



December 2, 2022

Food and
Nutrition
Service

Braddock
Metro
Center

1320
Braddock
Place
Alexandria
VA 22314

Ms. Lori Adkins, President
Ms. Patricia Montague, Chief Executive Officer
School Nutrition Association
2900 South Quincy St. Suite 700
Arlington, Virginia 22206

Dear Ms. Adkins and Ms. Montague:

Thank you for your letter dated November 28, 2022, regarding the FNS Notice on *Agency Information Collection Activities: State Administrative Expense (SAE) Funds*. The School Nutrition Association (SNA) outlined concerns raised by the State Agency Advisory Council, including requests for streamlining of the FNS 525 form, availability of on-line reporting for the form, and consistency in review and oversight of SAE plans in the FNS Regional Offices.

FNS has proposed revisions to streamline the FNS-525 form. The revisions made to the FNS-525 are intended to eliminate data that could be obtained via other methods. FNS believes that the revised FNS-525 will meet the concerns expressed by SNA in your comment, "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."

Further, FNS reviewed SNA's comment that our agency should consider incorporating the FNS-525 form into the Food Program Reporting System (FPRS) to accommodate on-line reporting. FNS has taken this comment under advisement.

Finally, we agree that the FNS Regional Offices should be consistent in the way they provide oversight and approvals on SAE plans. FNS will continue to strive towards improved consistency across the Regions through training, communication, and sharing of best practices.

FNS hopes the revisions address the comments expressed by SNA and its State Agency Advisory Council. The letter along with this response will be included in the information collection request submitted to Office of Management and Budget (OMB).

When the information collection request is submitted to OMB, a 30-Day Notice will be published in the Federal Register announcing its submission. The submission, with responses to public comments, will be available at www.reginfo.gov.

Sincerely,

Penny Burke
Chief
Operational Support Branch
Child Nutrition Programs