

## **Appendix B.2**

### **PUBLIC COMMENT 2**



**Feeding Bodies. Fueling Minds.™**

January 11, 2021

Ms. Ruth Brown  
Departmental Information Collection Clearance Officer  
USDA, OCIO, Mail Stop 7602  
Washington, DC 20250-7602

OMB Desk Officer for Agriculture  
Office of Information and Regulatory Affairs  
Office of Management and Budget  
New Executive Office Building  
Washington, D.C. 20503

ELECTRONIC SUBMISSION

Dear Ms. Brown and OMB Officer:

On behalf of the members of the School Nutrition Association (SNA) and its 50,000 members, we appreciate the opportunity to comment on the *Submission for OMB Review; Comment Request related to the Food and Nutrition Service School Food Purchase Study IV (SFPS-IV)*, OMB Control Number: 0584-0471 published in the Federal Register on December 17, 2020.

In a previous Federal Register publication, our Association submitted comments on the study in July, 2020. A copy of those comments is submitted along with this submission.

While addressing compliance with nutrition standards of the child nutrition programs, School Food Authorities (SFA's) have struggled with the food supply chain, in particular the availability of foods during the current pandemic emergency. The Food and Nutrition Service (FNS) researchers should include study questions to fully understand the challenges that SFAs are facing and how they are addressing in providing needed nutrition and meals to households throughout our communities. In addition, it would be helpful if the final report could provide useful suggestions on successful purchasing techniques to help SFAs better navigate the next national emergency.

Our previous comments remain current and it is our hope, considering the continuing pandemic emergency, that FNS will create minimal disruption with program operators during this information collection effort.

Sincerely,

Reginald Ross, SNS  
SNA President

Patricia Montague, CAE  
Chief Executive Officer

Attachment: SNA Purchase Study Comment July 2020



**Feeding Bodies. Fueling Minds.™**

July 12, 2020

Jinee Burdg, MPP, RDN, LDN  
Food and Nutrition Service  
U.S. Department of Agriculture  
1320 Braddock Place  
Alexandria, VA 22314

Dear Ms. Burdg:

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 Comment Request—*Agency Information Collection Activities: Proposed Collection; Comment Request- School Food Purchase Study IV* published in the *Federal Register* on May 13, 2020. This study is to provide an analysis of food acquisitions for meals served in the National School Lunch Program (NSLP) and School Breakfast Program (SBP).

The *School Food Purchase Study IV* could provide valuable information on the many facets of food purchasing in school nutrition programs. It is important to note that since mid-March 2020, school districts are implementing critical emergency feeding services in their communities to address rising food insecurity due to the emergency health crisis of COVID 19. In doing so, school nutrition operators have encountered many food acquisition challenges. Schools have not operated under the traditional school meal services mode during this pandemic; therefore, FNS should recognize that data collection will be impacted by the various waivers to the school meal service program requirements.

Currently, many school districts across the country are looking at multiple options to operate the school nutrition programs in school year 2020-2021. These include methods that will affect food purchases such as delivery methods, types of foods purchased, availability of foods in the food supply chain as well as purchases for protective equipment for employees. Although it is outlined in the Federal Register notice that there will be revisions to previous studies to minimize the burden on respondents, FNS must recognize and adjust the data collection to streamline the process and incorporate contactless and social distancing protocols.

Communications on FNS studies should provide clear information on the processes to collect the data and complete the analysis. Information from these studies should be available and provided in a consistent format. The data results and reports should not have such a long lag time between data collection and reports to ensure that the information remains relevant. School nutrition directors and key staff are very conscientious in gathering responses and data for FNS studies. Notices to the selected districts should be clear and concise, with a table of calendar dates and data information outlined. It is recommended that FNS look to promote its calendar of studies and release a schedule of timeframes for the activities related to the studies, including an approximate date when reports will be released.

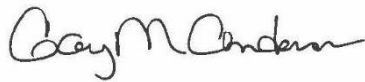
The format of data collections should allow school food authorities (SFA's) to submit or upload requested information in the SFA's format and not require another spreadsheet to be completed. The time spent to reformat to comply with a study takes time and attention away from school nutrition program operations and administration. This retooling of information is a burden and may be reducing the number of respondents to studies and the data collection content.

To assist in reducing the burden to respondents, we continue to recommend that FNS create a working group of school nutrition professionals from across the profession to work as a front-end testing group. As they would be skilled and knowledgeable on the programs, they could guide research design staff on relevant content, question interpretation and act as resource to elicit more responsive participants.

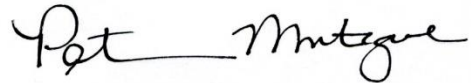
These working group members could be used to support development of studies and surveys, provide outreach during the study process, and make the study more valuable, relevant, and timely.

We appreciate the opportunity to comment and would support FNS in engaging a working group to guide and assist this study.

Sincerely,



Gay Anderson, SNS  
President



Patricia Montague, CAE  
Chief Executive Officer