

**APPENDIX F.6**

**FNS RESPONSE TO PUBLIC COMMENT 2**

**From:** [Figueroa, Holly - FNS](#)  
**To:** [ecampbell@eatright.org](mailto:ecampbell@eatright.org)  
**Subject:** FNS response to public comment on the School Meals Operations Study [85 FR 28602]  
**Date:** Tuesday, September 22, 2020 3:34:00 PM  
**Attachments:** [FNS Response to the Academy Sept2020.pdf](#)

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Ms. Campbell,

Thank you for your submission on behalf of the Academy of Nutrition and Dietetics (the Academy) 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 the Academy's comments are provided in the attached letter. The Academy'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

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September 22, 2020

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Academy of Nutrition and Dietetics  
1120 Connecticut Avenue NW  
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Washington, D.C. 20036

Dear Ms. Blankenship and Ms. Campbell:

Thank you for your response on behalf of the Academy of Nutrition and Dietetics 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:

- **Document the impact of child nutrition waivers on program operations as well as best practices for future emergency preparedness.** 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, how meals were provided, the challenges experienced, and the impact of the waivers on children. This study will also help States to fulfill their statutory reporting requirements under the Families First Coronavirus Response Act (FFCRA).
- **The burden estimate is too low.** Because the SFA Director Survey has been cancelled for SY 2020-2021 and the State Child Nutrition (CN) Agency Survey and administrative data collection have been expanded to collect the required information on the CN COVID-19 waivers, the burden estimate for the study has been revised to more accurately reflect the burden on respondents.
- **Send data collection tools well in advance so that systems and processes can be put in place to meet expectations.** FNS understands that it can be challenging to provide data in a specific format. To help States prepare for this data collection, the study team will send an advance letter and email explaining the purpose of the study and describing the data request. The study team will then conduct planning meetings with each State CN Agency Director to review the data request, identify any State-specific circumstances that will require the templates to be tailored, and discuss any challenges that the Director foresees to providing the data. The study team will use the information provided during this meeting to tailor the data collection materials to each State to reduce the burden of the data collection as much as possible.

- **Include questions that can capture how school closures have impacted districts nationwide, including which programs fared best and why.** 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 include questions about the financial and operational impacts of the COVID-19 pandemic on program operators and the methods used to provide meals to children during the school closures.
- **Collect information on the waiver process and impact of the COVID-19 waivers, including suggestions for future emergency preparedness.** FNS values input from program operators and recognizes its importance for future emergency preparedness. 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.
- **Ensure that data collection efforts reflect service models and topics specific to school meal program operations during the COVID-19 pandemic.** We acknowledge the significant impact that the COVID-19 pandemic has had on school meal program operations and have adjusted the School Meals Operations Study data collection materials accordingly. The administrative data collection instruments and the web survey will collect data for March 2020 – September 2020 to answer research questions related to how the waivers were implemented, how meals were provided, the challenges that program operators experienced, and the impact the waivers had on children.
- **Consider adding questions to the survey instrument to capture information on unpaid meal debt.** The School Meals Operations Study has been repurposed for SY 2020-2021 to focus on meeting States' reporting requirements under the FFCRA and learning about the impacts of the COVID-19 waivers on school meal operations and children. While we will not be able to include survey questions on unpaid meal debt in the survey this school year, we understand the Academy's request to collect this information and will consider including questions on unpaid meals in future data collections.

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

Sincerely,



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