



Feeding Bodies. Fueling Minds.™

November 20, 2020

Ms. Natalie Partridge
Nutrition, Education, Training and Technical Assistance Division
Child Nutrition Programs/Food and Nutrition Service
U.S. Department of Agriculture
1320 Braddock Place, 4th Floor
Alexandria, VA 22314

RE: CN Database Comments

Dear Ms. Partridge:

On behalf of the members of the School Nutrition Association (SNA), thank you for the opportunity to comment on the Federal Register notice of September 29, 2020, Agency Information Collection Activities: Proposed Collection; Comment Request-Child Nutrition Database, OMB Number: 0584—0494. The data collection information is noted as a revision to a currently approved collection.

School Food Authorities (SFA's) across the nation depend on the Child Nutrition (CN) database information to analyze the foods served at school for compliance with the nutrition standards established for meals served under the National School Lunch Program (NSLP) and School Breakfast Program (SBP). The proposed database formula changes to the CN Database Qualification Report (FNS-710 Spreadsheet) are not completed by SFA's. Therefore, the SFA's may be impacted indirectly in other ways as manufacturers and vendors update software and conduct analysis using this proposed process. As the Food and Nutrition Service (FNS) knows, SFA's rely on the database to adhere to the nutrient requirements of the programs. FNS should ensure that the compilations are accurate and updated as product formulations change.

The notice also mentions that FNS is researching options to modernize the CN database. Certainly, there have been significant technology changes since the first database approvals were done in the 1990's. To ensure that a new or modernized system is user friendly, child nutrition practitioners should be included in development assessments and user testing processes. As we look to streamlining operations, FNS should explore being able to easily read consumer food labels and apply similar principles to the database and analysis process.

Many of our members use U.S. Department of Agriculture resources along with our Association resources. Hopefully, your process to update the CN database will include school nutrition program operators and regular users of the database system.

We look forward to continued cooperation and collaboration with the Department.

Sincerely,

Reginald Ross, SNS
President

Patricia Montague, CAE
Chief Executive Officer