



March 31, 2022

Ms. Ruth Brown
Departmental Information Collection Clearance Officer
USDA, OCIO
Mail Stop 7602
Washington, DC 20250-7602

OMB Desk Officer for Agriculture
Office of Information and Regulatory Affairs
Office of Management and Budget
New Executive Office Building
Washington, DC 20503

Dear Ms. Brown and OMB Officer:

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 March 2, 2022, Submission for OMB Review; Comment Request related to the Agency Information Collection Activities: Fourth Access, Participation, Eligibility, and Certification Study Series (APEC IV), OMB Control Number: 0584-0530. 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.

In previous comments submitted to the Food and Nutrition Service on the APEC IV study (scheduled for school year 2023-2024), SNA shared the many challenges that school nutrition programs have been addressing during the current public health emergency. The school nutrition programs have been operating with changing personnel, significant supply chain disruptions and other protocols that have made the program balance change in many ways. While we recognize the value of studies, a study of this nature at this time would be a burden to the school administrations and operations. School Food Authorities (SFA's) are readily aware of the commitment to program integrity and compliance. Any future study should ensure that researchers are knowledgeable of the nuances of the programs and seek to minimize any disruptions to these valuable school nutrition programs.

As noted previously, this study has been conducted several times, and yet it 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.

Thank you again for the opportunity to provide comment.

Sincerely,

Beth Wallace, SNS
President

Patricia Montague, CAE
Chief Executive Officer