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Agency Information Collection Activities: Proposed Collection; Comment Request –
Information Collection for the National School Lunch Program

Comment On: FNS-2016-0029-0001

Agency Information Collection Activities; Proposals, Submissions, and Approvals: National
School Lunch Program

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Comment on FR Doc # 2016-05312

Submitter Information

Name: Amanda Mercer

Address:

1580 Logan St.

Suite 760

Denver, 80203

Email: mercer_a@cde.state.co.us

Phone: 303-866-6659

General Comment

See attachment

Attachments

FNS 640 comments:

(a) Whether the proposed collection of information is necessary for the proper performance of the functions of the agency, including whether the information shall have practical utility;

Question the practical utility of the following data points: review period, non-program foods, location of meal service, number of points where meal counts are taken, and number of serving days.

(b) the accuracy of the agency's estimate of the burden of the proposed collection of information, including the validity of the methodology and assumptions that were used;

As a State Agency all of our administrative review information is collected in an online system (we use Colyar Technology Solutions, Inc.). The burden of collecting the information for the FNS 640 data report will be greatly increased, above the proposed burden, if we have to complete the report manually. It will take time for our software company to develop the report and therefore manual submissions may be required if adequate time is not provided.

The current submission required for school year 2015-16 had to be done manually. For this submission documents were required for two reviews from school year 2014-15. This required the printing and scanning of hundreds of pages of forms. This manual process took about 4 hours to complete.

(c) ways to enhance the quality, utility, and clarity of the information to be collected; and

There is a fiscal action section; however recalculation information is collected in the school level meal service information section. All fiscal action information should be collected in one section.

The school level information appears to have mostly the same information as the administrative review S-1 School Data Meal Pattern Error form. It would be useful if the error/data forms for the administrative review collected the exact same information as is requested by the FNS 640.

(d) ways to minimize the burden of the collection of information on those who are to respond, including use of appropriate automated, electronic, mechanical, or other technological collection techniques or other forms of information technology.

As a State Agency all of our administrative review information is collected in an online system (we use Colyar Technology Solutions, Inc.). The burden of collecting the information for the FNS 640 data report will be greatly reduced if our online system is able to generate the report automatically. When the FNS 640 is finalized, USDA must give State Agencies ample time before the first report is required to be submitted to work with our software companies to ensure adequate time for report development.