APPENDIX H.8

PUBLIC COMMENT 8

PUBLIC SUBMISSION

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-2021-0014-0009
Comment on FR Doc # 2021-08212 from Share Our Strength

Submitter Information

Email: cvega@strength.org
Organization: Share Our Strength

General Comment

Please see the attached comment letter from Share Our Strength.

Attachments

SOS_School Meals Operations-COVID Waiver Survey Comment_6-21

FNS Response to SOS_School Meals Operations Study

June 21, 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: School Meals Operations Study: Evaluation of the COVID-19 Child Nutrition Waivers and Child Nutrition Programs (Document #2021-08212)

Dear Ms. Figueroa:

Thank you for the opportunity to comment on the proposed state agency evaluation of COVID19 child nutrition waivers. We think that this collection of both survey and administrative data is necessary for the proper performance of the U.S. Department of Agriculture (USDA), has enormous practical utility to support planning for the future, and will support state administering agencies. We wish to provide input to help make the best and most efficient use of this opportunity to assess the impact of the COVID-19 child nutrition waivers.

As an organization, Share Our Strength is committed to ending hunger and poverty in the United States and abroad. Our No Kid Hungry campaign focuses on alleviating childhood hunger in the United States by helping organizations to better leverage the child nutrition programs administered by the USDA's Food and Nutrition Service. Through this work, we regularly communicate with and support the state agencies, schools, sponsors, and sites that operate these programs. Over the course of the COVID-19 pandemic, this has included providing support on the implementation of the nationwide waivers. This experience informs our recommendations to use this proposed data collection in order to better understand the successes and challenges of implementation as well as the reach and impact of the waivers. Additionally, we feel particularly equipped to comment on this proposed data collection because we currently request and receive regular school meals participation data directly from 28 states and summer meals participation data from 25 states. This gives us a unique perspective on the capabilities of state data systems beyond what the USDA typically collects via regular data reporting.

We offer the following recommendations because we support this effort and see the critical importance of this proposed collection of both survey and administrative data. With these recommendations, which hopefully align with what USDA has already specifically proposed to collect, we feel that the proposed collection will not be overly burdensome to state agencies and will in fact help them in meeting their obligation to report on the use of waivers within their state.

Survey Respondents
Unlike the usual School Meals Operations survey, this study must encompass all child nutrition programs and include both school and non-school operators. The Summer Food Service Program (SFSP) and/or Child and Adult Care Food Program (CACFP) are administered by separate state agencies from the National School Lunch Program (NSLP) and School Breakfast Program (SBP) in several states, and even in agencies that administer all of these programs together, operations may be fairly siloed. It is essential to consider in advance how these agencies or teams may need to coordinate on responses. In many

cases, it may make sense for each agency or program manager to answer the survey separately or at least have the option to do so separately.

Survey Data to Collect for All Programs and Waivers
For each of the available nationwide and state-requested waivers, including any extensions, we recommend asking how many operators (e.g. school food authorities, sponsoring organizations, and independent entities) within each program (e.g. SFSP, CACFP, NSLP, etc.) utilized the waiver.

Depending on survey structure, it may make sense to ask for each waiver whether or to what extent the state agency feels that it allowed entities to serve participants who could not have been reached otherwise due to pandemic-related restrictions, whether or to what extent it allowed for improved service compared to usual operations, and/or whether or to what extent it alleviated administrative barriers that may have otherwise prevented entities from operating the program. In addition to that or at a minimum, we recommend open-ended questions allowing for free responses on which waivers were most essential, which should be available during future emergencies and school closures, and which should be available permanently.

Across waivers, we suggest asking for details on state agency procedures that entities used to request waivers; procedures for sending approvals or acknowledgments; approximate time to send approval or acknowledgement; how long approvals lasted; and how extensions were handled. Requesting the approval date for each waiver for each entity would be too burdensome, but a general question about how quickly most entities requested a waiver after its announcement would still be valuable.

Feedback on how the waiver request and approval process could be improved for state agencies in the future, particularly during emergencies, should also be requested. States should not be asked when they requested or received specific waivers as USDA should also have this information.

It would also be extremely beneficial for any insights on why entities may have chosen not to operate or been unable to operate. This can help to identify specific barriers and whether any additional waivers may have been helpful in improving service.

This survey collection also presents an excellent opportunity to ask whether state agencies promoted specific tools to help families identify meal sites in their communities, including the USDA Find Meals for Kids website, the USDA National Hunger Hotline, the No Kid Hungry texting hotline, or others.

Survey Data to Collect for Specific Programs
Summer Food Service Program & NSLP Seamless Summer Option
A critical question to ask is the impact of the waiver extension dates for the SFSP and SSO. Specifically, we recommend asking state agencies for their usual timeline for announcing and approving applications for usual summer operations and how the timing of the waiver extensions for summer 2020 affected their operations and approvals. This should be paired with an assessment of the administrative data regarding the number of entities operating the summer meals programs in the summer of 2020. Additionally, we recommend asking how the timing of the SFSP and SSO waiver and related waiver extensions affected planning for School Year 2020-2021 and affected state agency operations.

Through our partners, we heard anecdotally that state agencies took very different approaches from each other and from usual when it came to determining whether school food authorities and non-profit organizations were proposing to serve the same area or children. From what we heard, this included limiting the program options available to all entities based on which program the school food authority decided to operate; requiring the school food authority to certify that they were not able to meet all of the need in the area before approving other operators; or requiring school food authorities to sign off on non-profit operators' proposed sites. It would be helpful to ask for details on how the state agency approached

applications from school food authorities and non-profit organizations; how determinations about potential duplication were made; whether determinations only applied when school food authorities were operating SFSP instead of SSO; and how this may have affected the timeline for sponsor and site approvals. Ultimately, it would be beneficial to compare administrative data in states with different approaches to truly assess the impact of these decisions and determine whether more stringent measures led to reaching a smaller share of the children who normally receive free or reduced-price school meals.

Child and Adult Care Food Program
The afterschool enrichment activity waiver for the At-Risk Afterschool component of the CACFP expired on June 30, 2020. A survey question should assess the impact of that expiration on School Year 2020-2021 operations. Examining month by month administrative data for CACFP At-Risk sites could also show the impact of losing this waiver. Conversely, the nationwide area eligibility waiver for the At-Risk Afterschool component was only published on September 18, 2020. A question should assess how not having this waiver earlier may have affected operations prior to that date.

Administrative Data to Collect for All Programs
In general, many state agencies are able to report site-level claims data, and most of the site-level data points that we recommend below are easy for state agencies to report. (As evidence, we receive site-level data from 27 of the 28 states from which we obtain school meals data and 22 of the 25 states from which we obtain summer meals data.) Leveraging states' ability to submit this data directly, rather than filling in a separate form, may significantly lessen the burden on state agencies while maximizing the quality and amount of data collected. However, alternatives should be available for state agencies that cannot easily submit site-level data for some or all programs.

While many states maintain rich site-level data, this does not always include a designation for the site type. Even if site type is available, the designations may not be consistent across states or programs. Careful consideration must be given to this data point if it is part of the collection, including the feasibility and goals of requesting it.

Therefore, for each program, we recommend requesting monthly site-level claims data where it is available. Additionally, we encourage the inclusion of the following specific data points as part of this:
- The address including ZIP code for each site.
  - Including this data would allow for geocoding, determining census tract, and merging this dataset with other datasets. For example, would allow for determining whether a site is urban or rural (which is not otherwise collected for NSLP and CACFP) or area eligible based on census data under traditional rules.
- The National Center for Education Statistics (NCES) ID code, where available and applicable. o
  - This would allow for easy merging with NCES data, which includes other information about school demographics.
- The number of meals claimed, by type, for each site.

Administrative Data for Specific Programs
Summer Food Service Program & NSLP Seamless Summer Option
- New sponsoring organizations and school food authorities approved for each (SFSP vs. SSO) for unanticipated school closures operations March-June 2020 as well as for summer 2020. o
  - Separate by number of school food authorities and non-profit sponsors.
- As part of the site-level claims data, whether the entity or site's sponsor is a school food authority or non-profit organization.
  - Most states should be able to supply this information.

Thank you for this opportunity to provide input on this valuable data collection effort. With a robust and well-designed request, the information gathered will be instrumental in assessing the impact of the COVID-19 response waivers and planning for the future while minimizing the burden on state agencies.

Sincerely,

Lisa K. Davis
Senior Vice President
No Kid Hungry Campaign
Share Our Strength