



Feeding Bodies. Fueling Minds.™

May 13, 2019

Jessica Saracino
Chief
Operational Support Branch
Food and Nutrition Service
U.S. Department of Agriculture
3101 Park Center Drive, Room 632
Alexandria, VA 22302-1594

Dear Ms. Saracino:

On behalf of the 58,000 members of the School Nutrition Association (SNA) we appreciate the opportunity to submit comments on the Food and Nutrition Service's (FNS) notice, *Agency Information Collection Activities: Proposed Collection; Comment Request—State Administrative Expense Funds* published in the *Federal Register* on March 18, 2019. For this revision, a correction was made to remove the burden associated with form FNS-74, *Federal-State Agreement*, and address form FNS-525, *State Administrative Expense Funds Reallocation Report*. FNS plans to incorporate form FNS-525 into the Food Program Reporting System (FPRS) to accommodate electronic reporting of the data.

In preparing these comments, SNA consulted with our State Agency Advisory Council for their thoughts on your questions regarding this revision to a previously approved data collection. State Administrative Expense (SAE) funds are the primary funding source for State agencies to complete all the duties and responsibilities associated with the management and oversight of Federal child nutrition programs. In addition to regulatory and legislatively directed tasks, the State agencies are responsive to inquiries and requests from your agency, local educational agencies, non-profit and private organizations, state level inquiries as well as various other advocacy-oriented organizations.

While in concept it appears that incorporating the State Administrative Expense Funds Reallocation Report, FNS-525, into the Federal Program Reporting System would be perceived as streamlining, there are concerns about the data collected by the FNS-525 and its design. It is best to address those concerns prior to incorporating FNS-525 into FPRS. The current format of the FNS-525 is not user friendly nor intuitive. To reduce burden and redundancy, the FNS-525 has information that can be prefilled by FNS personnel based on reports submitted to FNS

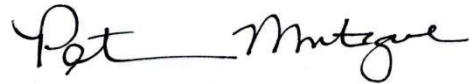
regional personnel and in FPRS. The usefulness of the report and intent of the data collection is not fully clear. Data reports collected by FNS should have a useful intent and provide clarity in purpose. The FNS-525 has challenges with both, yet creates a burden on State agencies for timing and content.

With the many changes of personnel at the Federal and state levels of program administration, it would benefit many to provide more background and information on the SAE formula calculation and other related funding sources as well as reporting procedures.

Sincerely,

A handwritten signature in black ink, appearing to read "Gay Anderson".

Gay Anderson, SNS
President

A handwritten signature in black ink, appearing to read "Pat Montague".

Patricia Montague, CAE
Chief Executive Officer