

**APPENDIX H.15**  
**RESPONSE TO PUBLIC COMMENT 8**

**From:** [Figueroa, Holly - FNS](#)  
**To:** [ldavis@strength.org](mailto:ldavis@strength.org)  
**Cc:** [cvega@strength.org](mailto:cvega@strength.org)  
**Subject:** FNS response to public comment on the School Meals Operations Study [86 FR 20654]  
**Date:** Tuesday, July 6, 2021 8:06:00 AM  
**Attachments:** [FNS Response to SOS School Meals Operations Study.pdf](#)

---

Ms. Davis,

Thank you for your submission on behalf of Share our Strength 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 Share Our Strength's comments are provided in the attached letter. Share Our Strength'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](mailto:Holly.Figueroa@usda.gov)  
703.305.2105



Food and  
Nutrition  
Service

July 6, 2021

1320  
Braddock  
Place  
Alexandria,  
VA  
22314

Share Our Strength  
1030 15<sup>th</sup> Street NW  
Suite 1100W  
Washington, DC 20005

Dear Ms. Davis:

Thank you for your response on behalf of Share Our Strength 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:

- **Encompass all Child Nutrition Programs and include both school and non-school operators.** Because the COVID-19 pandemic has changed the way that school meal programs operate, with other Child Nutrition Programs such as the Child and Adult Care Food Program (CACFP) and the Summer Food Service Program (SFSP) being used in place of or in combination with the National School Lunch and Breakfast Programs (NSLP/SBP) to provide meals to students, the School Meals Operations Study will collect administrative and web survey data from State agencies on each of these programs and web survey data from school food authorities (SFAs) on the programs they operate. The state-level collection will focus primarily on meeting States' statutory reporting requirements for the nationwide COVID-19 waivers under the Families First Coronavirus Response Act (FFCRA), while the SFA Director survey will focus on the effects the COVID-19 pandemic has had on local program operations and finances. All 67 State CN agencies that operate the aforementioned programs will be included in the State-level collection and will have the opportunity to provide individual responses to the data collection requests.
- **Consider Share Our Strength's suggestions for survey content.** Section 2202(d) of the FFCRA requires any State agency that elects to use a Child Nutrition nationwide waiver to submit a report not later than one year after electing to use the waiver that, at a minimum, summarizes the use of such waiver and describes how the waiver resulted in improved services to Program participants. The present study will satisfy the congressionally-mandated reporting requirements for all State agencies for the nationwide Child Nutrition COVID-19 waivers used during school years 2020-21 and SY 2021-22. In addition, the SFA survey will collect information on which waivers SFAs used during the pandemic, what challenges they experienced, and what factors influenced their meal operations. Neither State agencies nor SFAs will be asked for data that FNS already has available and, whenever possible, administrative data will be used to answer research questions in order to decrease burden on study participants. Because of the focus

on decreasing burden associated with the data collection, the surveys cannot cover all topics of interest. However, FNS appreciates Share Our Strength's suggestions and will consider them as the final survey instruments are developed.

- **Consider Share Our Strength's suggestions for the administrative data collection.** FNS values Share Our Strength's input on the administrative data collection component of the study. The administrative data collection instruments are designed to collect site- or sponsor-level meal claims data for the NSLP, SBP, CACFP, and the summer meals programs (including SFSP and the NSLP Seamless Summer Option). As Share Our Strength suggests, each instrument includes indicators for site/sponsor type and zip code, as appropriate. Consistent with the first administrative data collection in the School Meal Operations Study, which occurred in spring 2021, the administrative data will be accepted from State agencies in any standard format. State agencies are not required to complete separate forms as part of the administrative data request.

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

Sincerely,



Holly Figueroa  
Social Science Research Analyst  
Special Nutrition Evaluation Branch | Office of Policy Support  
703-305-2105 | [holly.figueroa@usda.gov](mailto:holly.figueroa@usda.gov)