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

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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.