs as a state option. These flexibilities have allowed our schools to continue to serve all children for free without unnecessary restrictions. We note, however, that the delay in this decision—not made until the first day of school in some of our jurisdictions—meant that our state departments of education and local school districts spent many hours preparing to administer programs that were constantly changing and in flux.

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We hope that, moving forward, USDA will continue to serve as many children as possible with the least amount of administrative burden to families and school food and nutrition staff, including providing sufficient notice to entities administering these programs.

COVID-19: Farmers to Families Food Box Program

During the public health crisis, the USDA Farmers to Families Food Box Program provided emergency food boxes to food assistance organizations in our region. Should Farmers to Families continue, or be leveraged during future emergencies, we would recommend USDA release more specific information on awarded distributors and the organizations receiving the food boxes. Greater transparency would be particularly helpful for planning and coordination within and between our jurisdictions. Informal feedback that we've received via emergency food providers and emergency food task forces indicates that the produce boxes were especially valuable for increasing access to nutritious food for residents. The program was less successful at supporting local, small, family and BIPOC-owned farms and businesses to supply these boxes.

We recognize the critical contribution that the program made to supplementing distributions from our emergency food assistance providers to residents, many newly food insecure. Ultimately, however, we would like to see stronger federal safety net programs to put more power in the hands of vulnerable residents to shop at grocery stores, farmers markets, and other retailers. This affords greater dignity and choice in shopping to accommodate cultural and medical diet needs. Further, the easier it is for households to access the food they need at times and locations convenient to them, the more time they can dedicate to other daily needs.

Emerging Priorities for FARM

The FARM Committee has also identified a need to support BIPOC farmers with increased access to land and capital to build and sustain successful enterprises. From COG's *What Our Region Grows* report, we [already know that BIPOC farmers make up a minority of our region's farmers](#), in numbers that do not reflect the diverse demographics of Greater Washington's residents. For example, in 2012, just 1.6% of farmer operators identified as Black or African American, and 1.8% as Hispanic, or of Latino Origin.

The FARM Committee has already identified land access/ownership and capital as key challenges facing BIPOC farmers and new and beginning farmers. We are eager to see what the USDA can do in its deployment of financial assistance to address these challenges, especially at a time when there is growing local interest and investment in small and urban farmers in our region, in the form of technical assistance, some financial resources, and (limited) contracting opportunities. We also urge USDA to support legislative efforts to end racial discrimination in federal farming assistance programs, restore land lost by BIPOC farmers, protect BIPOC farmers from future land loss, and assist all socially disadvantaged farmers.

As a region with a vibrant and growing urban farming community, we are watching the establishment of USDA's Office of Urban Agriculture and the deployment of its first round of funding with great interest. We expect that programs to incentivize urban production and composting will become even more important to our region in the future.

We stand ready to partner with USDA, our local Farm Service Agencies, and others to continue to build awareness about available federal support. We urge the clearest communication of these

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opportunities and streamlined application requirements wherever possible. The majority of our region's farmers hold off-farm jobs and time is a finite resource.

Regional Food System Development

The FARM Committee represents the next phase of COG's Regional Food Systems Program, made possible by [USDA's Food LINC program](#). Launched in 2016, Food LINC leveraged philanthropic investment to support supply chain development for local/regional food systems in participating jurisdictions around the country. Although regional food system programs have continued to evolve in a limited capacity—in the Farm Bill and in subsequent rule-writing and implementation—we believe that USDA should expand its efforts to build and sustain regional food and farm economies.

We would welcome an opportunity to meet with officials from the new administration to share additional insights from our experience, including where further support could help with the development of more resilient, *regional* food systems. We also stand ready to share more information on needed program administration flexibilities and changes to strengthen federal nutrition programs via our colleagues working in our local governments, schools, nonprofits, and businesses.

In closing, thank you for your service to ensuring a smooth transition at USDA and for considering our comments as a part of this process.

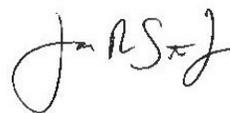
Sincerely,



Mary Cheh
Councilmember, District of Columbia
Chair, FARM Committee



Craig Rice
Councilmember, Montgomery County, MD
Vice Chair, FARM Committee



Jon Stehle
Councilmember, City of Fairfax, VA
Vice Chair, FARM Committee

cc: COG Congressional Delegation