



Feeding Bodies. Fueling Minds.™

June 9, 2021

Ms. Holly Figueroa
Food and Nutrition Service
U.S. Department of Agriculture
1320 Braddock Place
5th Floor
Alexandria, VA 22314

Dear Ms. Figueroa:

On behalf of the 50,000 members of the School Nutrition Association (SNA), we appreciate this opportunity to comment on the Food and Nutrition Service's (FNS) *Comment Request— Agency Information Collection Activities: School Meals Operations Study: Evaluation of the Covid-19 Child Nutrition Waivers and Child Nutrition Programs* published in the *Federal Register* on April 21, 2021. This study is identified as a revision of a currently approved study to assess the operations of the National School Lunch Program (NSLP) and School Breakfast Program (SBP).

Since the onset of the pandemic, schools have not operated in a traditional platform. As such, FNS should recognize that data collection will be impacted by the various waivers as well as other accommodations to the school meal programs. The waiver process, while well intended, was a bit cumbersome and implementation of the waivers were delayed as programs addressed the needs of individuals and households in need.

The evaluation of information may include more subjective decisions and anecdotal circumstances as the pandemic crisis created many reactions to help households in need. The traditional school meal operations changed rather abruptly when the school academic process in school buildings halted and unemployment rates soared. School meal programs addressing the needs of their community became a resource for food and nutrition through unexpected school closures and households were without income. The commitment and dedication of school nutrition personnel rallied to support the students and their families.

There were many adjustments to the operations of a school meal programs as well as the administration of the programs when addressing the needs of the community and the changes to 'normal' operations and procedures. While operating these programs in earnest and maintaining practices to keep households and employees safe, many operational changes were implemented to the program. Without national coordination, each local educational agency (LEA) has implemented practices and actions to address their needs to address safety and social distancing protocols.

We encourage FNS to recognize and adjust the data collection to streamline the process and incorporate contactless and social distancing protocols. As indicated in the notice, the web-based survey should assist in data collection. The format of data collections should allow School Food Authorities (SFA's) to submit, or upload requested information in the SFA's format and not require another spreadsheet to be completed. The time

spent to reformat to comply with a study format takes valuable time and attention away from school nutrition program operations and administration. As you can imagine this retooling of information is a burden and may, in turn, reduce the number of respondents to studies and the data collection content.

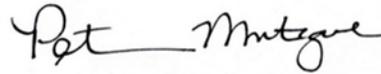
We recommend that FNS convene a Commission to evaluate the processes and practices used during this emergency health crisis and develop a national playbook on operating school meal service programs in various emergency situations. This Commission should have representation from the various stakeholders and operators involved in the operations of the school nutrition programs. The value from a reflective and objective review would provide great input and capture best practices to support future unanticipated school closures. In addition, FNS should include a review of the administrative procedures implemented at the federal and state level to see where processes could be streamlined and be timelier.

We appreciate the opportunity to comment and would support FNS in looking to develop streamlined practices and protocols.

Sincerely,



Reginald Ross, SNS
SNA President



Patricia Montague, CAE
Chief Executive Officer