

APPENDIX F.5

FNS RESPONSE TO PUBLIC COMMENT 1

From: [Figueroa, Holly - FNS](#)
To: ["ndavis@schoolnutrition.org"](mailto:ndavis@schoolnutrition.org)
Subject: FNS response to public comment on the School Meals Operations Study [85 FR 28602]
Date: Tuesday, September 22, 2020 3:29:00 PM
Attachments: [FNS Response to SNA Sept2020.pdf](#)

Ms. Davis,

Thank you for your submission on behalf of the School Nutrition Association (SNA) to the Federal Register notice requesting comments on the proposed information collection for the School Meals Operations Study, published May 13, 2020. FNS's response to SNA's comments are provided in the attached letter. SNA's comments and FNS's response will be included in the Information Collection Request (ICR) submission to the Office of Management and Budget (OMB). Submission of the ICR to OMB will be announced via the Federal Register.

Best,
Holly

Holly Figueroa
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Food and
Nutrition
Service

September 22, 2020

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Place
Alexandria,
VA
22314

School Nutrition Association
2900 S. Quincy St.
Suite 700
Arlington, VA 22206

Dear Ms. Anderson and Ms. Montague:

Thank you for your response on behalf of the School Nutrition Association to the Federal Register notice requesting comments on the proposed information collection for the study, School Meals Operations Study, published May 13, 2020. We appreciate your support for the study and the valuable information it will provide to program operators and other stakeholders.

The Food and Nutrition Service (FNS) appreciates your input about the School Meals Operations Study, and offers the following responses to the specific comments noted in your letter:

- **Recognize that data collection will be impacted by COVID-19 waivers and other accommodations to school nutrition programs.** We acknowledge the significant impact COVID-19 has had on school nutrition operations since March 2020, and understand that data collection for the study will be affected by the program waivers and changes in program operations that continue in school year (SY) 2020-2021. Given the current circumstances, FNS will only collect data at the state level for this study year. The planned survey with school food authority (SFA) directors has been cancelled for SY 2020-2021. The state-level data collection will include a web survey and an administrative data pull that will provide FNS with the information necessary to assess how the waivers were implemented at the state and local levels, the challenges experienced, and the methods used to provide meals to children during the pandemic. This study will also help States to fulfill their statutory reporting requirements under the Families First Coronavirus Response Act (FFCRA).
- **Include a review of administrative procedures implemented at the federal and state levels.** As noted above, the School Meals Operations Study will collect data from all State Child Nutrition (CN) Agency directors in SY 2020-2021 in order to learn how the COVID-19 CN waivers were implemented and what impact they had on children. This data collection will help States to fulfill their statutory reporting requirements under the FFCRA. The findings will also be used to inform policies and procedures related to CN program operations.
- **Adjust data collection to incorporate contactless and social distancing protocols and allow data to be submitted in the format used by SFAs.** We understand there can be significant burden placed on SFAs in completing a specific spreadsheet with their data. In light of the current circumstances, we have cancelled the SFA-level data collection associated with this study for SY 2020-2021. The state-level data collection will indeed be “contactless” as there is no in-person data collection. All study communications and data collection will be done electronically (email and web), by telephone, and, if needed, by mail and will comply with all CDC guidelines during the national emergency.

- **Convene a commission to evaluate the processes and practices used during the pandemic and develop a national playbook on school meal service operations in emergency situations.** FNS values stakeholder feedback and agrees that input from experienced state and local program operators is important for policy development. While convening a commission is outside the scope of this study, the School Meals Operations Study will survey State CN Agency directors regarding the processes, practices, and flexibilities that State and local program operators used to provide meals to children during the pandemic, as well as the challenges they experienced. Findings will inform future CN program policies and procedures.

Thank you again for your support of the School Meals Operations Study.

Sincerely,



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