



October 1, 2021

Ms. Amy Rosenthal
Food and Nutrition Service
U.S. Department of Agriculture
1320 Braddock Place, 5th Floor
Alexandria, VA 22314

Dear Ms. Rosenthal:

On behalf of the 50,000 members of the School Nutrition Association (SNA), we appreciate the opportunity to comment on the Federal Register Notice of August 4, 2021, *Agency Information Collection Activities: Fourth Access, Participation, Eligibility, and Certification Study Series (APEC IV)*. This comment request is related to the Access, Participation, Eligibility and Certification (APEC) IV Study that USDA plans to conduct on the National School Lunch Program (NSLP).

As you are aware, school districts operating the NSLP across the country have been challenged and impacted by the COVID-19 public health emergency. While we understand the value of program studies, the many studies initiated by the Food and Nutrition Service (FNS) place a burden on the school districts selected for data collection. Even with this data collection expected to be conducted in SY 2023-2024, we do not know whether full employment recovery will be in place for school nutrition programs. There has been an extraordinary change in nutrition professionals throughout districts as a result of the pandemic and building back will take some time.

We recommend that as this study is developed and formulated, FNS looks to the State agencies for data collection and review the technical assistance provided to school nutrition practitioners. Additionally, program reviews completed by State agencies are summarized and provided to FNS. This information should provide quantitative and qualitative data to FNS and as such minimize burden on local School Food Authorities (SFAs). Using data available through State agencies will minimize duplication of data collection and the impact on school food authorities as well.

Due to the complexity and impact of this study, SNA has commented on previous APEC studies noting that the final reports and recommendations have significant time lapses from the actual collections of data to be thoroughly useful. This study has been conducted several times, yet has struggled to reflect the full breadth of the operational and administrative burdens to operate a school meal program in the educational setting and provide constructive recommendations.

School nutrition programs across the country continue to be the resource for nutritious meals for children during the school day. As such, SNA stands ready to assist the Department on this and other regulatory issues as they arise. Thank you for the opportunity to provide input.

Sincerely,

Beth Wallace, MBA, SNS
President

Patricia Montague, CAE
Chief Executive Officer