

APPENDIX J.1

**FNS RESPONSE TO PUBLIC COMMENT FROM SHARE OUR
STRENGTH ON OMB SUBMISSION**

From: [Figueroa, Holly - FNS](#)
To: info@strength.org
Subject: FNS response to comments on the School Meals Operations Study
Date: Tuesday, March 2, 2021 8:46:00 PM
Attachments: [FNS Response to Share Our Strength_Mar2021.pdf](#)

Please forward to Lisa Davis, Senior Vice President, No Kid Hungry Campaign.

Ms. Davis,

Thank you for your submission on behalf of Share Our Strength to the Federal Register notice that was published on January 27, 2021 requesting comments on the School Meals Operations Study submission for the Office of Management and Budget's (OMB) review. FNS's response to Share Our Strength's comments are provided in the attached letter. Share Our Strength's comments and FNS's response will be included in the updated information collection request submission to the OMB.

Best,
Holly

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March 2, 2021

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Share Our Strength
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Washington, DC 20005

Dear Ms. Davis:

Thank you for your response on behalf of Share Our Strength to the Federal Register notice that was published on January 27, 2021 requesting comments on the School Meals Operations Study (OMB control number 0584-0607) submission for OMB review. 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 (SMO) Study, and offers the following responses to the specific comments noted in your letter:

- **Encompass all Child Nutrition (CN) Programs and include both school and non-school operators.** While FNS originally intended to conduct online surveys with both State agencies (SAs) and school food authorities (SFAs) on a variety of policy-relevant topics in SY 2020-2021 as we have done in previous years with this study series, in the spring of 2020 FNS's information needs and data collection plan shifted due to the COVID-19 pandemic and the ensuing changes to school nutrition service operations. As a result, FNS is only collecting data at the state level for this study year and has expanded the collection to include all 67 SAs that oversee the National School Lunch and School Breakfast Programs, the Summer Food Service Program, and the Child and Adult Care Food Program (CACFP) in the 50 States, District of Columbia, Guam, Puerto Rico, and U.S. Virgin Islands. The study includes a survey and an administrative data component designed to help SAs to fulfill their statutory reporting requirements for the nationwide COVID-19 CN waivers under the Families First Coronavirus Response Act (FFCRA).
- **Provide the option for each agency or program manager to answer the survey separately.** FNS understands that in some States separate agencies administer various CN Programs. For this reason, the survey sample has been expanded to include all 67 SA directors mentioned above. The survey uses display logic to tailor the questions to the particular programs and waivers relevant to each SA and will be distributed to the SA directors via a unique web link that can be shared within each SA as needed.
- **For each waiver, consider collecting data on:**
 - **The number of operators that utilized the waiver.** FNS has included survey questions to capture this information for each waiver.
 - **Whether and to what extent the waiver reached vulnerable participants, allowed for improved service, and alleviated administrative barriers, including open-ended questions that allow for free responses.** In accordance with the statutory reporting requirements for the nationwide waivers, the survey includes questions to capture information regarding States' use(s) of each waiver and the ways in which

- each waiver improved services to children. The survey also includes questions, many of which are open-ended, that ask about challenges State and local operating agencies experienced in implementing or using the waivers, which waivers they did not use and why, and what else they would like FNS to know about the waiver implementation process or State and local efforts to provide meals during the federally declared COVID-19 public health emergency from March-September 2020.
- **State agency procedures related to the waivers, including how quickly entities requested waivers after they were announced.** While FNS agrees there is value in understanding more about the processes State and local agencies undertook to implement the waivers, the current collection is focused primarily on meeting States' statutory reporting requirements for the nationwide COVID-19 CN waivers pursuant to the FFCRA. In order to minimize burden on respondents, specific questions about SA procedures and timing are not included in the survey. However, SAs are encouraged to note any information they would like FNS to have related to these topics in response to the open-ended survey questions and FNS will consider these topics for future information collections.
 - **How the waiver process could be improved.** As previously mentioned, the survey includes questions, many of which are open-ended, that ask about challenges State and local operating agencies experienced in implementing or using the COVID-19 CN waivers, which waivers they did not use and why, and what else they would like FNS to know about the waiver implementation process.
 - **Why entities may have chosen not to operate or been unable to operate.** The survey includes questions related to the challenges States and local program operators experienced in administering the CN Programs and implementing the waivers during the COVID-19 pandemic from March-September 2020, as well as a question about which barrier(s) they were unable to overcome.
 - **Whether SAs promoted specific tools to connect families with meal sites.** Because the current collection is focused primarily on meeting States' statutory reporting requirements for the nationwide COVID-19 CN waivers, specific questions about SA procedures and resources provided to families are not included in the survey. FNS will consider addressing the suggested topics in a future collection.
- **For the summer meal programs, ask about the timing of waivers and extensions and how it impacted SA operations for summer 2020.** While this collection does not include specific questions regarding States' timelines or the timing of the summer meal program waivers and extensions, FNS has included a series of questions to assess the challenges State and local agencies experienced in implementing and using the waivers. In response to these questions, FNS encourages SAs to provide any information they would like FNS to know about the challenges they experienced, including challenges related to timing, as appropriate. FNS will analyze the information provided to identify the key issues that SAs experienced with waiver implementation from March-September 2020.
 - **For the summer meal programs, ask for details on SAs' approaches to sponsor and site approvals and compare administrative data in States with different approaches to assess the impact on children's access to meals.** FNS agrees that the combination of survey and administrative data gathered through this collection will have many beneficial uses, including allowing comparisons based on different approaches and waivers used to provide meals to children during the pandemic. While the current collection is focused primarily on

meeting States statutory reporting requirements for the nationwide COVID-19 CN waivers pursuant to FFCRA and will therefore not ask for detailed information on States' summer meals processes, FNS will consider addressing these topics in future collections or analyses.

- **Assess the impact of the afterschool enrichment activity waiver for the CACFP At-risk Afterschool component either through a survey question or month by month administrative data.** As part of this collection, FNS is requesting site-level administrative data for CACFP for each month from March-September 2020 and will use it to assess how the Nationwide Waiver of the Activity Requirement in Afterschool Care Child Nutrition Programs was used and the impact that it had on program participants.
- **Assess the impact that not having the nationwide area eligibility waiver for the CACFP At-risk Afterschool component earlier had on operations.** The COVID-19: Child Nutrition Response #68: At-risk Afterschool Area Eligibility Waiver is not covered in the current SMO collection. FNS plans to collect information regarding the use and impact of this waiver in the next SMO collection and will consider this suggestion during that process.
- **Lessen the burden of providing administrative data on States by allowing them to submit data directly and providing alternatives for SAs that cannot easily submit site-level data.** FNS understands that SAs differ in the formats and availability of their meal claims data. For this reason, the study team will accept the requested data via secure file transfer in any standard format. The study team will also conduct advanced phone calls with each SA to discuss the format and availability of the requested data and will tailor the administrative data requests to each SA based on the information provided during that phone call. For example, SAs that are unable to provide data at the site level will receive administrative data requests at the sponsor or institution level instead.
- **Request monthly site-level claims data, including zip codes, National Center for Education Statistics (NCES) ID codes, and the number of meals claimed by type for each site.** As part of this collection, FNS will request site-level meal claims data for each month from March-September 2020, including the zip code for each site. To minimize the burden on SAs, FNS is requesting disaggregated data that align with the elements currently included on the standard program forms and will therefore not obtain NCES ID codes as part of this collection. While FNS agrees that there is value in merging the SMO and NCES datasets, analyses using NCES data will need to use other available indicators to do so.
- **For the summer meals programs, request data on newly approved sponsoring organizations and SFAs separately, and whether each site sponsor is a non-profit organization or SFA.** The study instruments include indicators for whether each summer meal site was established under the Area Eligibility Waiver and whether the site sponsor is a school, government, residential camp, national youth sports program, or non-profit private sponsor.

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

Sincerely,



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