June 28, 2019

Ms. Sarah Smith-Holmes  
Director, Program Monitoring and Operational Support Branch  
Child Nutrition Division  
U.S. Department of Agriculture  
3101 Park Center Drive, Room 630  
Alexandria VA 22302

Dear Ms. Smith-Holmes:

On behalf of the 58,000 members of the School Nutrition Association (SNA), we appreciate the opportunity to provide comments on the Food and Nutrition Services’ (FNS) Agency Information Collection Activities: Information Collection; Comment Request-CACFP National Disqualified List published in the Federal Register on May 3, 2019. SNA’s membership is comprised of school nutrition professionals serving K-12 schools, college level academic instructors/professors in related fields, State Agency personnel administering several Federal child nutrition programs and other related professionals.

As this notice is primarily in relation to the administrative responsibilities, we conferred with our State Agency Advisory Council on this issue. Noting that this notice is to extend the collection, without change to the current National Disqualified List, we have limited comments on the notice. We appreciate that the list was developed as a response to individuals and institutions that did not operate the Child and Adult Care Food Program (CACFP) with full integrity and fidelity. It has allowed administering State Agencies across the country and territories to research prospective sponsors and individuals looking to sponsor CACFP and assist in determining viability and capability.

To address your request on enhancing the quality, utility and clarity of the information collected, we recommend that FNS contact State Agency personnel to discuss technical improvements that could be made to the reports generated from the data collected. For example, incorporating some flexibility in the fields selected for reports would help to complete the review of individuals and organizations for integrity. Of note, is the limitation of not being able to export dates of birth to an exportable file. Because the date of birth of the principal(s) of an organization is a required data field to collect under CACFP regulations, State Agencies conducting a sponsor application review of a potential CACFP sponsor should have access to that data in an easily accessible report.

In addition, FNS should look to determine what actions could be taken to improve the use and value of this list. We appreciate the opportunity to comment.

Sincerely,

Gay Anderson, SNS  
President  

Patricia Montague, CAE  
Chief Executive Officer