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Agency Information Collection Activities: Child and Adult Care Food Program (CACFP) National Disqualified List

Comment On: FNA-2026-0072-0001
Agency Information Collection Activities; Proposals, Submissions, and Approvals: Child and Adult Care Food Program National Disqualified List

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Submitter Information

Name: Betsy Hovis
Address:
Bloomfield, IN, 47424
Email: millerb1128@gmail.com
Phone: 8125533798

General Comment

Comment on OMB Control No. 0584-0584 — CACFP National Disqualified List

I support the continued collection of information necessary to maintain the Child and Adult Care Food Program National Disqualified List. Protecting the integrity of a federally funded nutrition program is especially important because CACFP ultimately exists to serve populations that depend on reliable access to nutritious food. Preventing an institution or individual that has been properly disqualified from simply reentering the program through another State agency or sponsoring organization is a legitimate and necessary safeguard.

However, I encourage USDA to evaluate this information collection based on more than the number of minutes required to complete Forms FNS-843 and FNS-844. Administrative burden is important, but the greater question is whether the information collected remains accurate, timely, consistent across jurisdictions, and genuinely useful to the agencies that must rely on it.

The notice estimates 1,568 responses annually and 784 total reporting hours, based on an average of 30 minutes per response. That calculation measures the burden of entering information, but it does not necessarily capture time spent verifying records, correcting inaccurate or incomplete information, resolving inconsistencies, or determining whether a potential match actually involves the same individual or institution. I recommend that USDA examine these indirect administrative costs when evaluating whether its burden estimate reflects the real experience of State agencies.

I also recommend strengthening the quality of the National Disqualified List through automated

validation wherever practical. Required-field checks, standardized data formats, duplicate-record detection, confirmation prompts for critical identifying information, and electronic notifications when records are added or materially changed could reduce human error without creating unnecessary additional work for State agencies. Periodic data-quality reviews could further identify outdated, incomplete, or inconsistent records.

At the same time, efficiency should not come at the expense of procedural fairness. A national database capable of affecting an institution's or individual's eligibility carries significant consequences. USDA should therefore ensure that records clearly distinguish final disqualifications from pending matters, corrections, or other statuses that should not be treated identically. There should also be a clear and efficient process for correcting inaccurate information. Program integrity is strengthened—not weakened—when enforcement information is both accessible and demonstrably accurate.

Finally, USDA should consider measuring the effectiveness of this collection in addition to measuring its paperwork burden. Useful performance indicators could include how often the National Disqualified List prevents an otherwise improper approval, the frequency of corrected or duplicate records, the average time between a final disqualification and its appearance in the system, and the amount of administrative time saved through electronic validation. Those measures would help demonstrate whether the collection is accomplishing its statutory purpose rather than merely documenting that required forms were completed.

The National Disqualified List serves an important accountability function, and I support continuing the collection. My recommendation is that USDA use this extension as an opportunity to treat data quality, technological efficiency, due process, and measurable program outcomes as interconnected parts of program integrity. A system designed to protect public resources should not only collect the required information; it should ensure that the information is accurate enough, timely enough, and useful enough to justify the decisions made from it.

From: SM.FNS.CN-ProgramMonitoring
To: "millerb1128@gmail.com"
Subject: Comments on OMB Control Number 0584-0584
Date: Thursday, October 1, 2026 4:32:00 PM

Dear Betsy Hovis,

Thank you for your comments on the Federal Register Notice for Agency Information Collection Activities: Child and Adult Care Food Program (CACFP) National Disqualified List (NDL) (91-FR 36108). This submission is a revision of a currently approved information collection request, which is set to expire on September 30, 2026. This information collection request, OMB Control Number 0584-0584, estimates the burden hours associated with the National Disqualified List (NDL).

FNA appreciates your feedback. We acknowledge your request that USDA consider the burden for ensuring the information entered in the NDL be accurate, consistent, and timely. We would like to reassure you that the burden for those oversight duties are captured in the Federal Register Notice for Agency Information Collection Activities: Child and Adult Care Food Program (89-FR 68577) (CACFP OMB Control Number 0584-0055). In addition, the USDA evaluates the accuracy and usefulness of the NDL frequently as a result of user input and Management Evaluations.

Thank you again for your comments and support.

Jessica Saracino
Acting Associate Administrator
Child Nutrition Programs