



March 6, 2017

Mr. Kiley Larson  
Policy Branch  
FDD/FNS  
U.S. Department of Agriculture  
3101 Park Center Drive, Room 500  
Alexandria, Virginia 22302-1594

RE: RIN 0584-AE38

Dear Mr. Larson:

On behalf of the 57,000 members of the School Nutrition Association (SNA), this letter provides comments in response to the Federal Register Notice of Thursday, January 5, 2017, on **Revisions and Clarifications in Requirements for the Processing of Donated Foods**, a Proposed Rule from the U.S. Department of Agriculture (USDA).

The Proposed Rule addresses changes within the USDA Foods Processing Program that already have been implemented through pilot programs, policy memoranda and other means. There has been significant restructuring of 7 CFR 250, which regulates the USDA Foods Program, including the Processing Program. Although most of the proposed regulation streamlines the Processing Program and safeguards it for school districts and state agencies, SNA strongly recommends the development of additional training and support resources, in multiple formats, to address the needs of the various stakeholders impacted by USDA Foods processing: recipient agencies, distributing agencies, processors and distributors.

As just one example, USDA should provide an electronic template to facilitate the requirement for state agencies to develop a processing manual. In addition, training targeted to each stakeholder group should be developed in multiple formats, electronic and in-person, using clear and concise language appropriate to each individual audience. To assist with providing vehicles for such instruction, SNA would welcome USDA's participation on this topic at our Annual National Conference, as well as our webinar series.

SNA also encourages USDA to remain mindful of the changing school meal model that continues to emphasize a reduced reliance on heavily processed menu items. There will always be a place for a variety of processed items in school meal programs, but there is a need for balance in items offered through the USDA Foods Program. While these regulations assist the Processing Program, efforts to provide such items as cooked turkey roasts, sliced ham and pulled pork as directly available products will be very helpful to school nutrition operators and reduce procurement time for school food authorities.

Sincerely,

Becky Domokos-Bays, PhD, RD, SNS  
President

Patricia Montague, CAE  
Chief Executive Officer