



**Feeding Bodies. Fueling Minds.™**

October 20, 2020

Ms. Melissa Abelev  
U.S. Department of Agriculture  
Food and Nutrition Service  
1320 Braddock Place  
Alexandria, VA 22302

ELECTRONIC DELIVERY

Dear Ms. Abelev:

These comments are being submitted on behalf of the more than 55,000 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) FNS Information Collection Needs due to COVID-19 Comment Request printed in the Federal Register on August 27, 2020, OMB Control Number 0584-0654. As stated in the comment request, this collection is related to reporting needs due to COVID-19.

The notice request seeks to gather information related to waivers and other flexibilities provided through the Families First Coronavirus Response Act and the Coronavirus Aid, Relief, and Economic Security Acts. These Acts indicated a reporting process required for actions taken regarding the waivers and flexibilities implemented. School districts as well as state agencies are continuing to address issues to provide meal service and utilize food inventory during this public health emergency. As such, it appears that based on the descriptions of report revisions cited in the notice, the Food and Nutrition Service (FNS) is modifying its platform to gather information rather than requiring state agencies or school districts to make changes to their systems. This should reduce the reporting burden. In addition, as FNS continues to look to its regional offices (RO), who are in turn in frequent contact with state agencies, even more information will be collected—ultimately furthering reducing the overall collection burden.

Through this unanticipated extended period of addressing the nutritional needs of our communities, school district and state agency staff have worked tirelessly to provide meals in an efficient manner and serve the needs of their communities. We appreciate USDA's support and look to continue to find ways to support the Child Nutrition Programs in these difficult times.

Sincerely,

Reginald Ross, SNS  
President

Patricia Montague, CAE  
Chief Executive Officer