October 25, 2019

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

Desk Officer for Agriculture  
Office of Information and Regulatory Affairs  
Office of Management and Budget, New Executive Office Building  
725 17th Street, N.W.  
Washington, DC 20502

Dear Ms. Brown and Desk Officer:

On behalf of the 58,000 members of the School Nutrition Association (SNA), we welcome this opportunity to provide comment on the Food and Nutrition Services’ (FNS) Submission for OMB Review; Comment Request published in the Federal Register of September 25, 2019. The notice included three (3) items: Agency Information Collection for the National School Lunch Program, OMB Control Number 0584-0006; Generic Clearance for the Development of Nutrition Education Messages and Products for the General Public, OMB Control Number 0584-0523 and Generic Clearance to Conduct Formative Research, OMB Control Number 0584-0524.

The Association remains concerned about the burden that data collection presents to school nutrition program operators. SNA has submitted comments regarding the burden in response to previous notices. Copies of those comment letters have been attached for your reference.

While we understand the need for data collection and recognize that it is done in different formats, we would like to see the process streamlined and reduce the burden to State Agencies and local program administrators and operators. Noted in USDA’s Child Nutrition Burden Study Analysis Report were several recommendations for FNS to consider to reduce burden especially in the reporting process. This report should be reviewed for application to the reporting process related to this collection.

Our Association continues to appreciate the collaboration with the various divisions of USDA and FNS.

Sincerely,

Gay Anderson, SNA  
President

Patricia Montague, CAE  
Chief Executive Officer

Attachments