



**CONSORTIUM FOR CITIZENS
WITH DISABILITIES**

Sonny Perdue
Secretary of Agriculture
U.S. Department of Agriculture
1400 Independence Ave., S.W.
Washington, DC 20250

Pam Miller
Administrator of Food and Nutrition Service
U.S. Department of Agriculture
3101 Park Center Drive
Alexandria, VA 22302

Dear Secretary Perdue and Administrator Miller:

The undersigned members of the Consortium for Citizens with Disabilities (CCD) write to urge the U.S. Department of Agriculture (USDA) to expand the Supplemental Nutrition Assistance Program (SNAP) Online Purchasing Pilot program to all states and territories and extend eligibility for the program to more retailers. CCD is the largest coalition of national organizations working together to advocate for federal public policy that ensures the self-determination, independence, empowerment, integration and inclusion of children and adults with disabilities in all aspects of society.

The growing outbreak of COVID-19 across the United States creates specific issues for people with disabilities. The disability community includes millions of individuals with underlying or pre-existing conditions who are, and will be, particularly at risk as COVID-19 continues to spread across the country. These individuals will face high risk of complications and death if exposed to the outbreak and they need to isolate themselves for protection. This makes access to online ordering of needed supplies and groceries absolutely critical and, for many, a matter of life and death. We believe expanding the SNAP Online Purchasing Pilot program will greatly alleviate the issue of food insecurity among SNAP beneficiaries with disabilities during the pandemic.

SNAP provides millions of people with disabilities and their families with crucial food assistance. Compared to people without disabilities, people with disabilities and their families are significantly more likely to experience hunger and food insecurity.¹ With 95% of Americans under some form of a stay at home order², this rapidly evolving environment presents a particular set of challenges for beneficiaries with disabilities. Recent press reports indicate

¹ Carlson, Steven, Keith-Jennings, Brynne, and Chaudhry, Raheem (2017). SNAP Provides Needed Food Assistance to Millions of People with Disabilities. Washington, DC: Center on Budget and Policy Priorities.
<https://www.cbpp.org/research/food-assistance/snap-provides-needed-food-assistance-to-millions-of-people-with>.

² Mervosh, S., Lu, D., & Swales, V. (2020, March 24). See Which States and Cities Have Told Residents to Stay at Home. Retrieved from <https://www.nytimes.com/interactive/2020/us/coronavirus-stay-at-home-order.html>

some beneficiaries with disabilities are fearful of contracting the disease in a grocery store or infecting their families upon their return home. Some people with disabilities cannot drive or do not have access to an accessible vehicle and rely on public transit and paratransit to obtain groceries. Public transit service across the country is experiencing a severe reduction in operation because of the pandemic thus limiting people's ability to shop in person. Additionally, even if some beneficiaries with disabilities are able to drive to a grocery store that offers curbside pickup in the first place, this requires stops at gas stations and other exposures that increase their risk of infection more than if the groceries were delivered to their home.

For these reasons, we strongly urge USDA to proactively work with retailers who currently have the ability to accept online payments and offer grocery delivery to help them become eligible for the pilot program. This retail expansion will help ensure more beneficiaries have the opportunity to take advantage of the program in stores available in their community. Many beneficiaries with disabilities already face existing administrative barriers¹ in obtaining assistance. The inability of beneficiaries to order groceries online during the COVID-19 pandemic will almost certainly increase hunger and food insecurity and result in unnecessary death among some of our nation's most vulnerable populations.

We have been disappointed in USDA's response to requests to expand the SNAP Online Purchasing Pilot program. We do not believe that USDA's response to previous requests³ that sole responsibility to expand the program lies with state agencies, their third-party processor, and any retailers who wish to participate in the pilot program is sufficient. While we understand concerns that the expansion of the program is a complicated process that must be worked through carefully to ensure a minimal amount of harm to the entire state's Electronic Benefit Transfer (EBT) system, Congressional intent as outlined in the 2018 Farm Bill made it clear that USDA should proactively expand the program.⁴ The 2018 Farm Bill included online entities in the definition of retail food stores, continued to the Online Purchasing Pilot, and made it clear that Congress intended that there be nationwide implementation of online acceptance of SNAP benefits.⁵ Unfortunately, since passage of the 2014 Farm Bill, which authorized the SNAP Online Purchasing Pilot program, only a handful of states have implemented the program. We believe that USDA should have taken more steps to proactively expand the program nationwide and, unfortunately, the negative effects on vulnerable populations that result from this failure are coming to light now because of the COVID-19 pandemic.

This unprecedented time calls for bold measures in order to ensure all people remain safe and healthy during and after the COVID-19 pandemic. Agencies across the federal government are taking extraordinary and innovative measures to address the alarming outbreak of the pandemic. USDA should not be an exception to this effort. We strongly urge USDA to treat the expansion of the SNAP Online Purchasing Pilot program to all states and territories and extend

³ T. (2020, April 13). NDRN Calls on USDA to Expand the SNAP Online Purchasing Pilot Program. Retrieved from <https://www.ndrn.org/resource/ndrn-calls-on-usda-to-expand-the-snap-online-purchasing-pilot-program/>

⁴ Public Law 115–334—Dec. 20, 2018

⁵ Sec. 4001 Public Law 115–334—Dec. 20, 2018

eligibility for the program to more retailers as an emergency and necessary measure. Again, it is imperative that SNAP beneficiaries with disabilities are not unnecessarily put at risk of contracting the disease simply because administrative rules prohibit online delivery of groceries purchased with SNAP benefits.

We look forward to engaging with USDA on this important issue. Please do not hesitate to contact Cyrus Huncharek (cyrus.huncharek@ndrn.org) or Bethany Lilly (lilly@thearc.org) with any questions.

Sincerely,

American Diabetes Association
American Network of Community Options & Resources (ANCOR)
Autism Society of America
Autistic Self Advocacy Network
Center for Public Representation
Disability Rights Education & Defense Fund (DREDF)
Easterseals
Epilepsy Foundation
The Jewish Federations of North America
National Alliance on Mental Illness
National Association of Councils on Developmental Disabilities
National Disability Rights Network (NDRN)
National Down Syndrome Congress
National Health Law Program
RespectAbility
Special Needs Alliance
The Arc of the United States

CC: Senator Pat Roberts, Senator Debbie Stabenow, Representative Collin Peterson,
Representative Michael Conaway