

Appendix H.3

Public Comment 3



FLORIDA DEPARTMENT OF AGRICULTURE AND CONSUMER SERVICES

COMMISSIONER WILTON SIMPSON

March 28, 2023

Darcy Güngör, Food Nutrition Service
U.S. Department of Agriculture
darcy.gungor@usda.gov

RE: OMB Control Number: 0584-0607

Dear Darcy Gungor:

Thank you for providing an opportunity to review and comment on the information collection activities submitted by the United States Department of Agriculture regarding the School Meals Operations Study: Evaluation of the School-based Child Nutrition Programs.

Comments were requested regarding a) Whether the proposed collection of information is necessary for the proper performance of the functions of the agency, including whether the information shall have practical utility; (b) the accuracy of the agency's estimate of the burden of the proposed collection of information, including the validity of the methodology and assumptions that were used; (c) ways to enhance the quality, utility, and clarity of the information to be collected; and (d) ways to minimize the burden of the collection of information on those who are to respond, including use of appropriate automated, electronic, mechanical, or other technological collection techniques or other forms of information technology.

Below are comments from the Florida Department of Agriculture and Consumer Services, Division of Food, Nutrition and Wellness:

- There is no apparent benefit to reporting disaggregated data, and to do so would create an unnecessary, administrative burden for state agency staff. State agencies should continue to report the data in its current format using reports currently available.
- The completion of a web survey could be overwhelming to state agencies. Prior web surveys solicited specific details on SFAs operations to which State agencies had no notice of and did not have on-hand from SFAs to provide a comprehensive response to the survey questions. In addition, State agencies did not have systems in place to collect this information due to the lack of advance notice of what information would be required

through the survey. FNS should consider the burden to State agencies to collect this detailed information from SFAs.

- The completion of lengthy surveys by State agencies and SFAs could also potentially impact the quality and integrity of the data. A more suitable survey could mirror surveys used for WIC Farmer's Market Nutrition Program. The survey provided two basic reporting components: (1) A summary of the use of this waiver by the state agency and local program operators, and (2) A description of whether and how this waiver resulted in improved services to program participants. The two basic reporting components are also consistent with the reporting requirements specified in the USDA Policy Memos communicating Nationwide Child Nutrition Program waivers subject to the study.
- The USDA should consider obtaining input from State agencies during the development of survey questions. In prior surveys, State agencies found questions to be ambiguous and often struggled to ascertain what was being asked. This ambiguity could result in State agencies providing inaccurate data and information that does not fully address the question being asked.

Please feel free to contact Nedra Harrington, Policy Development, Division of Food, Nutrition and Wellness, at Nedra.Harrington@FDACS.gov if you have any questions.

Sincerely,



Vianka Colin
Director

VC/nh