

July 13, 2020

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RE: Agency Information Collection Activities: School Meals Operations Study: Evaluation of the School-Based Child Nutrition Programs

Dear Ms. Figueroa:

The Academy of Nutrition and Dietetics (the “Academy”) appreciates the opportunity to submit comments to the Food and Nutrition Service of the U.S. Department of Agriculture related to its request for feedback on the School Meals Operations Study (OMB 0584-0607), originally published in the Federal Register on May 13, 2020 (85 FR 28602). Representing more than 107,000 registered dietitian nutritionists (RDNs),<sup>1</sup> nutrition and dietetic technicians, registered (NDTRs), and advanced-degree nutritionists, the Academy is the largest association of food and nutrition professionals in the United States. We are committed to accelerating improvements in the nation’s health and well-being through food and nutrition.

**The Academy supports the continuation of the Child Nutrition Program’s Operations Study II data collection efforts and found the data and results from the previous collection to be informative and useful for a large range of stakeholders, including district and school level staff, school nutrition operators, as well as local, state, and federal policy makers and researchers.**

**The Academy is particularly concerned about the disproportionate impact the COVID-19 pandemic has had on communities of color and these same communities are far more likely to experience food insecurity. Before the pandemic, approximately 11 million children lived in a food-insecure household; this number is expected to rise to 18 million.<sup>2</sup> School nutrition programs are an essential piece of the federal nutrition safety net to combat hunger.**

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<sup>1</sup>The Academy approved the optional use of the credential “registered dietitian nutritionist (RDN)” by “registered dietitians (RDs)” to more accurately convey who they are and what they do as the nation’s food and nutrition experts. The RD and RDN credentials have identical meanings and legal trademark definitions.

<sup>2</sup> [https://www.feedingamerica.org/sites/default/files/2020-04/Brief\\_Impact%20of%20Covid%20on%20Child%20Food%20Insecurity%204.22.20.pdf](https://www.feedingamerica.org/sites/default/files/2020-04/Brief_Impact%20of%20Covid%20on%20Child%20Food%20Insecurity%204.22.20.pdf)

**The Academy supports efforts to better understand the short and long term implications from the COVID-19 school closures on the school nutrition programs, including impact on financial viability, future operations and student food security and health. Additionally the Academy encourages USDA to document the impact of child nutrition waivers on program operations as well as best practices for future emergency preparedness.**

***A. Practical utility of the CN-OPS II Study***

The Academy supports continued efforts to collect evaluative data on the National School Lunch and Breakfast programs. Previous CN-OPS data provided valuable, comprehensive information for policy makers, administrators, school food authorities, and nutrition and health professionals about policies, practices, and needs related to school nutrition service operations, financial management, meal counting, training and professional standards, food service equipment and technology. Members of the Academy of Nutrition and Dietetics use this information to:

- Operate school nutrition programs based on data provided on best practices, training resources and needs, and program trends;
- Identify critical needs for technical assistance and training;
- Develop policy recommendations that support for the efficient and effective operations of school nutrition programs that serve nearly 30 million children every day during the school year; and
- Study the impact of school nutrition programs on student health and achievement.

***B. Estimate of burden for data collection***

The original information collection announcement stated that the estimated average time per response is 17 minutes but elaborated that the estimated response per data collection activity varies from three minutes to 20 hours based on the instrument. According to Academy members who will be asked to perform these tasks, the estimate of burden is too low. Members suggest sending the data collection tools well in advance so that systems and processes can be put in place to better and more efficiently meet expectations.

***C. Opportunities to enhance the quality, utility and clarity of collected information***

*The Impact of COVID-19 School Closures*

As the nation grapples with the impact of COVID-19 disruptions, school nutrition professionals are working on the frontlines to combat rising levels of food insecurity in their communities. School meal programs chose to keep workers employed, deliver meals to students with no additional reimbursement and expose staff to the coronavirus with little to no funding for proper personal protective equipment. Many maintained fixed

expenses such as salaries while taking on unanticipated expenses such as hazard pay and transportation.

School nutrition programs rely on reimbursement from meal service to pay for expenses. During the 2018-19 school year, between the months of March and June, school nutrition programs served more than 2.5 billion meals and snacks, receiving over \$5 billion in reimbursement.<sup>3</sup> However, programs served only a fraction of those meals during the 2019-20 school year due to closures; this unanticipated loss of revenue has forced programs to tap into fund balances and draw upon lines of credit to sustain their operations. A recent School Nutrition Association survey reveals significant concerns about the financial sustainability of school meal programs; more than 90 percent of respondents either anticipate a financial loss or are uncertain of their program's financial health.<sup>4</sup> The Academy recommends including questions that can accurately capture how school closures have impacted districts across the country, including which programs fared best and why. Responses to these questions will help determine how best to support schools during this new service environment in the fall and to prepare for future emergency situations.

Looking to recovery, it is imperative to support school nutrition programs including planning for the health of staff and children and looking to the long-term sustainability of their operations. USDA-issued waivers played a pivotal role in providing school nutrition programs with the flexibilities needed to serve children during the initial school closures and continue to play an important role in the ever-changing reopening plan for school year 2020-21. The Academy recommends that USDA collect information on the impact of waiver issuance but also fully examine the process in which waivers were expected to be reviewed, approved and tracked. School Nutrition State Agency staff and school nutrition operators should be given the opportunity to report what worked well in the process and what needs to be improved for future emergency preparedness. Academy members reported that the process of filling out waiver requests by School Food Authorities and the review and approval by state employees was cumbersome and took extraordinary amounts of time. This data collection should allow for those most impacted by the waiver process the opportunity to recommend improvements for the future.

As reopening plans are still being discussed and finalized, it is important that data collection efforts in CN-OPS II include the service models that were employed because of the COVID-19 pandemic, as well as the resources, training and equipment staff are currently lacking in order to meet the ever-changing needs in school meal programs. The data collection should also capture how to prepare for future unanticipated school closures.

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<sup>3</sup> National Level Monthly Data for NSLP, SBP, and CACFP. <https://www.fns.usda.gov/pd/child-nutrition-tables>. Accessed on July 9, 2020.

<sup>4</sup> Impact of COVID-19 on School Nutrition Programs: Part 2. [https://schoolnutrition.org/uploadedFiles/11COVID-19/3\\_Webinar\\_Series\\_and\\_Other\\_Resources/COVID-19-Impact-on-School-Nutrition-Programs-Part2.pdf](https://schoolnutrition.org/uploadedFiles/11COVID-19/3_Webinar_Series_and_Other_Resources/COVID-19-Impact-on-School-Nutrition-Programs-Part2.pdf). Accessed on July 8, 2020.

### *Decrease in Paid Level Student Meal Participation*

The National School Lunch Program provided low-cost or free lunches to 29.7 million children daily in 2018; participation has declined in six of the last seven years, with the biggest decline seen in the paid student category.<sup>5</sup> According to the School Nutrition and Meal Cost Study-I, in SY 2014–2015, a 10 cent increase in the price of a paid lunch was associated with a decline of 0.7 percentage points in the rate of paid meal participation in the NSLP. The Academy is concerned that the Paid Lunch Equity provision from the Healthy, Hunger-Free Kids Act is out-pricing paid students from the program and is limiting the reach and impact of the newly improved school nutrition environment for all students. Lastly, given the option of virtual learning for many school districts, Academy members are concerned participation in the paid category will continue to decrease. The Academy encourages FNS to consider collecting additional information to explain this association in more detail.

### *Unpaid Meal Debt*

According to the School Nutrition Association’s operations study and repeated, recent news reports<sup>6,7,8</sup>, school meal programs continue to face challenges when students who are not enrolled in the free meal program lack adequate funds to pay for their meals. These unpaid meal debts have led to cases of lunch shaming. In turn, there have been a handful of state level bills as well as efforts to introduce federal policies to address ‘lunch shaming’. However, there are reports from Academy members that some state level anti-lunch shaming legislation has in fact increased the unpaid meal debt. Academy members have expressed concerns that meal charge debt will increase as systems to collect money for meals served during virtual learning will be challenging to implement. Strong policy is critical to address both the real burden of unpaid meal debt as well as the negative consequences of lunch shaming especially in the wake of the COVID-19 school closures, increased food insecurity and record unemployment numbers.

In order to make appropriate policy decisions, there needs to be a better understanding of who is incurring the unpaid meal debt and what, if any, unintended consequences may be occurring while state level anti-lunch shaming bills are implemented. The CN-OPS II is an ideal vehicle to collect some of the financial data needed to better address this issue and the Academy suggests that FNS consider adding questions to the survey instrument to capture this information.

### ***D. Ways to Minimize the Collection Burden***

Academy members have stressed that USDA could minimize the collection burden by informing state agency directors and school nutrition operators far in advance what and

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<sup>5</sup> USDA. National School Lunch Program. <https://www.ers.usda.gov/topics/food-nutrition-assistance/child-nutrition-programs/national-school-lunch-program.aspx> Accessed July 6, 2020.

<sup>6</sup> <https://www.cnn.com/2019/05/12/politics/school-lunch-shaming-children-debt/index.html>

<sup>7</sup> <https://www.cnn.com/2019/07/20/us/pennsylvania-school-lunch-debt-trnd/index.html>

<sup>8</sup> <https://www.bostonglobe.com/opinion/letters/2019/06/20/mass-should-move-fast-protect-pupils-from-lunch-shaming/Ci7HT26JApNQkGWh9Djc2O/story.html>

how data will be collected, analyzed and used, so that systems can be established to collect information rather than retroactively create a system that pulls from a variety of sources and may not adequately meet data collection expectations. For example, Academy members are concerned that collecting information about waivers issued during the COVID-19 pandemic school closures will be challenging to collect, compile and report on given the volume of requests and the absence of specific uniform reporting and evaluation measures across states.

**E. Conclusion**

The Academy appreciates the opportunity to submit comments and urges USDA to consider making changes to the survey instrument and methods to improve the clarity and utility of the survey and capture information about current topics where limited data is currently available.

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Sincerely,



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