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Submitter Information

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General Comment

I appreciate the opportunity to comment on the proposed revision and renewal of the information collection for USDA Food Distribution Programs as they relate to the National School Lunch Program (NSLP). Accurate reporting and strong recordkeeping are essential to program integrity, fiscal accountability, food safety, and compliance, and I fully support these requirements.

However, the burden estimates in the notice significantly underestimate the time required to meet current NSLP reporting and recordkeeping obligations at both the school and central office levels. In addition, the proposed revisions introduce new and revised forms that often duplicate information already required through existing NSLP documentation, increasing administrative workload without providing additional program value.

At the school level, nutrition managers are responsible for receiving USDA Foods, maintaining daily and weekly production records, conducting physical inventories, documenting food safety practices, reconciling deliveries and credits, and preparing for audits and administrative reviews. Based on operational experience, these responsibilities require approximately 20 hours per week per school. This time reflects not only form completion, but ongoing documentation, verification for accuracy, staff training, and resolution of discrepancies.

The burden estimates appear to assess individual tasks in isolation, often assigning only minutes per response, and do not capture the cumulative, daily nature of NSLP documentation or the overlap among multiple reporting systems collecting similar data.

Similarly, central office burden is understated. District nutrition staff consolidate school-level data, oversee production records and inventories, manage USDA Foods forecasting and reconciliation, coordinate with vendors and State agencies, respond to compliance findings, and support corrective actions. In many districts, these tasks require 10–15 hours per week per staff member.

Collectively, these responsibilities far exceed the burden levels reflected in the current estimates. Underestimating this workload, and the impact of redundant reporting, affects staffing capacity,

administrative funding, and compliance, particularly amid labor shortages and rising operational costs.

I encourage FNS to revisit its burden assumptions using input from school and district practitioners and to prioritize streamlining documentation, eliminating redundant data collection, aligning overlapping requirements, and expanding interoperable electronic systems to reduce burden while preserving program integrity.