

APPENDIX H.16
RESPONSE TO PUBLIC COMMENT 9

From: [Figueroa, Holly - FNS](#)
To: Nedra.Harrington@FDACS.gov
Subject: FNS response to public comment on the School Meals Operations Study [86 FR 20654]
Date: Tuesday, July 6, 2021 8:10:00 AM
Attachments: [FNS Response to FDACS School Meals Operations Study.pdf](#)

Ms. Harrington,

Thank you for your submission on behalf of the Florida Department of Agriculture and Consumer Services (FDACS) 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 FDACS's comments are provided in the attached letter. FDACS'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

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Food and
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July 6, 2021

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Florida Department of Agriculture and Consumer Services
Division of Food, Nutrition and Wellness
The Holland Building, Suite 120
600 South Calhoun Street
Tallahassee, FL 32399-0001

Dear Ms. Hood:

Thank you for your response on behalf of the Florida Department of Agriculture and Consumer Services (FDACS) to the Federal Register notice requesting comments on the proposed information collection for the study, School Meals Operations Study, published April 21, 2021.

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:

- **State agencies should report the administrative data in its current format using reports currently available.** FNS values FDACS' input on the administrative data collection component of the study. The administrative data collection will gather disaggregated meal claims data from State agencies that local program operators regularly report to State agencies for forms FNS-10 Report of School Program Operations, FNS-418 Report of the Summer Food Service Program for Children, and FNS-44 Report of the Child and Adult Care Food Program but that are not otherwise available to FNS in disaggregated form. These data will provide FNS with important information about how and where meals were being provided to children during the pandemic and will help to meet States' statutory reporting requirements for the nationwide Child Nutrition COVID-19 waivers under the Families First Coronavirus Response Act (FFCRA). To minimize burden of the collection on respondents, 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.
- **Consider the burden of the collection on State agencies and the impact that the length of the web surveys could have on data quality and integrity.** FNS recognizes the heroic efforts of our State partners throughout the COVID-19 pandemic to ensure that Child Nutrition Program operators have been able to serve meals to children during this critical and unprecedented period, and understands the incredible amounts of time and energy those efforts have required. We also appreciate and share FDACS' concern for data quality and accuracy and have taken steps to balance our informational needs with efforts to minimize respondent burden for the upcoming data collection. 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 study's data collection will satisfy the

congressionally-mandated reporting requirements from all State Child Nutrition agencies for the nationwide COVID-19 waivers used during SY 2020-2021 and SY 2021-2022. No other data will be collected for the FFCRA requirements. 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, where possible, administrative data will be used to answer research questions in order to decrease burden on study participants.

The data collected through the School Meal Operations Study are essential for FNS to be able to respond to auditors and inspectors when they are reviewing and assessing our COVID-19 operations and are critical to FNS being able to let people know how our waivers helped (and are still helping) provide food to children through the exceptional efforts of State and local program operators. Nonetheless, FNS understands that the length and content of the first collection in the School Meals Operations Study, which occurred in spring 2021, were surprising to many State agencies and has made a concerted effort to streamline the instruments for the upcoming collection in response to the feedback obtained.

Thank you again for your comments on the School Meals Operations Study.

Sincerely,



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