

APPENDIX H.3

PUBLIC COMMENT 3

PUBLIC SUBMISSION

As of: 9/1/21 7:41 AM Received: May 02, 2021 Status: Posted Posted: May 05, 2021 Category: Advocacy - Other Tracking No. ko7-l85z-6rr0 Comments Due: June 21, 2021 Submission Type: Web
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Docket: FNS-2021-0014

School Meals Operations Study: Evaluation of the School-based Child Nutrition Programs

Comment On: FNS-2021-0014-0001

Agency Information Collection Activities; Proposals, Submissions, and Approvals: School Meals Operations Study: Evaluation of the COVID-19 Child Nutrition Waivers and Child Nutrition Programs

Document: FNS-2021-0014-0003

Comment on FR Doc # 2021-08212 from Alexa Topakas

Submitter Information

Name: Alexa Topakas

Address:

Bensalem, PA, 19020

Email: 13axtopakas@gmail.com

Phone: 2152086157

General Comment

See attached file(s)

Attachments

Regulation Letter from Alexa Topakas

FNS Response to Comment on FR Doc # 2021-08212 from Alexa Topakas

May 2, 2021

Holly Figueroa

Food and Nutrition Service, U.S. Department of Agriculture

1320 Braddock Pl, 5th floor

Alexandria, VA 22314

RE: Agency Information Collection Activities; Proposals, Submissions, and Approvals: School Meals Operations Study: Evaluation of the COVID-19 Child Nutrition Waivers and Child Nutrition Programs

Madam,

Thank you for allowing the opportunity to comment on the Evaluation of the Covid-19 Child Nutrition Waivers and Child Nutrition Programs. My undergraduate degree is in Nutrition & Dietetics and my Masters is in Community Nutrition both acquired from West Chester University in Pennsylvania. I am extremely passionate about nutrition as I currently complete my Dietetic Internship with Utah State University. Doing so will allow me to become a Registered Dietitian. I also hold membership with Academy of Nutrition and Dietetics (AND). Alongside vigorous coursework, I have dedicated my time to working with other skilled Dietitians who share a similar passion that is food insecurity. I am currently working the NORTH Inc's., WIC office in Philadelphia where this is a huge forefront of their work. Prior to that, I was working with Food Services for the School District of Philadelphia. And before that I was doing clinical hours at St. Francis Medical Center in Trenton, NJ. No matter the rotation, food insecurity was brought to light somehow or another. Especially in these devastating times for families. My most first hand experience with food insecurity was working with the School District of Philadelphia (SDP) to provide free, nutritious meals to children and families of Philadelphia.

As you may be well aware, it is estimated that 37 million Americans and 11 million children are food insecure or 1 in 9 people.¹ As the pandemic has struck, this has impacted those already struggling and those facing new struggles. It is believed that nearly 1-4 households experienced food insecurity within the past year or up to 23% families.² This is a truly concerning and could be almost considered an epidemic in itself. It is important to note this has disproportionately affected people of color. If people are going hungry, they cannot take care of their health and in turn put themselves even more at risk of experiencing serious complications of COVID-19. Prior to the pandemic, we know that over 30 million children have participated in the NSLP.³ An attempt to help combat the more recent devastating statistics was with the support of Child Nutrition Waivers to allow meals be provided with less restriction.

I deeply appreciate FNS asking for public comment on this current issue and how our comments may affect changes to be made in the future. I fully support all data be collected in order to better understand how to feed our communities in need from those firsthand working to provide said meals. It is my deepest hope that the department is taking this information/data and considering how to make things easier for those working tirelessly to ensure the children in this country do not go hungry. The most recent extension of waivers exemplified these efforts and showed to me that you do support SFAs (School Food Authorities).

In reading what the study hopes to obtain (listed below):

1. General descriptive data on the characteristics of CN Programs to inform the budget process and answer questions about topics of current policy interest;
2. Data on program operations to identify potential topics for training and technical assistance for SFAs and State Agencies (SAs) responsible for administering the CN programs;
3. Administrative data to identify program trends and predictors;
4. Information on the use and effectiveness of the CN COVID-19 waivers, which will be used to satisfy States' reporting requirements on these waivers under FFCRA.

In addition to providing my comment and support, I want to provide some anecdotal evidence from my own experience working with the SDP. Without the waivers, it would be extremely difficult if possible at all to provide school meals to children within Philadelphia, America's poorest big city.⁴ I want you and those working on this study to take that into consideration how that could affect the children of this city and others when deciding how waivers get disseminated. Every week for nearly 3 months, I met endless people coming to pick up meals for their families with immense gratitude for this food. In addition to physically assisting with distributing meals at distribution sites, I worked behind the scenes with the district's hardworking Registered Dietitians. I saw firsthand how difficult it is to organize these efforts and ensure a smooth process for not only those receiving meals but those working to provide them. With that being said, I hope that FNS continues to make things as easy as possible for those of us working in school nutrition. It is my wish that with this continued data you may receive that it is brought to your attention how needed these meals and waivers are to communities like ours. With this collective data, hopefully it can be shared among SFA's to better serve the communities where this is being provided. All in all, it is my understanding that together we are working to combat how food insecurity has impacted our nation now, more than ever.

Being a member of AND, I want to include additional support to any comments that may have been submitted by the Advocacy office of the organization.

Sincerely,

Alexa Topakas

Utah State University Dietetic Intern

3250, Independence Court Bensalem, PA 19020

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1. Payne-Sturges DC, Tjaden A, Caldeira KM, Vincent KB, Arria AM. Student Hunger on Campus: Food Insecurity Among College Students and Implications for Academic Institutions. *American Journal of Health Promotion*. 2018;32(2):349-354. doi:[10.1177/0890117117719620](https://doi.org/10.1177/0890117117719620)
 2. Schanzenbach, D., & Pitts, A. How much has food insecurity risen? Evidence from the Census Household Pulse Survey. *Institute for Policy Research (IPR) Rapid Research Report*. Northwestern Institute for Policy Research. 2020;
 3. USDA . National school lunch Program (NSLP) fact sheet. <https://www.fns.usda.gov/nslp/nslp-fact-sheet>. 2019; Accessed May 2, 2021.

4. Saffron I. Philly didn't become America's poorest big city by chance. Here's how we fix it. JEVS Human Services. <https://www.jevshumanservices.org/philly-didnt-become-americas-poorest-big-city-by-chance-heres-how-we-fix-it/#:~:text=With%20a%20poverty%20rate%20of,poorest%20big%20city%20in%20America.2020;AccessedMay2,2021.>