



April 13, 2020

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 National Disability Rights Network (NDRN) writes to urge the U.S. Department of Agriculture (USDA) to expand the Supplemental Nutrition Assistance Program (SNAP) Online Purchasing Pilot program<sup>1</sup> to all states and territories and extend eligibility for the program to more retailers. In this time when a super majority of our country is practicing physical distancing, it is important that some of our most vulnerable people be able to obtain needed supplies and groceries online.

NDRN is the non-profit membership association of the nationwide network of Protection and Advocacy (P&A) agencies in every state and territory. The P&A Network comprises the nation's largest provider of legally-based advocacy services for individuals with disabilities. NDRN, like most of the nation, is gravely concerned about the outbreak of COVID-19 across the United States, and we are particularly concerned about the growing needs of SNAP beneficiaries with disabilities. We strongly believe an expansion of 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.<sup>2</sup> A growing body of research indicates that SNAP lifts millions of people out of poverty, helps families put food on the table, and can improve long-term health and economic outcomes.<sup>2</sup> However, the growing outbreak of COVID-19 greatly threatens access to

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<sup>1</sup> "FNS Launches the Online Purchasing Pilot." *USDA*, [www.fns.usda.gov/snap/online-purchasing-pilot](http://www.fns.usda.gov/snap/online-purchasing-pilot).

<sup>2</sup> 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>.

food for SNAP beneficiaries as 95% of Americans are under some form of a stay at home order.<sup>3</sup> This new environment presents a particular set of challenges for beneficiaries with disabilities.

P&A agencies in Colorado (Disability Law Colorado), Texas (Disability Rights Texas), and Arkansas (Disability Rights Arkansas, Inc.) have received complaints from beneficiaries who are unable to have their groceries delivered to their homes. Many people with disabilities are already at heightened risk of contracting COVID-19 and are particularly susceptible in a crowded setting such as a grocery store. Many beneficiaries with disabilities are fearful of contracting the disease in a grocery store or infecting their families upon their return home.<sup>4</sup> 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, their risk of infection will inevitably be higher than if the groceries were delivered to their home.

Many popular retailers, outside of the initial seven chosen for the pilot program, currently have the ability to accept online payments and offer grocery delivery. Given that the infrastructure already exists within many of these retailers, we also strongly urge USDA to work with additional retailers to make them eligible for participation in 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. The inability of all beneficiaries to order groceries online during the COVID-19 pandemic only serves to exacerbate existing administrative barriers<sup>2</sup> beneficiaries with disabilities face in obtaining assistance which will inevitably lead to increased hunger and food insecurity as the pandemic runs its course.

The expansion of the SNAP Online Purchasing Pilot program to all states and territories coupled with an increased number of eligible retailers is a unique opportunity for USDA in an effective way to help ensure beneficiaries continue to have access to vital food assistance in a safe and protective manner. We commend USDA's recent expansion of the program to Arizona and California<sup>5</sup> which will undoubtedly help alleviate hunger in both states while keeping people safe and healthy. We urge USDA to harness this momentum to expand the program to all eligible people and households and take advantage of the innovative flexibility Congress vested in USDA when it authorized the program.

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3 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>

4 Galli, J. (2020, March 31). State not allowing EBT to be used for curbside pickup. Retrieved from <https://news4sanantonio.com/news/local/man-fighting-cancer-wants-to-be-able-to-use-ebt-to-get-groceries-curbside-at-h-e-b>

5 Arizona and California Added to Innovative SNAP Online Pilot Program. (2020, April 8). Retrieved from <https://www.usda.gov/media/press-releases/2020/04/08/arizona-and-california-added-innovative-snap-online-pilot-program>

This unprecedented time calls for bold measures in order to ensure all people remain safe and healthy during and after the COVID-19 pandemic. 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.

Again, we urge USDA to take the necessary steps to rapidly expand the SNAP Online Purchasing Pilot program to all beneficiaries and increase the number of eligible retailers. Please contact Cyrus Huncharek, Public Policy Analyst, at [cyrus.huncharek@ndrn.org](mailto:cyrus.huncharek@ndrn.org) to answer any questions or provide further input as needed.

Sincerely,



Curtis L. Decker  
Executive Director

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