



Feeding Bodies. Fueling Minds.™

July 31, 2019

Desk Officer for Agriculture
Office of Information and Regulatory Affairs
Office of Management and Budget
New Executive Office Building
725 17th Street, NW
Washington, DC 20503

Ms. Ruth Brown
Departmental Information Collection Clearance Officer
Departmental Clearance Office
U.S. Department of Agriculture, OCIO
Mail Stop 7602
Washington, DC 20250– 7602

Dear Ms. Brown and Desk Officer for Agriculture:

The School Nutrition Association (SNA) appreciates the opportunity to comment on the Food and Nutrition Service's (FNS) *Federal Register* notice of July 1, 2019, regarding *Submission for OMB Review; Comment Request Summer Food Service Locations for State Agencies*. The Summer Food Service Program (SFSP) has become a noteworthy part of the school meals program activities.

In consultation with our State Agency Advisory Council, we previously discussed that the data collection, for the SFSP, has been rather cumbersome and inconsistent across USDA's Regional Offices (RO). While making well-intended inquiries, the Regional Offices require an update of sites every Friday by noon in the summer months. This reporting requirement creates a burden to State Agencies that are in the middle of conducting summer reviews as they try to provide much needed technical assistance to sponsors – especially during the short operational time of the summer program. Additionally, the requests are in different formats and may have a few data elements that are found in separate state reports that State Agencies utilize. These additional requests require reformatting of State Agency data to respond to the RO inquiry.

By standardizing the data collection into current Form FNS-905, State Agencies will be able to use standardized reporting and comply with the one-time annual report. We recommend that FNS look to link the national data base to the many state-based innovative outreach websites which will help individuals find resources in their local area where services are needed.

Thank you for the opportunity to submit comments.

Sincerely,

Gay Anderson, SNS
President

Patricia Montague, CAE
Chief Executive Officer