

APPENDIX H.13
RESPONSE TO PUBLIC COMMENT 5

From: [Figueroa, Holly - FNS](#)
To: ndavis@schoolnutrition.org
Subject: FNS response to public comment on the School Meals Operations Study [86 FR 20654]
Date: Tuesday, July 6, 2021 8:01:00 AM
Attachments: [FNS Response to SNA School Meals Operations Study.pdf](#)

Ms. Davis,

Thank you for your submission on behalf of the School Nutrition Association (SNA) to the Federal Register notice requesting comments on the proposed information collection for the School Meals Operations Study, published April 21, 2021. 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 Information Collection Request (ICR) submission to the Office of Management and Budget (OMB). Submission of the ICR to OMB will be announced via the Federal Register.

Best,
Holly

Holly Figueroa (*she/her*)
Social Science Research Analyst
Special Nutrition Evaluation Branch
Office of Policy Support
USDA Food and Nutrition Service
Holly.Figueroa@usda.gov
703.305.2105



Food and
Nutrition
Service

July 6, 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 requesting comments on the proposed information collection for the study, School Meals Operations Study, published April 21, 2021. 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:

- **Recognize that data collection will be impacted by COVID-19 waivers and other accommodations to school nutrition programs.** We acknowledge the significant impact COVID-19 has had on school nutrition operations since March 2020 and understand that data collection for the study will be affected by the program waivers and changes in program operations that continue in school year 2021-2022. The planned data collection will include web surveys with State Child Nutrition Directors and school food authority (SFA) directors as well as a state-level 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. This study will also help States fulfill their statutory reporting requirements under the Families First Coronavirus Response Act.
- **Adjust data collection to incorporate contactless and social distancing protocols and allow data to be submitted in the format used by SFAs.** We understand there can be significant burden placed on SFAs in completing a specific spreadsheet with their data. To reduce this burden, the study now includes a state-level administrative data collection component designed to gather information that SFAs already report to their State agencies. State agencies are asked to provide these data in whatever format is most convenient. Both the SFA- and state-level data collections will be “contactless” as there is no in-person data collection. All study communications and data collection will be done electronically (email and web), by telephone, and, if needed, by mail and will comply with all CDC guidelines during the national emergency.
- **Convene a commission to evaluate the processes and practices used during the pandemic and develop a national playbook on school meal service operations in emergency situations.** FNS values stakeholder feedback and agrees that input from experienced state and local program operators is important for policy development. While convening a commission is outside the scope of this study, the School Meals Operations

Study will survey State agency directors and SFA directors regarding the processes, practices, and flexibilities that State and local program operators used to provide meals to children during the pandemic, as well as the challenges they experienced. Findings will inform future program policies and procedures.

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
Social Science Research Analyst
Special Nutrition Evaluation Branch | Office of Policy Support
703-305-2105 | holly.figueroa@usda.gov