



October 12, 2021

Food and
Nutrition
Service

1320
Braddock
Place
Alexandria,
VA
22314

Ms. Beth Wallace, President
Ms. Patricia Montague, Chief Executive Officer
School Nutrition Association
2900 S. Quincy Street, Suite 700
Arlington, VA 22206

Re: Response to FR Doc No: 2021-16642

Dear Ms. Wallace and Ms. Montague:

Thank you for your response to the Federal Register Notice requesting comments on the proposed information collection for the Fourth Access, Participation, Eligibility, and Certification Study Series (APEC IV), published August 4, 2021. We appreciate your support for your study and your comments. The Food and Nutrition Service (FNS) is committed to generating a national estimate of the amount of improper payments based on School Year 2023-2024, and examining the relationship of student (household), school, and school food authority (SFA) characteristics to error rates.

Your comment highlights the burden of the study on SFAs and suggests that more data be collected from States. FNS agrees that more can be done to ease the burden of data collection on SFAs. As such, we have taken pains to remove unnecessary questions from the data collection instruments and offer more options for SFAs to provide data (i.e., by submitting files electronically). We have eliminated some data collection requests altogether. APEC IV will also explore the use of a new national dataset of meal claim data, which will draw from data submitted by states during the annual School Meal Operations survey. If successful, future APEC studies will no longer request the data from SFAs.

Your comment also notes the time lapse between when the study is conducted and when the findings are publicly released. We agree that there is an extended period between data collection and the release of the findings; however, it reflects the time needed for the study team to thoughtfully compile and analyze data from thousands of respondents and for various federal agencies to clear the findings prior to public release. We do our best to release the findings as timely as possible, and we believe that despite the necessary time lapse, the study series provides valuable information for helping track under and overpayments and understanding why they occur.

Thank you again for your comments and your support of USDA school meals programs.

Sincerely,

Amy Rosenthal, PhD
Social Science Research Analyst
Special Nutrition Evaluation Branch | Office of Policy Support
703-305-2205 | amy.rosenthal@usda.gov