



Feeding Bodies. Fueling Minds.™

July 31, 2017

Dr. Ashley Chaifetz, Ph.D.
Social Science Research Analyst
Special Nutrition Evaluation Branch
Food and Nutrition Service
U.S. Department of Agriculture
3101 Park Center Drive
Alexandria, VA 22302

ELECTRONIC MAIL

Dear Dr. Chaifetz:

On behalf of the 57,000 members of the School Nutrition Association (SNA), we appreciate this opportunity to comment on the U.S. Department of Agriculture's (USDA) May 30, 2017 Federal Register Notice, *Agency Information Collection Activities: Proposed Collection; Comment Request—Study of School Food Authority (SFA) Procurement Practices*. As the SFA procurement process is extremely complex and has several different protocols, SNA hopes this collection will yield recommendations to improve and streamline purchasing requirements for school meal programs.

As one of the first comprehensive reviews of SFA procurement practices, we hope this study will identify challenges and opportunities for improvement that will provide future guidance and support for school meal programs. SNA has already taken steps in this direction. To address the complexity of the procurement process and assess the many steps and challenges, SNA leadership convened a Procurement Task Force and released a white paper in Fall 2016, *Solving the Procurement Puzzle*; it can be accessed at this link:

https://schoolnutrition.org/uploadedFiles/Resources_and_Research/Operations/WhitePaper-SolvingtheProcurementPuzzle.pdf.

The procurement process crosses many facets of the foodservice industry, including USDA Foods processing, long range planning and forecasting, ensuring competition and contract management and contract bidding covering multiple school years. Each of these areas has unique issues that impact the food purchasing cycle. It would be welcomed to see this federal study provide relief to the burdens embedded in the procurement process.

The objectives in the study notice are broad, reflective of the variety in state and local procurement rules and financial thresholds as applied by individual SFAs. In some instances, the application of this array of procurement guidance is restrictive, limiting procurement options for SFAs. With the vast differences in procurement rules, it would be beneficial for the study to make recommendations that are consistent across the school segment and applicable to districts regardless of whether they are self-operated or managed through a foodservice management company (FSMC) contract.

The study sample size should be appropriate to ensure the data collected can be properly analyzed and provide meaningful results. This will allow FNS and State agencies to develop valuable tools to support technical assistance for SFAs. Any new information that can be used to enhance development of technical information on the procurement process and simplify overall procedures, including the administrative review, would be extremely helpful. We suggest the SFAs be stratified by size to better assess the scope and magnitude of the procurement process for large, medium, small and single unit SFAs.

A comprehensive assessment of available resources, challenges and barriers, based on SFA size, would be useful information for various stakeholders. Using information collection studies to inform and, in turn, improve program administration and operation is beneficial to all partners in this complex world of school nutrition. As a result of this study, new tools developed should eliminate redundancies in the current administrative review. In addition, guidance from USDA regional offices should be clear and concise, as well as consistent across all regions.

While we recognize and affirm the importance of USDA's proposed data collection activity in this area, we remain concerned regarding the number of overall data collection studies scheduled to be conducted. These data collection projects place a considerable burden on the State agencies and individual SFAs selected to participate. In many instances, the same State agencies and SFAs have been designated to take part in several USDA studies scheduled simultaneously for the current as well as upcoming school years. Whenever possible, electronic data collection instruments are preferred.

SNA appreciates the opportunity to offer comments on this and future USDA data collection activities and is more than willing to work with FNS in any way to help promote and facilitate data collection.

Sincerely,



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



Patricia Montague, CAE
Chief Executive Officer