



**Feeding Bodies. Fueling Minds.™**

February 26, 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, DC 20503

Dear Ms. Brown and OMB Officer:

On behalf of the 50,000 members of the School Nutrition Association (SNA), we appreciate the opportunity to comment on the Submission for OMB Review; Comment Request related to the Food and Nutrition Service (FNS); School Meals Operations Study: State Agency COVID-19 Child Nutrition Waivers Evaluation, OMB Control Number: 0584-0607 published in the Federal Register on January 27, 2021. This study has been renamed from the "Child Nutrition Operations Study" (CNOPS) and is focused on the COVID-19 waivers.

In a previous Federal Register publication, our Association submitted comments on the study in July 2020. Please see attached comments. While addressing compliance with COVID-19 related waivers, FNS should review the web survey and data content to ensure it is pertinent and can be easily retrievable. State agencies, as well as school districts, have been especially busy in addressing the implementation of the waivers that, in some circumstances, have been provided on very short notice. In addition, School Food Authorities (SFA's) have struggled with the food supply chain, in particular with the availability of foods during the current pandemic emergency.

FNS researchers should understand the challenges that State agencies and school districts have experienced during the pandemic in the administration of our child nutrition programs. It would be helpful—as indicated in the notice—if the information does... 'inform FNS's planning, policy, and guidance related to state and local meal service operations during future emergency situations and unanticipated school closures.'

Our previous comments remain current and we hope that FNS will make every effort to ensure minimal interference with State agencies and program operators during this information collection.

Sincerely,

Reginald Ross, SNS  
SNA President

Patricia Montague, CAE  
Chief Executive Officer

Attachment: SNA School Meals Operations Study Comment Letter, July 2020