



October 15, 2021

MEMORANDUM

TO: Jordan Cohen
Desk Officer
Office of Information and Regulatory Affairs, OMB

THRU: Maureen Lydon, Chief
Planning and Regulatory Affairs Office (PRAO)
Food and Nutrition Service

Ruth Brown
Departmental Clearance Officer
Office of the Chief Information Officer
United States Department of Agriculture

FROM: Cindy Long
Administrator
Food and Nutrition Service

SUBJECT: Emergency Approval of New Survey on
School Food Supply Chain Disruptions

The Food and Nutrition Service (FNS) of the United States Department of Agriculture (USDA) is requesting emergency approval under the Paperwork Reduction Act (PRA) to conduct a survey of School Food Authorities to collect information on school food supply chain challenges. The information will be used to assess the impacts of COVID-19-related supply chain disruptions on the Child Nutrition (CN) Programs. Attachment 1 is the proposed survey.

Throughout the pandemic, school nutrition professionals have met extraordinary challenges to ensure every child can get the food they need to learn, grow, and thrive. But circumstances in local communities remain unpredictable, and supply chains for food and labor have been stressed and at times disrupted. USDA is committed to working together with state agencies, school food authorities (SFAs), the food industry, and other stakeholders to communicate school food supply chain challenges and to identify solutions.

This survey will assist USDA's Food and Nutrition Service (FNS) and its partners to enhance the toolbox for school nutrition professionals working hard to make sure students have reliable access to healthy meals. Information gained through survey responses will build on the insight that USDA needs to support school districts during this difficult time with tailored resources, tools and flexibility needed to serve students healthy and nutritious meals. FNS is asking all SFAs that participate in the Child Nutrition Programs to complete this survey. The supporting statement and burden estimates are included in Attachment 2.

Background on Responsibilities and Authority

FNS is responsible for the administration of the CN programs—including the National School Lunch Program (NSLP), the School Breakfast Program (SBP), NSLP Seamless Summer Option (SSO), the Summer Food Service Program (SFSP), the Child and Adult Care Food Program (CACFP), and others—at the federal level. To inform current and future policy decisions and effectively oversee these programs, FNS requires information on how these programs are operating. Although FNS oversees these programs, SAs administer them through agreements with SFAs and other local entities that implement the programs at the local level.

This collection is authorized under Section 28(a)(1) of the Richard B. Russell National School Lunch Act (NSLA), which authorizes the USDA Secretary to conduct annual national performance assessments of the school meal programs and requires States and local entities participating in the programs to cooperate with program research and evaluations (XX). Furthermore, Section 305 of the 2010 Healthy Hunger-Free Kids Act (HHFKA) amended Section 28 of the Richard B. Russell National School Lunch Act (NSLA) by adding the following:

“(c) COOPERATION WITH PROGRAM RESEARCH AND EVALUATION.—States, State educational agencies, local educational agencies, schools, institutions, facilities, and contractors participating in programs authorized under this Act and the Child Nutrition Act of 1966 (42 U.S.C. 1771 et seq.) shall cooperate with officials and contractors acting on behalf of the Secretary, in the conduct of evaluations and studies under those Acts.”

Rationale for Emergency Collection

OMB has established regulations for the emergency processing of information collection requests (ICRs) at 5 CFR 1320.13. OMB can authorize Emergency Clearance for an information collection, for up to 6 months.

FNS can attest that this collection of information is:

- Needed sooner than OMB clearance can be granted under normal procedures; FNS needs the survey results by November 30th in order to be able to act on the information in a timely fashion given the dynamic situation of supply chain disruptions.
- Essential to the mission of the agency to continue to provide emergency food assistance and quantify the scope of the supply chain disruption challenges; and
- Essential to obtain the data in a timely manner. The use of normal clearance procedures would disrupt the collection. Complying with the normal clearance procedures would delay the agency's ability to provide emergency nutrition assistance to families and children who continue to be impacted by COVID-19. This survey will assist USDA's Food and Nutrition Service and its partners to enhance the toolbox for school nutrition professionals working hard to make sure students have reliable access to healthy meals. Information gained through survey responses will quantify and describe the current challenges school districts are facing to facilitate USDA's support for the school districts in successfully serving students healthy and nutritious school meals. Waiting three or more months to obtain normal clearance would negatively impact the timely and targeted delivery of this support.

FNS appreciates your consideration of this request.

Maureen Lydon, Chief
PRAO, Food and Nutrition Service

Cindy Long, Administrator
Food and Nutrition Service

Attachment 1 - Survey
Attachment 2 - Supporting Statement A and Burden
Attachment 3 - Form 83-I

Appendices