

**Appendix H.10**  
**Response to Public Comment 3**

**From:** Gungor, Darcy - FNS <[darcy.gungor@usda.gov](mailto:darcy.gungor@usda.gov)>

**Sent:** Wednesday, April 26, 2023 2:25 PM

**To:** [nedra.harrington@fdacs.gov](mailto:nedra.harrington@fdacs.gov)

**Subject:** FNS response to public comment on the School Meals Operations Study

Dear Nedra Harrington:

Thank you for your submission on behalf of the Florida Department of Agriculture and Consumer Services to the Federal Register notice requesting comments on the proposed information collection for the School Meals Operations Study, published February 1, 2023. FNS's response is provided in the attached letter. In addition, FDACS's comments and FDA's response will be included in the forthcoming Information Collection Request submission to the Office of Management and Budget, which will be announced via the Federal Register.

Regards,

Darcy

**Darcy Güngör**

*(she/her/hers)*

Child Nutrition Research and Analysis Division

Office of Policy Support

USDA Food and Nutrition Service



Food and  
Nutrition  
Service

1320  
Braddock  
Place  
Alexandria,  
VA  
22314

April 26, 2023

Florida Department of Agriculture and Consumer Services  
Division of Food, Nutrition and Wellness  
The Holland Building, Suite 120  
600 South Calhoun Street  
Tallahassee, FL 32399-0001

Dear Vianka Colin:

Thank you for your response on behalf of the Florida Department of Agriculture and Consumer Services (FDACS) to the Federal Register notice requesting comments on the proposed information collection for the School Meals Operations Study, published February 1, 2023.

The Food and Nutrition Service (FNS) appreciates your input about the School Meals Operations Study and offers the following responses to the specific comments noted in your letter:

- **State agencies should report the administrative data in its current format using reports currently available.** FNS values FDACS' input on the administrative data collection component of the study. The administrative data collection will gather disaggregated meal claims data from State agencies that local program operators regularly report to State agencies for forms FNS-10 Report of School Program Operations, FNS-418 Report of the Summer Food Service Program for Children, and FNS-44 Report of the Child and Adult Care Food Program, but that are not otherwise available to FNS in disaggregated form. These data assist in addressing the research questions related to school and site participation, as well as children's program participation. To minimize burden of the collection on respondents, the administrative data will be accepted from State agencies in any standard format. State agencies are not required to complete separate forms as part of the administrative data request.
- **The burden on State agencies to complete a web survey, including gathering information to answer the survey questions, could be overwhelming. FNS should seek input from State agencies during the development of the surveys.** FNS shares your concern about the burden required for State agencies to complete the web survey. We pretested the survey with three State agencies to seek input about the length of time required to complete the survey and whether any questions were unclear or difficult to answer. Pretest participants reported an average of 26 minutes to gather information and complete the survey. Therefore, we estimate the burden to be about 30 minutes, which is lower than the estimate of 6 hours in previous years. Pretest participants reported that the survey was easier than the surveys from previous years, and that relevant data from the 2022-2023 school year will be readily accessible when the survey is fielded in the fall.

Thank you again for your comments on the School Meals Operations Study.

Sincerely,

Darcy Güngör

Social Science Research Analyst  
Child Nutrition Evaluation Branch, FNS Office of Policy Support