



**Feeding Bodies. Fueling Minds.™**

November 12, 2021

Ms. Holly Figueroa  
Office of Policy Support  
Food and Nutrition Service  
U.S. Department of Agriculture  
1320 Braddock Place  
5th Floor  
Alexandria, VA 22314

Dear Ms. Figueroa:

On behalf of the 50,000 members of the School Nutrition Association (SNA), we appreciate this opportunity to comment on the Food and Nutrition Service's (FNS) *Agency Information Collection Activities: Proposed Collection; Comment Request—School Nutrition and Meal Cost Study—II* published in the *Federal Register* on September 14, 2021. This study is to provide a comprehensive picture of school foodservice operations and the nutritional quality, cost and acceptability of meals served in the National School Lunch Program (NSLP) and School Breakfast Program (SBP). This is a revision to previous collection that was delayed in collection due to COVID-19. At this time, the data collection is scheduled for school year 2022-2023.

The School Nutrition and Meal Cost Study II (SNMCS-II) should provide valuable information on the complexities of operating and supporting school nutrition programs. While the SNMCS-I cost study conducted in school year 2014-2015 will provide a comparison to this study once it is completed, it is important to note that school programs may still be addressing challenges related to pandemic and supply chain disruptions. These include food and supply shortages, labor, food, and supply price increases and staffing shortages.

In SNMCS-I, FNS noted within the report that the meal costs for school meals had increased with the new meal pattern requirements. It was noted in the report that while it was only a small increase, schools could absorb that increase. It is unfortunate that FNS believed that it was acceptable to have the non-profit meal service programs take on this increase in cost. We hope that FNS will review the continued challenges schools are facing, including substantial labor, food and supply price increases, and address so schools can continue to provide nutritious meals within the budget restraints of the programs.

While the study design includes assigned groups for purposes of data collection, the content assigned to each group has a significant relationship to the overall school nutrition program. Including the group of non-contiguous states and Washington DC, the data gathered needs to be evaluated in respect to the broad breadth and variety of programs operating across the country. Even with FNS' streamlining of the study, it will be important to capture the various aspects of the program and reflect the challenges now facing them.

The report recommendations including supporting technical assistance should be a component of the report as many operators and program staff have seen a change in program operations or are new to school nutrition programs.

We remain concerned about the long lag time between data collection and the eventual publication of the report, in that the information may no longer be relevant by the time report is published. School nutrition directors and key staff are very conscientious in gathering responses and data for FNS studies. It would be most welcomed, and much appreciated if reports were available in a timely manner.

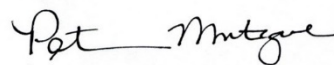
The design as referenced in the *Federal Register* is overly complex and indicates an extremely involved data collection process. As the time burden to complete the survey per participant is not included in the burden estimates, it is difficult to provide a concrete comment on the estimated time burden to responders. It is worth noting, however, that in several comment requests on previous FNS studies, SNA membership has voiced concern that many data elements are already available from the State agencies; and further, that questions asked on the School Food Authority (SFA) surveys are redundant to information that SFA's have previously submitted to their State agencies. Hopefully, SNA's constructive comments submitted previously on this study will provide added value to the conduct of the data collection and study report.

SNA appreciates the opportunity to comment on this notice. We would support FNS in engaging a working group to guide and assist this major study and would be delighted to collaborate with you on identifying potential child nutrition personnel for your consideration.

Sincerely,



Beth Wallace, SNS  
President



Patricia Montague, CAE  
Chief Executive Officer

