

**Appendix H.7**  
**Public Comment 7**





March 27, 2023

Ms. Darcy Güngör  
Food and Nutrition Service  
U.S. Department of Agriculture  
Braddock Metro Center II  
1320 Braddock Place  
Alexandria, VA 22314

Dear Ms., Güngör:

On behalf of the 50,000 members of the School Nutrition Association (SNA), we appreciate this opportunity to comment on the Food and Nutrition Service's (FNS)— *Agency Information Collection Activities: School Meals Operations Study: Evaluation of the School-Based Child Nutrition*, OMB Number: 0584–0607 published in the *Federal Register* on February 1, 2023. This study is identified as a revision of a currently approved study to assess the operations of the National School Lunch Program (NSLP) and School Breakfast Program (SBP) in School Year 2023-2024.

Revisions have been made for data collection related to operations to address various aspects of the administration and operations of the school nutrition programs during the COVID-19 public health emergency. As such, FNS should recognize that school districts are continuing to deal with issues related to COVID illnesses, staffing issues and supply chain disruptions. The data collection may be impacted by the various accommodations to the school meal service programs. The evaluation of information may include more subjective decisions and anecdotal circumstances as the pandemic crisis created many unintended consequences and reactions to help households in need.

Currently, many school districts across the country are looking at multiple options to operate the school nutrition programs in School Years 2022-23 and 2023-24. These include methods that will affect operations such as delivery methods, types of foods purchased, availability of foods in the food supply as well as purchases for protective equipment for employees.

FNS must recognize and adjust the data collection to streamline the process and incorporate contactless and social distancing protocols. As indicated in the notice, the web-based survey should assist in data collection. The format of data collection should allow School Food Authorities (SFA's) to submit, or upload requested information in the SFA's format without requiring another spreadsheet to be completed. The time spent to reformat to comply with a study format takes time and attention away from school nutrition program operations is an administrative burden and may result in a reduction in the number of respondents to studies and the data collection content. To the extent possible, data collection between the State agencies and SFA's should not be redundant. State agency information



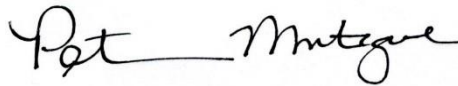
collection during the Administrative Review process should address several data points for the SFAs without undo duplication.

We appreciate the opportunity to comment and would support FNS in looking to develop streamlined practices and protocols.

Sincerely,

A handwritten signature in black ink that reads "Lori Adkins". The script is fluid and cursive.

Lori Adkins, MS, SNS  
President

A handwritten signature in black ink that reads "Pat Montague". The script is fluid and cursive.

Patricia Montague., FASAE, CAE  
Chief Executive Officer