

Attachment C1: Public Comment #1

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Agency Information Collection Activities: Summer Food Site Locations for State Agencies

Comment On: FNS-2022-0024-0001

Agency Information Collection Activities; Proposals, Submissions, and Approvals: Summer Food Site Locations for State Agencies

Document: FNS-2022-0024-0003

Comment on FR Doc # 2022-15579

Submitter Information

Email: cvega@strength.org

Organization: Share Our Strength

General Comment

Please see the attached comment letter.

Attachments

Share Our Strength_Comment on Summer Site Info Collection Activity



September 19, 2022

Cindy Long
Administrator
U.S. Department of Agriculture
Food & Nutrition Service
Braddock Metro Center II
1320 Braddock Place
Alexandria, VA 22314

Ms. Alice McKenney
Chief, Community Meals Branch
U.S. Department of Agriculture
Food & Nutrition Service
Braddock Metro Center II
1320 Braddock Place
Alexandria, VA 22314

Re: Agency Information Collection Activities: Summer Food Site Locations for State Agencies (Federal Register # 2022-15579; ICR Reference Number: 202205-0584-003)

Dear Administrator Long and Ms. McKenney:

On behalf of Share Our Strength, I am writing in response to the revision of the voluntary collection of summer meal site information from State agencies.

Share Our Strength is a nonprofit organization committed to ending hunger and poverty in the United States and abroad. Through our No Kid Hungry campaign, we're helping to end child hunger and food insecurity in America by connecting children and families to the federal nutrition programs for which they are eligible, including the Summer Food Service Program (SFSP) and the National School Lunch Program's Seamless Summer Option (SSO).

For the past ten summers, No Kid Hungry has helped kids and families find summer meals sites through a texting service that provides the three closest open site locations, along with their operating details, in response to their address or ZIP code. We receive the site operating data from the USDA as well as directly from state agencies in some cases. The texting service now also provides information about additional federal nutrition program and food resources when summer meals site data is not available, such as during the school year. We believe this is a helpful complement to the National Hunger Clearinghouse's hotline and the USDA's map-based summer meals site texting service.



We have learned through years of operating the texting service how critical it is to have accurate and timely data. Summer meals site data can change frequently as temporary sites open or close and sponsors shift operations in response to demand. Directing families to a site that is no longer operating or just ended its meal service can be frustrating, taking away from their limited time and resources instead of supporting them.

Therefore, it is vital for state agencies to frequently update site information through regular submissions of the Form FNS-905, making this a necessary use of time. The update in the estimated frequency of submission from eight to eleven per year seems correct as this represents roughly weekly updates throughout the summer. We would like to note that state agencies might submit updated site information directly to us separately on a more frequent basis if they are not submitting it to USDA, meaning that the higher submission frequency may not actually represent an increase in workload for state agencies.

Additionally, in the future, it may be possible to reduce the burden on state agencies while increasing the accuracy and timeliness of the summer meals site data by utilizing an Application Programming Interface (API) to directly sync updates between the state agency's data system and USDA's. We have implemented this system with multiple state agencies to seamlessly receive and share real-time updates. This does require high-level data infrastructure and data management to begin and maintain but ultimately saves time, especially during the busy summer months. This could have the further benefit of saving state agencies time and resources by eliminating the need for independent efforts to share real-time site information through separate apps or other services.

Thank you for the opportunity to submit our public comments.

Sincerely,

A handwritten signature in black ink that reads "Lisa K Davis". The signature is written in a cursive, flowing style.

Lisa Davis
Senior Vice President, No Kid Hungry Campaign