

Draft Collective Comment to USDA Food and Nutrition Service (FNS)

Agency Information Collection Activities: Renewing Burden Number 0584-0293

Submitted on behalf of participating School District Child Nutrition Program Directors

To Whom It May Concern:

Thank you for the opportunity to provide comments regarding the renewal of OMB Control Number 0584-0293 and the associated reporting and administrative requirements impacting child nutrition programs.

We conducted a survey of school district Child Nutrition Program Directors and staff to better understand how current USDA/FNS reporting requirements affect local program operations. The feedback gathered reflects the experiences of districts of varying enrollment sizes and operational capacities.

Overall, respondents expressed appreciation for the importance of accountability and program oversight; however, there was significant concern regarding the increasing administrative burden associated with reporting, compliance, inventory tracking, and audit preparation.

Key Findings from Survey Participants

1. Reporting and Administrative Burden Continue to Increase

Most respondents indicated that reporting requirements have increased over the past several years. Many directors reported spending multiple hours each week on USDA/FNS-related reporting and compliance activities, with several districts reporting more than 20 hours per week dedicated to administrative tasks.

Respondents consistently noted that increasing paperwork and compliance responsibilities reduce the time available for:

- Meal service operations
- Menu planning
- Staff supervision and training
- Student-focused program improvements
- Procurement and financial management

2. Duplicate Data Entry and Lack of System Integration Are Major Challenges

A significant concern among respondents was the need to enter the same information into multiple systems, including district systems, state reporting systems, inventory platforms, and USDA systems.

Most respondents reported that their systems either do not integrate or only partially integrate with state or federal systems. This creates:

- Duplicate work
- Increased risk of errors
- Additional staff time requirements
- Challenges meeting deadlines

Participants strongly encouraged USDA/FNS to explore unified or interoperable reporting systems that reduce repetitive manual entry.

3. Audit Preparation and Compliance Requirements Create Significant Stress

The most commonly identified administrative burden was audit preparation and compliance documentation.

Directors expressed concern that increasingly complex requirements, combined with limited staffing, create operational strain and increase the risk of noncompliance findings.

Several respondents specifically noted that:

- Guidance can be difficult to interpret
- Requirements are not always consistent across agencies
- Additional operational examples and practical training would be beneficial

4. Staffing Limitations Affect Program Capacity

Many school nutrition departments operate with limited administrative staff. Smaller districts, in particular, noted that directors often manage multiple responsibilities without dedicated office or compliance support.

Respondents emphasized that additional reporting requirements disproportionately affect small and rural districts with limited staffing capacity.

5. USDA Foods and Inventory Tracking Requirements Are Time-Consuming

Participants identified USDA Foods ordering, reconciliation, inventory management, and compliance tracking as particularly burdensome.

Several respondents requested:

- Simplified inventory reporting
- Clearer guidance regarding compliance expectations
- More user-friendly USDA systems and platforms
- Improved functionality and training related to WBSCM and related systems

Recommendations

Based on survey responses, participating school nutrition professionals respectfully recommend that USDA/FNS consider the following actions:

1. Simplify reporting requirements and eliminate unnecessary duplication.
2. Improve integration between district, state, and federal reporting systems.
3. Provide clearer and more consistent guidance documents.
4. Expand practical training opportunities with real-world operational examples and question-and-answer sessions.
5. Review reporting frequency and identify opportunities to reduce administrative workload.
6. Consider the staffing realities of small and rural districts when implementing reporting requirements.
7. Improve usability and functionality of USDA reporting and inventory systems.

Closing

School nutrition professionals remain committed to accountability, compliance, and responsible stewardship of federal resources. However, administrative processes should support, not hinder, the core mission of feeding students.

We appreciate USDA/FNS seeking stakeholder feedback and respectfully request that the agency consider the operational realities faced by local Child Nutrition Programs when renewing and implementing reporting requirements.

Thank you for your consideration.