



September 15, 2022

United States
Department of
Agriculture

MEMORANDUM

Food and
Nutrition
Service

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TO: Laurel Havas
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FROM: Cindy Long
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Food and Nutrition Service

SUBJECT: Emergency Approval of SFA Survey II 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 the continued impacts of COVID-19-related supply chain disruptions on the Child Nutrition (CN) Programs, as well as emerging challenges related to the transition back to standard school nutrition program operations. The proposed survey is provided in Appendix B.

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 these challenges and to identify solutions.

This is the second survey issued to SFAs that will assist FNS and its partners to enhance the toolbox for school nutrition professionals working hard to make sure students have reliable access to healthy meals. Whereas the first SFA survey focused on challenges and mitigation strategies related to procuring specific food or non-food items during the 2021-2022 school year, this survey focuses on food costs, labor costs, and vendor issues that continue to disrupt school food service in the 2022-2023 school year, as well as changes in student participation related to the return to standard operations.

The survey has a maximum of 31 questions and is estimated to take approximately 20 minutes to complete per respondent. As a result, the total proposed time burden is 8,840.79 burden hours. FNS is asking all SFAs that participate in the Child Nutrition Programs to complete this survey.

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. 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 15th to be able to act on the information in a timely fashion given the dynamic situation of supply chain disruptions, a national issue. It’s reasonable to add that this involves an unanticipated event. FNS could not predict school food authorities facing labor shortages and suppliers exiting the school foods market *going into SY 2022-2023*, and the ramifications of the pandemic lasting this long.

- Essential to the mission of the agency to quantify the scope of continuing supply chain disruption challenges and take that into account, as appropriate, in emergency food assistance; and
- Essential to obtain the data in a timely manner. The use of normal clearance procedures would certainly disrupt timely collection of information. 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 challenges school districts are facing related to school food vendors, costs, and labor to facilitate USDA's support for the school districts in successfully serving students healthy and nutritious school meals. Waiting months to obtain normal clearance would negatively impact the timely collection of information, and targeted delivery of this support, which is a primary reason for gathering this information.

FNS appreciates your consideration of this information.

Maureen Lydon, Branch Chief
PRAO, Food and Nutrition Service

Cindy Long, Administrator
Food and Nutrition Service

Appendices

Appendix A. Section 28 of the Richard B. Russell National School Lunch Act and Section 305 of the Healthy, Hunger-Free Kids Act of 2010

Appendix B. SFA Survey II on School Food Supply Chain Disruption

Appendix C. Survey Support Email

Appendix D. Reminder Email

Appendix E. Thank You Email

Appendix F. Pretest

Appendix G. Burden Table