



Feeding Bodies. Fueling Minds.™

July 13, 2018

Tim Vázquez
School Programs Branch
Policy and Program Development
Division, Food and Nutrition Service
U.S. Department of Agriculture
3101 Park Center Drive, Room 1206
Alexandria, VA 22302

ELECTRONIC MAIL

Dear Mr. Vázquez:

On behalf of the 57,000 members of the School Nutrition Association (SNA), we appreciate the opportunity to comment on the notice *Agency Information Collection Activities: Proposed Collection; Comment Request-School Breakfast Program Study*, published in the Federal Register on May 23, 2018.

Overall, we recognize the importance of this proposed study, however, some of the survey designs would present challenges to School Food Authorities (SFAs). The data collection process should be streamlined and the redundancy of questions minimized. We acknowledge that electronic data collection is the new norm. When possible, the survey administrators should work with the State Agencies to capture global data on meal counts, reimbursements and other areas as appropriate to minimize the burden to SFAs. At the introduction of the survey selection notifications, it would be helpful to clearly list the information that will need to be gathered, especially being cognizant that data may be maintained at the school level or throughout the district by a central data system. To ensure a successful response rate, we recommend keeping the survey design simple, providing an estimate of time to complete and supplying adequate time to gather data. As we have mentioned on other proposed studies, gathering data in the format maintained by the SFA is most appreciated.

Although it may not be part of this study, SNA's membership is concerned about the recent decrease in SFAs participating in the program, and we encourage USDA to consider a future study to determine why SFAs have left the program.

On behalf of our SNA membership, thank you for the opportunity to share our thoughts. Please let us know how we may provide additional assistance or serve as a resource.

Sincerely,

Dr. Lynn Harvey, RDN, LDN, FAND, SNS
President

Patricia Montague, CAE
Chief Executive Officer