

**APPENDIX F.1**

**PUBLIC COMMENT 1**

# PUBLIC SUBMISSION

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**Docket:** FNS-2020-0022  
School Meals Operations Study

**Comment On:** FNS-2020-0022-0001  
Agency Information Collection Activities; Proposals, Submissions, and Approvals: School Meals Operations Study: Evaluation of the School-Based Child Nutrition Programs

**Document:** FNS-2020-0022-0002  
Comment on FR Doc # 2020-10205

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## Submitter Information

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**Submitter's Representative:** Nadia Davis  
**Organization:** School Nutrition Association

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## General Comment

Please see attached comments from the School Nutrition Association.

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## Attachments

School Meals Operations Study 7.13.2020



**Feeding Bodies. Fueling Minds.™**

July 12, 2020

Ms. Holly Figueroa  
Food and Nutrition Service  
U.S. Department of Agriculture  
1320 Braddock Place  
5th Floor  
Alexandria, VA 22314

Dear Ms. Figueroa:

On behalf of over 55,000 members of the School Nutrition Association (SNA), we appreciate this opportunity to comment on the Food and Nutrition Service's (FNS) *Comment Request— Agency Information Collection Activities: School Meals Operations Study: Evaluation of the School-Based Child Nutrition* published in the *Federal Register* on May 13, 2020. This study is identified as a revision of a currently approved study to assess the operations of the National School Lunch Program (NSLP) and School Breakfast Program (SBP).

It appears that revisions have been made for data collection for school meal program operations as a result of the COVID-19 global pandemic. While school nutrition professionals are operating these programs in earnest, there are many food safety, operational and administrative changes that have been made, including social distancing, in order to keep staff, students and their families safe. Without national coordination, each local educational agency (LEA) has implemented practices and actions to address their needs.

The traditional school meal program operations model changed abruptly when schools across the country closed in mid-March 2020 as a result of the pandemic. In addition, school nutrition programs became a welcome resource for families to feed their children as unemployment rates soared. Committed and dedicated school nutrition personnel rallied to support the children and followed the direction of Secretary Perdue to ensure that no students go hungry. FNS should recognize that data collection will be impacted by the various waivers as well as other accommodations to the school meal programs. The evaluation of program data may need to include more subjective reviews and decisions as school nutrition operators creatively administer school nutrition programs during the pandemic based on the challenges, they are facing in their school district to ensure that students are fed.

The waiver process, while very helpful and well intended, was a bit cumbersome and did not provide immediate flexibility needed as the national pandemic emergency was taking hold in our country. In your evaluation process, SNA recommends FNS include a review of the administrative procedures implemented at the federal and state levels to identify where processes could be streamlined so we are all better prepared when the next national emergency emerges. This is an unprecedented time in our

country, and with the pandemic forecasted to continue well into the new school year that a reevaluation of decisions at all levels may be needed to ensure that children and households are not food insecure.

Currently, school districts across the country are looking at multiple options to operate school nutrition programs in school year 2020-2021. These options will impact operations and require changes in delivery methods, types of foods purchased, availability of foods in the food supply chain as well as purchases for protective equipment for employees. In addition, there needs to be recognition that the current pandemic will include emergency purchasing and change data collections from previous school food operations studies.

FNS must also adjust the data collection to streamline the process and incorporate contactless and social distancing protocols. As indicated in the notice, the web-based survey should assist in data collection. The format of data collections should allow school food authorities (SFAs) to submit or upload requested information in the SFA's format and not require an additional spreadsheet to be completed. The time spent reformatting data to comply with a study takes time and attention away from school nutrition program operations and administration. This retooling of information is a burden and could potentially reduce the number of respondents to studies and the data collection content.

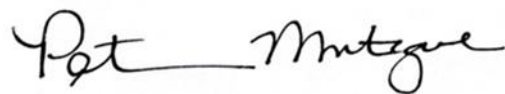
Finally, SNA recommends that FNS convene a commission to evaluate the processes and practices used during this emergency health crisis and develop a national playbook on operating school meal service programs in various emergency situations. This commission should have representation from the various stakeholders and operators involved in the operations of the school nutrition programs from across the country. The value from a reflective and objective review would provide great input and practices to future unanticipated school closures.

We appreciate the opportunity to comment and are more than happy to support FNS in identifying streamlined practices and protocols for operating school nutrition programs during a national emergency.

Sincerely,



Gay Anderson, SNS  
President



Patricia Montague, CAE  
Chief Executive Officer