



November 28, 2022

Penny Burke
Chief
Operational Support Branch
Food and Nutrition Service
U.S. Department of Agriculture
1320 Braddock Place
Alexandria, VA 22314

Dear Ms. Burke:

On behalf of the 50,000 members of the School Nutrition Association (SNA), we welcome this opportunity to provide comments on the Food and Nutrition Services' (FNS) Notice *Agency Information Collection Activities: State Administrative Expense (SAE) Funds* published in the *Federal Register* of September 27, 2022. In consultation with our State Agency Advisory Council, we provide these comments.

This notice proposes changes to the FNS-777, FINANCIAL STATUS REPORT; FNS 525, STATE ADMINISTRATIVE EXPENSE FUNDS REALLOCATION REPORT and references an updated process for SAE reallocation. The notice indicates that there was a copy of the revised 525, however, it was not attached to the notice of September 27, 2022. Comments are requested on the FNS-525 but the FNS-777 burden is included, but not included for comments. This complex notice references several reports and administrative functions, including the SAE Reallocation Funding Process. Comments are provided on the various aspects of these forms and related processes.

The reporting process for State agencies to FNS remains varied. Some reporting is done electronically through the Food Programs Reporting System (FPRS). Reporting for the FNS 525 is through a fillable PDF form that in some regions continues to be collected as paper document. A fillable PDF remains, at this point with technological advances, an archaic method for data collection. It is especially outdated when within the Federal Register notice you are seeking comments on methods to relieve burdens and to encourage electronic collection techniques. The reallocation form, FNS 525, does have several data elements that could be accessed through a review of the financial reports that states submit on a regular basis to FNS. Rather than having states retrieve the data, copy it to the 525 report and then submit to the regional office staff, who have access to the data elements, you should streamline the collection using data previously submitted by the State agencies through other reports. The duplication of data collection adds an additional burden on all. With training, the regional office officials should be able to use the FNS-777 to check funding.

The processes related to the completion and management of the SAE Plans by State agencies should

be reviewed and made consistent across the FNS regional offices. The interpretation of when and why the SAE plans need to be updated varies by regions. Some regions look for annual plans while others follow the guidance on amendments when there are substantive changes within cost categories. The SAE Plan is a guide on anticipated expenses and was streamlined to be submitted when significant changes occur. Consistency of use and application of review needs to be implemented by all the regions.

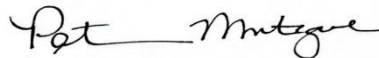
This Federal Register Notice on collection activities can help reduce burden hours for these agencies and streamline the reporting processes conducted by USDA regional offices. Given the many challenges facing school nutrition programs, any changes that streamline collection activities and reduce the administration burdens would be greatly welcomed.

SNA continues to appreciate the collaboration with USDA FNS.

Sincerely,

Handwritten signature of Lori Adkins in black ink.

Lori Adkins, MS, SNS
President

Handwritten signature of Patricia Montague in black ink.

Patricia Montague., FASAE, CAE
Chief Executive Officer