March 18, 2020

Andrea Farmer
Chief
Community Meals Branch
Policy and Program Development Division
USDA Food and Nutrition Service
1320 Braddock Place
Alexandria, VA 22314

Dear Ms. Farmer:

The School Nutrition Association (SNA) appreciates this opportunity to provide comments on the Federal Register Proposed Rule Notice of January 23, 2020, *Streamlining Program Requirements and Improving Integrity in the Summer Food Service Program (SFSP).*

On behalf of our members, SNA has long advocated for the simplification of complex federal child nutrition regulations and burdensome administrative requirements. SNA greatly appreciates USDA’s continued efforts to respond to this feedback from school nutrition professionals. Our members work on the frontlines, implementing child nutrition program regulations and seeing firsthand their positive impact on the students served. We are grateful for USDA’s commitment to correcting oversights in the regulatory process, addressing unintended challenges and striving to ensure the programs succeed.

This proposed rule was developed to update important definitions, simplify the application process, enhance monitoring and provide state agencies discretion in certain operational areas. The implementation phase of this rule, however, will need some guidance and technical assistance. SNA also urges USDA to consider the following specific input when finalizing this proposed rule:

1. **Streamlining Program Requirements**

   For many years, in efforts to provide improved access to summer meals by eligible participants, the SFSP has operated with flexibilities built from policy memoranda, as well as official guidance. With this proposed rule consolidating those key documents into regulation, SNA believes the program will benefit from a more solid operational and administrative base. The waiver process that has been used to update many aspects of program administration has been cumbersome and redundant. These revisions will better support outreach efforts and sponsor operations, as well as encourage increased participation by sponsors and children in the SFSP.

   SNA recommends striving for consistency in program implementation and oversight across the different state agencies that administer the SFSP. This clarity will assist in engaging potential sponsors and expanding sponsorship. In addition, because program sponsors sometimes operate across state borders,
there should be a method or protocol to communicate program sponsor information among state agencies.

It is important that sponsors, many of which are school districts, have streamlined methods to comply with their numerous SFSP administrative responsibilities. In revising the application process, this rule assists in that effort. It would further benefit sponsors, especially those that operate multiple child nutrition programs, for the Food and Nutrition Service (FNS) to continue to examine other potential areas that can be streamlined.

2. **Proposal Regarding Sponsor Demonstration of Financial and Administrative Capability**

In codifying the current flexibility that relieves SFAs and CACFP institutions in good standing from providing further evidence of financial and administrative capabilities, SNA requests that FNS does not undermine a State agency’s need to assess new SFSP sponsors. State agencies use the financial viability and accountability factors as key tools in this assessment. While many programs are operating with good intentions, there needs to be a method to affirm the solvency and capability of new organizations.

3. **Proposals to Simplify Monitoring**

SNA supports the proposed revisions to the program monitoring requirements that address the redundancy burden of reviews and monitoring visits scheduled at separate times. SNA further recommends that an emphasis be placed on providing technical assistance during the first few weeks of SFSP operations. With new staff frequently in place during this critical period, focusing on best practices and constructive training would be beneficial.

4. **Proposed Customer-service Friendly Meal Service**

The proposed “customer-service friendly meal service” changes address challenges that have existed for both sponsors and State agencies. SNA requests that, with State agency approval, revisions to meal service times reflect the actual operations of SFSP sites.

Continued streamlining for the SFSP is a necessary step for supporting program improvement and maintaining administrative integrity. SNA thanks USDA for its continued efforts to respond to feedback from school nutrition professionals working on the frontlines and for its commitment to ensuring vital child nutrition programs, like SFSP, succeed in serving America’s children.

Sincerely,

Gay Anderson, SNS  
President  
Patricia Montague, CAE  
Chief Executive Officer