April 17, 2019

Desk Officer for Agriculture
Office of Information and Regulatory Affairs
Office of Management and Budget (OMB)
OIRA_Submission@omb.eop.gov

Kimble Brown
Departmental Information Collection
Clearance Officer
Departmental Clearance Office
USDA, OCIO
Mail Stop 7602
Washington, DC 20250–7602

Dear Desk Officer for Agriculture and Kimble Brown:

These comments are being submitted on behalf of the 58,000 members of the School Nutrition Association (SNA). The comments are related to the request for comment on the U.S. Department of Agriculture’s (USDA) Food and Nutrition Service (FNS) Submission for OMB Review; Comment Request published in the Federal Register on March 18, 2019, Title: Child Nutrition Program Operations Study II (CN–OPS II): Year 4, OMB Control Number: 0584–0607.

As SNA has mentioned in previous correspondence, we recognize the value of FNS studies, yet there are considerable burdens placed on participating school districts in completing these surveys. The agency should work to minimize burden to school district personnel and be proactive in providing electronic resources to selected school districts. Given that the survey will incorporate questions reflective of current operational trends, we hope the results will be publicly available in a timely manner. SNA looks forward to utilizing the findings in professional development resources to assist school food authorities in improving their programs.

For your reference, we have enclosed comment letters submitted in December 2016 and July 2018 related to the CN-OPS II study. Thank you for this opportunity to provide FNS with comments related to the study.

Sincerely,

Gay Anderson, SNS
President

Patricia Montague, CAE
Chief Executive Officer