



**Feeding Bodies. Fueling Minds.™**

April 22, 2022

Ms. Ruth Brown  
Departmental Information Collection Clearance Officer  
U.S. Department of Agriculture  
Mail Stop 7602  
Washington DC 20250-7602

Desk Officer for Agriculture  
Office of Information and Regulatory Affairs  
Office of Management and Budget  
New Executive Office Building  
725 17th Street, N.W.  
Washington, DC 20502

[OIRASubmission@omb.eop.gov](mailto:OIRASubmission@omb.eop.gov)

Dear Ms. Brown and Desk Officer for Agriculture:

On behalf of the 50,000 members of the School Nutrition Association (SNA), we welcome this opportunity to provide comment on the Food and Nutrition Services' (FNS) *Submission for OMB Review; Comment Request* published in the *Federal Register* of March 25, 2022. It included the need to reinstate a previously approved information collection for the Child and Adult Care Food Program (CACFP), OMB Control Number 0584-0055.

Many school nutrition programs are sponsoring CACFPs; however, the Association remains concerned on the burden that data collection presents to program operators. We recognize the need for data collection yet look to have any data collection streamlined and be a minimal burden to school nutrition program directors and other personnel. Many CACFPs in schools are overseen by temporary or part-time personnel. As such, the burden of data collection falls on the school nutrition director. In addition, CACFPs operate in many cases outside of the regular school day necessitating the need for additional time and hours to complete or gather information for data collection.

With this proposed reinstatement of this data collection, it should be a priority of FNS to make the collection simple and electronically based. Although we understand the need for data collection and recognize that it is performed in different formats, we believe it should be streamlined in order to reduce the burden to state agencies, local program administrators and operators. As was noted in

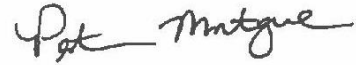
[USDA's Child Nutrition Burden Study Analysis Report, there](#) were several recommendations for FNS to consider reducing data collection burdens especially in the reporting process. This report should be reviewed for application to this reporting process related to this CACFP collection.

SNA continues to appreciate the collaboration with the various divisions of USDA and FNS. Thank you for the opportunity to respond.

Sincerely,

A handwritten signature in blue ink that reads "Beth Wallace".

Beth Wallace, SNS  
President

A handwritten signature in black ink that reads "Pat Montague".

Patricia Montague  
Chief Executive Officer