



FNS RESPONSE TO SCHOOL NUTRITION ASSOCIATION

May 22, 2019

Food and
Nutrition
Service

Park Office
Center

3101 Park
Center Drive
Alexandria
VA 22302

Ms. Gay Anderson, President
Ms. Patricia Montague, Chief Executive Officer
School Nutrition Association
2900 South Quincy St.
Arlington, Virginia 22206

Re: Response to FR Doc No: 2019-04090

Dear Ms. Anderson and Ms. Montague:

Thank you for your response to the notice requesting comments on the proposed information collection for the Summer Food Service Program (SFSP) Integrity Study, published in the Federal Register on March 7, 2019. The Food and Nutrition Service (FNS) is committed to understanding how the SFSP is administered at the State and local levels, and to identifying both integrity challenges and resources or technical assistance that would better support the administration and monitoring of the SFSP.

FNS appreciates your support for the study, and your comments about the critical role SFSP plays in supporting children's nutritional needs. In your letter, you advocated that the SFSP Integrity Study:

1. Include a working group of State agency directors to serve as a front-end testing group of study materials.
2. Eliminate redundancies and reduce burden;
3. Provide advance information to respondents, including accurate estimates on time needed for the interviews;
4. Use State agency directors as the primary contact and only contact other State agency personnel with their prior approval;
5. Allow study respondents to submit requested information in the original format, not requiring another spreadsheet to be completed; and
6. Look at ways to streamline administration of SFSP.

FNS is mindful of the need to reduce burden and target data collection efforts whenever possible. To that end, we established a Peer Advisory Panel (PAP) for this study to review the study plan, as well as data collection instruments and other study materials. Included on that Council are subject-matter experts including State agency personnel. In addition to input from members of the PAP, all data collection instruments were tested with State agency staff as well as sponsor- and site-level staff. With their feedback, we streamlined the recruitment and data collection materials to help ensure that all questions are relevant, necessary and easy to understand.

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As far as providing advance information on the time needed for interviews, the study team will state the expected time burden in four ways: 1) in recruitment emails asking respondents to participate in the study; 2) in the informational letter posted on the online survey website; 3) in the consent information reviewed orally prior to the start of all telephone interviews; and 4) in the meeting invitation sent to respondents to hold the time for a telephone interview. Through those various communications, respondents should be fully aware of the time commitment of each data collection effort, and researchers will abide by the stated times.

FNS agrees with your suggestion to use the State agency directors as the primary contacts, and that is how the study team will approach recruitment. The study team will not attempt to recruit other State personnel for the study, but the State agency directors will be allowed to invite up to two additional State-level staff to join the telephone interviews if they choose. If they decide to include other staff, the study team will include those staff in the meeting invitation for the interview, and will also send them a thank you note following the interview.

FNS hears your concern about requesting data from study respondents. Apart from the request to State agency directors to complete an online survey, no other request will be made of respondents to submit data for the study. The online survey is predominantly multiple-choice questions, and does not request any data to be uploaded.

Finally, FNS appreciates your suggestion to explore ways to streamline the SFSP. While an exploration of ways to streamline the program falls outside the scope of this study, we hope that some of the findings will contribute to that conversation. The first study objective is to examine how States and sponsors administer and oversee the SFSP, and to probe into which practices States consider to be most effective. We expect that the qualitative data on practices considered to be effective will offer some suggestions on how to streamline the program while continuing to ensure program integrity.

Thank you again for your comments and your support of USDA nutrition assistance programs. We look forward to our continued partnership.

Sincerely,



Chanchalat Chanhataasilpa, PhD
Social Science Research Analyst
USDA – Food and Nutrition Service