NEW YORK CITY
EMERGENCY MANAGEMENT
(NYCEM)

PUBLIC HEARING

ON PROPOSED RULE

MONDAY, AUGUST 24, 2020

VIA WEBEX VIDEOCONFERENCE

Reported By:

Elbia Merino

A P P E A R A N C E S:

STELLA GUARNA, Chief Counsel
NEW YORK CITY EMERGENCY MANAGEMENT

SPEAKERS:
TARA KLEIN, Policy Analyst
United Neighborhood Houses

MS. STELLA GUARNA: Good morning, and welcome. My name is Stella Guarna, and I am the Chief Counsel of New York City Emergency Management. Thank you for attending this public hearing this morning.

At the end of my statement, I will give those that wish to speak an opportunity to do so. Please send me a message through chat and I will call you in the order of receiving your name.

New York City Emergency Management is conducting this remote hearing in accordance with the requirements of the City Administrative Procedure Act. The purpose of this hearing is to receive comments from the public on the new rule to continue the temporary emergency food delivery program for vulnerable homebound New Yorkers who are, one, impacted by food insecurity during the declared COVID-19 public health emergency; and two, meet

certain eligibility criteria.

This proposed rule was published in the City record on July 21, 2020 with the scheduled hearing date of today, August 24, 2020. In addition, New York City Emergency Management e-mailed copies of the rules to all New York City local elected officials, the City's 59 community boards, media and interested parties and published the proposed rule on their website.

The New York City Emergency Management office previously issued a temporary emergency rule establishing an emergency food delivery program for vulnerable New Yorkers who are either impacted by food insecurity during the declared COVID-19 public health emergency and two, meet certain eligibility criteria. Under the Charter, the emergency rule remains in effect for 60 days unless extended by agency. OEM now seeks to continue the program by establishing the program by

rule on an ongoing basis.

The emergency food delivery program feeds New Yorkers facing food insecurity during the COVID-19 public health emergency by delivering free meals to program participants. Meals are delivered by Taxi and Limousine Commission-licensed drivers of taxis and for-hire vehicles and vendors. The program is focused on the City's most vulnerable population, and is a key element of the City's commitment not to let any New Yorkers go hungry.

In order to receive services under the program, the individual or family must meet all of the following criteria:

One, no member of the household is able to obtain food from outside the home as a result of the COVID-19 public health emergency. For example, the individual is in quarantine or otherwise restricted to their home as a result of the City and/or State

emergency orders and policies adopted in response to the COVID-19 public health emergency. Or because the individual is over 60, a person with a disability or a person with functional needs that prevent or impedes travel outside the home to obtain food regularly; and the individual or family lacks neighbors or other family members that can and are willing to regularly obtain food for the individual or family; and the individual or family does not receive meal assistance, assistance to cover all meal needs from existing meal delivery programs, including but not limited to: Meals on Wheels and God's Love We Deliver.

And either the household is either unable to afford meal delivery or grocery delivery as a result of the COVID-19 public health emergency. Perhaps the crisis might have led to job loss or other adverse impact on

their income. Or the household normally relies on public food service, for example, a food pantry or a soup kitchen, and those areas are unavailable to the individual or the families due to the COVID-19 public health emergency.

This rule is necessary because food and security among New Yorkers is an immediate continuing and significant problem facing the City during the COVID-19 public health crisis. This includes, but is not limited to, those who would normally rely on services outside the home such as food pantries, senior centers, soup kitchens or other free food service programs, but are homebound due to COVID-19. Existing programs for the home delivery of food, food insecure individuals operated by the City or by nonprofits such as Meals on Wheels and Gods's Love We deliver, do not have adequate staffing or financial

capacity to meet the increased needs of this population during this period of emergency.

In order to address the urgent and growing challenge of providing adequate food supply to vulnerable homebound New Yorkers, the City has developed an emergency food delivery program for food insecure residents who meet the criteria described above. Home delivery of meals is the safest and most efficient way to ensure that this population is receiving adequate nutrition. OEM is now proposing to add a new Section 1-02 to its rule to codify this program.

A court reporter is present today and is recording the hearing. You may present an oral statement or submit written comments concerning either or both of the proposed rules. We have been accepting written comments on the proposed rule since the publication. Today is the deadline for submission

of written comments. Such comments may be e-mailed directly to FoodDeliveryRule -- that's one word -- FoodDeliveryRule@OEM.NYC.gov by 5:00 p.m. today.

New York City Emergency Management will make available a copy of all written comments received through today, together with a hearing transcript for viewing on its website within the next few weeks. New York City Emergency Management will carefully consider all the comments it receives today at the hearing and all written comments it receives.

I will begin calling all of you who wish to speak this morning in the order in which you have signed up to testify. While the notices requested that persons wishing to testify sign up in advance of this hearing, anyone wishing to testify at this time may do so by indicating in the chat area that you wish to speak by indicating your

name and your affiliation, if any.

When you speak, please state your name and affiliation, if any. When you speak, speak slowly and clearly so that the court reporter can understand and accurately submit and record your statement. We also ask that you limit your statement to five minutes.

Thank you for attending the hearing today, and I would like to call upon Tara Klein, who has registered and has asked to speak in advance. Thank you.

MS. TARA KLEIN: Thank you so much. Good morning, and thank you for the opportunity to provide comments today. My name is Tara Klein, and I am a policy analyst with United Neighborhood Houses. UNH is a policy and social change organization representing 43 neighborhood settlement houses. Settlement houses have been on the front lines of the COVID-19 emergency response by

continuing to deliver essential services to New Yorkers, providing emergency food, counseling, shelter, youth and family support and more. They have been enormously creative and adaptive to meeting needs on the ground, especially in responding to the rapidly growing challenge of food insecurity.

So the City's emergency food program has been a tremendous initiative providing a massive number of free meals to New Yorkers in need. And given that the City is still experiencing virus cases, social distancing remains the norm and the economic impact of the pandemic continues to hit people hard, UNH supports this proposal to extend the emergency rule and continue the program.

That being said, we recommend modifications to how the City has operationalized this emergency rule.

And accordingly, we are urging the Office of Emergency Management to include a preference for nonprofits and community-based organizations in the final rule.

So the rule states that existing programs for the home delivery of food to food insecure individuals operated by the City or by nonprofits do not have adequate staffing or financial capacity to meet the increased needs of this population during the emergency.

While this is true, it's important to recognize that these nonprofit programs are generally operating on government contracts issued by the City. Meaning their staffing levels and financial capacity are predetermined by the City agency that procures the contract.

As the City invested new resources into the GetFoodNYC emergency feeding program, it could have easily

consulted and employed nonprofits to scale up their existing work, for which they have a proven track record of success. Rather, the City hired a series of new private vendors which caused significant administrative hurdles and confusion.

This was particularly evident in the older adult feeding program under GetFood, which operated under the Department for the Aging and then moved to Sanitation and the Food Czar. My written comments lay out a number of the challenges with the new private vendors, including poor quality food and delivery problems. Older adults were calling their senior centers for help, but were left in the dark because senior centers were not managing the program.

By contrast, nonprofit community-based organizations have been providing food to local resident for decades, and they do it well.

They serve culturally competent meals to meet local needs, can adjust individual meals to meet dietary restrictions, and respond quickly and directly to solve any problems that may arise. Senior centers and home deliver meal programs are literally designed to do this work.

So for future emergency feeding needs, especially as our city moves towards reopening, we hope the City looks at modifying existing nonprofit contracts to scale up services, makes slight modifications to food distribution mechanisms as needed, and appropriately funds these services.

We hope the emergency rule will include this preference for nonprofits. Above all else, the City should work in collaboration with the community-based organizations that know their communities best.

Thank you.

MS. STELLA GUARNA: Thank you,

Ms. Klein. I'm checking my chat. I don't see that anybody else has asked to speak. So before I close the meeting, I'd like to give anybody that's on the call an opportunity to engage.

(No response.)

MS. STELLA GUARNA: Okay, hearing from no one, I thank all of the attendees today and be well and keep safe.

Thank you, everyone. Bye.

(TIME NOTED: 10:13 a.m.)

C E R T I F I C A T E

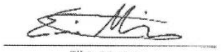
STATE OF NEW YORK)
:SS
COUNTY OF SUFFOLK)

I, Elbia Merino, a Notary Public within and for the State of New York, do hereby certify:

I reported the proceedings in the within-entitled matter, and that the within transcript is a true record of such proceedings to the best of my ability.

I further certify that I am not related to any of the parties to this action by blood or marriage; and that I am in no way interested in the outcome of this matter.

IN WITNESS WHEREOF, I have hereunto set my hand this 24th day of August, 2020.



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UNITED NEIGHBORHOOD HOUSES
45 Broadway, 22nd Floor, New York, NY 10006
212-967-0322 | www.unhny.org

Testimony of United Neighborhood Houses
Before the New York City Office of Emergency Management
Temporary Food Distribution Program Emergency Rule
City Administrative Procedures Act

Submitted by Tara Klein, Policy Analyst

August 24, 2020

Thank you for the opportunity to share comments on the NYC Office of Emergency Management's Temporary Food Distribution Program under the City Administrative Procedures Act. United Neighborhood Houses (UNH) is a policy and social change organization representing 43 neighborhood settlement houses that reach 765,000 New Yorkers from all walks of life. A progressive leader for more than 100 years, UNH is stewarding a new era for New York's settlement house movement. We mobilize our members and their communities to advocate for good public policies and promote strong organizations and practices that keep neighborhoods resilient and thriving for all New Yorkers.

The COVID-19 pandemic has ravaged New York City's economy and safety net and has underscored the significant racial and economic disparities that have impacted New York City's neighborhoods for decades. Just as they did through other crises our City has faced, settlement houses have been on the frontlines of the COVID-19 emergency response by continuing to deliver essential services to New Yorkers, providing emergency food, counseling, shelter, youth and family supports, and more. These organizations have been enormously creative and adaptive to meet needs on the ground, particularly in responding to the rapidly growing challenge of food insecurity, through activities such as:

- Increasing food pantry capacity and launching new pop-up pantries;
- Operating existing Department for the Aging (DFTA) home delivered meals contracts for homebound older adults;
- Serving as close partners in carrying out the City's GetFood NYC initiative;
- Staffing grab-and-go meal hubs for families at NYCHA Cornerstone sites and other locations;
- Operating urban farms and community gardens;
- Helping people access SNAP benefits; and
- Exploring new private partnerships to feed communities.

Along with these community-based solutions to combatting food insecurity, the City's emergency food program has been a tremendous initiative throughout the pandemic, providing a massive number of free meals to New Yorkers in need. Given that New York City is still experiencing virus cases, social distancing remains the norm, and the economic impact of the pandemic continues to hit people hard, **UNH supports this proposal to extend the emergency rule and continue the program.** That being said, we recommend modifications to how the City has operationalized this emergency rule. Accordingly, **we urge the Office of Emergency Management to include a preference for nonprofits and community-based organizations in the final rule.**

The emergency rule states: *Existing programs for the home delivery of food to food insecure individuals, operated by the City or by non-profits such as Meals on Wheels and God's Love We Deliver, do not have adequate staffing or financial capacity to meet the increased needs of this population during the period of this emergency.*

While this statement is true, it is important to recognize that these nonprofit food programs are generally operating on government contracts issued by the City, meaning their staffing levels and financial capacity are predetermined by the City agency that procures the contract. As the City invested new resources into the GetFood NYC emergency feeding program, it could have easily consulted and employed nonprofits to scale up their existing work, for which they have a proven track record of success. Rather, the City hired a series of new private vendors that initially operated autonomously, which caused significant administrative hurdles and confusion.

This was particularly evident in the older adult feeding program under GetFood, which replaced congregate meals served daily at senior centers before the pandemic. This program was housed under DFTA and later moved to the Department of Sanitation (DSNY) under the new Food Czar. Instead of utilizing existing senior centers to prepare food and manage delivery to their communities, or exploring scaling up home delivered meals contracts which serve food and provide wellness checks to homebound older adults (and have been operating as normal with increased demand throughout the pandemic), DFTA issued an emergency RFP with an extremely tight deadline that was not directly publicized to those organizations. Several private vendors were selected to prepare and deliver the meals, while senior centers were instructed to staff their buildings to act as holding areas for the food.

There were a number of major barriers to service delivery under the new private vendors. There were concerns about the quality of the food, with complaints including food that was difficult for seniors to chew and low availability and quality of culturally-appropriate meals (especially kosher meals). In a well-known case, one vendor was delivering subpar snack-type food and subsequently their contract was terminated. Older adults were inundating senior centers with phone calls: some did not receive their meal while their neighbor got one, some wanted to know when the meal would be delivered, some wanted to make sure they were signed up, etc. Unfortunately, senior centers were unable to answer most of these questions because they were not managing the program administration or given access to rosters. While some of these challenges have gotten better over time (i.e. senior centers can now enroll and un-enroll older adults directly), reports indicate there are still some problems, including poor quality food and delivery mistakes.

By contrast, nonprofit community-based organizations have been providing food to local residents for decades, and they do it well. They serve culturally competent meals to meet local needs, can adjust individual meals to meet someone's dietary restrictions, and respond quickly and directly to solve any problems that may arise. Senior centers and home delivered meal programs are literally designed to do this work.

Notably, in late July the Food Czar collected responses to an RFP for nonprofits who are interested in being part of the City's emergency food response. While we are glad the City has recognized the critical role of nonprofits in providing for their communities, this RFP came fairly late in the progression of the pandemic. And unfortunately, we know that many aging services programs that are experienced in preparing or distributing meals did not apply due to stringent requirements they could not meet, especially the high number of daily meals. The RFP gave no assurances that programs would receive the financial or technical support to scale up their work, so many opted not to attempt an expansion.

For future emergency feeding needs, especially as our City moves toward reopening and there are fewer requests for deliveries, we hope the City looks at modifying existing nonprofit contracts to scale

up services, make slight modifications to food distribution mechanisms as needed, and appropriately fund these services; instead of issuing brand new contracts and programs that may bring new administrative challenges. This is especially important for senior centers and home delivered meals contracts for older adults, though it can also apply to other programs that feed the community (i.e. food pantries, after school programs, etc.). Further, it is important that we build a strong system with nonprofits now, in case we face a second wave of the virus and must quickly scale the emergency feeding program up once again.

Accordingly, we hope the proposed emergency food rule will take these lessons into account. We urge the Office of Emergency Management to include a preference for nonprofits and community-based organizations in the rule. Above all else, the City should work in collaboration with the community-based organizations that know their communities best. Thank you.

For questions or follow-up, you can contact me at tklein@unhny.org.

COMMENTS: UJA-FEDERATION OF NEW YORK

New York City Office of Emergency Management Public Hearing
Proposed Rule to Continue Temporary Emergency Food Delivery Program

Submitted by:
UJA-Federation of New York

August 24, 2020

Good morning. Thank you for the opportunity to submit comments on the New York City Office of Emergency Management's Temporary Food Distribution Program under the City's Administrative Procedures Act.

Established more than 100 years ago, UJA-Federation of New York is one of the nation's largest local philanthropies. Central to UJA's mission is to care for those in need. UJA identifies and meet the needs of New Yorkers of all backgrounds and Jews everywhere. UJA connects people to their communities and respond to crises in New York, Israel and around the world, and supports nearly 100 nonprofit organizations serving those that are most vulnerable and in need of programs and services.

Over the course of a few months, the COVID-19 pandemic has dramatically and disproportionately impacted the lives of people of color and those living in poverty, further lifting-up the effects of systemic inequality and the real challenges New York City faces. In response to these needs, UJA's nonprofit partners have been on the front lines since the pandemic hit, assisting New Yorkers of all backgrounds, throughout the five boroughs. UJA's network provides a wide range of services, including emergency childcare, mental health supports, case management services, services for survivors of domestic violence, senior programming, and access to food. UJA's nonprofit partners quickly shifted their operations to better support New York City's emergency food efforts. They expanded their food pantry operations; worked as partners with the City through the GetFood NYC program; helped clients gain access to SNAP and other benefits and raised private dollars to deliver meals to homebound older adults.

UJA, through its partners, is also the largest provider of kosher food. There are over 500,000 people living in poor or near-poor Jewish households in New York City, and access to kosher food, both before and throughout the COVID-19 pandemic, is costly and challenging. The high cost of a kosher meal – which on average is 30 percent more expensive than a not-kosher meal – presents unique difficulties for many of UJA's agencies in their work with clients who observe these dietary laws. As a result of the high cost of kosher food, there is an increased reliance on emergency food programs, as benefits often run out earlier in the month.

UJA thanks the Administration and OEM for acting quickly to put in place food delivery programs to ensure that families in need and those who are homebound can receive food throughout the COVID-19 pandemic. UJA recognizes that there is an urgent need to find innovative solutions to help feed vulnerable New Yorkers that continue to struggle to access healthy food in a safe way during this public health emergency. **UJA is supportive of the rule extension and continuation of the program. However, UJA requests that OEM give special consideration to nonprofits and community-based organizations that can prepare and deliver meals, particularly those providing culturally competent meals, in the final rule.**

As OEM acknowledges, this rule extension is necessary because food access is a growing concern among New Yorkers, with almost one in four New Yorkers dealing with food insecurity. This represents over 2 million New Yorkers. As businesses lay off workers in response to economic hardship and as individuals remain in their homes and practice social distancing to the maximum extent possible, this number is expected to grow.

The justification for the enactment of this rule highlights that existing programs for the home delivery of food to food insecure individuals, operated by the City or by non-profits do not have adequate staffing or financial capacity to meet the increased needs of this population during the period of this emergency. The emergency rule states: *Existing programs for the home delivery of food to food insecure individuals, operated by the City or by non-profits such as Meals on Wheels and God's Love We Deliver, do not have adequate staffing or financial capacity to meet the increased needs of this population during the period of this emergency.*

Much of the existing nonprofit food programs are procured and funded through New York City Human Services contracts. UJA agrees these contracts do not provide adequate funding or staffing to meet this increased need; however, the City could have supplemented contracts to support these efforts. While New York City has invested millions into the GetFood NYC program, it has done so by ignoring its existing emergency food infrastructure and instead contracted with private vendors, who operated autonomously and are largely new to emergency food programs.

This also led to confusion, particularly within the older adult food program, which quickly shifted from senior center grab and go meals through the Department for the Aging to the Department of Sanitation under the larger food response effort. Throughout the COVID-19 crisis, senior centers have played a critical role in the wellbeing of more than 30,000 older adults. Senior Center staff have worked to ensure access to the GetFood NYC program; provided regular wellness check-ins, and swiftly shifted to virtual programming. By largely leaving senior center providers out of the emergency food program, older adult clients have experienced inadequate and inconsistent meals, such as seeds and apples which are hard to chew; many kosher clients were unable to get a kosher meal, and across the board, deliveries often did not show up.

The Home Delivered Meals Program has also played a critical role in New York City's COVID-19 response efforts. As older adults remain at home, many do not have family or friends that are able to help them acquire food. While New York City launched GetFood to help address this issue, demand for the HDM program also increased, with as many as 4,500 new clients now enrolled. The HDM Program currently serves 21,000 homebound older adults throughout the five boroughs, and the number of older adults eligible for this program is increasing. The recipients also require meals that accommodate dietary needs and restrictions, a demand that the HDM program is equipped to meet. The City could have explored expanding this program to meet the dietary needs of older, homebound adults to support the GetFood program. Additionally, the recently closed HDM RFP did not account for the increase in the potential number of New Yorkers in need of this service in the out years of the pandemic.

The solution is to invest in the nonprofit organizations that can do this work effectively. The NYC FY21 budget contains significant cuts to nonprofits, which serve as a safety net and a force that builds stronger communities. City Council FY21 discretionary funding was cut by almost 17%. Discretionary funding often represents a large portion of small community-based nonprofits' budgets. Numerous NYC based community organizations and emergency food providers are highly experienced, trained in safe food handling, well equipped and eager to prepare and deliver food to seniors and other vulnerable populations right now. Including nonprofits in this emergency rule—and funding them—will enable them to do the essential work that their

communities need, and it will allow the City to effectively serve the millions of individuals that continue to rely on emergency food services as we recover from the pandemic.

Conduct an evaluation of the emergency food delivery program to date and put in place quality control measures moving forward.
Since the launch of GetFood NYC, there have been numerous accounts of people experiencing issues with the program, including with the quality and safety of the food delivered (with some reporting food arriving rotten from lack of proper refrigeration); food not being culturally appropriate, and food being left in front of buildings on the street with no notice nor regard for food safety measures. There have also been reports of recipients throwing out food received through this program due to spoilage, poor quality or dietary standards, both a significant waste of food and funding. To alleviate this waste, before this program is extended, UJA strongly urges the Administration and OEM to conduct and make publicly available an evaluation of the effectiveness of the program to date and put in place quality control measures to ensure that the delivery program itself and the food it is providing are of the highest quality and meet dietary standards.

Ensure that older adults receiving emergency meals are aware of program details and timeline.
Early in the GetFood Program's creation, there was a lot of confusion surrounding how to sign up for meal delivery; where the meals would be coming from; how often meals would be delivered, and how often seniors would have to renew sign up for continued deliveries. This created unnecessary stress on the individuals who would be relying on these programs. While some of these issues have been alleviate, as the program continues, UJA urges the Administration and OEM to ensure that seniors are aware of the program details so that they know where their next meal is coming from.

Thank you for the opportunity to submit comments. If you have any questions, please contact Ariel Savransky at savranskya@ujafedny.org.

equity advocates

Testimony Submitted by
Gabrielle Blavatsky, Policy Director, Equity Advocates
Before the NYC Office of Emergency Management

My name is Gabrielle Blavatsky and I am the Co-Founder and Policy Director of Equity Advocates. We thank the New York City Office of Emergency Management for holding today's hearing and the opportunity to submit this testimony.

Equity Advocates builds the capacity of nonprofit organizations to address the underlying causes of food inequity through policy and systems change. We partner with New York-based organizations working to alleviate hunger and poverty, providing them with the tools they need to be more civically engaged—including policy education, advocacy training and coalition building services.

New York emerged as the first American the epicenter of the Covid-19 pandemic. This crisis is causing major disruptions to our food system and is exacerbating poverty and food inequity across the state. In response, Equity Advocates organized the New York Covid-19 Food Coalition: a diverse multi-sector group of 40+ food system stakeholders. The Coalition is advocating for resources to ensure that the local food system and supply chain remains intact, that all families are able to access the food and support they need, and that front line community embedded organizations can respond effectively to the crisis.

Like the Office of Emergency Management (OEM) we recognize that there is an urgent need to find innovative solutions to help feed vulnerable New Yorkers that continue to struggle to physically and financially access healthy food in a safe way during this public health emergency. We also appreciate how quickly the Administration and OEM moved to put in place food delivery programs to ensure that families in need are able to access food. However, before the temporary emergency food delivery program for vulnerable homebound New Yorkers is extended, we would like OEM to consider and implement the following recommendations:

1. **Open up an RFP process for nonprofits and CBOs to apply to participate and receive funding for delivering meals through this program.** We are very concerned that this program is being limited to only Taxi and Limousine Commission licensed drivers. One of the key reasons cited by OEM for extending the temporary emergency food delivery program and only making it available to TLC drivers to operate is because "existing programs for the home delivery of food to food insecure individuals, operated by the City or nonprofits…do not have adequate staffing or financial capacity to meet the increased needs of this population during the period of this emergency."

However, one of the key reasons that emergency food providers and food delivery nonprofits lack the needed staff and funds to do this work right now is due to a historic and ongoing lack of City support and investment. For example, City Council FY21 discretionary funding was cut by almost 17%. Discretionary funding often represents a large portion of small community based nonprofits' budgets, many of which are led by, serve and are embedded in communities of color. Numerous NY based CBOs and emergency food providers are highly experienced, trained in safe food handling, well equipped and eager to prepare and deliver food to seniors and other vulnerable populations right now. Therefore, we recommend that OEM open up an RFP process for nonprofits and CBOs in addition to TLC drivers to apply to participate and receive funding for delivering meals through this program. This support from the City is more critical than ever as demand for emergency services has increased significantly since the start of the pandemic.

2. **Conduct an evaluation of the emergency food delivery program to date and put in place quality control measures moving forward.** Through the weekly NY COVID-19 Food Coalition calls and weekly Food Czar advocate calls, we've heard numerous accounts of people experiencing issues with the program, including with the quality and safety of the food delivered (with some reporting food arriving rotten from lack of proper refrigeration), food not being culturally appropriate and food being simply left in front of buildings on the street with no notice nor regard for food safety measures. There have also been reports of recipients throwing out food received through this program, both a significant waste of food and City dollars. Therefore, before this program is extended, we strongly urge the City and OEM to conduct and make publicly available an evaluation of the effectiveness of the program to date and put in place quality control measures to ensure that the delivery program itself and the food it's providing is of the highest quality.

3. **We call upon OEM and the City of to make future emergency food decisions more inclusive of community voice.** We recognize that the City has had to move very quickly to meet the unprecedented demand for food during this public health and economic crisis. However, we are very concerned that the incredibly short notice given for this hearing will make it difficult for the CBOs and members of the community that are deeply embedded in and directly affected by this program to respond to this open comment period. Information about this hearing was not widely available or distributed and input from food delivery nonprofits was not actively sought out by OEM before the rule was published. This unfortunately is not the first time that the administration has made a decision about a major food emergency program without community input. In April, the Food Czar team and Mayor DeBlasio announced that $25 Million would be made available to emergency food providers. This funding decision was made without the knowledge or input of the EFPs targeted for this funding, causing major confusion and some conflict within the sector. Therefore, moving forward, we encourage OEM and the administration

to more actively seek the input of the food nonprofit sector before these decisions are finalized, advertise hearings and more broadly, and extend the timelines for submission of testimony and input into the rulemaking process to at least 60 days.

Thank you for your time and consideration.