



Feeding Bodies. Fueling Minds.™

September 27, 2019

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Office of Management and Budget
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Dear Ms. Brown and OMB Agriculture Desk Officer:

On behalf of the 58,000 members of the School Nutrition Association (SNA), we welcome this opportunity to provide comments on the Food and Nutrition Services' (FNS) *Submission for OMB Review; Comment Request Title: 7 CFR Part 235—State Administrative Expense (SAE) Funds. OMB Control Number: 0584-0067 and Title: 7 CFR part 225, Summer Food Service Program, OMB Control Number: 0584-0280* related to data collection published in the *Federal Register* on August 28, 2019.

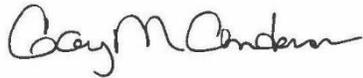
As stated in the *Federal Register*, this data collection is related to the funds issued to State agencies for purposes of administrative expenditures. State Agencies rely on these funds for expenses incurred in supervising and providing technical assistance to School Food Authorities (SFA's) in connection with the child nutrition programs. It is critical that states have sufficient funds to address the on-going fiscal responsibilities for proper oversight and program integrity. As outlined in the notice, there are several data points to collect and several reports that are used for the determination of these funds. It would be helpful to identify a way in which these reports and data elements could be streamlined to reduce burden on State Agency staff.

For the Summer Food Service Program (SFSP) data collection, it is important to have accurate data. Data collection related to SFSP has its challenges as the program operates for a short period of time and overlaps with many State Agency related duties conducted during the summer months. Further, many summer sponsors conduct community activities and programs that coincide with the summer months and may not be completely familiar with all program requirements. SNA recommends that flexibility be provided in methods used to determine SFSP sponsor eligibility in order to streamline the program and maintain program integrity.

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 the burden to State Agencies and local program operators reduced. As was noted in [USDA's Child Nutrition Burden Study Analysis Report](#), there were several recommendations for FNS to consider to reduce burden. This report should be reviewed for application to these collections.

SNA continues to appreciate the collaboration with the various divisions of USDA and FNS and is willing to assist in any way to identify ways to streamline reporting processes.

Sincerely,



Gay Anderson, SNS
President



Patricia Montague, CAE
Chief Executive Officer