

June 8, 2022

Ms. Ruth Brown
Departmental Information Collection Clearance Officer
US Department of Agriculture
OCIO, Mail Stop 7602
Washington, DC 20250-7602

Dear Ms. Brown:

On behalf of the 50,000 members of the School Nutrition Association (SNA), we welcome this opportunity to provide comment on the USDA, Food and Nutrition Services' (FNS) *Submission for OMB Review; Comment Request Title: Food Program Reporting System (FPRS) forms FNS 583 and FNS 366B. OMB Control Number:* 0584–0594 published in the *Federal Register* of May 9, 2022.

This proposed collection looks to consolidate certain programmatic and financial data reporting requirements that are currently approved by the Office of Management and Budget (OMB), under the Food Programs Reporting System (FPRS), an electronic reporting system. It is intended to give states and Indian Tribal Office (ITO) agencies one portal for the various reporting required for the programs that they operate. Over time, FPRS has been pieced together to support the new programs and grants initiated after its original release.

The collection of reporting information should be sustained in a system that has current modality and features. It is recommended that a new system integrate error messages or other notifications when a data field has been missed or other edit checks to assist in submitting accurate information. The data collected through FPRS needs to be relevant and available to be used by others doing research on child nutrition programs. As data is used across programs, it is important that it be accurate and user friendly for analysis activities. We believe that there be a way identified for this process to be streamlined and to prevent duplication. In the consolidation process, the various FPRS reports, and corresponding data elements should be reviewed for current reporting and data analysis application.

While we understand the need for data collection and recognize that it is done in different formats, we would like to see the processes be streamlined further and reduce the burden to State agencies as well as program administrators and operators.

Hopefully, this collection will reduce the burden on the number of man hours for these agencies and streamline the reporting processes conducted by USDA offices. Our Association continues to appreciate the collaboration with the various divisions of USDA and FNS and look to the opportunity for future submissions and comments.

Sincerely,

Beth Wallace, SNS President

Beth Wallace

Patricia Montague, CEO Chief Executive Officer

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