

Appendix H.6
Public Comment 6



MDE Comments on the School Meals Operations Study – due April 2023

Participation in the School Meals Operations (SMO) study was overly burdensome. The SMO was advertised as a way to condense and make COVID-19 data reporting easier. However, every edition of the SMO that has taken place since the pandemic has been so lengthy that, had Minnesota known the amount of work required, we would have opted out of SMO participation.

In addition to the sheer volume of work required to participate, Minnesota struggled with the SMO questions not matching the vague reporting requirements. The majority of COVID-19 waivers asked for a summary of the use of the waiver and a description of how the waiver resulted in improved services to children. However, the SMO questions were very specific. For example, instead of asking which meal delivery methods, meal options, and meal counting methods were used, the survey asked what proportion implemented those methods (i.e. none, less than half, about half, more than half, all, or don't know). Because we didn't know what proportion of operators used certain methods, we were able to report anything on the methods used in our state. We suspect this type of rigid reporting requirement prevented a number of other states from providing important information, as well.

Though the posting mentions reducing redundancy by utilizing data already reported, we have not had that experience. Some of the COVID-19 data has been asked for up to three times. When we pushed back on this with USDA, we were told that Mathematica was not sharing the data quickly enough with USDA so we would need to provide the same information in multiple places.

There are concerns about the added burden this survey places on SFA directors. Schools are still dealing with challenges from the pandemic in addition to losing flexibilities that were available in earlier pandemic years. Giving them more work seems unnecessary.