

Appendix H.11
Response to Public Comment 6

From: Gungor, Darcy - FNS <darcy.gungor@usda.gov>

Sent: Thursday, April 27, 2023 11:31 AM

To: megan.r.carter@state.mn.us

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

Dear Megan Carter:

Thank you for your submission on behalf of the Minnesota Department of Education 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, MDE'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 Gungör

(she/her/hers)

Child Nutrition Research and Analysis Division

Office of Policy Support

USDA Food and Nutrition Service



Food and
Nutrition
Service

April 27, 2023

1320
Braddock
Place
Alexandria,
VA
22314

Minnesota Department of Education
1500 Highway 36 W
Roseville, MN 55113

To the Minnesota Department of Education:

Thank you for your response 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 participation in the School Meals Operations Study and offers the following responses to the comments in your letter:

- **Concern about the burden required for State agencies and School Food Authorities (SFAs) to complete the surveys and the difficulty of answering questions.**

FNS shares your concerns. We pretested both surveys to learn the length of time required to complete them and whether any questions were unclear or difficult to answer. The State Child Nutrition directors who pretested the State agency survey reported an average of 26 minutes to gather information and complete the survey, and the SFA directors who pretested the SFA survey reported an average of 27 minutes. Therefore, we estimate the burden to be about 30 minutes, which is lower than the estimated 6 hours required to complete previous State agency surveys and 1 hour required to complete the previous SFA survey. In addition, the State Child Nutrition directors reported that the State agency survey was easier than it was in previous years, and that relevant data from the 2022-2023 school year will be readily accessible when the survey is fielded in the fall.

- **Concern about the collection of information that is not about COVID-19 waivers.**

The School Meals Operations Study is the current study in a series of studies that FNS uses to “conduct annual national performance assessments” of the school meal programs, as described in Section 28 (program evaluation) of the [Richard B. Russell National School Lunch Act](#). Because the COVID-19 pandemic changed the way that school meal programs operated, with programs such as the Summer Food Service Program being used in place of or in combination with the National School Lunch and School Breakfast Programs, the School Meals Operations Study also collects data on these programs.

These annual national performance assessments provide timely data on policy, administrative, and operational issues, which are important for FNS to have for budget preparation, development and implementation of program policy and regulations, and identification of areas for technical assistance and training.

- **Concern about collecting COVID-19 data each year.**

In addition to collecting the data described above, FNS uses the School Meals Operations Study to satisfy States’ requirement to report the use and effectiveness of COVID-19 nationwide waivers within 1 year of receiving the waivers, as described in Section 2202 of the [Families First Coronavirus Response Act](#). Each year of the School Meals

Operations Study collects this information for a single school year (to date, school years 2019-2020, 2020-2021, and 2021-2022).

Thank you for providing important data to FNS through the School Meals Operations study, and for submitting these comments.

Sincerely,

A handwritten signature in black ink, appearing to read 'Darcy Güngör', with a stylized flourish at the end.

Darcy Güngör

Social Science Research Analyst

Child Nutrition Evaluation Branch, FNS Office of Policy Support