

June 19, 2012

Jon Garcia, Acting Branch Chief  
Program Analysis & Monitoring Branch  
Child Nutrition Division  
Food & Nutrition Service  
U.S. Department of Agriculture  
3101 Park Center Drive, Room 640  
Alexandria, VA 22302

Dear Mr. Garcia:

We are writing to comment on the Notice regarding Agency Information Collection Activities; Proposed Collection; Comment Request: Determining Eligibility for Free and Reduced-Price Meals & Free Milk.

First, we question the need for expanded reporting regarding how children qualify for free or reduced-price meals. The changes which will need to be made in software, the time for reporting and the time for State Agencies (SA) to compile all the School Food Authority (SFA) reports do not add quality to our program. While we believe direct certification is a great benefit, both to parents, schools and ultimately the children who benefit from our program, requiring additional reporting does not facilitate the operation of the program.

Second, we wish to comment regarding the accuracy of the burden of the proposed collection of information. The burden does not include the amount of time and money which will be needed to re-program SFA and SA software. Our SA provides school meals accountability software to SFAs to facilitate their participation in school feeding programs. That will need re-programming in order to comply with these new reporting requirements. In addition, SFAs often use non-SA provided software, which will also need re-programming to comply with these reporting requirements. Finally, SA file specifications have not been provided with this proposal, so it is not possible to estimate the amount of time it will take to compile SFA reports into a SA report which summarizes the data collection.

Currently, direct certification reporting does not require separation to show the origin of the certification (SNAP, TANF, FDPIR, etc.). Incorporating that information will mean an additional data point will need to be entered so the system can extract the information. Each record for which the SFA enters data will need to have this additional reporting element entered.

Provision II and III reporting will be expanded by this proposed reporting. SFAs in our state use SA software which calculates their free and reduced-price participation based on information entered via their claims during the base year. SFAs do not know the percentage of free or reduced-price in non-base years – it is simply calculated for them using the base year figures and current year enrollment. The SA will need to re-program software to either provide these figures for the SFA so they can complete this report OR design software which will automatically complete this report based on SA data.

Why is the date for which direct certification numbers collected (last operating day of October, per the instructions) *different from* the date upon which the total number of applications or children are counted (on file as of October 1<sup>st</sup>, per the instructions)? This is just another aspect of our programs

which makes it very challenging for SFAs to accurately perform and report on verification activities. We strongly suggest both reports be run on the same date (either October 1<sup>st</sup> or October 31<sup>st</sup>). It would also be helpful if the free & reduced price survey was run on the same date (currently, it is data as of October 31<sup>st</sup>).

We feel this proposed report adds unnecessary additional reporting elements, such as the total number of error prone applications on file, the number of directly verified applications and students reported separately from those not directly verified. These numbers might be interesting, but they do not add to the quality of our programs. It will take time, software re-programming and labor to report them. Why are SFAs being asked to track them separately from other verification?

In terms of ways to minimize the burden of data collection, we suggest forms be 'auto-completed' when the information has been given in a different area of the proposed report. For example, the tool could add the number of free and reduced-price applications to obtain the total in T-1 and T-2.

Finally, the reporting tool and instructions need to use a font which is larger than the one printed in the Federal Register.

We believe that the certification of children for free and reduced-price meals provides a great benefit to families and their children. We believe the verification of applications is necessary to provide program integrity and that a certain level of reporting helps to assure we can provide data regarding the actual eligibility of those who have completed applications. We do not believe this detailed level of reporting is necessary. It will cost a great deal of money to have systems updated so software can be used to report this data. It will take additional staff time to modify SA reporting elements so the information can be compiled into one report. It will take additional SFA time to enter the additional reporting elements (from what agency was a child directly certified for benefits?). The integrity of our program is important to us, but the program is already so complicated. This report adds additional complexity and we do not feel the changes are warranted by the benefits it would provide.

Sincerely,

*Charlene S. Allert*

Charlene S. Allert, M.P.H.  
Sr. Specialist, Child Nutrition Programs