



October 11, 2016

Devin Wallace-Williams, Ph. D.  
Food and Nutrition Service  
U.S. Department of Agriculture  
3101 Park Center Drive  
Alexandria, VA 22302

Dear Dr. Wallace-Williams:

On behalf of the members of the School Nutrition Association (SNA), this letter is in response to the Federal Register Notice of Wednesday, August 10, 2016 related to a request for comments on Information Collection Activities from the U.S. Department of Agriculture. The Access, Participation, Eligibility, Certification (APEC) III Study will provide information on the National School Lunch and School Breakfast Programs. SNA appreciates the opportunity to comment on this Notice and offer the following recommendations for your consideration.

The collection of comments seems to run parallel to the notification of school districts for the school year 2017-2018 information collection time frame. It is appreciated that the Department has requested comments as most school districts have found the process to be extremely burdensome and a distraction from proper oversight of program operations. Data collection in previous APEC studies required school nutrition professionals at the state and local level to dedicate a significant amount of time compiling information requested as well as accompanying researchers for onsite data collection.

USDA should incorporate several changes into the data collection process. For instance, study participants should be able to upload a file (.doc, .xls or .csv) to the data portal that has been set up for this study. Any pre-made templates should demonstrate how the data fields are to be reported, identify the file format and be formatted adequately to prevent any issues in data entry. This streamlines the process to compile data and may prevent errors in reformatting files. In addition, it is redundant to capture information that has been collected through the state agency administrative review process. Because that process has been updated in many states to an electronic format, it would seem reasonable to gather information that has been collected in the three-year review cycle as well as collect significant data from state agencies that have electronic claims payment systems. Collecting the same data twice adds unnecessary burden to the school district personnel.

In some instances, there have been questions as to whether APEC study research assistants are fully trained in all the nuances of the programs – particularly the meal pattern requirements. There have been significant meal pattern changes to lunch and breakfast, including meal pattern flexibilities provided at the state level. Research assistants and others evaluating the reimbursable meal for compliance to the meal pattern should have the required training and experience and be sufficiently trained on their responsibilities relative to this study. As a result, and in previous APEC studies, some school districts perceived that onsite researchers did not make the appropriate determination on the meal eligibility.

As this is the first APEC study with nationwide Community Eligibility Provision (CEP) fully in effect, it is essential that the researchers are aware of the various phases of implementation of CEP. The extension of time for a district to declare CEP operations, as well as the calculation of Identified Student Percentage, are two areas that have required significant guidance. Revisions to the CEP guidance and policy memoranda have been numerous and frequent as districts looked to implement CEP and provide meals at no charge to students in a district. Those school districts where 100% CEP is in effect have been well accepted and should reduce APEC findings.

School nutrition personnel should not be held responsible for information and decisions where they did not have direct oversight of school nutrition programs. In school districts, academics remain the priority mission with the meal services being a significant support service for children in schools. The school lunch program serves more than 30 million children in over 100,000 school sites and the breakfast program serves more than 14 million children daily. In most instances, these meals are being served in a very compressed period of time each school day. To conduct a study without thorough review and consideration of all the variables and complex nature of child nutrition programs does a disservice; and, unfortunately, does not accurately reflect the school meals programs.

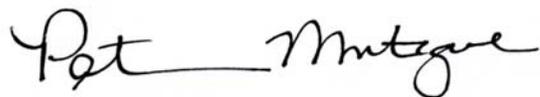
The APEC Study design has focused predominantly on the school nutrition staff in the functions of meal eligibility benefit determinations, while there are several other variables affecting the process including: reliance on state issued data files, current status of the data files, district attendance records, language and literacy challenges, and school district administrators who are not aware of the detailed eligibility requirements and exceptions to the meal benefit eligibility determination rules.

Thank you for the opportunity to provide input. SNA is hopeful this APEC study will initiate additional positive program efficiencies and we stand ready to assist the Department in implementing this study as you move forward.

Sincerely,



Becky Domokos-Bays, PhD, RD, SNS  
President



Patricia Montague, CAE  
Chief Executive Officer