



Feeding Bodies. Fueling Minds.™

November 9, 2018

Ms. Rachele Ragland-Greene
Planning and Regulatory Affairs Office
Food and Nutrition Service
U.S. Department of Agriculture
3101 Park Center Drive, Room 1014
Alexandria, VA 22302

Dear Ms. Ragland-Greene:

On behalf of the 57,000 members of the School Nutrition Association (SNA), we appreciate this opportunity to comment on the Food and Nutrition Service's (FNS) *Agency Information Collection Activities: Proposed Collection; Comment Request-Generic Clearance to Conduct Pre-Testing of Surveys* published in the *Federal Register* on September 14, 2018. This request is related to a currently approved collection to conduct various procedures to test questionnaires and survey procedures and to improve the quality and usability of information collection instruments.

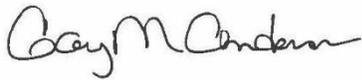
SNA has recommended in previous comments relative to reducing the burden to survey respondents, that FNS should create a working group of school nutrition professionals to serve as a pre-testing group of content specialists. As they are skilled and knowledgeable on child nutrition programs, this working group could guide research design staff on relevant content question development interpretation, act as a resource to elicit more effective design, and ultimately increase the number of survey respondents. These working group members could also be used to support studies and provide outreach during the study process. With the assistance of these content experts, the pre-testing process should be more relevant and consistent for FNS researchers, thereby yielding improved quality and usability of collected information.

SNA believes, wherever possible in the pre-testing survey process, that FNS eliminate redundancies and utilize state agencies' comprehensive data collections from monthly reports, annual reports and administrative reviews to name a few. Also, the format of data collections should allow SFAs to submit or upload requested information in the SFA's format without requiring another spreadsheet to be completed. Time spent reformatting data to comply with a study format takes time and attention away from school nutrition program operations and administration. Burdens such as these may be reducing the number of respondents to studies and the data collection content.

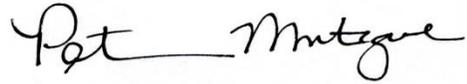
In addition to examining the pre-testing of surveys, FNS should work to reduce the long lag time between data collection and the publication of reports to ensure that the information remains relevant. School nutrition directors and key staff are very conscientious in gathering responses and data for FNS studies. It would be appreciated that in return reports be issued and available in a timely manner.

We appreciate the opportunity to comment and would support FNS in engaging a working group to guide and assist with the study process.

Sincerely,



Gay Anderson, SNS
President



Patricia Montague, CAE
Chief Executive Officer