

APPENDIX J.2

**FNS RESPONSE TO PUBLIC COMMENT FROM SCHOOL
NUTRITION ASSOCIATION ON OMB SUBMISSION**

From: [Figueroa, Holly - FNS](#)
To: servicecenter@schoolnutrition.org
Cc: pmontague@schoolnutrition.org
Subject: FNS response to comments on the School Meals Operations Study
Date: Tuesday, March 2, 2021 9:02:00 PM
Attachments: [FNS Response to SNA Mar2021.pdf](#)

Please forward to Reginald Ross, SNA President.

Mr. Ross and Ms. Montague,

Thank you for your submission on behalf of the School Nutrition Association (SNA) 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 SNA's comments are provided in the attached letter. SNA's comments and FNS's response will be included in the updated information collection request submission to the OMB.

Best,
Holly

Holly Figueroa

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Food and
Nutrition
Service

March 2, 2021

1320
Braddock
Place
Alexandria,
VA
22314

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

Dear Mr. Ross and Ms. Montague:

Thank you for your response on behalf of the School Nutrition Association 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 Study, and offers the following responses to the specific comments noted in your letter:

- **Please review previously submitted comments on the study.** FNS has reviewed the comments submitted in July 2020. Our response to those comments, provided in September 2020, remains unchanged. As noted previously, this study will help States to fulfill their statutory reporting requirements under the Families First Coronavirus Response Act (FFCRA). FNS acknowledges the significant impact COVID-19 has had on school nutrition operations since March 2020 and understands 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 is only collecting data from the CN State agencies for this study year. 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.
- **Review the web survey and data content to ensure it is pertinent and can be easily retrieved.** The School Meals Operations Study data collection instruments have been carefully reviewed and streamlined where possible to minimize burden on respondents while ensuring that the collection will satisfy States' reporting requirements under the FFCRA. Additionally, the study team pretested the instruments with three State agency directors to obtain feedback on content, burden and data availability, and modified the instruments based on respondents' suggestions.
- **Understand the challenges that State agencies and school districts have experienced during the pandemic in the administration of the Child Nutrition Programs.** FNS acknowledges the significant impact COVID-19 has had on school nutrition operations. In light of these circumstances, the planned survey with school food authority directors was cancelled for SY 2020-2021. The State CN Director web survey will include questions designed to provide FNS with additional information on the challenges that State and local operating agencies experienced during the administration of the CN

programs from March-September 2020. Findings will be used to meet the congressionally-mandated reporting requirements of the FFCRA, which require States to summarize the use of each waiver and describe how it resulted in improved services to Program participants.

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

Sincerely,

A handwritten signature in blue ink, appearing to read "Holly Figueroa", with a stylized, flowing script.

Holly Figueroa
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