

**APPENDIX H.9**  
**PUBLIC COMMENT 9**

# PUBLIC SUBMISSION

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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-2021-0014-0010

Comment on FR Doc # 2021-08212 from FDACS

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## Submitter Information

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## General Comment

See Attached

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## Attachments

Comment on FR Doc # 2021-08212 from FDACS

Response to FDACS\_School Meals Operations Study

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**From:** Harrington, Nedra <Nedra.Harrington@fdacs.gov>

**Sent:** Monday, June 21, 2021 5:01 PM

**To:** Figueroa, Holly - FNS <holly.figueroa@usda.gov>

**Subject:** Comments - Agency Information Collection Activities: School Meals Operations Study: Evaluation of the COVID-19 Child Nutrition Waivers and Child Nutrition Programs - RE: OMB Control Number: 0584-0607

Good afternoon, Ms. Figueroa.

Thank you for providing an opportunity to review and comment on the information collection activities submitted by the United States Department of Agriculture regarding the Agency Information Collection Activities: School Meals Operations Study: Evaluation of the COVID-19 Child Nutrition Waivers and Child Nutrition Programs.

Please find attached the comments submitted by the Florida Department of Agriculture and Consumer Services, Division of Food, Nutrition and Wellness.

Please let me know if you have any questions.

**Nedra Harrington**

Senior Management Analyst II

Division of Food, Nutrition and Wellness

Florida Department of Agriculture and Consumer Services

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## FLORIDA DEPARTMENT OF AGRICULTURE AND CONSUMER SERVICES

COMMISSIONER NICOLE "NIKKI" FRIED

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June 21, 2021

Holly Figueroa, Food Nutrition Service  
U.S. Department of Agriculture  
Holly.Figueroa@usda.gov

RE: OMB Control Number: 0584-0607

Dear Ms. Figueroa:

Thank you for providing an opportunity to review and comment on the information collection activities submitted by the United States Department of Agriculture regarding the Agency Information Collection Activities: School Meals Operations Study: Evaluation of the COVID-19 Child Nutrition Waivers and Child Nutrition Programs.

Comments were requested regarding a) Whether the proposed collection of information is necessary for the proper performance of the functions of the agency, including whether the information shall have practical utility; (b) the accuracy of the agency's estimate of the burden of the proposed collection of information, including the validity of the methodology and assumptions that were used; (c) ways to enhance the quality, utility, and clarity of the information to be collected; and (d) ways to minimize the burden of the collection of information on those who are to respond, including use of appropriate automated, electronic, mechanical, or other technological collection techniques or other forms of information technology.

Below are comments from the Florida Department of Agriculture and Consumer Services, Division of Food, Nutrition and Wellness:

- There is no apparent benefit to reporting disaggregated data, and to do so would create an unnecessary, administrative burden for state agency staff. State agencies should continue to report the data in its current format using reports currently available.
- The completion of a web survey that is in excess of 155 pages would be overwhelming to state agencies.
- The prior web surveys solicited specific details on SFAs operations to which State agencies had no notice of and did not have on-hand from SFAs to provide a comprehensive response to the survey questions. In addition, State agencies did not have systems in place to collect this information due to the lack of advance notice of what

information would be required through the survey. FNS should consider the burden that State agency collection of this detailed information from SFAs causes due to the sheer volume and repetitive nature of information being requested.

- The completion of lengthy surveys by State agencies and SFAs could also potentially impact the quality and integrity of the data. A more suitable survey could mirror surveys used for WIC Farmer's Market Nutrition Program. The survey provided two basic reporting components: (1) A summary of the use of this waiver by the state agency and local program operators, and (2) A description of whether and how this waiver resulted in improved services to program participants. The two basic reporting components are also consistent with the reporting requirements specified in the USDA Policy Memos communicating Nationwide Child Nutrition Program waivers subject to the study.

Please feel free to contact Nedra Harrington, Policy Development, Division of Food, Nutrition and Wellness, at [Nedra.Harrington@FDACS.gov](mailto:Nedra.Harrington@FDACS.gov) if you have any questions.

Sincerely,



Lakeisha T. Hood  
Director

LTH/nh