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Comment On: FNS-2018-0044-0001
Agency Information Collection Activities: Proposed Collection; Comment Request—Generic Clearance To Conduct Formative Research or Development of Nutrition Education and Promotion Materials and Related Tools and Grants for FNS Population Groups

Document: FNS-2018-0044-DRAFT-0004
Comment on FR Doc # 2018-27443

Submitter Information

Name: Gay Anderson
Organization: School Nutrition Association

General Comment

See attached file(s)

Attachments

NutritionEducationMaterials SNA Final Comments

February 19, 2019

Rachelle Ragland-Greene
USDA Food and Nutrition Service
3101 Park Center Drive, Room 1014
Alexandria, VA 22302

Dear Ms. Ragland-Greene:

These comments are submitted on behalf of the 58,000 members of the School Nutrition Association (SNA) in response to the *Generic Clearance to Conduct Formative Research or Development of Nutrition Education and Promotional Materials and Related Tools and Grants for FNS Population Groups* Comment Request published in the *Federal Register* on December 20, 2018. SNA's membership is comprised of school nutrition professionals working in K-12 schools/districts, as well as state agency personnel administering the Federal child nutrition programs, university instructors/professors in related fields and other allied groups. Our comments address areas of concern specifically within the school population, as they relate to school meals, and address the following requests:

(c) ways to enhance the quality, utility and clarity of the information to be collected; and
(d) ways to minimize the burden of the collection of information on those who respond

(c) ways to enhance the quality, utility and clarity of the information to be collected

SNA members report that the frequency of survey and research activities—especially those conducted by USDA agencies—has increased. Given their investment of time and other resources to participate in such research, school nutrition operators request that their feedback be reflected in materials and resources that are produced as a result of the findings—and that such materials demonstrate direct application to school meal operations. Such materials should be easily incorporated into school nutrition programs, as well as be readily available to participants.

SNA recognizes the inherent challenges in raising awareness among school nutrition professionals to materials and resources designed to help them improve their programs. To this end, whenever materials and resources have been developed, SNA recommends that the Food and Nutrition Service (FNS) coordinate across state and local levels to promote their availability. Social media is a popular marketing vehicle, although SFAs may not subscribe specifically to FNS social media platforms. Coordinating with state agencies—as well as with SNA and its state affiliates—is a recommended approach to help expand the reach of such materials. SNA cautions against one-time promotions, however, noting that repeated and frequent marketing is a solid strategy to ensure awareness and use.

In terms of improving the utility of nutrition education-specific materials, SNA encourages FNS to look beyond the primary audience (school nutrition professionals and their students) for such materials.

FNS is urged to consider how to disseminate messages and information that would benefit the child's *household*, as well as other direct and indirect stakeholders.

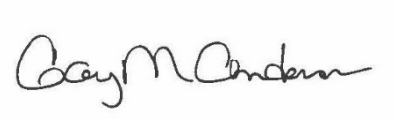
(d) ways to minimize the burden of the collection of information on those who respond

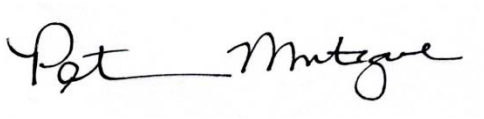
School nutrition professionals are asked to participate in numerous information collections each year. In addition to research-based requests, there are a number of initiatives and programs that make research data collection a requirement for participation; these include recent revisions to federal grants, such as those in the Team Nutrition program. Such research-based requirements have become a significant burden on school meal operators. While SNA recognizes the value of data regularly collected in the school setting, the reality is that many school systems now have restrictions on the number of surveys that can be conducted, as well as concerns for student privacy (FERPA and HIPAA). Simply gaining approval to collect such research can be a time-consuming barrier.

FNS is encouraged to review grant requirements and consult with both state agencies and local school nutrition directors for feedback on proposed grant designs and the possible impacts on potential applicants. In particular, this could provide valuable input to FNS on the Request for Applications (RFA) design. Further, SNA suggests engaging school nutrition professionals with strong academic credentials and in-depth knowledge of the complex day-to-day operations of the child nutrition programs to help support data collection processes.

SNA appreciates the opportunity to provide comment to ensure strong nutrition education and promotional materials are utilized by school nutrition professionals and is happy to work with FNS to promote the availability of new materials.

Sincerely,





Gay Anderson, SNS
President

Patricia Montague, CAE
Chief Executive Officer