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Subject: comments on FNS 640

Sarah,

Thank you for the opportunity to comment.

The FNS 640 has the potential to collect valuable information and eliminate the need for USDA to collect various information on a random basis. However, the amount of information being requested should be carefully considered to ensure that all data points will be used on a routine basis by USDA. State Agencies are overwhelmed with additional responsibilities. Representing a large state agency, it makes sense to provide USDA any information it desires, providing it is collected with a specific purpose in mind and it can be accomplished using an automated process.

In general, our key concerns with the proposed FNS 640 are as follows:

- The amount of information being requested is not a concern providing that all data points are currently being requested, and no data points being requested result in the need to collect additional information (See specific data field comments below).
- There must adequate time to establish an electronic mechanism to extract the data points from the Administrative Review (AR). The current proposed timeframe is not realistic. As we understand it, the proposed FNS 640 will use data from this current SY and collect it in the 16-17 SY. This is an unrealistic timeframe for State Agencies to work with their vendor to establish an automated process (in addition to added fields).
- FPRS must be prepared to accept a file of this size without "timing out." Timeout issues cause a redundancy of tasks from the State Agency perspective.
- Edit checks should be provided to State Agencies so data can be investigated/corrected as it occurs. For example, if data fields are going to be pulled from the AR form, those specific questions on the AR should have edit checks (hypothetical: answer for 342 cannot be yes if answer for 341 is no), as well as the respective fields on the FNS 640 (field for 341 and 342). This allows the State Agency to become immediately aware of an investigate information that does not appear to be accurate. Historically, FNS does not provide the business rule/edit checks that are placed within FPRS or used by USDA staff after information is uploaded in FRPS. This causes two issues: it presents itself that USDA is using a "gotcha" philosophy opposed to the philosophy USDA expects us to convey to SFA's, which is more of a partnership; and it causes the state agency an enormous amount of time to circle back to the original situation to determine the circumstances related to the situation. It would be much more efficient and effective for edit checks and business rules to occur on the front end to prevent the entry of erroneous data due to human error. A more specific example would be: School Level Information After School Snack Program requires Total # of Snacks Served on Day of Review – Number of snacks may not be recorded for Day of Review in the situation where a documentation review of the Afterschool Snack Program was conducted.

Specific comments related to the data fields on the FNS 640:

- **General SFA Information – Total # of Schools Offering SBP** – this is not information that is currently collected on the AR. Collecting and reporting this information for each SFA reviewed would place an undue burden to the SA.
- **Fiscal Action - Report all dollar amounts in whole numbers, rounded to the nearest whole dollar** – FNS 640 requires total overclaim/underclaim for each NSLP, SBP, and ASSP. The USDA fiscal action workbook does not calculate total fiscal action by rounding to the nearest whole dollar. Collecting and reporting fiscal action rounded to the nearest whole dollar will place an undue burden on the SA.
- **School Level Information – Meal Pattern used K-5, 6-8, or 9-12.** - this is not information that is currently collected on the AR. Collecting and reporting this information for each reviewed school would place an undue burden to the SA.
- **School Level Information – In what area was the violation that caused the recalculation to be necessary PS 1 or PS 2.** - this is not information that is currently collected on the AR. Collecting and reporting this information for each reviewed school would place an undue burden to the SA.

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