September 23, 2019

Ms. Tina Namian  
School Programs Branch  
Policy and Program Development Division  
Food and Nutrition Service  
U.S. Department of Agriculture  
3101 Park Center Drive, Room 1206  
Alexandria, VA 22302–1594

Dear Ms. Namian:

On behalf of the 58,000 members of the School Nutrition Association (SNA), we welcome this opportunity to provide comment on the Food and Nutrition Services’ (FNS) Agency Information Collection Activities: Proposed Collection; Comment Request—Information Collection for the National School Lunch Program published in the Federal Register of July 24, 2019.

As stated in the Federal Register, the data collection is a revision of a currently approved collection which FNS employs to determine public participation in the National School Lunch Program (NSLP). The notice indicates that the revision includes unaccounted burden not counted in the last notice on this reporting as well as burden for the revised administrative review process. It notes that due to the unfortunate decrease in NSLP program participation, there is a decrease in burden for this Information Collection.

While we understand the need for data collection and recognize that it is done in different formats, we recommend that the process be streamlined to reduce the burden on state agencies and local program administrators and operators. In USDA’s Child Nutrition Burden Study Analysis Report were several recommendations for FNS to consider to reduce burdens, especially in the reporting process. This report should be reviewed for application to the reporting process related to this collection.

SNA continues to appreciate the collaboration with the various divisions of USDA and FNS and is happy to assist to strengthen the process in any way.

Sincerely,

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

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