



Feeding Bodies. Fueling Minds.™

June 27, 2022

Ms. Emma Kingsbury
Food and Nutrition Service
U.S. Department of Agriculture
1320 Braddock Place
Alexandria, VA 22314

ELECTRONIC SUBMISSION

Dear Ms. Kingsbury:

On behalf of the School Nutrition Association (SNA) and its 50,000 members, thank you for the opportunity to comment on the notice published in the *Federal Register* of May 4, 2022, by the *Food and Nutrition Service (FNS); Agency Information Collection Activities: Produce Safety University Nomination and Course Evaluation, OMB CONTROL NUMBER: 0584–NEW*.

As stated in the register's notice, FNS is conducting an evaluation of the Produce Safety University (PSU) that is offered for school nutrition programs focusing on the safe preparation of produce. While the PSU has been offered on a nomination basis by State agencies with the intent of being a "train the trainer" designed format, the challenges of programming during the pandemic has revised the program delivery. It is important to determine if the hybrid training model has improved participants skills, knowledge, and competencies. Most school nutrition personnel are kinetic learners so the evaluation should consider these learning methods and styles in development and include this as part of the evaluation. As many training materials have been redesigned to address remote learning, PSU should also consider expanding the use of materials beyond just PSU direct in-person training. There may be some modules that could stand alone and benefit the broad need of on-going professional development for school nutrition professionals.

While we support the value of data being used in overall decision-making and informing the agency, we are concerned with the administrative burden being placed on school districts. The section outlined in the notice regarding the number of respondents appears to be complex and includes multiple steps. We would recommend that this be reviewed for consolidation and ease of completion by respondents. The various evaluation components should be completed electronically and be clear and concise.

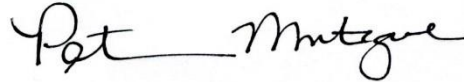
With school nutrition programs being greatly understaffed, they have limited resources and personnel, so the burden to complete even a “quick” evaluation impacts the daily routine. As USDA returns to conducting program studies and has quick surveys conducted, we would ask that these surveys be selective in administration and be evaluated as to whether they really need to be implemented.

Thank you again for the opportunity to provide comments.

Sincerely,



Beth Wallace, SNS
President



Patricia Montague, CAE
Chief Executive Officer