

July 13, 2020

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RE: Agency Information Collection Activities: Proposed Collection Comment Request for the School Food Purchase Study IV

Dear Ms. Burdug:

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 Food Purchase Study IV (OMB 0584-0471), originally published in the Federal Register on May 13, 2020 (85 FR 28599). Representing more than 104,000 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 reinstatement of the School Food Purchase Study IV with modifications 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, tribal 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 and that 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 procurement process, from field to child.**

***A. Practical utility of the School Food Purchase Study IV***

The Academy supports continued efforts to collect evaluative data on the National School Lunch and Breakfast programs. Previous School Food Purchase Study data provided valuable, comprehensive information for policy makers, administrators, school food authorities, and nutrition and health professionals and researchers about the overall changes in the composition of the school food market basket including foods purchases for a la carte sales and the relative importance of donated USDA Foods. The School Food Purchase Study data also provided important insight into the relationship between district characteristics, purchasing practices and food costs. 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;
- 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 Academy applauds USDA for their efforts to reduce the burden for data collection while keeping the fidelity of the study. Switching from a paper survey to a web-based system will greatly reduce the burden on School Food Authorities. Previously the Academy had called for informational webinars to better prepare respondents to effectively and efficiently participate in school nutrition program evaluative studies. The training webinars described in this information collection will allow USDA to help facilitate clear instructions and set appropriate expectations with participants. Academy members also suggest that USDA send the data collection tool in advance to all respondent types in order to align the data with the collection tool and to underscore the interrelationship of the data providers.

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

*COVID-19 School Closures Impact on Supply Chain and Procurement Practices*

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 and to prepare for the ever-evolving reopening of schools for the 2020-2021 school year.

School meal programs chose to keep workers employed, deliver meals to students with no additional reimbursement, and risk staff being exposed to the coronavirus with no additional funding for proper personal protective equipment. Many maintained fixed expenses such as salaries while taking on unanticipated expenses, including hazard pay and transportation. This has left school nutrition programs financially strained as they try to plan for fall service where additional challenges such as market disruptions; increased food costs; additional labor, transportation and personal protective equipment costs; menu changes; and varied service models have left school nutrition professionals frustrated and anxious on how they will best serve children.

The Academy suggests that USDA include the following questions to the procurement study in order to document the impact of the pandemic on the school nutrition procurement process from field to child:

- Menu Development
  - To what degree did the COVID-19 pandemic disrupt your menu development and therefore your procurement practices?
  - What types of products are no longer available to procure because of market disruptions?
  - What types of products are no longer available to menu because of changes in service model?
  - How has the size of your district impacted your food availability with limited or high demand items?
  - How has the amount of packaging increased and has there been an impact of the nutrient density or quality of available items?
  - To what degree has your food waste increased?
  
- Equipment and Supplies Procurement
  - To what degree has the COVID-19 pandemic impacted your service model and what additional pieces of equipment did you purchase to support reopening for the 2020-2021 school year?
  - To what degree have your supply costs increased in the 2020-2021 school year?
  - To what degree did you have trouble finding the equipment you needed to reopen in the 2020-2021 school year?
  - To what degree did you have trouble affording the equipment you needed to reopen in the 2020-2021 school year? Why?
  - What additional equipment needs still exist in your district?
  - What new or additional supplies have you needed to procure to accommodate new service models?
  
- Local Farmer Relationships
  - To what degree were your relationships with local farmers disrupted because of the pandemic?

- Food Costs
  - To what degree have your food costs been impacted by the pandemic?
  
- Market Challenges
  - To what degree have your bid processes been impacted by market disruptions?
  - What types of flexibilities or waivers would be necessary to improve the procurement process during market disruptions and emergencies?

**D. Conclusion**

The Academy appreciates the opportunity to submit comments to USDA related to its request for feedback on the School Food Purchase Study IV. The Academy 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. Please contact either Jeanne Blankenship at 312-899-1730 or by email at [jblankenship@eatright.org](mailto:jblankenship@eatright.org) or Liz Campbell at 202-775-8277 ext. 6021 or by email at [ecampbell@eatright.org](mailto:ecampbell@eatright.org) with any questions or requests for additional information.

Sincerely,



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