



Child Nutrition Reporting Burden Analysis Study

Submitted to:

Jinee Burdg, COR
Contract # AG-3198-D-17-009

Prepared by:

2M Research
1521 N. Cooper St., Suite 600
Arlington, TX 76011

USDA is an equal opportunity provider, employer, and lender

ACKNOWLEDGMENTS

A number of individuals contributed to the successful completion of this report. Jinee Burdg of the Food and Nutrition Service (FNS) Office of Policy Support served as our Contracting Officer's Representative. Ms. Burdg helped ensure that our work proceeded in a timely fashion, facilitated our communication with staff at FNS, and generally helped guide the development of this report. At FNS, Child Nutrition and Office of Policy Support staff provided timely feedback and guidance to help us understand relevant issues and refine our research. Within the 2M Research team, Dr. Steven Garasky served as Project Director, Linda Piccinino was Project Manager, and Dr. Allison Magness, Dr. Nicholas Beyler, and Dr. Jim Murdoch were key subject matter experts (SMEs). Our colleagues Kevin Conway and Elizabeth Gearan at Mathematica Policy Research and Dr. Cynthia Waisner at Catalyst Consulting Partners made significant contributions to the research. 2M's research staff, including Michael Jacobsen, Moyo Kimathi, Charles Horseman, Madison Davis, Shu Li, Gail Clark, Cindy Romero, Joshua Townley, and MacKenzie Regier, helped with the research and assisted in preparation of the final document. Dr. Beyler from 2M Research was Project Director for the Quick Response Surveys Child Nutrition Reducing Burden Study from which the survey data for this study were obtained. Many thanks to Cathy Schuchart and Patricia Montague of the School Nutrition Association and to SMEs Barry Sackin and Robin Tennille for their useful suggestions for the work group meetings and potential participants. We are also grateful to all of the State and local Child Nutrition stakeholders who contributed to the work group meetings and provided insights throughout the research. Any remaining errors are our own.

TABLE OF CONTENTS

ACKNOWLEDGMENTS	I
LIST OF EXHIBITS	IV
AUTHORS AND CONTRIBUTORS	V
GLOSSARY OF ACRONYMS	VI
EXECUTIVE SUMMARY	VII
Administration of School Meals Programs	vii
Research Approach	viii
Principles for Reducing Administrative and Reporting Burden	viii
Key Considerations	ix
Conclusion	xi
1. INTRODUCTION	1
A. Administration of School Meals Programs.....	1
B. Research Approach	2
C. Report Organization	3
2. PRINCIPLES FOR REDUCING ADMINISTRATIVE AND REPORTING BURDEN.....	4
Principle #1: Increase Consistency Across All CN Programs and Streamline and Align Requirements	4
Principle #2: Provide Sufficient Lead Time to Implement New and Revised Program Requirements, Policies, Procedures, and Reports	5
Principle #3: Improve Consistency in Program Operations and Procedures Across FNS Regions, SAs, and SFAs	6
Principle #4: Foster a More Team-Centered Atmosphere Among the FNS National Office, ROs, SAs, and SFAs	7
Principle #5: Increase Collaboration Between FNS Program Offices and Financial Management Offices.....	8
Principle #6: Support Technology Acquisition and Standardization at the SA and SFA Levels.....	9
3. TOPIC-SPECIFIC KEY CONSIDERATIONS	10
A. USDA Guidance Documents and Policy Memos Considerations	10
B. Program Standards and Requirements Considerations.....	12
C. Management Evaluations, Financial Management Reviews, and Administrative Reviews Considerations	14
D. Procurement Standards and Requirements Considerations	16
E. Reporting Requirements Considerations	20
F. Research and Evaluation Studies Considerations	22
4. CONCLUSIONS.....	25

APPENDIX A. FISCAL YEAR REPORTING TABLE A-1

APPENDIX B. REVIEW OF HISTORICAL LEGISLATION, POLICIES, AND REGULATIONS B-1

 Document Review Findings B-1

APPENDIX C. CHILD NUTRITION REDUCING BURDEN STUDY DATA COLLECTION INSTRUMENTS..... C-1

 C.1. State Agency Survey C-1

APPENDIX D. STATE AGENCY AND SCHOOL FOOD AUTHORITY SURVEYS: SUPPLEMENTAL EXHIBITS D-1

APPENDIX E. WORK GROUP PARTICIPANT PERSPECTIVES: ADDITIONAL THEMES.....E-1

 A. Overview E-1

 B. Additional Themes Across Work Groups E-1

LIST OF EXHIBITS

Appendices

Exhibit A.1 Fiscal Year Reporting Table—CN School Meal Programs (NSLP, SBP, SMP).....	A-1
Exhibit B.1 Counts of Relevant Documents Reviewed from 2008–2017.....	B-1
Exhibit B.2 FNS Policy Memos Categorized by Broad Topic Area and Year (2008 through 2017)	B-2
Exhibit B.3 FNS Rules Categorized by Broad Topic Area and Year (2008 through 2017).....	B-3
Exhibit B.4 Counts of Information Collection Requests for FNS Regulations by Broad Topic Area and Year (2008 through 2017)*	B-5
Exhibit B.5 Counts of Information Collection Requests for FNS Research Studies by Broad Topic Area and Year (2008 through 2017).....	B-5
Exhibit B.6 Counts of Research Reports and White Papers by Broad Topic Area and Year (2008 through 2017).....	B-6
Exhibit D.1 SA Perceptions of USDA Guidance Documents and Policy Memos	D-1
Exhibit D.2 Forms of USDA Guidance Documents and Policy Memos Used by SFA Size	D-2
Exhibit D.3 Most Frequently Cited Factors Contributing to Effort Needed by SAs for Undergoing FNS Reviews.....	D-3
Exhibit D.4 Uses Automated Technology to Determine Student Certification Status by SFA Size	D-3
Exhibit D.5 Ease of Obtaining and Navigating USDA Guidance Documents and Policy Memos by SFA Size	D-4
Exhibit D.6 Most Frequently Cited Factors Contributing to Effort Needed by SAs for Conducting Administrative Reviews by SA Size	D-5
Exhibit D.7 Factors Contributing the Most to Effort Needed by SAs for Understanding Procurement Standards and Participating in Procurement Reviews	D-6
Exhibit D.8 SFA Rankings of Most Time-Consuming Aspects of Procurement	D-7
Exhibit D.9 Perceptions of Assistance with Aspects of Procurement by SFA Size	D-8
Exhibit D.10 Providing Technical Assistance (TA) to SFAs as Contributing to Effort Needed by SAs by Aspect of Procurement and SA Size	D-10
Exhibit D.11 Factors Contributing the Most to Effort Needed by SAs for Reporting Requirements	D-11
Exhibit D.12 Factors Contributing the Most to Effort Needed by SAs for Financial Reporting Requirements	D-13
Exhibit D.13 Factors Contributing the Most to Effort Needed by SFAs to Collect and Submit Data by SFA Size	D-15
Exhibit D.14 Participation in FNS Research and Evaluation Studies	D-16
Exhibit D.15 Factors Related to Participation in FNS Research and Evaluation Studies.....	D-17

AUTHORS AND CONTRIBUTORS

Authors

Dr. Steven Garasky	<i>2M Research</i>
Linda Piccinino	<i>2M Research</i>
Kevin Conway	<i>Mathematica Policy Research</i>
Dr. Allison Magness	<i>2M Research</i>
Elizabeth Gearan	<i>Mathematica Policy Research</i>

Contributors

Dr. Cynthia Waisner	<i>Catalyst Consulting Partners</i>
Dr. Nicholas Beyler	<i>2M Research</i>
Dr. Jim Murdoch	<i>2M Research</i>
Michael Jacobsen	<i>2M Research</i>
Moyo Kimathi	<i>2M Research</i>
Charles Horseman	<i>2M Research</i>
Madison Davis	<i>2M Research</i>
Shu Li	<i>2M Research</i>
Gail Clark	<i>2M Research</i>
Cindy Romero	<i>2M Research</i>
Joshua Townley	<i>2M Research</i>
Mackenzie Regier	<i>2M Research</i>

GLOSSARY OF ACRONYMS

Acronym	Term
ART	Administrative Review Training
CACFP	Child and Adult Care Food Program
CEP	Community Eligibility Provision
CFR	Code of Federal Regulations
CN	Child Nutrition
DC	Direct Certification
DoD	Department of Defense
F/RP	Free/Reduced Price
FNS	Food and Nutrition Service
FPRS	Food Programs Reporting System
FSMC	Food service management company
HHFKA	Healthy, Hunger-Free Kids Act
ICR	Information Collection Request
IT	Information technology
NSLA	Richard B. Russell National School Lunch Act
NSLP	National School Lunch Program
OMB	Office of Management and Budget
RCCI	Residential child care institutions
RO	Regional office
SA	State agency
SAE	State Administrative Expense
SBP	School Breakfast Program
SFA	School Food Authority
SFSP	Summer Food Service Program
SME	Subject matter expert
SMP	Special Milk Program for Children
SNAP	Supplemental Nutrition Assistance Program
SOP	Standard Operating Procedure
SY	School year
TA	Technical assistance
USDA	U.S. Department of Agriculture
USDA DoD Fresh	USDA Department of Defense Fresh Fruit and Vegetable Program

EXECUTIVE SUMMARY

This report responds to a legislative requirement of House Report 114-531:

BACKGROUND: Child Nutrition Programs Nutrition Program Administration — For Nutrition Programs Administration, the Committee provides \$168,524,000. This funding level includes \$1,000,000 for FNS to contract an independent study to identify the best means of efficiently consolidating Child Nutrition Program reporting requirements for school food authorities and State agencies. The Committee expects the study to be completed no later than 18 months from the date of enactment of this Act (**House Report 114-531**).

The U.S. Department of Agriculture (USDA) Food and Nutrition Service (FNS) contracted with 2M Research to examine challenges faced by State agencies (SAs) and School Food Authorities (SFAs) related to Child Nutrition (CN) program administrative and reporting requirements and identifying those that contribute most to the workload for SAs and SFAs that operate CN programs. The overarching objective of the study was to develop a set of considerations for FNS for reducing SA and SFA administrative and reporting burden related to school meals programs.

Administration of School Meals Programs

Two existing statutes authorize all CN programs, including the federal school meals programs: the Richard B. Russell National School Lunch Act,¹ which created the National School Lunch Program (NSLP), and the Child Nutrition Act of 1966,² which established the School Breakfast Program (SBP). The most recent reauthorization of the CN programs occurred with the Healthy, Hunger-Free Kids Act of 2010.³ In fiscal year 2017, approximately 30 million children participated in the NSLP, and nearly 15 million participated in the SBP on average each school day.⁴

FNS administers the CN programs at the federal level through the National office and seven Regional offices (ROs). The ROs work directly with SAs within their region to provide oversight, guidance, and technical assistance. SAs operate the programs at the State level through agreements with local SFAs. SAs are responsible for ensuring that SFAs comply with federal regulations, but SFAs and schools have operational discretion in how they administer the programs within federal and State guidelines. SFAs administer the program locally and are responsible for the procurement of foods, goods, and services for their school meals programs and for feeding children via these programs.

FNS monitors CN program operations through data reported by SAs, FNS-led reviews of SAs, and SA-led reviews of SFAs. FNS collects program administrative data from SAs via standard reports that SAs are

¹ Richard B. Russell National School Lunch Act, P.L. 396, 60 Stat. 230, codified as amended at P.L. 113–79 (2014). Retrieved from <http://www.fns.usda.gov/sites/default/files/NSLA.pdf>

² Child Nutrition Act of 1966, P.L. 89–642, 80 Stat. 885, codified as amended at P.L. 111–296 (2010). Retrieved from https://www.fns.usda.gov/sites/default/files/CNA_1966_12-13-10.pdf

³ Healthy, Hunger-Free Kids Act of 2010, P.L. 111–296, 124 Stat. 3183. Retrieved from https://www.fns.usda.gov/sites/default/files/PL_111-296.pdf

⁴ Child Nutrition Tables. Retrieved from <https://www.fns.usda.gov/pd/child-nutrition-tables>

required to submit during the fiscal year. SAs collect data for these reports from their SFAs and compile the data prior to submission to FNS. FNS uses reported data to provide reimbursement for meals served; monitor expenditures, revenues, and the status of grants; monitor program operations; understand program participation; and assess compliance with federal rules, regulations, standards, and requirements that optimize program integrity and students' access to healthy meals at school. FNS evaluates SA operations through Management Evaluations and Financial Management Reviews. FNS also requires SAs to conduct administrative reviews and procurement reviews of SFAs to assess compliance with specific regulations.

Research Approach

Data collected through national surveys and in-depth work group discussions identified challenges SAs and SFAs face in meeting CN regulatory and reporting requirements for the school meals programs. Survey and work group discussion topics included program standards, reporting, reviews, procurement, USDA guidance, and research participation. The data highlighted which of those challenges contribute most to the administrative workload of CN staff at the SA and SFA levels. The national surveys collected the perceptions and opinions of SAs and SFAs across the country, while the work groups provided an in-depth understanding of the most pressing concerns of SA and SFA participants.

The research team (2M Research and Mathematica Policy Research) conducted online surveys of State CN directors (i.e., SAs) and SFA directors. Within each topic area, SAs and SFAs were asked to identify which specific operational or reporting requirements require the most effort and/or are the most time-consuming. The surveys also asked about training for certain topics since this could be directly related to challenges reported by SAs and SFAs.

The surveys were administered in April and May 2018. A total of 52 SAs responded to the SA survey, including SAs for the 50 States; Washington, DC; and Guam. A random sample of SFAs, stratified by SFA size based on student enrollment, was drawn for the SFA survey. The sample excluded SFAs serving residential child care institutions (RCCIs). In all, 1,071 completed SFA surveys were obtained from the 1,240 sampled SFAs, for a response rate of 86.4 percent.

Three work group meetings were held to gather additional information. A professional facilitator led in-depth discussions in each meeting. The research team customized topics covered for each meeting, though most topics were common to all meetings. The work groups allowed for in-depth, nuanced discussions on topic-specific issues. At each meeting, SA and SFA work group participants identified challenges and prioritized the discussed challenges. Survey results and work group meeting discussions presented in this report represent the opinions of the SA and SFA survey respondents who operate the school meals programs and not those of FNS or the research team.

Principles for Reducing Administrative and Reporting Burden

Over the course of the study, a set of six principles for reducing administrative and reporting burden emerged. These principles could help inform FNS about each of the topic-specific considerations that highlight potential program and operational changes across CN programs.

The six principles are as follows:

- Increase consistency across all CN programs and streamline requirements
- Provide sufficient lead time to implement new and revised program requirements, policies, procedures, and reports
- Improve consistency in program operations and procedures across FNS regions, SAs, and SFAs
- Increase collaboration between FNS program offices and financial management offices
- Foster a more team-centered atmosphere among the FNS National office, ROs, SAs, and SFAs
- Support technology acquisition and standardization at the SA and SFA levels

Key Considerations

Ten key considerations for reducing administrative and reporting burden across six topic areas emerged within the survey responses and work group discussions. CN program stakeholders—including Congress, FNS, SAs, and SFAs—should regard these key considerations as suggestions for consolidating reporting requirements, simplifying program regulations, and improving program operational efficiencies.

- **USDA guidance documents and policy memos:**
 - *Redesign the FNS website to include a single, user-friendly location for all USDA guidance materials* – SAs and SFAs often struggle to find all relevant and most current guidance available. Having a single website location, which includes a search function organized by topic and an archive of old versions of documents, would help users easily (and confidently) access the most recent guidance materials. FNS would likely need additional resources, including additional policy and communication staff to implement this consideration.
- **Program standards and requirements:**
 - *Streamline school meal certification and verification processes* – SFAs devote considerable time and resources determining student eligibility for free and reduced price meals and verifying those determinations. SFAs desire a simpler and more efficient process for certifying students, such as a unified application to be used by a student for all CN programs. Any changes to eligibility requirements would likely require legislative action.
 - *Allow program flexibilities for RCCIs and small SFAs* – The smallest SFAs and RCCIs often face the greatest challenges dealing with program requirements because they lack needed staff resources and expertise. If RCCIs and small SFAs were permitted, for example, to participate in a USDA Foods-only program without participating in the NSLP, their level of administrative burden would be greatly reduced. Legislative changes would likely be required to give FNS the authority to make program options available to small SFAs and RCCIs.
- **Management Evaluations, Financial Management Reviews, and administrative reviews:**
 - *Consolidate duplicative information requests across Management Evaluations and Financial Management Reviews* – There is substantial overlap in the information that reviewers request from SAs for Management Evaluations and Financial Management Reviews. Streamlining information requests by eliminating duplication across Management Evaluations and Financial Management Reviews could be an efficient way of reducing administrative burden for SAs.

- *Implement a risk-based administrative review cycle* – SAs and SFAs agreed that a risk-based approach to administrative reviews could balance the need to maintain program integrity and the amount of staff time and resources that SAs reported are associated with reviews. Transitioning to a risk-based cycle would require additional resources and research to identify risk indicators, implementation parameters, and any required legislative changes.
- **Procurement standards and requirements:**
 - *Develop procurement templates and supporting materials* – SAs and SFAs would benefit from a centralized repository of procurement resources that would provide information on best practices. These resources could include templates, prototypes, and supporting materials. In particular, SFAs felt that clarifying federal guidance and direction from SAs regarding Buy American, such as through standardized guidance documents or templates could be helpful. SA and SFA work group participants indicated that preapproved waivers for food items such as bananas, pineapple, Mandarin oranges, and olives would make the overall procurement process more efficient.
 - *Increase support for SFAs that contract with food service management companies (FSMCs)* – Managing FSMC contracts is one of the most time-consuming aspects of procurement for SFAs—both in procuring the services of FSMCs and in overseeing the resulting contracts. Additional support (such as information on best practices, tools, and templates) is needed to help SFAs work with FSMCs and supplement the often-limited experience working with FSMCs of SFA staff. FNS staff also face time and resource restrictions that limit their ability to provide the level of support related to FSMCs that SAs and SFAs prefer. FNS staff may not have the expertise needed for all questions because issues are often complex and specific to a local area.
- **Reporting requirements:**
 - *Develop a fact sheet for each CN reporting requirement* – SAs want to better understand the purpose for each of the federal reports they are required to submit to support CN programs. A standardized, one-page fact sheet for each report could clearly identify the purpose and intent of the report and explain how FNS analyzes the data. Fact sheets would help improve communication about the uses of data specifically and about program rules and regulations more generally.
 - *Modernize the Food Programs Reporting System (FPRS)* – SAs report that the FPRS is outdated and difficult to use and adds to their overall burden related to CN program reporting. An updated or completely new system would improve data submission. Updating the FPRS would likely present substantial challenges to FNS processes, primarily because the system is used FNS-wide and is fundamental to how FNS reimburses SAs for meals claimed. FPRS system updates (or replacement) would also require substantial additional resources.
- **Research and evaluation studies:**
 - *Develop a standard operating procedure (SOP) for FNS-funded research studies* – SAs and SFAs called for an SOP for FNS-funded research studies, which would establish a framework for researchers seeking participation from SAs and SFAs in FNS-funded research studies. The SOP could include essential information about the research study, such as intent, timeline,

study design, sample, and time commitment needed from SAs and SFAs. FNS efforts to improve communication between the agency, researchers, SAs, and SFAs would benefit all parties and increase SA and SFA buy-in and study participation.

Conclusion

The key considerations identified in this study give FNS and Congress a path to make long-lasting changes to reduce administrative burden across school meals programs at the State and local level. Some considerations will likely need additional research for full understanding of the extent of what is needed to implement the proposed changes. A number of the considerations can be implemented without legislative changes, but may require appropriated resources. For others, legislative changes will be needed to either restructure program requirements or delegate authority to FNS to allow program flexibilities.

FNS should consider working closely with State and local CN program operators to minimize unintended consequences of any actions. FNS could explore potential impacts by working in partnership with State and local stakeholders. SA and SFA work group participants repeatedly expressed their willingness to help FNS assess and plan for programmatic or policy changes and expressed that they are eager to reduce administrative and reporting burden in responsible ways that uphold program integrity and stewardship of federal funds.

1. INTRODUCTION

This report responds to a legislative requirement of House Report 114-531:

BACKGROUND: Child Nutrition Programs Nutrition Program Administration — For Nutrition Programs Administration, the Committee provides \$168,524,000. This funding level includes \$1,000,000 for FNS to contract an independent study to identify the best means of efficiently consolidating Child Nutrition Program reporting requirements for school food authorities and State agencies. The Committee expects the study to be completed no later than 18 months from the date of enactment of this Act (**House Report 114-531**).

This chapter continues with an overview of SA and SFA administration of Child Nutrition (CN) programs, followed by brief discussions of the research approach and key project activities. The chapter concludes with an overview of the remainder of the report.

A. Administration of School Meals Programs

FNS administers the CN programs through the National office and seven Regional offices (ROs), with program direction flowing through the ROs, participating SAs, participating SFAs, and, finally, to the school and site levels. The ROs provide oversight, guidance, and technical assistance (TA) directly to the SAs in their region. SAs are responsible for ensuring that SFAs comply with federal regulations and operate the programs at the State level through agreements with local SFAs which can encompass a single school, multiple schools, an entire school district, or multiple school districts. SFAs and schools have operational discretion in how they administer the programs within federal and State guidelines. SFAs are responsible for the procurement of foods, goods, and services for their school meals programs and for feeding children via these programs.

FNS monitors CN program operations through data reported by SAs, reviews of SAs led by FNS, and reviews of SFAs led by SAs. Reporting and data collection on CN programs originate at schools or sites. SAs collect and compile program data from SFAs and are required to submit standard reports to FNS during the fiscal year. FNS uses reported financial data to provide reimbursement for meals served, as well as to monitor expenditures, revenues, and the status of grants. FNS uses submitted program administration data to monitor program operations, understand program participation, and assess compliance with federal rules, regulations, standards, and requirements that optimize program integrity and students' access to healthy meals at school. For more details on reporting requirements, see Appendix A.

FNS evaluates SA operations through FNS Management Evaluations and Financial Management Reviews. SAs are required to conduct official reviews of SFAs to assess compliance through administrative reviews and procurement reviews. To address specific questions from Congress, the White House, senior USDA officials, and others, the FNS National office and ROs may issue ad hoc requests to SAs to gather and submit additional information related to various aspects of the school meals programs. Throughout the year, SAs and SFAs may be asked to participate in FNS-supported research or evaluation studies. SAs operating the school meals programs are required to cooperate with officials and federal contractors in conducting these studies per Section 28 of the Richard B. Russell National School Lunch Act (NSLA), as amended by Section 305 of the Healthy, Hunger-Free Kids Act of 2010 (HHFKA).

B. Research Approach

The research began with a review of documents to inform understanding of the time and effort SAs and SFAs need to meet FNS reporting and administrative requirements. The research team conducted literature scans and reviewed and summarized available documentation on CN reporting and administrative burden including historical legislation; existing program guidance; and manuals, reports, and other documents. Information gathered from the document reviews and initial discussions with FNS guided identification of topic areas for the online surveys and work group meeting discussion guides. For more details on the document review, see Appendix B.

The research team conducted online surveys of State CN directors (i.e., SAs) and SFA directors to identify challenges that SAs and SFAs face related to program administration and reporting requirements for school meals programs. Survey instruments are provided in Appendix C. Survey topics and work group meeting topics included program standards, reporting, reviews, procurement, USDA guidance, and research participation.⁵ Within each topic area, SAs and SFAs were asked about specific operational or reporting requirements and asked to identify those requirements that require the most effort and/or are the most time-consuming. The surveys also asked about awareness and usage of training for certain topics, since this knowledge could be directly related to challenges reported by SAs and SFAs. The content of each topic area and the wording of the questions varied between the two surveys, but each topic area in both surveys included one or more open-ended questions for which respondents could elaborate on a challenge and/or provide a specific example.

The surveys were administered in April and May 2018. A total of 52 SAs responded to the SA survey, including SAs for the 50 States; Washington, DC; and Guam. A random sample of SFAs, stratified by SFA size based on student enrollment, was drawn for the SFA survey. The sample excluded SFAs serving residential child care institutions (RCCIs). In all, 1,071 completed SFA surveys were obtained from the 1,240 sampled SFAs, for a response rate of 86.4 percent. Quantitative SFA survey results were weighted to account for nonresponse. Quantitative subgroup analyses were conducted according to SA and SFA size.⁶ Open-ended question responses in both surveys were analyzed using qualitative methodologies to identify recurrent themes. Overall, the census of SAs and the nationally representative sample of SFAs drawn for the surveys allowed for a range of voices to be heard on the surveyed topics.

Work group meetings were held to gather additional information about program administration and reporting requirement challenges that SAs and SFAs face. The research team engaged CN subject matter experts (SMEs) and the School Nutrition Association to help identify potential SA and SFA participants for the work group meetings. The research team compiled a list of potential meeting participants for FNS review based on a range of characteristics, such as the size of their State or SFA, and also to ensure representation from across FNS regions.

⁵ All topics were discussed in the work group meetings. All topics except program standards were included in the SA survey. All topics except financial reporting requirements and reviews were included in the SFA survey. Survey instruments are provided in Appendix C.

⁶ SAs were classified by size using the number of SFAs served rather than some other metric (e.g., student enrollment), as it most closely equates to SA administrative and reporting effort. SFAs were classified by size using the number of students enrolled.

Three work group meetings were held in March and April 2018: two at the FNS National office in Alexandria, VA, and one via telephone. A professional facilitator led in-depth discussions in each meeting. The research team customized topics covered for each meeting, though most topics were common to all meetings.⁷ The work groups allowed for detailed discussions on issues related to these topics. At each meeting, SA and SFA work group participants identified challenges and prioritized the discussed challenges. The research team met with FNS after the third meeting to debrief.

The survey results and work group discussions summarized throughout this report are the opinions of survey respondents and work group participants, not those of FNS or the research team, and reflect the experience of the experts who oversee and implement the CN programs. The small number of SA and SFA stakeholders who participated in the work groups allowed for in-depth discussions but limited the generalizability of the findings.⁸

C. Report Organization

This report continues with Chapter 2, a discussion of overarching principles that inform the operational recommendations presented here based on the research conducted for this study. These principles may also be helpful for FNS to adopt going forward in managing CN requirements while keeping burden to a minimum. Chapter 3 provides topic-specific considerations across six topic areas: USDA guidance and policy memos; program standards and requirements; Management Evaluations, Financial Management Reviews, and administrative reviews; procurement standards and requirements; reporting requirements; and research and evaluation studies. The principles could be considered by FNS when addressing each of the topic-specific considerations, as well as when the agency implements other changes to CN programs. The principles are also informative for Congress as it decides on potential legislative changes that may be required to authorize or facilitate implementation of program changes. Concluding thoughts complete the report.

⁷ During the discussion of research and evaluation studies, work group conversation also covered ad hoc data requests FNS makes to SAs.

⁸ The number of participants for each work group meeting ranged from 9 to 13 individuals, not including FNS and research team attendees.

2. PRINCIPLES FOR REDUCING ADMINISTRATIVE AND REPORTING BURDEN

Six principles for reducing administrative and reporting burden emerged from analyses of survey data and work group discussions with SAs and SFAs. The principles described below focus on increasing consistency in requirements across all CN programs; improving working relationships among the FNS National office, ROs, SAs, and SFAs; and making program changes and technology more user-friendly. The underlying rationale for each principle is highlighted from the work group discussions and survey results, where relevant.

Principle #1: Increase Consistency Across All CN Programs and Streamline Requirements

SA and SFA work group participants expressed a need for greater consistency across CN programs: the National School Lunch Program (NSLP), the School Breakfast Program (SBP), the Special Milk Program for Children (SMP), the Child and Adult Care Food Program (CACFP), and the Summer Food Service Program (SFSP). Work group participants noted that dealing with different requirements across programs was particularly challenging. Participants felt that these programs are currently organized into silos and emphasized that misalignments between programs reduces overall efficiency and complicates program operations unnecessarily. In considering this issue, one SFA work group participant cautioned that efforts to create greater consistency and align requirements should avoid simply settling on the most restrictive requirement across CN programs. This individual felt that doing so would only increase burden on local districts and undermine the intent of this principle and the key objective of this study, which is to alleviate administrative burden.

We as CNP professionals understand the difference in regulations, but our employees have a hard time keeping the rules straight and the District staff definitely don't understand why sometimes it is ok to do things one way, other times it is not.—SFA survey respondent

Improving consistency and streamlining the programs is an important priority and could cut across many areas, including eligibility requirements and determination, program guidance, administrative reviews, and consolidating information requests among Management Evaluations and Financial Management Reviews. For example, SFA work group participants felt that a unified application for all CN programs could reduce inefficiencies for SFAs, program staff, and families. Changes would be required to one or more of the laws authorizing the various CN programs to formally align requirements across CN programs. Where FNS already has authority, however, it could consider exploring options for eliminating unnecessary differences that complicate operations at the local level.

Principle #2: Provide Sufficient Lead Time to Implement New and Revised Program Requirements, Policies, Procedures, and Reports

The timing of when FNS releases updates to requirements, policies, procedures, and reports can present a major challenge for SAs and SFAs. Work group participants expressed strong preference for receiving notice of changes at least several months before the start of the school year in which a change is to take effect. There was unanimous agreement that midyear implementation should always be avoided.

Honestly, too many changes. Changes come at times that are not convenient for [an] SFA's operating year. –SFA survey respondent

SA work group participants felt strongly that any attempt to make changes during a school year creates substantial challenges for implementation because SAs and SFAs need time to

The memos that are received do not always leave time to be trained on them. Timing is huge! –SFA survey respondent

- understand and fully process the changes,
- update standard operating procedures,
- negotiate and implement required changes into their information technology (IT) systems, and
- prepare and deliver necessary training or TA to SA staff or SFAs.

The amount of advance notice preferred by work group participants depended on the type of update. For example, SAs and SFAs suggested that changes to administrative review or procurement review processes require 9 to 12 months' notice before implementation, whereas SFAs may need up to 18 months' notice for changes to procurement policies because districts likely need to address the changes in purchase orders and contracts. SA participants also emphasized that changes to procurement rules and regulations may require them to seek approval from appropriate legislative bodies for any funding changes.

Work group participants also indicated that they need sufficient lead time to implement a policy change prior to being reviewed for, or conducting reviews of, the requirements associated with the change. Without sufficient lead time to properly implement changes, reviews often initiate a burdensome cycle of noncompliance findings and corrective actions. SA work group participants also felt it would be beneficial if FNS developed a timeline for implementing new or revised program requirements, policies, procedures, and reports.

Some specific guidance manuals and documents are released too late. The eligibility manual, administrative review manual, PLE guidance and memo, reimbursement rates come out too late to provide adequate guidance to schools. In [STATE] school starts in early August and much of the needed guidance is not yet out. We also conduct trainings in June for SFAs and do not have up to date guidance to provide for the upcoming school year. This year notification of the household application not changing came in April, and this was a huge relief for the ability to prepare training materials. –SA survey respondent

The surveys did not ask specifically about the timing of new or revised guidance or policies.

However, SAs were asked about the timeliness of USDA guidance and policy memos that were provided.

Over half (54 percent) of SAs indicated that guidance documents were either not very timely or not at all timely; 32 percent of SAs reported that policy memos were not timely.⁹ With more than 85 percent of SFAs indicating that they use USDA guidance documents and policy memos in their original forms as developed by USDA or in adapted forms as developed by USDA and their SA,¹⁰ receiving these materials late only compounds issues associated with implementing changes.

Work group participants indicated that creating a standardized timeline for implementation of changes before the start of the school year would benefit SAs and SFAs by minimizing or eliminating the changes they would need to make during the school year. If FNS were to establish such a timeline, it would also need to plan for and execute program and regulatory changes consistent within that framework. SAs indicated that they would appreciate the opportunity to provide feedback on updated guidance and policies, as well as participate in any potential pilots of those new rules. The ability of FNS to abide by a predetermined timeline and engage in a feedback cycle with SAs and SFAs may be limited if statutory or operational requirements necessitate a more compressed timeline.

There needs to be a reasonable roll-out of these [guidance documents and] policy memos. For example, perhaps a precursor of what is to come—with a reasonable timeline of training, Q&A, communication, and implementation/effective date. The current structure is unreasonable and unfeasible to accurately implement upon receipt of guidance documents and memos—especially when the training does not yet exist.
—SA survey respondent

Principle #3: Improve Consistency in Program Operations and Procedures Across FNS Regions, SAs, and SFAs

SA survey respondents were not consistent across FNS regions in how they perceived effort needed for several program activities. Using FNS Management Evaluations as an example, the time required to prepare for Management Evaluations was cited by nearly all (90 percent) of SAs in one region as a factor contributing to the effort needed for an evaluation, but only one-third (33 percent) of SAs in another region reported the same. Similarly, SAs varied in citing the amount of information collected (33 to 86 percent of SAs in a region) and type of information collected (17 to 86 percent) as a factor contributing to time and effort needed during Management Evaluations. The pattern continued for Financial Management Reviews. Reports varied by FNS region regarding preparation time (33 to 86 percent), amount of information collected during the review (20 to 86 percent), and type of information collected during the review (20 to 86 percent) as key contributors to needed effort.

ROs have different interpretations of program requirements. Enforcement of specific areas is inconsistent. That is, a finding in one review may not be a finding in another review. —SA work group participants

⁹ See Appendix D, Exhibit D.1, for more SA survey details.

¹⁰ See Appendix D, Exhibit D.2, for more SFA survey details.

SA work group participants also described inconsistencies across FNS regions, which are overseen by ROs, in their interpretation of federal policies, regulations, and guidance; quality of TA and training; responsiveness to questions; and coordination across CN programs. SFA work group participants discussed similar inconsistencies across and within SAs related to how program policies and regulations are implemented. In addition, SFA work group participants noted there is often inconsistency within SAs because interpretation may vary from staff person to staff person (and from year to year), exacerbated by staff turnover in many States.

SAs in general, and procurement reviewers specifically, do not have a consistent understanding of Buy American standards. SFAs often receive conflicting information. Inconsistencies occur over time as interpretations change, as well as when staff turnover occurs. –SFA work group participants

SFA work group participants suggested that FNS could provide additional support to SAs through training and TA to improve consistent implementation of program policies, regulations, and procedures. They also suggested eliminating ambiguity in guidance documents, so there is less room for different interpretations among SAs and among staff members within an SA. Improving the content of USDA guidance and policy memos (52 percent of SAs surveyed considered USDA guidance documents to have too little or far too little detail, and 46 percent considered policy memos to have too little or far too little detail) and the timeliness of these materials, as discussed earlier, could also support broader efforts to improve consistency across ROs, States, and SFAs.

Manuals/guidance are often devoid of samples, examples, minimum requirements and lack specifics that would make processes less subjective for SAs. –SA survey respondent

Principle #4: Foster a More Team-Centered Atmosphere Among the FNS National Office, ROs, SAs, and SFAs

SA work group participants would like to work more closely with FNS in a more team-oriented atmosphere. For example, SA work group participants want FNS to give them a more active role in developing requirements or policies and reviewing or pilot-testing guidance before it is officially released in final form. SAs also hoped that RO reviews and evaluations could be viewed as a continuous improvement process rather than focusing on negative findings.

SFA work group participants would like to transform the current compliance-oriented management approach to a more positive, action-based approach in which the FNS National office and ROs, SAs, and SFAs are true partners. SFA work group participants felt that policies and guidelines should be developed collaboratively, and that administrative reviews and procurement reviews performed by SAs should be conducted with the intent to provide TA and serve as an impetus for continuous improvement. In addition, they desired to better understand how FNS uses the data they

We're all in this together. –SA work group participant
The cooperation and partnership exhibited between FNS, SAs, and SFAs throughout the course of this study can serve as a model for future efforts. –SA and SFA work group participants discussing working more collaboratively with FNS

are required to provide and noted that reporting should focus on providing federal, SA, and SFA staff with the key information SFAs need to achieve the mission of CN programs to provide nutritious meals to students.

One suggestion offered by work group participants to promote this type of team-centered atmosphere was for FNS to conduct listening sessions among SAs, SFAs, and the FNS National office and ROs to discuss key issues. At each session, representatives from one of the three groups could be designated as the “listener,” which would actively position them to consider the roles and responsibilities of the other groups, as well as the challenges they face.

Principle #5: Increase Collaboration Between FNS Program Offices and Financial Management Offices

SA survey responses provided evidence that greater collaboration between FNS program and financial management offices offers potential for reducing administrative burden for SAs. Two-thirds of SAs reported that the amount of time needed to prepare for Management Evaluations (64 percent) and Financial Management Reviews (67 percent) was a key contributing factor to the effort required for these activities. In fact, preparation time was the most frequently named contributing factor to effort for both review types. Increased collaboration between the FNS program and financial management offices, such as streamlining data requirements across reviews and/or coordinating timing of reviews, may reduce time and effort needed by SAs to prepare for reviews.¹¹

SA work group participants also believed that there is not enough coordination between FNS program offices and FNS financial management offices. They believed silos need to be removed and that the two offices should work more closely together. For example, SA work group participants noted that CN program staff and financial management staff use very different (and very technical) terminology in their communications even when they are referencing the same practical subject matter, which makes interpretation of guidance or policy even more challenging.

Neither the FNS program offices nor the FNS financial management offices use plain language in their communications. As a result, there is a compounding effect interpreting guidance and policy. – SA work group participants

Greater cooperation across these and other agency offices is critically important if efforts to reduce administrative burden, consolidate program requirements, simplify regulations, or improve operational efficiencies are to be effective and long-lasting. Some regulatory changes may be needed to enable closer cooperation and increase consistency across program and financial management offices.

¹¹ See Appendix D, Exhibit D.3, for more SA survey details.

Principle #6: Support Technology Acquisition and Standardization at the SA and SFA Levels

SFAs were surveyed about the extent to which collecting and submitting various types of data is time-consuming. Focusing on technology, three quarters of SFAs indicated they use automated technology to certify students, with the likelihood of using automated technology increasing with SFA size; nearly all (95 percent) very large SFAs use automated technology to certify students compared to 67 percent of small SFAs.^{12,13}

Technology systems do not always provide the specific required data or format for each State; so technology may be there to improve efficiency but each State makes it difficult to use due to individual requirements and preferences. –SFA survey respondent

SFA work group participants said that resources for user-friendly, modern technology systems and tools are not consistently available at the SA and SFA levels. Several participants reported that some SFAs still conduct manual data collection and data submission.

SFA work group participants thought that a standardized, modern technology infrastructure across all CN programs would improve compliance, reporting, review processes, and responses to ad hoc requests. For example, reporting requirements for forms such as FNS-742 (SFA Verification Collection Report) would be greatly simplified by modernized technology systems. The data could also be more easily accessed at the State and possibly federal levels with improved technology, reducing duplicative requests for information from SFAs.

SA and SFA work group participants expressed strong support for acquisition of modernized technology to mitigate these challenges. SFAs cited efforts in one State to make point-of-sale software available at no cost to small school districts across the State as an example of the type of technology-acquisition program that could be scaled up to the national level. SFA work group participants suggested that nearly all categories of software and technology could be offered nationwide, including those for applications, student eligibility, point-of-sale, menu planning, inventory, financial reporting, SA reporting, and administrative reviews. A key benefit, according to participants, would be that the data collected through standardized systems would be more consistent, reliable, and valid.

FNS has long sponsored the acquisition of technology through grants to SAs, providing technology training, and publishing model functional requirements to assist SAs and SFAs when developing technical specifications for the technology State agencies and local organizations procure. Continued efforts, especially if expanded to the extent expressed by SAs and SFAs, may require significant resources (appropriations), as well as legislative action to encourage (or require) widespread adoption of standardized technology systems.

¹² SFA size definitions were based on number of students: small (1–999), medium (1,000–4,999), large (5,000–24,999), and very large (25,000+).

¹³ See Appendix D, Exhibit D.4, for more SFA survey details.

3. TOPIC-SPECIFIC KEY CONSIDERATIONS

This chapter presents 10 key considerations for reducing administrative and reporting burden across 6 topic areas that emerged within the survey responses and work group discussions. CN program stakeholders—including Congress, FNS, SAs, and SFAs—should consider the content of this chapter as suggestions for consolidating reporting requirements, simplifying program regulations, and improving operational efficiencies. For each consideration, the specific action item is provided, rationale for the proposed change is discussed, and implementation factors that Congress and/or FNS may need to be mindful of are highlighted. At times, the reader is pointed to Appendix D, in which additional survey findings are provided to support the rationale.

Work group participants offered a range of additional ideas and themes on broader issues in each of the six topic areas. Appendix E highlights these additional themes and ideas for identifying efficiencies in current CN program operations and regulations. In some cases, those themes are consistent with or complement the key considerations described below, or they support the principles discussed in Chapter 2. In other cases, the additional themes identify separate issues that were raised by SAs or SFAs. While the additional themes are important, the key considerations below emerged from the study as the most pressing challenges or most prominent suggestions for consideration because they are most likely to have real and long-term benefits in reducing administrative and reporting burden.

A. USDA Guidance Documents and Policy Memos Considerations

USDA regularly issues guidance documents and policy memos to provide SAs and SFAs with the most up-to-date information on operating the school meals programs, including complying with legislative mandates and federal rules and regulations. SAs may further adapt USDA guidance documents and policy memos for local settings.

The majority of SFA survey respondents (61 percent) reported using both original USDA guidance documents and policy memos and materials adapted by their SA.¹⁴ Work group participants confirmed that USDA guidance and policy memos are used and referred to as SAs and SFAs operate the school meals programs. However, the specific needs of each SA and SFA, as well as how effectively and consistently information is conveyed, determines the usefulness of these guidance documents and policy memos.

Redesigning the FNS website emerged as the most prominent action item related to USDA guidance and policy memos based on the survey findings and work group discussions. Work group participants also suggested improving the format and design of guidance and policy resources to increase usefulness and improve compliance. The implementation of a single location for guidance and policy memos could be even more effective if it included redesigned materials. This additional theme is discussed further in Appendix E.

¹⁴ See Appendix D, Exhibit D.2, for more SFA survey details.

KEY CONSIDERATION #1: REDESIGN THE FNS WEBSITE TO INCLUDE A USER-FRIENDLY, SINGLE LOCATION FOR ALL USDA GUIDANCE MATERIALS

Rationale

Nearly one quarter of surveyed SAs reported difficulty in accessing guidance documents and policy memos. SAs also indicated that guidance documents and policy memos are not provided in a timely manner. SFAs had similar concerns, with nearly one quarter of them reporting difficulty in accessing guidance documents and policy memos.¹⁵

SFA work group participants echoed these findings and reported that they sometimes struggle to find guidance materials. In addition, SA work group participants voiced concern that CN staff at SAs and SFAs may not find all relevant documents or the most recent versions of those documents. Both groups suggested that FNS design a single website location (a “one-stop-shop”) where users could easily and confidently access up-to-date materials for all CN programs. Such a website could help bridge the gap in accessing critical resources and include a user-friendly search function organized by program and topic, an archive and index of older versions of USDA guidance and policy memos, and materials that SA and SFA staff could use for presentations (e.g., to train staff on the guidance or policy or to communicate the CN policy to parents or the community).

Implementation Factors

FNS would likely need to devote substantial resources to creating a single location for all USDA guidance and policy materials, such as additional policy and communications staff (including online resource design and usability experts) who would be dedicated to implementing this task. Having a single website location, which includes a search function organized by program and topic and an archive of old versions of documents, could help users easily (and confidently) access the most recent guidance materials.

As policy memos are updated, the originals may no longer be found but still had pertinent information regarding original implementations. It would be nice to have a simple way to find information in these memos, or search for the ones related to what you need. –SFA survey respondent

Appreciate that many memos have been combined and older memos superseded. This helps a lot. What would be very helpful—a reference guide that would pull the policies together by subject and also link the policies to the affected regulations. –SA survey respondent

In the state of [NAME] we have a policy manual that consolidates all of the guidance in one place. When researching USDA guidance, it feels that we have to search in multiple locations and review multiple memos to find the latest guidance. –SFA survey respondent

Most of the requirements take some time to understand. You really have to read several times to get all the points. ... When State, federal, and county have different requirements we don't always know what the rule is for which entity. – SFA survey respondent

¹⁵ See Appendix D, Exhibits D.1 and D.5, for more survey details.

B. Program Standards and Requirements Considerations

Federal regulations for the school meals programs define specific standards and requirements for SFAs participating in the programs. SFA respondents were asked an array of survey questions about compliance with a variety of standards and requirements for the school meals programs. SFA work group participants discussed how CN program standards and requirements could be revised or streamlined to reduce administrative burden.

Two key considerations related to program standards and requirements emerged from discussions with SFAs: (1) restructure school meal eligibility requirements and (2) allow RCCIs and small SFAs to receive USDA Foods (or cash in lieu) without participating in the NSLP. Other themes that emerged related to restructuring school meal eligibility requirements are discussed in Appendix E and include methods such as using census tract-level data to determine eligibility for participation in Special Provisions. As options for restructuring school meal requirements are considered, potential consequences should be examined. As SFA work group participants noted, the implementation of the Community Eligibility Provision (CEP)—which expanded children’s access to school meals programs throughout the country—did have some unintended consequences. For example, Title I, Title II, and other federal funding mechanisms depend on tracking a school district’s free/reduced price (F/RP) meal percentages, yet these data are calculated differently in CEP schools.

KEY CONSIDERATION #2: STREAMLINE SCHOOL MEAL CERTIFICATION AND VERIFICATION PROCESSES

Rationale

SFA work group participants expressed concern about the amount of time and resources they must devote to determining the eligibility of students for F/RP meals—whether through application, direct certification (DC), or a Special Provision. Many participants indicated that their districts are overwhelmed during the early part of the school year because their focus is on collecting and processing school meal applications. Participants also noted that, shortly after the initial certification surge has ended, their staff must devote more time and resources to verifying and recertifying the accuracy of those initial eligibility decisions.

SFA participants thought that the school meal eligibility process should be restructured such that all CN programs

Our district struggles to obtain meal applications for all students by the first day of school. There are multiple strategies we implement to get all meal applications submitted by households but we continue to struggle in this area. We have large events in our district for student registration that we are not able to leverage because they are before July 1st and we cannot collect meal applications for the new school year. We have discussed this with [officials] that oversee this area both at the state and federal level and understand that changes to the law would have to happen in order to allow this. We would like to continue advocating for change in this area. Allowing schools to collect this information earlier would help reduce barriers of participation and allow them more time to collect meal applications and process eligibilities before the first day of school. This would also reduce the negative balances incurred by families that qualify for free meals but submit late applications. – SFA survey respondent

have the same eligibility requirements. This change would make it easier and more efficient for SFAs to certify students for F/RP meals across CN programs. In so doing, SFA staff could focus more resources on their core mission of providing nutritious meals to students. Along with having the same eligibility requirements across all CN programs, SFA work group participants suggested developing a unified application to be used by a student for all CN programs. A single application could reduce time and resources needed to determine eligibility for students participating in multiple CN programs. Regarding verifying eligibility determinations, SFA participants were unsure of how this process supports the mission of the CN programs. If the intent is to eliminate fraud on individual applications, their experience has been that little fraud is found. If the intent is to confirm district-level program integrity, SFA participants believed more efficient alternatives exist and suggested using census tract information on poverty levels from the Bureau of Labor Statistics in lieu of the current verification process.

The process of verification 'is an exercise in futility.' The results say more about the difficulties in chasing down families than about the validity of the information on applications. –SFA work group participant

Implementation Factors

FNS does not have the authority to substantially restructure or simplify the eligibility process. Suggestions to modify the application process with a unified school meals application form or revise the verification process to allow for the use of census tract data on poverty levels, as suggested by SFA work group participants, would likely require additional research to identify a plan of action that ensures that all requirements are met. The plan of action should also identify required legislative changes.

KEY CONSIDERATION #3: ALLOW PROGRAM FLEXIBILITIES FOR RCCIS AND SMALL SFAS

Rationale

SFA work group participants noted that most RCCIs and the smallest SFAs—those with fewer than 100 students—face the greatest hurdles. They do not have the staff resources or the expertise to meet CN program regulations and reporting requirements. According to SFA survey respondents, for example, the most cited contributor to the effort needed to collect, compile, and submit data to their SA was the amount of information required. The availability of staff time and/or resources was the second most cited key contributor.

Some of the verbiage from USDA and [STATE] laws are confusing. We receive guidance from our local State agency, but i [sic] feel some of the guidelines are really confusing for districts in [STATE]. –SFA survey respondent

Work group participants suggested that FNS consider ways to provide RCCIs and small SFAs with program flexibilities. For example, to reduce the administrative burden, RCCIs and small SFAs might be allowed to participate in a USDA Foods-only program without full participation in the NSLP. Doing so would enable these entities to provide healthy foods to students without the burden associated with NSLP

At least 50 percent of RCCIs dropped out of the NSLP in my State. –SFA work group participant discussing the increasing program requirements of the NSLP

requirements. An alternative suggestion was to allow RCCIs and small SFAs access to an equivalent amount of cash in lieu of foods.

Implementation Factors

FNS does not have the authority to provide RCCIs and small SFAs the program flexibility suggested in this key consideration. Legislative changes would be required to give FNS this authority; allowing RCCIs and small SFAs to receive USDA Foods (or cash in lieu) without participating in the NSLP may require starting a new CN program with its own unique administrative and operational requirements. FNS understands the challenges RCCIs and small SFAs face and is addressing many of these issues.

C. Management Evaluations, Financial Management Reviews, and Administrative Reviews Considerations

Program reviews are an important part of ensuring the integrity of school meals programs and compliance with program regulations within the RO-SA-SFA framework. Specifically, FNS conducts Management Evaluations and Financial Management Reviews of the SAs. FNS ROs review the SAs in their region as part of their monitoring of CN program operations. SAs are required to conduct administrative reviews and procurement reviews of SFAs. Regarding the frequency of administrative reviews, section 207 of the HRFKA amended the NSLA to make changes to administrative review requirements that included implementing a new 3-year review cycle (or other period prescribed by the USDA Secretary) in place of the former 5-year cycle.¹⁶

SAs are involved in reviews in two distinct ways. For Management Evaluations and Financial Management Reviews conducted by FNS, SAs are being reviewed and must devote time and resources to prepare for (e.g., gather required information), and participate in, the review while FNS is on site. They must also address any corrective actions that stem from the reviews. For administrative reviews and procurement reviews of SFAs, SAs are conducting the reviews. Conducting reviews of SFAs also requires SA time and resources for preparation, onsite activities, and post-review administration. SFAs must also devote time and resources for their administrative reviews and procurement reviews. They must gather information in advance, participate in the review site visits, and address any needed corrective actions.

SA survey respondents were asked a series of questions to better understand the effort required to prepare for, conduct, and report on the results of reviews and evaluations. SA work group participants said that at the individual level, Management Evaluations and Financial Management Reviews are not necessarily difficult; however, when taken together with other audits, such as those by the State Office of Inspector General and other agencies in the State, challenges arise. SA and SFA work group participants generally described administrative reviews as burdensome and time-consuming.

Two key considerations related to program reviews emerged from the survey data and work group discussions: (1) consolidate duplicative information requests across Management Evaluations and Financial Management Reviews and (2) implement a risk-based administrative review cycle. Other

¹⁶ Healthy, Hunger-Free Kids Act of 2010, P.L. 111-296, 124 Stat. 3183. Retrieved from https://www.fns.usda.gov/sites/default/files/PL_111-296.pdf

themes that emerged related to program reviews are discussed in Appendix E and are generally encompassed in the principles that encourage FNS to increase consistency across CN programs, foster a more team-centered atmosphere, and increase collaboration between FNS program offices and financial management offices.

KEY CONSIDERATION #4: CONSOLIDATE DUPLICATIVE INFORMATION REQUESTS ACROSS MANAGEMENT EVALUATIONS AND FINANCIAL MANAGEMENT REVIEWS

Rationale

SA survey respondents indicated that for both Management Evaluations and Financial Management Reviews, the two leading factors cited as contributing most to effort were the amount of time required to prepare (Management Evaluations – 64 percent, Financial Management Reviews – 67 percent) and the amount of information collected during the review (Management Evaluations – 62 percent, Financial Management Reviews – 58 percent).¹⁷

SA work group participants reiterated how time-consuming Management Evaluations and Financial Management Reviews are and emphasized that there is substantial overlap in the information that these reviewers request. SA participants explained that they are often asked to provide data to reviewers for their offsite analysis in advance of the review and are then asked for that same information by other reviewers during the onsite portion of the review. SA work group participants understand that information collected for Management Evaluation and Financial Management Reviews may be used for different purposes. However, to the extent possible, SAs would like duplication to be eliminated, so they receive a request for specific data only once.

Our SA has had a[n] NSLP ME in 2007, 2013, 2015, and 2017. This is due to the risk indicators used by USDA and is a result of our SA being very small, not that we are non-compliant. –SA survey respondent

SA work group participants emphasized that they are not opposed to providing data for review purposes. Given that providing information is time-consuming and a key contributor to SA effort for reviews, streamlining information requests by eliminating duplication across Management Evaluations and Financial Management Reviews could be an efficient way of reducing overall administrative burden for SAs.

Implementation Factors

Implementing ways to consolidate duplicative information requests across Management Evaluations and Financial Management Reviews would need to ensure that the purposes of both reviews are met. FNS officials could also seek to ensure there is better communication between financial management staff and FNS program staff, as well as improved dialogue among FNS ROs and SAs.

¹⁷ See Appendix D, Exhibit D.3, for more SA survey details.

KEY CONSIDERATION #5: IMPLEMENT A RISK-BASED ADMINISTRATIVE REVIEW CYCLE

Rationale

Both SAs and SFAs found administrative reviews to be time-consuming. The top factors contributing to administrative review effort as reported in the SA survey are the amount of information required (77 percent) and preparation time (73 percent). About two-thirds (64 percent) of SAs identified the frequency (3-year cycle) of administrative reviews and staff availability (62 percent) as key contributors to the effort needed to conduct administrative reviews. Small SAs (77 percent) were nearly twice as likely to cite availability of SA staff (or lack thereof) to participate in administrative reviews as a burden factor compared to very large SAs (46 percent).¹⁸ SFA work group participants noted that some SFAs must hire additional staff to help with preparation activities or start preparation in the prior school year.

When the new AR cycle and workload was implemented, SAs experienced a great deal of staff burnout and turnover. States are just recovering from the loss of staff. –SA work group participant

SA and SFA work group participants agreed that a risk-based approach to administrative reviews could be extremely beneficial and could balance the need to maintain program integrity with the amount of staff time and resources that SAs reported are associated with administrative reviews. However, work group participants had different views on the best length of time for the administrative review cycle for different risk groups. Lower-risk SFAs could be reviewed less frequently—perhaps on a 5-year cycle—to alleviate burden, which would provide SAs with more time to administer TA to SFAs. Higher risk SFAs would be reviewed more frequently (for example, maintaining the current 3-year cycle) and benefit from additional TA as limited SA resources are more effectively focused.

The 3-year cycle pushes a focus on compliance, and less of a focus on the provision of training and technical assistance to SFAs. –SFA work group participant

Implementation Factors

Transitioning to a two-tiered administrative review cycle would likely require additional research to identify appropriate risk indicators for establishing a framework for what constitutes “high-risk” and “low-risk,” and implementation parameters. Reaching agreement on objective, meaningful, and appropriate risk factors, along with maintaining overall program integrity, could be particularly challenging. The benefits of switching to a risk-based administrative review cycle could also address other themes identified by SFA work group participants, including making administrative reviews more interactive with more TA administered to SFAs (see Appendix E).

D. Procurement Standards and Requirements Considerations

The procurement of all foods, goods, and services for school meals programs must comply with procurement standards, including federal policy requirements and USDA regulations. Compliance with

¹⁸ See Appendix D, Exhibit D.6, for more SA survey details.

procurement standards facilitates SFA procurement of domestic and locally sourced foods using competitive procedures and helps SFAs ensure that program funds are used effectively and efficiently.

SAs are responsible for ensuring that SFAs comply with federal regulations. SFAs are responsible for the procurement of foods, goods, and services for their school meals programs. SAs were surveyed about understanding procurement standards and procurement-related activities such as procurement reviews, monitoring, and providing technical assistance that SAs are asked to perform. SFAs were asked about how time-consuming various aspects of procurement are, the clarity of procurement instructions and guidance, and awareness and usage of available procurement training. Overall, SA and SFA survey respondents and work group participants view the procurement process as complex and challenging, although SFA experiences with procurement vary based on SFA size.

Procurement standards can be very tricky and difficult to navigate. Even when we think we are doing right a new rule comes along and convolutes the already convoluted process. Meat is a grain at breakfast???? Why can't it be written meat can then be served in place of a grain? –SFA survey respondent

Two key considerations emerged as the most important issues related to procurement standards and requirements. FNS could: (1) develop procurement templates and supporting materials and (2) increase support for SFAs that contract with FSMCs. Implementation of the first consideration is consistent with another theme voiced by SA and SFA work group participants for FNS to provide a list of foods considered exempt from the Buy American provision without the SFA having to maintain additional justification (see Appendix E).

KEY CONSIDERATION #6: DEVELOP PROCUREMENT TEMPLATES AND SUPPORTING MATERIALS

Rationale

SA survey results support the need for clearer procurement standards, instructions, and guidance. More than 75 percent of SA respondents reported that the (lack of) clarity of procurement standards was a key contributor to their administrative effort, and nearly 70 percent indicated the (lack of) clarity of instructions and guidance was a contributing factor to needed effort.¹⁹ Similarly, SFAs found the instructions and guidance for procurement standards to be least clear among the nine aspects of procurement surveyed. In fact, one-third (33 percent) of SFAs indicated they did not find the instructions and guidance for understanding procurement standards to be generally clear. These findings suggest areas in which templates and supporting materials would be valuable. Revisiting and revising procurement

The guidance concerning exactly what documentation is required and considered acceptable and the frequency it must be updated for purchasing under the Buy American rule was especially confusing. –SFA survey respondent

¹⁹ See Appendix D, Exhibit D.7, for more SA survey details.

materials (e.g., instructions, guidance, trainings) provided by FNS offers an opportunity to reduce SA and SFA administrative effort in this area.²⁰

SA work group participants identified several aspects of procurement as challenging: micro-purchases, processed commodity contracts with food service management companies (FSMCs), conflicts between State and federal requirements, incentive programs, ethics, capital improvement expenditures, and working with group purchasing organizations and co-ops.

In general, there is little guidance and lots of misunderstanding regarding bids and market basket. – SFA survey respondent

Work group participants highlighted a need for procurement materials in general but emphasized that specific information related to the Buy American provision is also needed. SFA work group participants believed that SAs in general, and procurement reviewers specifically, do not have a consistent understanding of standards for the Buy American provision. In turn, SFAs often receive conflicting information as interpretations change or as there is staff turnover. SFAs understood that they must comply with the Buy American provision but felt that clarifying federal guidance and direction from SAs, such as through standardized guidance documents or templates, could be helpful. SA and SFA work group participants indicated that preapproved waivers for food items such as bananas, pineapple, Mandarin oranges, and olives would make the overall procurement process more efficient.

Work group participants said they would benefit from a centralized repository of procurement resources that would provide information on best practices for their staff. These resources could include templates, prototypes, and supporting materials such as the following:

I am in the process of figuring out how to create SOPs for procurement for my district and need resources for creating a manual and then training. –SFA survey respondent

- Web-based procurement training materials and best practices documents, including frequently asked questions and quick-reference sheets, for both SA and SFA staff
- Sample procurement plans, including plans for food co-ops
- Sample Requests for Proposals for managing or participating in various procurement contract scenarios, including FSMC contracts, piggyback contracts, and co-ops
- Guidance on best practices for managing FSMCs
- Guidance on compliance with equipment grants, including equipment waiver lists

Implementation Factors

Many of the CN procurement-related materials, such as the optional FNS procurement review tool, are viewed as inadequate by SAs and SFAs. SAs and SFAs would benefit from having clearer standards, instructions, and guidance that could be found in a single location. Encouraging FNS to improve these materials is consistent with other considerations that focus on improved communication and collaboration between FNS, ROs, SAs and SFAs. It may be challenging to produce standardized templates that can be used broadly given that the procurement process is so complex and varied across the

²⁰ See Appendix D, Exhibits D.8 and D.9, for more SFA survey details.

country. In addition, SAs and SFAs would need to keep in mind that following a single standard template would not automatically ensure compliance.

KEY CONSIDERATION #7: INCREASE SUPPORT FOR SFAS THAT CONTRACT WITH FSMCS

Rationale

Across all SFAs surveyed, respondents ranked managing FSMC contracts as the second most time-consuming aspect of procurement—behind only the time it takes to order produce through the USDA Department of Defense Fresh Fruit and Vegetable Program (USDA DoD Fresh). Similarly, SA respondents overwhelmingly felt FSMC contracts were a challenge. More than 80 percent of SA respondents identified their roles in assisting SFAs with FSMC contracts as a key procurement-related activity; 75 percent of SAs indicated monitoring FSMC contracts as a major contributor toward administrative effort.²¹

SFA work group participants expressed how challenging it is to procure the services of FSMCs and then to effectively oversee the resulting contracts. SA work group participants indicated that SFA staff often do not have adequate expertise or experience in working with FSMCs. Although contracting with an FSMC can alleviate burden on an SFA, both SA and SFA work group participants agreed that FSMC contracts can be particularly complex and require specialized expertise.

SA staff overseeing the FSMC contracting require specialized training given the legal aspects of contracting and given the FSMCs pull their legal counsels in when there is a dispute. —SA survey respondent

Although most SFA survey respondents that work with FSMCs indicated that the available instructions and guidance for managing FSMC contracts are generally clear, one in five of these SFAs did not. Among SFAs that work with FSMCs, 80 percent reported being aware of training resources for managing these contracts, and 70 percent of SFAs that are aware of training resources are using them.²² SFA work group participants requested additional support (such as information on best practices, tools, and templates) to help them work with FSMCs and supplement the often limited experience working with FSMCs of SFA staff. For example, the additional support materials could highlight strategies for procuring the services of FSMCs, monitoring the activities of FSMCs, and reviewing and approving FSMC invoices, which can often be complex. The additional support materials would also benefit SAs. SA work group participants noted that they receive questions from the private sector (i.e., FSMCs) about their operations with SFAs, which they cannot always address effectively.

While the procurement process does become easier for SFAs over time, many grey areas persist that require continual training and technical assistance to SFAs. —SA work group participants

²¹ See Appendix D, Exhibits D.8 and D.10, for more SFA survey details.

²² See Appendix D, Exhibit D.9 for more SFA survey details.

SFA work group participants indicated that FSMC management is a challenging aspect of procurement, and they are eager for additional assistance. Ideally, increased support from FNS would improve their ability to procure FSMC services and oversee contracts.

Implementation Factors

FNS must provide guidance that is broad to encompass all FSMCs versus providing guidance on specific issues to specific FSMCs. In addition, FNS staff may not have the expertise or in-depth knowledge needed to answer all questions or provide specific guidance on FSMC contracting because issues are often complex and specific to a local area. Implementing this consideration may require additional resources and expertise, including legal expertise.

E. Reporting Requirements Considerations

Throughout the year, SFAs are required to submit a variety of data to their SAs regarding the school meals programs. Much of the data provided are ultimately submitted to FNS and used to provide reimbursement for meals served, monitor program operations, understand program participation, assess compliance with CN program rules and regulations, ensure program integrity, establish trends, and identify TA needs.

[FNS-425] requires collaboration with the finance dept which is not always easy. –SA survey respondent

SA survey respondents were asked about the effort required to collect, compile, and submit data from SFAs to FNS for several specific reports. SFAs were queried more broadly about aspects of and effort related to data collection, compilation, and submission. Overall, reviewing and reconciling information before submission and the amount and type of information required in a report were noted by SAs as the most frequent key contributors to effort needed for report submission. SFAs most frequently cited the amount of information required and the (lack of) available staff time and resources as key contributors to effort for collecting, compiling, and submitting data to SAs.²³

SFA Survey respondents identified data issues such as challenges with data from point-of-sale systems and needing to manually count some data items.

Two key considerations emerged as most critical from the survey data and work group discussions related to CN reporting requirements: (1) develop a fact sheet for each CN reporting requirement and (2) modernize the Food Programs Reporting System (FPRS). As detailed in the considerations provided below, SA and SFA work group participants identified aspects of CN reporting requirements that could be updated, streamlined, or otherwise improved. As the requirements and responsibilities of operating CN programs have grown dramatically over the past 7 to 8 years, SFAs noted that the number of staff they have to meet those responsibilities has not kept pace. The phrase “weed the garden” was a common refrain among SFA work group participants, reflecting the group’s desire to have FNS and SAs reconsider the need for the data SFAs are required to provide and to eliminate data requirements that are no longer necessary.

²³ See Appendix D, Exhibits D.11, D.12, and D.13, for more survey details.

KEY CONSIDERATION #8: DEVELOP A FACT SHEET FOR EACH CN REPORTING REQUIREMENT

Rationale

SA work group participants wanted to better understand the purpose for each of the federal reports they are required to submit across all CN programs. For example, when discussing FNS-640 (Administrative Review Report Form), participants expressed that there seems to be a continuous expansion of information requested and little to no feedback regarding how FNS is using that information. SA participants indicated that they would like to see any completed analysis or reports that FNS creates from these data. Similarly, when discussing FNS-742 (School Food Authority Verification Collection Report), SA participants said that the intentions for the data being collected are unclear to them. If the purpose of the report is to uncover SFA error, according to the participants, it sends the wrong signal because virtually all of the error found on applications is from households.

Too much of the data requested by States and FNS are redundant and repetitive (asking for the same information again and again). –SFA work group participants

SA work group participants suggested that a standardized, one-page fact sheet could clearly identify the purpose and intent of each report and explain how FNS analyzes the data that are submitted. The fact sheets could also be shared with SFAs as a training resource to help them understand how and why the data they submit to their SA is important, as well as to provide guidance on how to collect the data.

Much of the data requested by SAs and FNS across various reports are no longer needed to operate programs or perform oversight. –SFA work group participants

Similarly, SA participants wanted to see the results of any analyses conducted by FNS and to be provided with tools for communicating this information to their staff and SFAs. In addition, it was unclear to work group participants whether FNS intended SAs or SFAs to use the data required in reports—for monitoring program operations, for example. If FNS does intend SAs and SFAs to use the data for a specific purpose, SA participants requested specific details about how they should use the data. This type of information could also be included in the fact sheets.

Much of the data required across the various CN reports are duplicative. –SA work group participants

Implementation Factors

A one-page fact sheet that clearly identifies the purpose and intent of the reporting requirement and how FNS analyzes the submitted data would help improve communication with SAs and SFAs about the use of data specifically and about program rules and regulations more generally. The fact sheets could also be a training resource for SFAs. However, this key consideration also highlights a general need for more robust communication resources targeted toward State and local program operators.

KEY CONSIDERATION #9: MODERNIZE THE FOOD PROGRAMS REPORTING SYSTEM

Rationale

Between one-fifth and one-third of all SAs surveyed reported that using the FPRS was one of the top factors contributing to their effort to complete several FNS reporting forms (e.g., FNS-742, FNS-640, FNS-10, FNS-828, and FNS-425 [respectively, the SFA Verification Collection Report, Administrative Review Report, Report of School Program Operations, Paid Lunch Price Report, and CACFP Audit]).²⁴

SA survey respondents voiced concerns about the manner of data entry and inability to import data from .CSV files. Respondents also called for a simpler upload function for FPRS.

SA work group participants described the FPRS as outdated and difficult to use. Participants indicated that the system itself contributes to overall burden related to CN program reporting. Concerns focused on system performance issues such as inaccurate and outdated edit checks and an upload process that frequently stalls, as well as a permission access structure that is tedious and a user interface that is neither user-friendly nor functional. For example, E-authentication requires users to go through the same two-level access process for each separate report, while users are required to manually enter data for some reports (e.g., FNS-10, FNS-44, and FNS-418 [respectively, the Report of School Program Operations, Report of the Child and Adult Care Food Program, and Report of the Summer Food Service Program for Children]). The alignment of the survey and work group findings suggests that SAs find the FPRS difficult to use, but they are familiar with its idiosyncrasies and limitations.

We have invested in reports from our online system that make reports based on data in the system like the FNS-10 (Report of School Program Operation), FNS-44 (Report of the CACFP), FNS 418 (Report of the Summer Food Service Program for Children) easy to complete. –SA survey respondent

Implementation Factors

Updating the FPRS would likely present substantial challenges to FNS, primarily because the system is used agency-wide, not only for CN programs, and is fundamental to FNS financial management. Completely replacing the FPRS with a modern system would represent a significant infrastructure investment requiring considerable time and resources (appropriations). Nonetheless, SA work group participants noted that several studies are currently under way to examine system infrastructure at the State and local levels and suggested that FNS also examine replacing or improving the FPRS.

F. Research and Evaluation Studies Considerations

SAs and SFAs operating the school meals programs are required to cooperate with officials and federal contractors in conducting research and evaluation studies of the CN programs and are asked to participate in USDA/FNS studies throughout the year.

²⁴ See Appendix D, Exhibit D.11, for more SA survey details.

SA and SFA survey respondents were asked about their experiences participating in these studies. SA and SFA work group participants indicated they appreciate being invited to participate in research and evaluation studies because this reflects strong interest in and support of the CN programs. However, SA and SFA survey respondents and work group participants noted that the frequency with which they are asked to provide data and the time required to respond to requests can be burdensome.

I have always participated when asked as I feel this is a wonderful thing you do. –SFA survey respondent

Developing a standard operating procedure (SOP) for studies emerged as the key consideration related to research and evaluation studies. Consistent with implementing an SOP for research and evaluation studies, SA and SFA work group participants also stressed how important it was for participating sites to receive results from FNS of all completed research studies and ad hoc FNS requests (see Appendix E for more details).

KEY CONSIDERATION #10: DEVELOP A STANDARD OPERATING PROCEDURE FOR FNS-FUNDED RESEARCH STUDIES

Rationale

Based on survey results, one-third of SAs reported participating in 1 to 4 research and evaluation studies per year, while 1 in 6 SAs participate in studies 10 or more times per year. Two-thirds of SFAs participated in at least one study in the last 5 years, with most participating one to four times per year. Larger SFAs reported participating in studies more often than smaller SFAs.²⁵

The requests are numerous from many different areas, local, State and federal levels. Data is always requested. –SA survey respondent

Time required to participate in these studies was a concern for SAs. Over half (58 percent) of SAs responded that the time required to participate is always/often excessive. In addition, one-third (31 percent) of SAs indicated that the time required to participate always/often adversely impacts other responsibilities.

Meeting short timelines means planned program activities may be delayed. –SA survey respondent

Communication about research studies was another concern expressed by SA and SFA survey respondents. Less than half of SAs (48 percent) and SFAs (37 percent) reported that the research purpose of the study is always/often clearly communicated with about half (56 percent for SAs and 57 percent for SFAs) indicating always/often being given advance notice regarding participation in research studies. Half (50 percent) of SAs indicated they are rarely/never told how to find study results after publication.

It would be great if we could see the information from our State as well as nationally, so we could learn from the information. –SA survey respondent

²⁵ See Appendix D Exhibit, D.14, for more survey details.

Communication concerns varied by FNS regions. SFAs also expressed concerns about redundancy across studies.²⁶

SA and SFA work group participants called for an SOP for FNS-funded research studies, which would establish a framework for researchers seeking participation from SAs and SFAs. The SOP could include essential information about the research study such as purpose, timeline, study design, sample, and time commitment needed from SAs and SFAs. The protocol could define how SFAs, schools, and other entities involved in the study will be notified, as well as provide background information that SAs can share with SFAs and that SFAs can share with individual schools. SFA work group participants also wanted information about how their participation specifically, and the results of the study in general, may affect SFAs.

I think the studies are important to improve the programs. I don't find them difficult, I do spend more time on them than the recommended time. –SFA survey respondent

Implementation Factors

FNS efforts to improve communication between the agency, researchers, SAs, and SFAs would benefit all parties and increase SA and SFA buy-in and study participation. However, FNS would need to review an SOP to ensure that it helps reduce burden rather than adding to the time and effort required of SAs and SFAs to participate in FNS-funded research studies. FNS could also require that a template SOP be completed by every contractor as part of their contracted work for each research study.

²⁶ See Appendix D, Exhibit D.15, for more survey details.

4. CONCLUSIONS

The considerations presented in this report for reducing administrative and reporting burden for CN staff at SAs and SFAs that participate in the school meals programs were developed based on (1) the results of national surveys of all State CN directors (including Washington, DC, and Guam) and 1,071 randomly sampled SFAs, and (2) the expert insights from in-depth work group discussions with select groups of SA and SFA administrators. The surveys and work group discussions focused on administrative burden related to topic areas that included USDA guidance and policy memos, program standards, reviews, procurement, reporting, reviews, and research participation.

The study identified a core set of principles that can help FNS plan for and potentially implement program and operational changes across CN programs. Additionally, the principles are informative for Congress as it decides on potential legislative changes that may be required to authorize or assist with implementing these changes. These principles are:

- Increase consistency across all CN programs and streamline requirements
- Provide sufficient lead time to implement new and revised program requirements, policies, procedures, and reports
- Improve consistency in program operations and procedures across FNS regions, SAs, and SFAs
- Increase collaboration between FNS program offices and financial management offices
- Foster a more team-centered atmosphere among the FNS National office, ROs, SAs, and SFAs
- Support technology acquisition and standardization at the SA and SFA levels

For some of the key considerations described in the report, such as transitioning to a tiered, risk-based administrative review cycle or modernizing the FPRS, FNS will likely need to conduct additional research to understand the full impact of the proposed changes and the extent of what is needed to implement them. For other considerations, legislative changes may be needed to restructure program requirements (for example, to streamline eligibility determinations across the various school meal programs) or to give FNS authority to provide requested flexibilities, such as allowing RCCIs and small SFAs the option of receiving USDA Foods (or cash in lieu) without participating in the NSLP. Many of the considerations, however, can be initiated by FNS without legislative changes to provide near-term benefit to SAs and SFAs. For example, FNS could reduce duplicative information requests across Management Evaluations and Financial Management Reviews, create fact sheets for each CN reporting requirement to clearly identify the purpose and intent of each report and explain how FNS analyzes the data, and develop an SOP for FNS-funded research studies. Taken together, the key considerations give FNS and Congress a path to make long-lasting changes to reduce administrative burden across school meals programs at the State and local levels.

However, FNS and Congress should recognize the potential for unintended consequences of actions meant to streamline school meals program requirements and to reduce administrative burden. Even a seemingly minor change should be explored prior to implementation to assess its impact on SAs, SFAs, and students served by school meals programs. Importantly, FNS could explore these impacts in partnership with State and local stakeholders. The cooperation and partnership exhibited between FNS, SAs, and SFAs throughout the course of this study can serve as a model for future efforts.

SA and SFA work group participants repeatedly expressed their willingness to help FNS assess and plan for programmatic or policy changes and expressed that they are eager to reduce administrative and reporting burden in a responsible way. These stakeholders agree that their administrative responsibilities are critically important to the integrity of all CN programs. They are interested in reducing administrative burden not to shirk duties but to most effectively direct their limited resources to enhance their ability to achieve their core mission of serving nutritious meals to students.

APPENDIX A. FISCAL YEAR REPORTING TABLE

Exhibit A.1 | Fiscal Year Reporting Table—CN School Meal Programs (NSLP, SBP, SMP)

Form	Report Name	Brief Description	Method of Submission	Frequency	Due Dates
FNS-10	Report of School Program Operations	Covers monthly operation of NSLP, SBP, and SMP; includes number of meals served, the number of schools and RCCIs participating, and the number of children approved for free and reduced price meals	FPRS	M/A	M (30/90 day): Items 5–9 A: July - Item 17 A: October - Items 10–16
FNS-13	State Revenue Matching Requirement Report	Provides data necessary to monitor the State Revenue Matching Requirement	FPRS	A	October 31
FNS-525	State Administrative Expenses Funds Reallocation Report	Report on current status of State Administrative Expense (SAE) funds; request additional funds through reallocation or return of excess funds	FNS Regional Office	A	April, per memo
FNS-742	School Food Authority Verification Collection Report	Verification and certification by application, categorical certification, and direct certification data for each SFA participating in the NSLP; also includes data on numbers of schools using special provisions	FPRS	A	March 15
FNS-874 (Previously, FNS-742A)	Second Review of Applications	Collects results of second review of applications of selected SFAs	FPRS	A	March 15
FNS-777 CN	Financial Status Report: Child Nutrition	Financial data for programs, function, and activity for which an SA receives federal program funds (CACFP, Summer, Schools)	FPRS	Q/F	Q: 30 days after end of Q F: 90 days after end of 4th Q
FNS-777 SAE	Financial Status Report: State Administrative Expense Funds	Financial data for SAE Funds (columns 11 and 12), and CACFP Sponsor Admin Funds (column 2); 2-year grant period	FPRS	Q/F	Q: 30 days after end of Qs 1–7 F: 30 days after end of last applicable Q

Form	Report Name	Brief Description	Method of Submission	Frequency	Due Dates
		reported quarterly up to seven times and final			
FNS-828	School Food Authority Paid Lunch Price Report	Report most frequently charged paid lunch price by grade categories in each SFA	FPRS	A	Last operating day of <u>JANUARY</u>
FNS-834	State Agency (NSLP/SNAP) Direct Certification Rate Data Element Report	Report of data elements #2 (SNAP) and #3 (NSLP) for annual calculation of Direct Certification Rate	FPRS	A	December 1
SF-425 CN-HHFKA-ADM	Federal Financial Report: CN-HHFKA-ADM (Section 201 Funds)	Report use of Section 201 funds to assist with new meal pattern administration	FPRS	Q/F	Q: 30 days after end of Q F: 90 days after end of grant
SF-425 NSLPE; SF-425 NSLPE2	Federal Financial Report: NSLP Equipment Assistance Grants	Report of funding expenditures related to NSLP Equipment Assistance Grants (SF-425 NSLPE2 used for "Second Round" FY14 funds only)	FPRS	Q/F	Q: 30 days after end of Q F: 90 days after end of grant
Ameliorative Action	Ameliorative Action Report	Report of actions taken or planned as part of the verification reporting requirement under 7 CFR Section 245.12(i)	EMAIL: cnstatesystems@fns.usda.gov	A	March 15
CEP Notification and Publication	Community Eligibility Provision Annual Notification and Publication Requirement	SAs provide link to public website with list of LEAs and schools eligible and near-eligible for, or currently participating in, CEP	EMAIL: cenotification@fns.usda.gov	A	May 1
NSLP Equipment Grants	Progress Reports	SAs receiving Equipment Assistance Grants submit progress reports of activities	FNS Regional Office	Q/F	Q: 30 days after end of Q F: 90 days after end of grant
QTR-SFA- CERT	Quarterly SFA Certification Report	Identifies SFAs certified to receive performance-based reimbursement	FPRS	Q	30 days after end of Q

Form	Report Name	Brief Description	Method of Submission	Frequency	Due Dates
School Food Safety Inspection	School Food Safety Inspection	Report of total safety inspections for SFAs in each SA	EMAIL: NSLPFoodSafetyInspections@fns.usda.gov	A	November 15
As applicable:					
SF-425 CN- ART; SF-425 CN-DC	Federal Financial Reports: ART and DC Grants	Report status of grant funds: Administrative Review Training (ART); and Direct Certification (DC) Implementation and DC Tier I & Tier 2 Improvement	FPRS	Q/F	Q: 30 days after end of Q F: 90 days after end of grant
ART and DC Grants	Progress Reports	SAs receiving ART Grants and DC Grants submit progress reports of activities	EMAIL: cnstatesystems@fns.usda.gov	Q/F	Q: 30 days after end of Q F: 90 days after end of grant
FNS-640	Coordinated Review Effort (CRE)	SAs that have not transitioned to new Administrative Review process use this to report on the results of first and follow-up reviews conducted during the preceding school year review period	FPRS	A	March 1

NOTES:

Reproduced from Form SP21-2016a2, accessed at <https://www.fns.usda.gov/fiscal-year-reporting-timeline-and-reporting-table>. Excludes forms required for CACFP, USDA DoD Fresh, or SFSP.

A = Annual

F = Final

Q = Quarterly

M = Monthly (30/90 day): "Estimated" and "Actual" data are due 30 and 90 days, respectively, after the month reported for.

APPENDIX B. REVIEW OF HISTORICAL LEGISLATION, POLICIES, AND REGULATIONS

The research team utilized information drawn from document reviews to provide an overview of the reporting policies and regulations for current school meals programs. This section outlines the methods behind and purpose of the document review, as well as some of the limitations of these activities.

The research team reviewed available documentation on school meals programs reporting and administrative burden, including existing program guidance and manuals, reports, and other documents. The primary websites utilized during the document review included the Office of Management and Budget’s (OMB) [Reginfo.gov](https://www.reginfo.gov);²⁷ the U.S. Government Accountability Office website;²⁸ the FNS website;²⁹ the Federal Register;³⁰ PubMed; and the School Nutrition Association website.³¹ Utilizing this search strategy, a total of 539 documents related to operating the school meals programs (Exhibit B.1) were reviewed for the reference period of January 2008 to October 2017. The majority (80 percent) were policy memos provided by FNS to SAs and SFAs.

Exhibit B.1 | Counts of Relevant Documents Reviewed from 2008–2017

Document Type	Count
FNS Policy Memos	433
FNS Rules	23
OMB Information Collection Request	61
Research Report/White Paper	22
Total	539

The specific scope and parameters of the document review approach should be noted. The document review pertained to extant information in the public domain and information provided by FNS. In addition, because FNS released some final rules (i.e., professional standards and local wellness policies) in more recent years, few research reports are publicly available assessing issues SAs and SFAs had implementing those rules. The following sections summarize the information gathered from the document review, by document type.

Document Review Findings

FNS POLICY MEMOS

FNS regularly issues policy memos that provide SAs and SFAs with up-to-date information on operating the school meals programs. The FNS policy memo website³² provides links to each memo and includes

²⁷ <https://www.reginfo.gov/public/do/PRASearch>

²⁸ <https://www.gao.gov/>

²⁹ <https://www.fns.usda.gov/>

³⁰ <https://www.federalregister.gov/>

³¹ <https://schoolnutrition.org/>

³² <https://www.fns.usda.gov/school-meals/policy>

the date, document number, and title of each memo. Users can search only by year, not by topic or by supporting materials included with the memo release.

In total, FNS issued 433 policy memos related to the school meals programs over the past 10 years (Exhibit B.2). On average, 43 policy memos per year were issued, with a low of 28 memos in 2008 and a high of 56 memos in 2014. Additionally, 24 policy memos were replaced by updated memos in subsequent months or years. Policy memos related to the following broad topic areas were issued most frequently over the 10-year period:

- Meal patterns and nutrition standards (*n* = 59)
- Administrative review/Coordinated review effort (*n* = 47)
- Procurement (*n* = 46)
- Eligibility (*n* = 41)
- Costs, expenses, and funds (*n* = 31)
- Grants (*n* = 30)
- Reporting (*n* = 23)
- CEP (*n* = 21)

Policy memos typically included guidance in a memo format, announced the availability of new information or data, or announced an extension of a deadline. The memos often included additional documents or supporting materials for SAs and/or SFAs, including Q&A documents; tools, forms, and instructions; templates; prototypes; and manuals. Over the 10-year period, 22 policy memos included manuals or updates to manuals for SAs and/or SFAs, covering topics such as administrative reviews/coordinated review effort, eligibility, and meal patterns and nutrition standards.

Exhibit B.2 | FNS Policy Memos Categorized by Broad Topic Area and Year (2008 through 2017)

Broad Topic Area	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	Total
Meal Patterns/Nutrition Standards	2	4	1	4	11	11	8	7	5	6	59
Administrative Reviews/Coordinated Review Effort	7	4	2	3	4	6	6	7	4	4	47
Procurement	4	11	2	3	8	3	2	5	6	2	46
Eligibility	5	3	9	4	3	4	6	2	4	1	41
Costs/Expenses/Funds	1	1	2	3	2	5	7	5	4	1	31
Grants		11	7	3	1	2	2	1	1	2	30
Reporting	1	1			6	3	3	4	5		23
Community Eligibility Provision				1	2		4	8	5	1	21
Food Safety	3	2	2	5	2	1				1	16
Paid Lunch Equity				1	2	6	1	3		2	15
Direct Certification	1			5	1	2	4				13
Smart Snacks/Competitive Foods	1						6	1	1		9
Free/Reduced Price (F/RP) Application				1		1	1	1	1	2	7
Meal Service				2	1	1		1	2		7
Disabilities						1		1	1	3	6
Disaster Response		3			2		1				6
Unpaid Meal Challenge									4	2	6
Access				2	1				2		5
Farm to School	1		1			1	1	1			5

Broad Topic Area	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	Total
Reimbursement				1		2	2				5
Team Up for School Nutrition							1	2		1	4
Verification		1		1	1					1	4
American Recovery and Reinvestment Act		1	2								3
Demonstrations				1	1				1		3
Provision 2/3	1					1		1			3
Audits	2										2
Head Start	1					1					2
Management Evaluations								1		1	2
Professional Standards								1	1		2
Revenue						1		1			2
Wellness				1						1	2
Charter Schools	1										1
Information Technology									1		1
Meal Patterns, Nutrition Standards, and Smart Snacks Standards							1				1
Research				1							1
School Gardens		1									1
Waivers										1	1
Total	31	43	28	42	48	52	56	53	48	32	433

FNS RULES

Between 2008 and 2017, FNS released several rules that impact the school meals programs (Exhibit B.3). Similar to the policy memos, these rules are available on the FNS website.³³ The rules also are published in the Federal Register for public review and comment. Only the final rules were included in the document review and document counts except when the rule had not been finalized. In those cases, the interim/proposed rule was included.

From 2008 to 2017, FNS issued 23 rules, averaging approximately two rules per year, with the highest number of rules being released in 2016 ($n = 5$). The number of rules released by broad topic area did not vary, with each broad topic area having one or two rules released during the 10-year period.

Exhibit B.3 | FNS Rules Categorized by Broad Topic Area and Year (2008 through 2017)

Broad Topic Area	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	Total
Administrative Reviews/ Coordinated Review Effort						1			1		2
Direct Certification				1		1					2
Disabilities	1										1
Eligibility				1			1				2
Food Distribution	1									1	2
Food Safety		2									2
Food Marketing		1									1
Local Wellness									1		1
Meal Patterns/Nutrition Standards					1		1				2
Procurement				1							1

³³ <https://www.fns.usda.gov/school-meals/federal-register-documents/rules/view-all>

Broad Topic Area	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	Total
Professional Standards								1			1
Program Integrity									1		1
Provisions, Including CEP						1			1		2
Smart Snacks/Competitive Foods									1		1
Research				1							1
Revenue				1							1
Total	2	3	0	5	1	3	2	1	5	1	23

INFORMATION COLLECTION REQUESTS

The research team identified Information Collection Requests (ICRs) focused on CN programs (e.g., the NSLP, the SBP, the SMP) from 2008 to 2017. The Code of Federal Regulations (CFR) for the NSLP, the SBP, and the SMP list the OMB control numbers for the ICRs detailing the burden associated with the regulations.³⁴ Each submitted ICR must consistently include (1) a description of the information to be collected, (2) justification that the information is needed, and (3) an estimate of the number of respondents and the total annual cost burden to respondents.³⁵

The research team also identified ICRs for FNS research studies approved by OMB from 2008 to 2017. FNS research includes rigorous evidence-based analysis and evaluations that are critical tools to promote effective policies and strong management in the federal nutrition assistance programs.³⁶ Much of FNS research involves a data collection element (e.g., surveys, questionnaires) requesting the participation of federal, SA, SFA, local, or third-party priority populations. Such ICRs from each group (except federal populations) impose an amount of “burden” on society. The definition of burden referenced in the Paperwork Reduction Act is “the time, effort, or financial resources the public expends to provide information to or for a federal agency, or otherwise fulfill statutory or regulatory requirements.”³⁷ To conduct research requiring a certain level of burden, an ICR must be submitted to and receive approval from OMB.

In total, the research team reviewed 61 ICRs and their supporting documents, grouped by topic area. Between 2008 and 2017, approximately three-fourths of the selected ICRs (both regulations and research) focused on the following subtopics: direct certification, revenue, eligibility, school operations/administration, meal patterns/nutrition standards, reporting, and costs/expenses/funds (Exhibits B.4 and B.5).

³⁴ U.S. Department of Agriculture, Food and Nutrition Service. (2017, September 21). *School meals: Program legislation & regulations*. Retrieved from <https://www.fns.usda.gov/school-meals/program-legislation-regulations>

³⁵ U.S. Department of Agriculture, Office of the Chief Information Officer. (n.d.). *Information collection package*. Retrieved from <https://www.ocio.usda.gov/policy-directives-records-forms/information-collection/information-collection-package>

³⁶ U.S. Department of Agriculture, Food and Nutrition Service. (2016, October 28). *Research*. Retrieved from <https://www.fns.usda.gov/ops/research-and-analysis>

³⁷ Government Publishing Office. Controlling Paperwork Burdens on the Public. 5 CFR § 1320.3 (2010). Retrieved from <https://www.gpo.gov/fdsys/pkg/CFR-2010-title5-vol3/xml/CFR-2010-title5-vol3-part1320.xml>

Exhibit B.4 | Counts of Information Collection Requests for FNS Regulations by Broad Topic Area and Year (2008 through 2017)*

Broad Topic Area	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	Total
Administrative Reviews/Coordinated Review Effort						1			2		3
Costs/Expenses/Funds	1	2			2	1			1		7
Direct Certification						1				1	2
Eligibility			1			2	1		1	1	6
Food Safety			1								1
Meal Patterns/Nutrition Standards					1	1		1			3
Professional Standards								1			1
Program Participation		1			2						3
Reporting	1	1			1		1	3	1		8
Revenue	1			1		1	1				4
School Operations/Administration		1			1						2
Smart Snacks/Competitive Foods						1			1		2
Verification									1		1
Wellness									1		1
Total	3	5	2	1	7	8	3	5	8	2	44

Exhibit B.5 | Counts of Information Collection Requests for FNS Research Studies by Broad Topic Area and Year (2008 through 2017)

Broad Topic Area	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	Total
Community Eligibility Provision					1				1		2
Costs/Expenses/Funds					2						2
Direct Certification					1	1					2
Meal Patterns/Nutrition Standards		1	1	1			1			1	5
Procurement		1									1
School Operations/Administration							2		1	1	4
Smart Snacks/Competitive Foods						1					1
Total	0	2	1	1	4	2	3	0	2	2	17

RESEARCH REPORTS AND WHITE PAPERS

The research team also conducted a literature scan of FNS research reports and white papers released from 2008 to October 2017. The research team conducted a focused and specific search to identify documents describing the various forms of reporting burden associated with operating the school meals programs. Key terms and phrases searched included “Child Nutrition programs,” “Child Nutrition,” “USDA-FNS,” “FNS,” “reporting burden,” “burden,” “challenge,” “School Food Authorities,” “State agency,” “administration,” “administrative burden,” and “USDA forms” (e.g., FNS-742).

A total of 22 research reports and white papers were identified (Exhibit B.6). Nearly half ($n = 10$) focused on direct certification, which is due to FNS releasing an annual report on the progress of State implementation of direct certification. School operations and administration was another popular topic, with five studies on this topic released between 2014 and 2016. Please note that FNS released three reports related to school nutrition program operations during this time. Those reports covered a variety of topics, such as eligibility, meal cost, and revenue. In addition, 18 of the 22 of reports/white papers were published by FNS.

Exhibit B.6 | Counts of Research Reports and White Papers by Broad Topic Area and Year (2008 through 2017)

Broad Topic Area	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	Total
Community Eligibility Provision							1				1
Direct Certification	1	1	1	1	1	1	1	2	1		10
Eligibility									1		1
Meal Patterns/Nutrition Standards							1	1	1		3
Program Integrity								1			1
School Operations/ Administration							1	1	2		4
Verification		1	1								2
Total	1	2	2	1	1	1	4	5	5	0	22

APPENDIX C. CHILD NUTRITION REDUCING BURDEN STUDY DATA COLLECTION INSTRUMENTS

C.1. State Agency Survey

Child Nutrition Reducing Burden Study

Final State Agency Survey

April 2018

According to the Paperwork Reduction Act of 1995, an agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a valid OMB control number. The valid OMB control number for this information collection is 0584-0613. The time required to complete this information collection is estimated to average 20 minutes per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to: U.S. Department of Agriculture, Food and Nutrition Services, Office of Policy Support, 3101 Park Center Drive, Room 1014, Alexandria, VA 22302, ATTN: PRA (0584-0613). Do not return the completed form to this address.

1. REPORTING REQUIREMENTS

The questions in this section ask about a number of standard reports that State Agencies must submit to USDA. These reports help States to establish trends, identify technical assistance needs, and ensure program integrity. We would like to better understand the effort required to collect and compile the data from SFAs and submit the reports to USDA.

1.1: For the FNS-742: SFA Verification Collection Report, which of the following contribute the most to the effort needed to collect and compile the data and submit the report?

MARK ALL THAT APPLY

- Availability of instructions and guidance on completing the report..... 1
 - Clarity of instructions and guidance on completing the report 2
 - Availability of training..... 3
 - Quality of training..... 4
 - Type of information required in report 5
 - Amount of information required in report..... 6
 - Timing of report submission 7
 - Frequency of report submission..... 8
 - Using the Food Programs Reporting System (FPRS)..... 9
 - Reviewing and reconciling information across sources
before submission 10
 - Other (*specify*) 99
- SPECIFY: _____
- None, collecting and compiling the data and submitting this report
requires minimal effort 0

1.2: For the FNS-834: State Agency (NSLP/SNAP) Direct Certification Rate Data Element Report, which of the following contribute the most to the effort needed to collect and compile the data and submit the report?

MARK ALL THAT APPLY

- Availability of instructions and guidance on completing the report..... 1
- Clarity of instructions and guidance on completing the report 2
- Availability of training..... 3
- Quality of training..... 4
- Type of information required in report 5
- Amount of information required in report..... 6
- Timing of report submission 7
- Frequency of report submission 8
- Using the Food Programs Reporting System (FPRS)..... 9
- Reviewing and reconciling information across sources
before submission 10
- Other (*specify*) 99

SPECIFY: _____

- None, collecting and compiling the data and submitting this report requires minimal effort..... 0

1.3: For the FNS-640: Administrative Review Report, which of the following contribute the most to the effort needed to collect and compile the data and submit the report?

The FNS-640: Administrative Review Report was recently redesigned, and State Agencies are required to use the new version by March 2018.

MARK ALL THAT APPLY

- Availability of instructions and guidance on completing the report..... 1
- Clarity of instructions and guidance on completing the report 2
- Availability of training 3
- Quality of training..... 4
- Type of information required in report 5
- Amount of information required in report..... 6
- Timing of report submission 7
- Frequency of report submission 8
- Using the Food Programs Reporting System (FPRS)..... 9
- Reviewing and reconciling information across sources before submission 10
- Don't know (haven't completed the FNS-640)
- Other (*specify*) 99
SPECIFY: _____
- None, collecting and compiling the data and submitting this report requires minimal effort 0

1.4: For the FNS-828: SFA Paid Lunch Price Report, which of the following contribute the most to the effort needed to collect and compile the data and submit the report?

MARK ALL THAT APPLY

- Availability of instructions and guidance on completing the report..... 1
- Clarity of instructions and guidance on completing the report 2
- Availability of training 3
- Quality of training..... 4
- Type of information required in report 5
- Amount of information required in report..... 6
- Timing of report submission 7
- Frequency of report submission 8
- Using the Food Programs Reporting System (FPRS)..... 9
- Reviewing and reconciling information across sources before submission 10
- Other (*specify*) 99
SPECIFY: _____
- None, collecting and compiling the data and submitting this report requires minimal effort 0

1.5: For the annual Community Eligibility Provision notification and publication requirement, which of the following contribute the most to the effort needed to collect and compile the data and submit the report?

MARK ALL THAT APPLY

- Availability of instructions and guidance on completing the report 1
- Clarity of instructions and guidance on completing the report 2
- Availability of training 3
- Quality of training 4
- Type of information required in report 5
- Amount of information required in report 6
- Timing of report submission 7
- Frequency of report submission 8
- Using the USDA-developed reporting template 9
- Reviewing and reconciling information across sources before submission 10
- Other (*specify*) 99
SPECIFY: _____
- None, collecting and compiling the data and submitting this report requires minimal effort 0

1.6: Thinking about the standard reports that your State Agency must submit to USDA, were there any that were especially problematic or that highlighted a specific concern for your State Agency? If so, please provide one or more recent examples. Please specify the name(s) of the report(s) in your response. Any suggestions or commendations to share? If your State has no problems, concerns, suggestions or commendations to share, write “None.”

2. FINANCIAL REPORTING REQUIREMENTS

State Agencies are required to submit various financial reports throughout the fiscal year. These reports collect a wide array of information that allow USDA to monitor school meals program expenditures and revenues and monitor the status of grants. The information reported to USDA is used to provide reimbursement for the meals served. Reports are also used to monitor program operations, understand program participation, and ensure compliance with Federal rules and regulations. Financial reports may also be useful for States for monitoring, disseminating information, and planning purposes.

The questions in this section ask about a number of financial reports that State Agencies must submit to USDA. We would like to better understand the effort required to collect and compile the data from SFAs and submit the reports to USDA.

2.1: For the FNS-10: Report of School Program Operations, which of the following contribute the most to the effort needed to collect and compile the data and submit the report?

MARK ALL THAT APPLY

- Availability of instructions and guidance on completing the report..... 1
 - Clarity of instructions and guidance on completing the report 2
 - Availability of training 3
 - Quality of training..... 4
 - Type of information required in report 5
 - Amount of information required in report..... 6
 - Timing of report submission 7
 - Frequency of report submission 8
 - Using the Food Programs Reporting System (FPRS)..... 9
 - Reviewing and reconciling information across sources
before submission 10
 - Other (*specify*) 99
- SPECIFY: _____
- None, collecting and compiling the data and submitting this report
requires minimal effort..... 0

2.2: For the FNS-13: Annual Report of State Revenue Matching, which of the following contribute the most to the effort needed to collect and compile the data and submit the report?

MARK ALL THAT APPLY

- Availability of instructions and guidance on completing the report 1
 - Clarity of instructions and guidance on completing the report 2
 - Availability of training 3
 - Quality of training 4
 - Type of information required in report 5
 - Amount of information required in report 6
 - Timing of report submission 7
 - Frequency of report submission 8
 - Using the Food Programs Reporting System (FPRS) 9
 - Reviewing and reconciling information across sources before submission 10
 - Other (*specify*) 99
- SPECIFY: _____
- None, collecting and compiling the data and submitting this report requires minimal effort 0

2.3: For the FNS-525: State Administrative Expense Funds Reallocation Report, which of the following contribute the most to the effort needed to collect and compile the data and submit the report?

MARK ALL THAT APPLY

- Availability of instructions and guidance on completing the report 1
 - Clarity of instructions and guidance on completing the report 2
 - Availability of training 3
 - Quality of training 4
 - Type of information required in report 5
 - Amount of information required in report 6
 - Timing of report submission 7
 - Frequency of report submission 8
 - Using the USDA-developed reporting template 9
 - Reviewing and reconciling information across sources before submission 10
 - Other (*specify*) 99
- SPECIFY: _____
- None, collecting and compiling the data and submitting this report requires minimal effort 0

2.4: For the FNS-777: Financial Status Report, which of the following contribute the most to the effort needed to collect and compile the data and submit the report?

MARK ALL THAT APPLY

- Availability of instructions and guidance on completing the report 1
 - Clarity of instructions and guidance on completing the report 2
 - Availability of training 3
 - Quality of training 4
 - Type of information required in report 5
 - Amount of information required in report 6
 - Timing of report submission 7
 - Frequency of report submission 8
 - Using the Food Programs Reporting System (FPRS) 9
 - Reviewing and reconciling information across sources before submission 10
 - Other (*specify*) 99
- SPECIFY: _____
- None, collecting and compiling the data and submitting this report requires minimal effort 0

2.5: For the SF-425: Federal Financial Report, which of the following contribute the most to the effort needed to collect and compile the data and submit the report?

MARK ALL THAT APPLY

- Availability of instructions and guidance on completing the report 1
 - Clarity of instructions and guidance on completing the report 2
 - Availability of training 3
 - Quality of training 4
 - Type information required in report 5
 - Amount of information required in report 6
 - Timing of report submission 7
 - Frequency of report submission 8
 - Using the Food Programs Reporting System (FPRS) 9
 - Reviewing and reconciling information across sources before submission 10
 - Other (*specify*) 99
- SPECIFY: _____
- None, collecting and compiling the data and submitting this report requires minimal effort 0

2.6: Thinking about the financial reports that your State Agency must submit to USDA, were there any that were especially problematic or that highlighted a specific concern for your State

Agency? If so, please provide one or more recent examples. Please specify the name(s) of the financial report(s) in your response. Any suggestions or commendations to share? If your State has no problems, concerns, suggestions or commendations to share, write "None."

**3. CONDUCTING ADMINISTRATIVE REVIEWS AND PARTICIPATING IN FNS
MANAGEMENT EVALUATIONS AND FINANCIAL MANAGEMENT REVIEWS**

State Agencies contribute to the integrity of the school meals programs by overseeing program operations and ensuring compliance with program regulations. State Agencies are required to conduct official reviews of SFAs to assess compliance with specific regulations, including administrative reviews. In addition, FNS is legislatively mandated to evaluate State Agency operations through FNS Management Evaluations and Financial Management Reviews.

First, we would like to better understand the effort required to conduct Administrative Reviews.

3.1: For Administrative Reviews, which of the following contribute the most to the effort needed to prepare for, conduct, and report on the results of the reviews?

MARK ALL THAT APPLY

- Timeliness of instructions 1
- Availability of instructions and guidance on conducting reviews 2
- Clarity of instructions and guidance on conducting reviews 3
- Availability of training 4
- Quality of training 5
- Amount of time required to prepare for reviews 6
- Amount of time required to conduct reviews 7
- Type of information collected during reviews 8
- Amount of information collected during reviews 9
- Timing of reviews 10
- Frequency of reviews 11
- Availability of SA staff to conduct reviews 12
- Providing feedback after reviews (technical assistance, corrective action) 13
- Responding to feedback (findings) after reviews 14
- Other (*specify*) 99

SPECIFY: _____

Next, we would like to better understand the effort required of your State Agency to prepare for and participate in FNS Management Evaluations and Financial Management Reviews.

3.2: For Management Evaluations conducted by FNS Regional Offices, which of the following contribute the most to the effort needed to prepare for and participate in the evaluations?

MARK ALL THAT APPLY

- Availability of instructions and guidance on preparing for evaluations 1
 - Clarity of instructions and guidance on preparing for evaluations..... 2
 - Availability of training 3
 - Quality of training..... 4
 - Amount of time required to prepare for evaluations 5
 - Type information collected during evaluations 6
 - Amount of information collected during evaluations 6
 - Timing of evaluations..... 7
 - Frequency of evaluations 8
 - Availability of SA staff to participate in evaluations 9
 - Responding to feedback (findings) after evaluations 10
 - Other (*specify*) 99
- SPECIFY: _____
- I have not participated in a Management Evaluation 0

3.3: For Financial Management Reviews conducted by FNS Regional Offices, which of the following contribute the most to the effort needed to prepare for and participate in the reviews?

MARK ALL THAT APPLY

- Availability of instructions and guidance on preparing for reviews..... 1
 - Clarity of instructions and guidance on preparing for reviews..... 2
 - Availability of training 3
 - Quality of training..... 4
 - Amount of time required to prepare for reviews 5
 - Type of information collected during reviews 6
 - Amount of information collected during reviews..... 7
 - Timing of reviews..... 8
 - Frequency of reviews 9
 - Availability of SA staff to participate in reviews 10
 - Responding to feedback (findings) after reviews 11
 - Other (*specify*) 99
- SPECIFY: _____
- I have not participated in a Financial Management Review 0

3.4: Thinking about Administrative Reviews, Management Evaluations, and Financial Management Reviews, were there any that were especially problematic or that highlighted a specific concern for your State Agency? If so, please provide one or more recent examples. Please specify the name(s) of the reviews or evaluations in your response. Any suggestions or commendations to share? If your State has no problems, concerns, suggestions or commendations to share, write "None."

4. PROCUREMENT

The procurement of all foods, goods, and services for the school meal programs must comply with procurement standards, including Federal policy requirements and USDA regulations. The standards facilitate SFA procurement of domestic and locally-sourced foods by using competitive procedures and spending program funds effectively and efficiently.

The questions in this section ask about procurement-related activities that your State Agency is asked to perform. We would like to better understand the effort needed to perform these activities.

4.1: For procurement reviews, which of the following contribute the most to the effort needed to prepare for, conduct, and report on the results of the reviews?

MARK ALL THAT APPLY

- Timeliness of instructions 1
 - Availability of instructions and guidance on conducting reviews..... 2
 - Clarity of instructions and guidance on conducting reviews..... 3
 - Availability of training 4
 - Quality of training..... 5
 - Amount of time required to prepare for reviews 6
 - Amount of time required to conduct reviews 7
 - Type of information collected during reviews 8
 - Amount of information collected during reviews..... 9
 - Timing of reviews..... 10
 - Frequency of reviews 11
 - Availability of SA staff to conduct reviews 12
 - Providing feedback after reviews (technical assistance, corrective action) 13
 - Responding to feedback (findings) after reviews 14
 - Other (*specify*) 99
- SPECIFY: _____
- None, preparing for, conducting, and reporting on the results of procurement reviews requires minimal effort 0

4.2: Which of the following contribute the most to the effort needed of your State Agency for understanding procurement standards in general?

MARK ALL THAT APPLY

- Availability of instructions and guidance..... 1
- Clarity of instructions and guidance 2
- Availability of training..... 3
- Quality of training..... 4
- Clarity of the procurement standards 5
- Other (*specify*) 99

SPECIFY: _____

- None, understanding procurement standards in general requires minimal effort..... 0

When answering the following questions, please consider effort related to monitoring and providing technical assistance that is needed during formal procurement reviews, as well as any other time.

4.3: Which of the following contribute the most to the effort needed of your State Agency for monitoring food purchases and contracts for compliance with Buy American policies?

MARK ALL THAT APPLY

- Availability of instructions and guidance..... 1
- Clarity of instructions and guidance 2
- Availability of training..... 3
- Quality of training..... 4
- Providing technical assistance to SFAs 5
- Other (*specify*) 99

SPECIFY: _____

- None, monitoring food purchases and contracts for compliance with Buy American requires minimal effort..... 0

4.4: Which of the following contribute the most to the effort needed of your State Agency for monitoring other SFA food purchases and contracts?

MARK ALL THAT APPLY

- Availability of instructions and guidance..... 1
- Clarity of instructions and guidance 2
- Availability of training..... 3
- Quality of training..... 4
- Providing technical assistance to SFAs 5
- Other (*specify*) 99

SPECIFY: _____

- None, monitoring other SFA food purchases and contracts requires minimal effort..... 0

4.5: Which of the following contribute the most to the effort needed of your State Agency for monitoring equipment purchasing?

MARK ALL THAT APPLY

- Availability of instructions and guidance..... 1
- Clarity of instructions and guidance 2
- Availability of training..... 3
- Quality of training..... 4
- Providing technical assistance to SFAs 5

- Other (*specify*) 99
SPECIFY: _____
- None, monitoring equipment purchasing requires minimal effort..... 0

4.6: Which of the following contribute the most to the effort needed of your State Agency for assisting SFAs with food service management company contracts?

MARK ALL THAT APPLY

- Availability of instructions and guidance..... 1
- Clarity of instructions and guidance 2
- Availability of training 3
- Quality of training..... 4
- Providing technical assistance to SFAs 5
- Other (*specify*) 99
SPECIFY: _____
- None, assisting SFAs with food service management company contracts requires minimal effort. 0
- Not applicable, no food service management company contracts..... NA

4.7: Thinking about the various aspects of procurement, please give a recent example that was especially problematic or highlights a specific concern for your State Agency. Any suggestions or commendations to share? If your State has no problems, concerns, suggestions or commendations to share, write “None.”

5. USDA GUIDANCE AND POLICY MEMOS

USDA regularly issues guidance documents and policy memos in order to provide State Agencies and SFAs with the most up-to-date information on operating the school meal programs, including complying with legislative mandates and Federal rules and regulations. The questions in this section ask for your thoughts on the guidance documents and policy memos.

First, thinking generally only about the guidance documents that are issued by USDA, please answer the following questions. (Examples of guidance documents include manuals, handbooks, toolkits, fact sheets, and other resources provided on USDA websites.)

5.1: In general, how timely are the guidance documents provided, so that your State Agency can efficiently apply the information discussed within the documents?

MARK ONLY ONE

- Very timely 1
- Moderately timely 2
- Somewhat timely 3
- Not very timely 4
- Not at all timely 5
- Don't know DK

5.2: In general, how clear and concise is the information in the guidance documents?

- Very clear and concise 1
- Moderately clear and concise 2
- Somewhat clear and concise 3
- Not very clear and concise 4
- Not at all clear and concise 5
- Don't know DK

5.3: In general, how much detail do you think is provided in the guidance documents?

- Far too much 1
- Too much 2
- About the right amount 3
- Too little 4
- Far too little 5
- Don't know DK

5.4: In general, how easy or not easy is it to obtain and navigate through the guidance documents?

- Very easy..... 1
- Moderately easy 2
- Somewhat easy 3
- Not very easy..... 4
- Not at all easy..... 5
- Don't know DK

Next, thinking generally only about the policy memos (for example, the “SP” series policy memos such as the SP40-2017 and SP11-2018) that are issued by USDA, please answer the following questions.

5.5: In general, how timely are the policy memos provided, so that your State Agency can apply the information discussed within the memos?

MARK ONLY ONE

- Very timely..... 1
- Moderately timely 2
- Somewhat timely 3
- Not very timely..... 4
- Not at all timely 5
- Don't know DK

5.6: In general, how clear and concise is the information in the policy memos?

- Very clear and concise 1
- Moderately clear and concise..... 2
- Somewhat clear and concise..... 3
- Not very clear and concise 4
- Not at all clear and concise 5
- Don't know DK

5.7: In general, how much detail do you think is provided in the policy memos?

- Far too much..... 1
- Too much..... 2
- About the right amount 3
- Too little 4
- Far too little 5
- Don't know DK

5.8: In general, how easy or not easy is it to obtain and navigate through the policy memos?

- Very easy..... 1
- Moderately easy 2
- Somewhat easy 3
- Not very easy..... 4
- Not at all easy..... 5
- Don't know DK

5.9: Thinking about USDA guidance documents and policy memos, were there any that were especially problematic or that highlighted a specific concern for your State Agency? If so, please provide one or more recent examples. Any suggestions or commendations to share? If your State Agency has no problems, concerns, suggestions or commendations to share, write "None."

6. AD HOC REPORTING REQUESTS

To address questions from Congress, the White House, senior USDA officials, and others, USDA national or regional offices may issue a request to State Agencies to gather and submit additional information related to various aspects of the school meals programs.

- 6.1: Thinking about ad hoc requests that your State Agency may receive from either the USDA National or Regional Office, were there any that were especially problematic or that highlighted a specific concern for your State Agency? If so, please provide one or more recent examples. Any suggestions or commendations to share? If your State Agency has no problems, concerns, suggestions or commendations to share, write "None."

7. PARTICIPATING IN RESEARCH AND EVALUATION STUDIES

State Agencies operating the school meal programs are required to cooperate with officials and Federal contractors in the conduct of research and evaluation studies of the programs. Throughout the year, State Agencies are asked to participate in USDA/FNS research and/or evaluation studies.

The questions in this section ask about your State Agency’s experience participating in research and/or evaluation studies.

7.1: Over the last 5 years, how often per year on average has your State Agency been asked to participate in any USDA/FNS research and/or evaluation study? *Please do not include this study in your answer.*

- 1 to 4 times per year 1
- 5 to 9 times per year 2
- 10 or more times per year 3
- Not required to participate over the last 5 years..... 0 SKIP TO 7.4
- Don't know DK SKIP TO 7.4

7.2: For USDA/FNS research and/or evaluation studies in which your State Agency has been asked to participate over the last 5 years, how often:

	MARK ONE ONLY PER ROW					
	1	2	3	4	5	Don't know
	Always	Often	Sometimes	Rarely	Never	
a. were you given adequate advance notice for participation?	1 <input type="radio"/>	2 <input type="radio"/>	3 <input type="radio"/>	4 <input type="radio"/>	5 <input type="radio"/>	DK <input type="radio"/>
b. was the purpose of the research communicated to you clearly?	1 <input type="radio"/>	2 <input type="radio"/>	3 <input type="radio"/>	4 <input type="radio"/>	5 <input type="radio"/>	DK <input type="radio"/>
c. did you feel that the research study would produce useful information?	1 <input type="radio"/>	2 <input type="radio"/>	3 <input type="radio"/>	4 <input type="radio"/>	5 <input type="radio"/>	DK <input type="radio"/>
d. was the focus of the research redundant with other USDA/FNS studies you participated in?	1 <input type="radio"/>	2 <input type="radio"/>	3 <input type="radio"/>	4 <input type="radio"/>	5 <input type="radio"/>	DK <input type="radio"/>
e. was the focus of the research redundant with other non-USDA/FNS studies you participated in?	1 <input type="radio"/>	2 <input type="radio"/>	3 <input type="radio"/>	4 <input type="radio"/>	5 <input type="radio"/>	DK <input type="radio"/>
f. did you consider the time required to participate in the studies excessive?	1 <input type="radio"/>	2 <input type="radio"/>	3 <input type="radio"/>	4 <input type="radio"/>	5 <input type="radio"/>	DK <input type="radio"/>
g. did you consider the effort required to participate in the studies excessive?	1 <input type="radio"/>	2 <input type="radio"/>	3 <input type="radio"/>	4 <input type="radio"/>	5 <input type="radio"/>	DK <input type="radio"/>

h. did the time required to participate adversely impact your ability to perform other responsibilities?

1 2 3 4 5 DK

i. did the effort required to participate adversely impact your ability to perform other responsibilities?

j. did the time required to participate in the studies require a new allocation of resources?

1 2 3 4 5 DK

k. did the effort required to participate in the studies require a new allocation of resources?

l. were you given information on how to find the results of the studies after they had been published?

1 2 3 4 5 DK

7.3: Thinking about USDA/FNS research and/or evaluation studies in which your State Agency may have participated, were there any that were especially problematic in terms of time or effort for your State Agency? If so, please provide one or more recent examples. Any research and/or evaluation studies for which you have suggestions or commendations to share? If your State Agency has no problems, concerns, suggestions or commendations to share, write "None."

7.4: If your State Agency did not participate in a USDA/FNS research and/or evaluation study, please give one or more reason(s) why. Were there any studies where your participation was requested but would have been problematic? If so, please provide one or more examples. Any research and/or evaluation studies for which you have suggestions or commendations to share? If your State Agency has no problems, concerns, suggestions or commendations to share, write "None."

7.5: If your agency did participate in a USDA/FNS research and/or evaluation study and found participation difficult, please provide one or more example(s) why. Any research and/or evaluation studies for which you have suggestions or commendations to share? If your State Agency has no problems, concerns, suggestions or commendations to share, write "None."

C.2. School Food Authority Survey

Child Nutrition Reducing Burden Study

Final School Food Authority Survey

April 2018

According to the Paperwork Reduction Act of 1995, an agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a valid OMB control number. The valid OMB control number for this information collection is 0584-0613. The time required to complete this information collection is estimated to average 20 minutes per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to: U.S. Department of Agriculture, Food and Nutrition Services, Office of Policy Support, 3101 Park Center Drive, Room 1014, Alexandria, VA 22302, ATTN: PRA (0584-0613). Do not return the completed form to this address.

1. PROGRAM STANDARDS AND REQUIREMENTS

Federal regulations for the school meals programs define specific standards and requirements for SFAs participating in the programs. Complying with program standards and requirements allows SFAs to ensure the integrity of the programs and ensure that students have access to healthy meals at school.

The questions in this section ask about compliance with a variety of standards and requirements for the school meals programs.

1.1: Is your SFA implementing the Community Eligibility Provision (CEP) district-wide (in all schools)?

- Yes 1
- No 0

1.2: Are the available instructions and guidance generally clear for each of the following standards and requirements? Examples of instructions and guidance include written materials such as manuals, handbooks, toolkits, fact sheets, and USDA policy memos; other online resources provided on USDA and State Agency Child Nutrition Programs websites; and technical assistance provided to your SFA.

SELECT ONE PER ROW				
	YES	NO	DON'T KNOW	NOT APPLICABLE (no instructions or guidance used)
a. Nutrition standards for school meals	1 <input type="radio"/>	0 <input type="radio"/>	DK <input type="radio"/>	NA <input type="radio"/>
b. Smart Snacks in Schools nutrition standards	1 <input type="radio"/>	0 <input type="radio"/>	DK <input type="radio"/>	NA <input type="radio"/>
c. Procurement standards	1 <input type="radio"/>	0 <input type="radio"/>	DK <input type="radio"/>	NA <input type="radio"/>
d. Professional standards	1 <input type="radio"/>	0 <input type="radio"/>	DK <input type="radio"/>	NA <input type="radio"/>
e. Free and reduced-price eligibility determination requirements (including direct certification, applications, Special Provisions)	1 <input type="radio"/>	0 <input type="radio"/>	DK <input type="radio"/>	NA <input type="radio"/>
f. Reimbursement claim requirements (including Special Provisions)	1 <input type="radio"/>	0 <input type="radio"/>	DK <input type="radio"/>	NA <input type="radio"/>
g. Other standard or requirement (specify) _____	1 <input type="radio"/>	0 <input type="radio"/>	DK <input type="radio"/>	NA <input type="radio"/>

1.3: Is your SFA aware of training resources that are available to assist your SFAs in complying with each of the following standards and requirements? Examples of training

resources include trainings that are conducted in-person or by webinar and materials like training manuals, presentation slides, and videos.

	SELECT ONE PER ROW	
	YES	NO
a. Nutrition standards for school meals	1 <input type="radio"/>	0 <input type="radio"/>
b. Smart Snacks in Schools nutrition standards	1 <input type="radio"/>	0 <input type="radio"/>
c. Procurement standards	1 <input type="radio"/>	0 <input type="radio"/>
d. Professional standards	1 <input type="radio"/>	0 <input type="radio"/>
e. Free and reduced-price eligibility determination requirements (including direct certification, applications, Special Provisions)	1 <input type="radio"/>	0 <input type="radio"/>
f. Reimbursement claim requirements (including Special Provisions)	1 <input type="radio"/>	0 <input type="radio"/>
g. Other standard or requirement (specify) _____	1 <input type="radio"/>	0 <input type="radio"/>

IF 1.3a, 1.3b, 1.3c, 1.3d, 1.3e, 1.3f, OR 1.3g = YES, ANSWER 1.4. PROGRAMMER: DISPLAY ONLY ITEMS MARKED YES IN 2.3.

1.4: Has your SFA used any training resources to help your SFA comply with each of the following standards and requirements?

	SELECT ONE PER ROW	
	YES	NO
a. Nutrition standards for school meals	1 <input type="radio"/>	0 <input type="radio"/>
b. Smart Snacks in Schools nutrition standards	1 <input type="radio"/>	0 <input type="radio"/>
c. Procurement standards	1 <input type="radio"/>	0 <input type="radio"/>
d. Professional standards	1 <input type="radio"/>	0 <input type="radio"/>
e. Reimbursement claim requirements (including Special Provisions)	1 <input type="radio"/>	0 <input type="radio"/>
f. Free and reduced-price eligibility determination requirements (including direct certification, applications, Special Provisions)	1 <input type="radio"/>	0 <input type="radio"/>
g. Other standard or requirement (specify) _____	1 <input type="radio"/>	0 <input type="radio"/>

1.5: Thinking about the various standards and requirements, were there any that were especially problematic or that highlighted a specific concern for your SFA? If so, please provide one or more recent examples. Any suggestions or commendations to share? If your SFA has no problems, concerns, suggestions or commendations to share, write "None."

2. REPORTING REQUIREMENTS

Throughout the year, SFAs are required to submit a variety of data to their State Agencies regarding the school meals programs. Much of the data provided is ultimately submitted to USDA and is used to monitor program operations, understand program participation, and comply with USDA rules and regulations. Complying with reporting requirements helps SFAs ensure program integrity.

The questions in this section ask about several aspects of reporting.

2.1: On a scale of 1 to 5, with 1 being “not at all time-consuming (less than one hour/week)” and 5 being “extremely time-consuming (10 or more hours/week),” please rate the extent to which collecting and submitting the following types of data is time-consuming for your SFA.

	1	2	3	4	5
	Not at all time- consuming (less than one hour/week)	Not very time- consuming	Moderately time- consuming	Very time- consuming	Extremely time- consuming (10 or more hours/week)
a. Counts of schools operating the NSLP/SBP	1 <input type="radio"/>	2 <input type="radio"/>	3 <input type="radio"/>	4 <input type="radio"/>	5 <input type="radio"/>
b. Counts of enrolled students in NSLP/SBP	1 <input type="radio"/>	2 <input type="radio"/>	3 <input type="radio"/>	4 <input type="radio"/>	5 <input type="radio"/>
c. Counts of schools operating under Special Provisions	1 <input type="radio"/>	2 <input type="radio"/>	3 <input type="radio"/>	4 <input type="radio"/>	5 <input type="radio"/>
d. Counts of students in schools operating under Special Provisions	1 <input type="radio"/>	2 <input type="radio"/>	3 <input type="radio"/>	4 <input type="radio"/>	5 <input type="radio"/>
e. Counts of students directly certified for free meals	1 <input type="radio"/>	2 <input type="radio"/>	3 <input type="radio"/>	4 <input type="radio"/>	5 <input type="radio"/>
f. Counts of students approved for free or reduced price meals through an application	1 <input type="radio"/>	2 <input type="radio"/>	3 <input type="radio"/>	4 <input type="radio"/>	5 <input type="radio"/>
g. Results of verification	1 <input type="radio"/>	2 <input type="radio"/>	3 <input type="radio"/>	4 <input type="radio"/>	5 <input type="radio"/>
h. Other data (specify) _____	1 <input type="radio"/>	2 <input type="radio"/>	3 <input type="radio"/>	4 <input type="radio"/>	5 <input type="radio"/>

2.2: Are the available instructions and guidance generally clear for collecting and submitting the following types of data? Examples of instructions and guidance include written materials such as manuals, handbooks, toolkits, fact sheets, and USDA policy memos; other online resources provided on USDA and State Agency Child Nutrition Programs websites; and technical assistance provided to your SFA.

	SELECT ONE PER ROW			
	YES	NO	DON'T KNOW	NOT APPLICABLE (no instructions or guidance used)
a. Counts of schools operating the NSLP/ SBP	1 <input type="radio"/>	0 <input type="radio"/>	DK <input type="radio"/>	NA <input type="radio"/>
b. Counts of enrolled students in NSLP/SBP schools	1 <input type="radio"/>	0 <input type="radio"/>	DK <input type="radio"/>	NA <input type="radio"/>
c. Counts of schools operating under Special Provisions	1 <input type="radio"/>	0 <input type="radio"/>	DK <input type="radio"/>	NA <input type="radio"/>
d. Counts of students in schools operating under Special Provisions	1 <input type="radio"/>	0 <input type="radio"/>	DK <input type="radio"/>	NA <input type="radio"/>
e. Counts of students directly certified for free meals	1 <input type="radio"/>	0 <input type="radio"/>	DK <input type="radio"/>	NA <input type="radio"/>
f. Counts of students approved for free or reduced-price meals through an application	1 <input type="radio"/>	0 <input type="radio"/>	DK <input type="radio"/>	NA <input type="radio"/>
g. Results of verification	1 <input type="radio"/>	0 <input type="radio"/>	DK <input type="radio"/>	NA <input type="radio"/>
h. Other data (specify) _____	1 <input type="radio"/>	0 <input type="radio"/>	DK <input type="radio"/>	NA <input type="radio"/>

2.3: Is your SFA aware of training resources that are available to help your SFA with collecting and submitting the following types of data? Examples of training resources include trainings that are conducted in-person or by webinar and materials like training manuals, presentation slides, and videos.

	SELECT ONE PER ROW	
	YES	NO
a. Counts of schools operating the NSLP/ SBP	1 <input type="radio"/>	0 <input type="radio"/>
b. Counts of enrolled students in NSLP/SBP schools	1 <input type="radio"/>	0 <input type="radio"/>
c. Counts of schools operating under Special Provisions	1 <input type="radio"/>	0 <input type="radio"/>
d. Counts of students in schools operating under Special Provisions	1 <input type="radio"/>	0 <input type="radio"/>
e. Counts of students directly certified for free meals	1 <input type="radio"/>	0 <input type="radio"/>
f. Counts of students approved for free or reduced-price meals through an application	1 <input type="radio"/>	0 <input type="radio"/>
g. Results of verification	1 <input type="radio"/>	0 <input type="radio"/>
h. Other data (specify) _____	1 <input type="radio"/>	0 <input type="radio"/>

IF 2.3a, 2.3b, 2.3c, 2.3d, 2.3e, 2.3f, 2.3g, OR 2.3h = YES, ANSWER 2.4. PROGRAMMER: DISPLAY ONLY ITEMS MARKED YES IN 2.3.

2.4: Has your SFA used any training resources to help your SFA collect and submit the following types of data?

	SELECT ONE PER ROW	
	YES	NO
a. Counts of schools operating the NSLP/ SBP	1 <input type="radio"/>	0 <input type="radio"/>
b. Counts of enrolled students in NSLP/SBP schools	1 <input type="radio"/>	0 <input type="radio"/>
c. Counts of schools operating under Special Provisions	1 <input type="radio"/>	0 <input type="radio"/>
d. Counts of students in schools operating under Special Provisions	1 <input type="radio"/>	0 <input type="radio"/>
e. Counts of students directly certified for free meals	1 <input type="radio"/>	0 <input type="radio"/>
f. Counts of students approved for free or reduced-price meals through an application	1 <input type="radio"/>	0 <input type="radio"/>
g. Results of verification	1 <input type="radio"/>	0 <input type="radio"/>
h. Other data (specify)	1 <input type="radio"/>	0 <input type="radio"/>

2.5: **Thinking about types of data that your SFA collects and submits to your State Agency, which of the following contribute the most to the time needed to collect and compile the data?**

- MARK ALL THAT APPLY
- Availability of instructions and guidance 1
- Clarity instructions and guidance 2
- Type of information required 3
- Amount of information required 4
- Timing of submission 5
- Frequency of submission 6
- Availability of staff time and/or resources 7
- Other (specify) 99
- SPECIFY: _____
- My SFA has no issues collecting and compiling data. 0

2.6: **Thinking about types of data that your SFA collects and submits to your State Agency, which of the following contribute the most to the time needed to submit the data?**

- MARK ALL THAT APPLY
- Lack of available of instructions and guidance 1
- Lack of clear instructions and guidance 2
- Type of information required 3
- Amount of information required 4
- Timing of submission 5
- Frequency of submission 6
- Lack of availability of staff time and/or resources 7
- Other (specify) 99
- SPECIFY: _____
- My SFA has no issues submitting data. 0

2.7: **Does your SFA use any automated technology (computer) systems for determining students' certification status?**

- Yes 1
- No 0
- Don't know DK

2.8: **Thinking about the types of data that you collect, compile, and submit to your State Agency, were there any that were especially problematic or that highlighted a specific concern for your SFA? If so, please provide one or more recent examples. Any suggestions or commendations to share? If your SFA has no problems, concerns, suggestions or commendations to share, write "None."**

3. PROCUREMENT STANDARDS

The procurement of all foods, goods, and services for the school meals programs must comply with procurement standards, including Federal policy requirements and FNS regulations. Complying with procurement standards facilitates SFA procurement of domestic and locally-sourced foods using competitive procedures and helps SFAs to ensure that program funds are used effectively and efficiently.

3.1: On a scale of 1 to 10, with 1 being “the least time-consuming” and 10 being “the most time-consuming” please rate the extent to which the following aspects of procurement are time-consuming for your SFA.

	Please rate from 1 (least time-consuming) to 10 (most time-consuming)
a. Understanding the procurement standards	1 <input type="radio"/>
b. Issuing contract solicitations in a timely manner	1 <input type="radio"/>
c. Identifying vendors, suppliers, and/or contractors that comply with Buy American	1 <input type="radio"/>
d. Ensuring that all food purchases comply with Buy American	1 <input type="radio"/>
e. Understanding geographic preference	1 <input type="radio"/>
f. Managing contracts with local vendors or suppliers	1 <input type="radio"/>
g. Maintaining records and or documentation for compliance with procurement standards	1 <input type="radio"/>
h. Managing food service management company contracts	1 <input type="radio"/>
i. Ordering produce through the USDA Department of Defense (DoD) Fresh Fruit and Vegetable Program	1 <input type="radio"/>
j. Other aspect (specify)	1 <input type="radio"/>

3.2: Are the available instructions and guidance generally clear for each of the following aspects of procurement? Examples include written materials such as manuals, handbooks, toolkits, fact sheets, and USDA policy memos; other online resources provided on USDA and State Agency Child Nutrition Programs websites; and technical assistance provided to your SFA.

	SELECT ONE PER ROW		
	YES	NO	NOT APPLICABLE
a. Understanding the procurement standards	1 <input type="radio"/>	0 <input type="radio"/>	
b. Issuing contract solicitations in a timely manner	1 <input type="radio"/>	0 <input type="radio"/>	
c. Identifying vendors, suppliers, and/or contractors that comply with Buy American	1 <input type="radio"/>	0 <input type="radio"/>	
d. Ensuring that all food purchases comply with Buy American	1 <input type="radio"/>	0 <input type="radio"/>	
e. Understanding geographic preference	1 <input type="radio"/>	0 <input type="radio"/>	
f. Managing contracts with local vendors or suppliers	1 <input type="radio"/>	0 <input type="radio"/>	
g. Maintaining records and/or documentation for compliance with procurement standards	1 <input type="radio"/>	0 <input type="radio"/>	
h. Managing food service management company contracts	1 <input type="radio"/>	0 <input type="radio"/>	NA <input type="radio"/> Not applicable - My SFA does not manage a food service management company contract.
i. Ordering produce through the USDA Department of Defense (DoD) Fresh Fruit and Vegetable Program	1 <input type="radio"/>	0 <input type="radio"/>	NA <input type="radio"/> Not applicable - My SFA does not order produce through the USDA DoD Fresh Fruit and Vegetable Program.
j. Other aspect (specify) _____	1 <input type="radio"/>	0 <input type="radio"/>	

3.3: Is your SFA aware of training resources that are available to assist your SFA with the following aspects of procurement? Examples of training resources include trainings that are conducted in-person or by webinar and materials like training manuals, presentation slides, and videos.

	SELECT ONE PER ROW		
	YES	NO	NOT APPLICABLE
a. Understanding the procurement standards	1 <input type="radio"/>	0 <input type="radio"/>	
b. Issuing contract solicitations in a timely manner	1 <input type="radio"/>	0 <input type="radio"/>	
c. Identifying vendors, suppliers, and/or contractors that comply with Buy American	1 <input type="radio"/>	0 <input type="radio"/>	
d. Ensuring that all food purchases comply with Buy American	1 <input type="radio"/>	0 <input type="radio"/>	
e. Understanding geographic preference	1 <input type="radio"/>	0 <input type="radio"/>	
f. Managing contracts with local vendors or suppliers	1 <input type="radio"/>	0 <input type="radio"/>	
g. Maintaining records and/or documentation for compliance with procurement standards	1 <input type="radio"/>	0 <input type="radio"/>	
h. Managing food service management company contracts	1 <input type="radio"/>	0 <input type="radio"/>	NA <input type="radio"/> Not applicable - My SFA does not manage a food service management company contract
i. Ordering produce through the USDA Department of Defense (DoD) Fresh Fruit and Vegetable Program	1 <input type="radio"/>	0 <input type="radio"/>	NA <input type="radio"/> Not applicable - My SFA does not order produce through the USDA DoD Fresh Fruit and Vegetable Program
j. Other aspect (specify) _____	1 <input type="radio"/>	0 <input type="radio"/>	

IF 3.3a, 3.3b, 3.3c, 3.3.d, 3.3e, 3.3f, 3.3g, 3.3h, OR 3.3i = YES, ANSWER 3.4. PROGRAMMER:
 DISPLAY ONLY ITEMS MARKED YES IN 2.3.

3.4: Has your SFA used any training resources to help with the following aspects of procurement?

	SELECT ONE PER ROW	
	YES	NO
a. Understanding the procurement standards	1 <input type="radio"/>	0 <input type="radio"/>
b. Issuing contract solicitations in a timely manner	1 <input type="radio"/>	0 <input type="radio"/>
c. Identifying vendors, suppliers, and/or contractors that comply with Buy American	1 <input type="radio"/>	0 <input type="radio"/>
d. Ensuring that all food purchases comply with Buy American	1 <input type="radio"/>	0 <input type="radio"/>
e. Understanding geographic preference	1 <input type="radio"/>	0 <input type="radio"/>
f. Managing contracts with local vendors or suppliers	1 <input type="radio"/>	0 <input type="radio"/>
g. Maintaining records and/or documentation for compliance with procurement standards	1 <input type="radio"/>	0 <input type="radio"/>
h. Managing food service management company contracts	1 <input type="radio"/>	0 <input type="radio"/>
i. Ordering produce through the USDA Department of Defense (DoD) Fresh Fruit and Vegetable Program	1 <input type="radio"/>	0 <input type="radio"/>
j. Other aspect (specify) _____	1 <input type="radio"/>	0 <input type="radio"/>

3.5: Thinking about the various aspects of procurement, please give a recent example that was especially problematic or highlights a specific concern for your SFA. If your SFA has no problem or concern to share, write "None."

4. USDA GUIDANCE AND POLICY MEMOS

USDA regularly issues guidance documents and policy memos in order to provide State Agencies and SFAs with the most up-to-date information on operating the school meal programs, including complying with legislative mandates and Federal rules and regulations. State Agencies may further adapt USDA guidance documents and policy memos for local settings.

The questions in this section ask for your general thoughts on USDA guidance documents and policy memos.

4.1: What forms of USDA guidance documents and policy memos does your SFA use?

- Original form, as developed by USDA 1
- Adapted form, as developed by our State Agency 2
- Original and adapted forms, as developed by USDA and our State Agency 3

4.2: How easy or not easy is it to obtain and navigate through the USDA guidance documents and policy memos?

- Very easy 1
- Moderately easy 2
- Somewhat easy 3
- Not very easy 4
- Not at all easy 5
- Don't know DK

4.3: How often does your State Agency offer training or technical assistance on the topics covered in USDA guidance documents and policy memos?

- Always 1
- Often 2
- Sometimes 3
- Rarely 4
- Never 5

4.4: Thinking about USDA guidance documents and policy memos, were there any that were especially problematic or that highlighted a specific concern for your SFA? If so, please provide one or more recent examples. Any suggestions or commendations to share? If your SFA has no problems, concerns, suggestions or commendations to share, write "None."

5. PARTICIPATING IN RESEARCH AND EVALUATION STUDIES

SFAs operating the school meals programs are required to cooperate with officials and Federal contractors in the conduct of research and/or evaluation studies of the programs. Throughout the year, SFAs may be asked to participate in USDA/FNS research and/or evaluation studies.

The questions in this section ask about your SFA’s experience participating in any prior research and/or evaluation studies over the past 5 years.

5.1: Over the last 5 years, how often per year on average has your SFA been asked to participate in any USDA/FNS research and/or evaluation study? *Please do not include this study in your answer.*

- 1 to 4 times per year 1
- 5 to 9 times per year 2
- 10 or more times per year 3
- Not required to participate over the last 5 years..... 0 SKIP TO 5.4
- Don't know DK SKIP TO 5.4

5.2: For Federal research studies in which your SFA has been asked to participate over the last 5 years:

	MARK ONE ONLY					
	1	2	3	4	5	Don't know
	Always	Often	Sometimes	Rarely	Never	
a. How often were you given adequate advance notice for participation?	1 <input type="radio"/>	2 <input type="radio"/>	3 <input type="radio"/>	4 <input type="radio"/>	5 <input type="radio"/>	DK <input type="radio"/>
b. How often was the purpose of the research communicated to you clearly?	1 <input type="radio"/>	2 <input type="radio"/>	3 <input type="radio"/>	4 <input type="radio"/>	5 <input type="radio"/>	DK <input type="radio"/>
c. How often was the focus of the research redundant with other studies you participated in?	1 <input type="radio"/>	2 <input type="radio"/>	3 <input type="radio"/>	4 <input type="radio"/>	5 <input type="radio"/>	DK <input type="radio"/>
d. How often did you consider the time required to participate in the studies excessive?	1 <input type="radio"/>	2 <input type="radio"/>	3 <input type="radio"/>	4 <input type="radio"/>	5 <input type="radio"/>	DK <input type="radio"/>
e. How often were you given information on how to find the results of the studies after they had been published?	1 <input type="radio"/>	2 <input type="radio"/>	3 <input type="radio"/>	4 <input type="radio"/>	5 <input type="radio"/>	DK <input type="radio"/>

5.3: If your SFA did not participate in a USDA/FNS research and/or evaluation study, please give one or more reason(s) why. Were there any studies where your participation was requested but would have been problematic? If so, please provide one or more examples. Any research and/or evaluation studies for which you have suggestions or commendations to share? If your SFA has no problems, concerns, suggestions or commendations to share, write “None.”

5.4: If your SFA did participate in a USDA/FNS research and/or evaluation study and found participation difficult, please provide one or more example(s) why. Any research and/or evaluation studies for which you have suggestions or commendations to share? If your SFA has no problems, concerns, suggestions or commendations to share, write "None."

APPENDIX D. STATE AGENCY AND SCHOOL FOOD AUTHORITY SURVEYS: SUPPLEMENTAL EXHIBITS

Exhibit D.1 | SA Perceptions of USDA Guidance Documents and Policy Memos

Factor	Rating	State Agencies (%)	
		Guidance Documents	Policy Memos
Timeliness	Very or moderately timely	20.0	24.0
	Somewhat timely	26.0	44.0
	Not very or not at all timely	54.0	32.0
Clarity and Conciseness of Information	Very or moderately clear and concise	36.0	34.0
	Somewhat clear and concise	50.0	48.0
	Not very or not at all clear and concise	14.0	18.0
Ease of Obtaining and Navigating through Documents	Very or moderately easy	38.0	32.0
	Somewhat easy	42.0	42.0
	Not very or not at all easy	20.0	26.0
Level of Detail*	Far too much or too much detail	6.0	10.0
	About the right amount of detail	40.0	42.0
	Too little or far too little detail	52.0	46.0

Note: Responding SAs = 50.

*2.0 percent of SAs responded “don’t know” for both guidance documents and policy memos.

Source: Child Nutrition Reducing Burden Study, Final State Agency Survey, questions 5.1–5.8.

Exhibit D.2 | Forms of USDA Guidance Documents and Policy Memos Used by SFA Size

Characteristic	School Food Authorities (%)		
	Original Form, as Developed by USDA	Adapted Form, as Developed by SA	Original and Adapted Forms, as Developed by USDA and SA
All SFAs	24.8	14.2	61.0
SFA Size (students)			
Small (1–999)	29.3	15.0	55.7
Medium (1,000–4,999)	20.9	13.6	65.6
Large (5,000–24,999)	12.9	11.8	75.3
Very Large (25,000+)	9.9	13.5	76.6

Note: Weighted percentages. Responding SFAs = 1,039.

Source: Child Nutrition Reducing Burden Study, Final School Food Authority Survey, question 4.1.

Exhibit D.3 | Most Frequently Cited Factors Contributing to Effort Needed by SAs for Undergoing FNS Reviews

Activity/Contributing Factor	State Agencies (%)
	ALL
Management Evaluations	
Amount of time required to prepare for evaluations	63.5
Amount of information collected during evaluations	61.5
Type information collected during evaluations	55.8
Responding to feedback (findings) after evaluations	44.2
Availability of SA staff to participate in evaluations	38.5
Financial Management Reviews	
Amount of time required to prepare for reviews	67.3
Amount of information collected during reviews	57.7
Type of information collected during reviews	48.1
Availability of SA staff to participate in reviews	40.4
Clarity of instructions and guidance on preparing for reviews	40.4

Note: Respondents were instructed to mark all that apply for each question. Responding SAs = 52.

Source: Child Nutrition Reducing Burden Study, Final State Agency Survey, questions 3.2 and 3.3.

Exhibit D.4 | Uses Automated Technology to Determine Student Certification Status by SFA Size

Characteristic	School Food Authorities (%)		
	Yes	No	Don't Know
All SFAs	75.2	19.4	5.5
SFA Size (students)			
Small (1–999)	67.0	25.9	7.1
Medium (1,000–4,999)	84.0	12.4	3.6
Large (5,000–24,999)	93.6	4.3	2.1
Very Large (25,000+)	95.3	2.3	2.3

Note: Weighted percentages of SFAs. Responding SFAs = 1,057.

Source: Child Nutrition Reducing Burden Study, Final School Food Authority Survey, question 2.7.

Exhibit D.5 | Ease of Obtaining and Navigating USDA Guidance Documents and Policy Memos by SFA Size

Characteristic	School Food Authorities (%)					
	Very Easy	Moderately Easy	Somewhat Easy	Not Very Easy	Not at All Easy	Don't Know
All SFAs	7.3	21.2	39.0	19.5	5.5	7.4
SFA Size (students)						
Small (1–999)	6.8	20.4	41.8	18.0	3.7	9.2
Medium (1,000–4,999)	9.2	23.1	36.3	19.5	6.3	5.6
Large (5,000–24,999)	4.3	20.2	31.6	27.0	13.5	3.5
Very Large (25,000+)	5.8	20.5	32.2	31.6	8.8	1.2

Note: Weighted percentages. Responding SFAs = 1,050.

Source: Child Nutrition Reducing Burden Study, Final School Food Authority Survey, question 4.2.

Exhibit D.6 | Most Frequently Cited Factors Contributing to Effort Needed by SAs for Conducting Administrative Reviews by SA Size

Contributing Factor	State Agencies (%)*				
	All	Small	Medium	Large	Very Large
Amount of information collected during reviews	76.9	92.3	76.9	76.9	61.5
Amount of time required to prepare for reviews	73.1	69.2	84.6	69.2	69.2
Frequency of reviews	63.5	53.8	92.3	46.2	61.5
Availability of SA staff to conduct reviews	61.5	76.9	69.2	53.8	46.2
Timeliness of instructions	61.5	46.2	76.9	61.5	61.5
Amount of time required to conduct reviews	59.6	53.8	61.5	53.8	69.2
Type of information collected during reviews	59.6	76.9	53.8	69.2	38.5
Providing feedback after reviews (technical assistance, corrective action)	51.9	53.8	38.5	61.5	53.8
Clarity of instructions and guidance on conducting reviews	50.0	46.2	53.8	46.2	53.8

Note: Respondents were instructed to mark all that apply for each question.

*SA size based on rank ordering of SAs by number of SFAs served using data from FNS-742 for SY 2016–17 excluding SFAs serving RCCIs. SAs ranked 1 to 13 (those serving the fewest SFAs) were classified as “small.” SAs ranked from 14 to 26 were classified as “medium.” SAs ranked 27 to 39 were considered “large.” SAs serving the most SFAs, SAs ranked from 39 to 52, were classified as “very large.” Responding SAs = 52.

Source: Child Nutrition Reducing Burden Study, Final State Agency Survey, question 3.1.

Exhibit D.7 | Factors Contributing the Most to Effort Needed by SAs for Understanding Procurement Standards and Participating in Procurement Reviews

Activity / Contributing Factor	State Agencies (%)
Understanding Procurement Standards	
Clarity of the procurement standards	76.9
Clarity of instructions and guidance	69.2
Quality of training	50.0
Availability of instructions and guidance	44.2
Availability of training	40.4
Other (specify)	26.9
None, understanding procurement standards in general requires minimal effort.	5.8
Participating in Procurement Reviews	
Amount of time required to conduct reviews	67.3
Availability of SA staff to conduct reviews	65.4
Amount of information collected during reviews	63.5
Clarity of instructions and guidance on conducting reviews	61.5
Type of information collected during reviews	61.5
Amount of time required to prepare for reviews	57.7
Availability of instructions and guidance on conducting reviews	55.8
Providing feedback after reviews (technical assistance, corrective action)	51.9
Availability of training	42.3
Quality of training	40.4
Frequency of reviews	38.5
Responding to feedback (findings) after reviews	36.5
Timeliness of instructions	34.6
Other (specify)	32.7
Timing of reviews	21.2
None, preparing for, conducting, and reporting on the results of procurement reviews requires minimal effort.	3.8

Note: Respondents were instructed to mark all that apply for each question. Responding SAs = 52.

Source: Child Nutrition Reducing Burden Study, Final State Agency Survey, questions 4.1 and 4.2.

Exhibit D.8 | SFA Rankings of Most Time-Consuming Aspects of Procurement

Aspect of Procurement
1. Ordering produce through USDA DoD Fresh
2. Managing FSMC contracts
3. Understanding geographic preference
4. Managing contracts with local vendors or suppliers
5. Ensuring that all food purchases comply with Buy American
6. Maintaining records and/or documentation for compliance with procurement standards
7. Identifying vendors, suppliers, and/or contractors that comply with Buy American
8. Issuing contract solicitations in a timely manner
9. Understanding procurement standards

Note: Weighted rankings from most time-consuming to least time-consuming. Responding SFAs = 947.

Source: Child Nutrition Reducing Burden Study, Final School Food Authority Survey, question 3.1.

Exhibit D.9 | Perceptions of Assistance with Aspects of Procurement by SFA Size

Factor	Aspect of Procurement	School Food Authorities (%) *				
		ALL	SMALL	MEDIUM	LARGE	VERY LARGE
Instructions and Guidance are Generally Clear**	Understanding the procurement standards	67.3	69.6	68.8	52.2	54.1
	Issuing contract solicitations in a timely manner	74.6	74.6	75.6	71.2	77.4
	Identifying vendors, suppliers, and/or contractors that comply with Buy American	73.5	77.1	71.5	60.7	69.7
	Ensuring that all food purchases comply with Buy American	73.1	73.8	75.4	63.1	69.5
	Understanding geographic preference	71.2	70.7	73.1	67.9	71.3
	Managing contracts with local vendors or suppliers	77.0	77.0	78.2	72.9	80.6
	Maintaining records and/or documentation for compliance with procurement standards	78.9	81.5	76.7	71.2	80.5
	Managing food service management company contracts***	80.1	77.8	85.1	81.0	76.0
	Ordering produce through the USDA Department of Defense (DoD) Fresh Fruit and Vegetable Program***	83.0	77.7	89.9	87.4	90.9
Aware of Available Training Resources****	Understanding the procurement standards	83.2	82.5	84.0	84.0	87.6
	Issuing contract solicitations in a timely manner	77.9	78.0	77.4	78.5	80.7
	Identifying vendors, suppliers, and/or contractors that comply with Buy American	76.3	77.7	75.4	71.5	74.9
	Ensuring that all food purchases comply with Buy American	76.5	76.5	78.1	71.4	78.9
	Understanding geographic preference	74.0	72.8	76.6	71.7	79.3
	Managing contracts with local vendors or suppliers	77.3	77.6	77.4	75.8	76.3
	Maintaining records and/or documentation for compliance with procurement standards	82.8	83.3	82.9	79.9	83.5
	Managing food service management company contracts***	80.3	78.2	84.9	81.0	81.8
Used Any Training Resources*****	Ordering produce through the USDA Department of Defense (DoD) Fresh Fruit and Vegetable Program***	79.6	75.4	86.1	82.0	85.3
	Understanding the procurement standards	87.6	86.1	89.3	88.7	95.3
	Issuing contract solicitations in a timely manner	69.1	65.7	73.5	72.8	75.9
	Identifying vendors, suppliers, and/or contractors that comply with Buy American	72.3	69.5	77.6	70.0	80.3

Factor	Aspect of Procurement	School Food Authorities (%) *				
		ALL	SMALL	MEDIUM	LARGE	VERY LARGE
	Ensuring that all food purchases comply with Buy American	77.9	76.2	80.9	77.2	80.7
	Understanding geographic preference	71.2	69.1	72.9	74.7	82.0
	Managing contracts with local vendors or suppliers	71.1	69.4	73.1	73.6	73.0
	Maintaining records and/or documentation for compliance with procurement standards	82.5	81.0	85.3	80.9	86.4
	Managing food service management company contracts	70.1	70.5	71.6	62.8	64.2
	Ordering produce through the USDA Department of Defense (DoD) Fresh Fruit and Vegetable Program	79.6	77.1	83.7	78.8	78.9

Note: *SFA size definitions based on number of students: small (1-999), medium (1,000-4,999), large (5,000-24,999), and very large (25,000+).

**Weighted percentages of SFAs responding 'yes.' Remaining SFAs responded 'no' unless otherwise indicated. Responding SFAs = 1,059.

*** Weighted percentages of SFAs responding 'yes' among SFAs indicating that this aspect of procurement was applicable to their SFA.

****Weighted percentages of SFAs responding 'yes.' Remaining SFAs responded 'no' unless otherwise indicated. Responding SFAs = 1,059.

*****Weighted percentages of SFAs responding 'yes.' Remaining SFAs responded 'no.' Respondent universe limited to SFAs responding 'yes' to being aware of training for the aspect of procurement. Eligible SFAs = 924.

Source: Child Nutrition Reducing Burden Study, Final School Food Authority Survey, questions 3.2 – 3.4.

Exhibit D.10 | Providing Technical Assistance (TA) to SFAs as Contributing to Effort Needed by SAs by Aspect of Procurement and SA Size

Aspect of Procurement	State Agencies (%)*				
	All	Small	Medium	Large	Very Large
TA to assist SFAs with FSMC contracts	80.8	69.2	76.9	100.0	76.9
TA to monitor food purchases and contracts for compliance with Buy American policies	59.6	61.5	53.8	84.6	38.5
TA to monitor other SFA food purchases and contracts	75.0	84.6	76.9	76.9	61.5
TA to monitor equipment purchasing	65.4	61.5	53.8	84.6	61.5

Note: Respondents were instructed to mark all that apply for each question. Responding SAs = 52.

*SA size based on rank ordering of SAs by number of SFAs served using data from FNS-742 for SY 2016–17 excluding SFAs serving RCCIs and those with zero schools or zero students. SAs ranked 1 to 13 (those serving the fewest SFAs) were classified as “small.” SAs ranked from 14 to 26 were classified as “medium.” SAs ranked 27 to 39 were considered “large.” SAs serving the most SFAs, SAs ranked from 39 to 52, were classified as “very large.”

Source: Child Nutrition Reducing Burden Study, Final State Agency Survey, questions 4.3 - 4.6.

Exhibit D.11 | Factors Contributing the Most to Effort Needed by SAs for Reporting Requirements

Report / Contributing Factor	State Agencies (%)
FNS-742 Report	
Reviewing and reconciling information across sources before submission	84.6
Type of information required in report	48.1
Amount of information required in report	44.2
Clarity of instructions and guidance on completing the report	40.4
Using the Food Programs Reporting System (FPRS)	32.7
Availability of training	26.9
Availability of instructions and guidance on completing the report	23.1
Other (specify)	21.2
Timing of report submission	15.4
Quality of training	11.5
Frequency of report submission	3.8
None, collecting and compiling the data and submitting this report requires minimal effort.	0.0
FNS-834 Report	
Reviewing and reconciling information across sources before submission	59.6
Type of information required in report	32.7
Clarity of instructions and guidance on completing the report	25.0
Timing of report submission	21.2
Other (specify)	19.2
Amount of information required in report	17.3
Availability of training	15.4
Using the Food Programs Reporting System (FPRS)	15.4
Availability of instructions and guidance on completing the report	9.6
Quality of training	9.6
Frequency of report submission	1.9
None, collecting and compiling the data and submitting this report requires minimal effort	15.4
FNS-640 Report	
Amount of information required in report	76.9
Reviewing and reconciling information across sources before submission	71.2
Type of information required in report	61.5
Clarity of instructions and guidance on completing the report	55.8
Availability of instructions and guidance on completing the report	32.7
Using the Food Programs Reporting System (FPRS)	28.8
Other (specify)	23.1
Availability of training	19.2
Timing of report submission	19.2
Quality of training	17.3
Frequency of report submission	3.8

Report / Contributing Factor	State Agencies (%)
None, collecting and compiling the data and submitting this report requires minimal effort.	0.0
FNS-828 Report	
Reviewing and reconciling information across sources before submission	38.5
Clarity of instructions and guidance on completing the report	23.1
Using the Food Programs Reporting System (FPRS)	19.2
Amount of information required in report	15.4
Type of information required in report	15.4
Availability of instructions and guidance on completing the report	11.5
Other (specify)	11.5
Availability of training	9.6
Timing of report submission	7.7
Quality of training	5.8
Frequency of report submission	1.9
None, collecting and compiling the data and submitting this report requires minimal effort.	26.9

Note: Respondents were instructed to mark all that apply for each question. Responding SAs = 52.

Source: Child Nutrition Reducing Burden Study, Final State Agency Survey, questions 1.1 – 1.4.

Exhibit D.12 | Factors Contributing the Most to Effort Needed by SAs for Financial Reporting Requirements

Report / Contributing Factor	State Agencies (%)
FNS-10 Report*	
Reviewing and reconciling information across sources before submission	51.9
Using the Food Programs Reporting System (FPRS)	28.8
Amount of information required in report	19.2
Availability of training	19.2
Frequency of report submission	19.2
Other (specify)	19.2
Availability of instructions and guidance on completing the report	17.3
Clarity of instructions and guidance on completing the report	15.4
Timing of report submission	17.3
Type of information required in report	17.3
Quality of training	13.5
None, collecting and compiling the data and submitting this report requires minimal effort.	17.3
FNS-13 Report*	
Reviewing and reconciling information across sources before submission	23.1
Clarity of instructions and guidance on completing the report	17.3
Availability of instructions and guidance on completing the report	15.4
Availability of training	13.5
Using the Food Programs Reporting System (FPRS)	9.6
Other (specify)	7.7
Quality of training	7.7
Amount of information required in report	5.8
Type of information required in report	5.8
Frequency of report submission	1.9
Timing of report submission	1.9
None, collecting and compiling the data and submitting this report requires minimal effort.	53.8
FNS-525 Report**	
Clarity of instructions and guidance on completing the report	28.8
Reviewing and reconciling information across sources before submission	28.8
Availability of training	23.1
Availability of instructions and guidance on completing the report	13.5
Amount of information required in report	11.5
Other (specify)	11.5
Quality of training	11.5
Type of information required in report	11.5
Timing of report submission	9.6
Using the Food Programs Reporting System (FPRS)	7.7
Frequency of report submission	0.0
None, collecting and compiling the data and submitting this report requires minimal effort.	34.6

Report / Contributing Factor	State Agencies (%)
FNS-777 Report*	
Reviewing and reconciling information across sources before submission	48.1
Clarity of instructions and guidance on completing the report	28.8
Availability of training	23.1
Amount of information required in report	19.2
Availability of instructions and guidance on completing the report	19.2
Other (specify)	19.2
Using the Food Programs Reporting System (FPRS)	17.3
Timing of report submission	15.4
Quality of training	13.5
Type of information required in report	13.5
Frequency of report submission	5.8
None, collecting and compiling the data and submitting this report requires minimal effort.	19.2
FNS-425 Report*	
Reviewing and reconciling information across sources before submission	28.8
Clarity of instructions and guidance on completing the report	21.2
Using the Food Programs Reporting System (FPRS)	19.2
Availability of instructions and guidance on completing the report	15.4
Availability of training	15.4
Other (specify)	13.5
Amount of information required in report	9.6
Type of information required in report	9.6
Quality of training	7.7
Timing of report submission	5.8
Frequency of report submission	1.9
None, collecting and compiling the data and submitting this report requires minimal effort.	34.6

Note: Respondents were instructed to mark all that apply for each question. *Responding SAs = 52. **Responding SAs = 51.

Source: Child Nutrition Reducing Burden Study, Final State Agency Survey, questions 2.1 – 2.5.

Exhibit D.13 | Factors Contributing the Most to Effort Needed by SFAs to Collect and Submit Data by SFA Size

Activity	Contributing Factor	School Food Authorities (%) *				
		ALL	SMALL	MEDIUM	LARGE	VERY LARGE
Collecting and compiling data for State Agency**	Amount of information required	41.9	39.7	43.6	46.8	55.9
	Availability of staff time and/or resources	40.1	40.4	38.4	43.6	41.8
	Type of information required	34.2	34.9	31.1	38.9	36.5
	Clarity instructions and guidance	30.0	29.5	30.5	31.4	32.4
	Timing of submission	21.8	19.9	23.6	25.7	32.4
	Frequency of submission	16.3	14.7	18.0	18.9	24.7
	Availability of instructions and guidance	12.1	12.3	11.8	11.8	12.9
SFA has no issues collecting and compiling data.		33.3	35.6	31.8	25.7	22.4
Submitting data to State Agency***	Amount of information required	34.3	33.0	33.8	41.8	45.6
	Availability of staff time and/or resources	32.9	35.7	26.8	34.6	34.3
	Type of information required	28.2	29.9	23.8	31.1	33.7
	Clarity instructions and guidance	20.8	21.6	18.2	25.0	16.0
	Timing of submission	18.0	18.2	15.6	22.9	29.6
	Frequency of submission	14.9	14.8	13.2	19.3	22.5
	Availability of instructions and guidance	9.0	8.9	9.3	8.9	6.5
SFA has no issues collecting and compiling data.		37.2	37.1	40.1	29.6	28.4

Note: Respondents were instructed to mark all that apply for each question. Weighted percentages of SFAs.

*SFA size definitions based on number of students: small (1-999), medium (1,000-4,999), large (5,000-24,999), and very large (25,000+).

**Responding SFAs = 1,047.

***Responding SFAs = 1,042.

Source: Child Nutrition Reducing Burden Study, Final School Food Authority Survey, questions 2.5 – 2.6.

Exhibit D.14 | Participation in FNS Research and Evaluation Studies

Characteristic	State Agencies/School Food Authorities (%)				
	1 to 4 times per year	5 to 9 times per year	10 or more times per year	Not asked to participate over last 5 years	Don't Know
All SAs	35.3	43.1	15.7	2.0	3.9
SA Size*					
Small	46.2	23.1	23.1	7.7	0.0
Medium	41.7	41.7	8.3	0.0	8.3
Large	30.8	46.2	15.4	0.0	7.7
Very large	23.1	61.5	15.4	0.0	0.0
All SFAs	41.9	2.4	0.2	22.6	32.9
SFA Size (students)					
Small (1–999)	31.9	1.7	0.3	29.5	36.6
Medium (1,000–4,999)	53.9	3.0	0.0	13.8	29.3
Large (5,000–24,999)	59.4	4.2	0.0	11.3	25.1
Very large (25,000+)	76.0	8.8	0.0	4.1	11.1

Note: Responding SAs = 51. Weighted percentages of SFAs. Responding SFAs = 1,053.

*SA size based on rank ordering of SAs by number of SFAs served using data from FNS-742 for SY 2016–17 excluding SFAs serving RCCIs and those with zero schools or zero students. SAs ranked 1 to 13 (those serving the fewest SFAs) were classified as “small.” SAs ranked from 14 to 26 were classified as “medium.” SAs ranked 27 to 39 were considered “large.” SAs serving the most SFAs, SAs ranked from 39 to 52, were classified as “very large.”

Source: Child Nutrition Reducing Burden Study, Final State Agency Survey, question 7.1. Child Nutrition Reducing Burden Study, Final School Food Authority Survey, question 5.1.

Exhibit D.15 | Factors Related to Participation in FNS Research and Evaluation Studies

Factor	State Agencies (%)		School Food Authorities (%)	
	Always/Often*	Rarely/Never*	Always/Often*	Rarely/Never*
Given adequate advanced notice for participation	56.2	12.5	57.3	11.1
Research purpose clearly communicated	47.9	18.8	36.5	17.8
Research focus redundant with other USDA/FNS studies	29.2	14.6	NA	NA
Research focus redundant with other non-USDA/FNS studies	18.8	20.8	NA	NA
Research focus redundant with other studies	NA	NA	57.4	9.5
Time required to participate excessive	58.4	16.7	21.0	44.7
Time required to participate adversely impacted other responsibilities	31.2	22.9	NA	NA
Time required to participate required new allocation of resources	6.3	73.0	NA	NA
Given information for finding study results after publication	8.4	50.1	61.8	9.2

Note: Responding SAs = 48. Weighted percentages of SFAs. Responding SFAs = 597.

*Remaining responses were either “sometimes” or “don’t know.”

NA = Factor was not listed in survey instrument.

Source: Child Nutrition Reducing Burden Study, Final State Agency Survey, question 7.2. Child Nutrition Reducing Burden Study, Final School Food Authority Survey, question 5.2.

APPENDIX E. WORK GROUP PARTICIPANT PERSPECTIVES: ADDITIONAL THEMES

A. Overview

As discussed in the body of the report, three work group meetings (two in-person and one via telephone) gathered information from SA and SFA participants to develop recommendations for consolidating CN program reporting requirements, simplifying regulations, and improving efficiencies. In addition to the principles and key considerations detailed in the report, this appendix describes additional themes under the six high-level topics that emerged during the work group meetings. The opinions and perspectives that are summarized are those of the work group participants, not of FNS or the research team.

B. Additional Themes Across Work Groups

The work groups discussed a range of issues in each of the six topic areas, and participants offered many ideas for identifying efficiencies in current program operations and regulations. For each topic area, this section outlines additional themes and suggestions from work group participants and describes the discussions that led to those suggestions.

1. USDA GUIDANCE AND POLICY MEMOS

Participants confirmed that USDA guidance and policy memos are used and referred to as SAs and SFAs operate the school meals programs. However, their usefulness is driven by the specific needs of each SA and SFA and how effectively and consistently information is conveyed. The following additional themes emerged from the SA and SFA work group discussions related to USDA guidance and policy memos:

(a) Improve format and design of guidance and policy resources to increase their usefulness and improve compliance

SA work group participants requested an efficient and standardized set of resources for all USDA guidance and policy memos. Participants noted that standardization in the format of the guidance and policy resources would provide consistency that users—especially those at the SFA level—can rely on to help find the information they need quickly. In addition, work group participants stressed that it was especially important that all materials be visually appealing and written using plain language (for example, using infographics) so that multiple audiences can understand them. Participants recommended that both guidance and policy memo materials include real-life examples and templates that SAs or SFAs could adapt, as needed.

Participants noted that it is particularly useful when guidance documents and policy memos are updated that changes, including deletions, are tracked and highlighted. This helps the SAs and SFAs easily identify changes in guidance and policies, increasing the likelihood that the revisions will be implemented. SA work group participants also expressed the need for all guidance documents, policy memos, and other information to be compliant with Section 508 of the Rehabilitation Act, so they can post the materials on their own websites without having to spend time and resources to make them compliant (if required by their State).

(b) Routinely seek feedback from SAs (and SFAs) to help inform and improve new or substantially revised USDA guidance and policy memos

SA work group participants indicated that many SAs would offer to review and pilot-test USDA guidance and policy memos before official release. They felt that the final guidance and policy memos are improved when FNS asks for and incorporates feedback from SAs and SFAs. According to SA work group participants, routinely obtaining feedback from the stakeholders who will be implementing the guidance and policy memos helps reduce the likelihood that corrections will be needed. SA work group participants also asked that FNS consider giving SAs and SFAs the opportunity to prepare questions and discuss the guidance or policy with FNS before formal implementation. For example, SAs and SFAs asked whether FNS might be able to host an online forum or webinar prior to implementation to discuss the key components of the guidance or policy and to answer common questions submitted by SAs and SFAs.

(c) Use clear, direct language to promote uniformity and consistency across programs

SFA work group participants voiced concern that the language in USDA guidance and policy memos sometimes allows for varied interpretations, which leads to inconsistencies across CN programs and inconsistencies in adherence to CN policies across the country (and even within a State). Participants discussed their preference for guidance materials that include more precise language that allows for less interpretation. SFA work group participants felt that greater clarity and less ambiguity would promote more uniformity at the State and local levels—both in program operations and during the administrative review process.

Work group participants also acknowledged that, in some cases, using more direct language may eliminate the intended flexibility FNS provides to SAs and SFAs in implementing specific guidance or policies. Because program operations can vary across SAs and SFAs, some flexibility may actually be desirable.

2. PROGRAM STANDARDS AND REQUIREMENTS

SFA work group participants discussed how CN program standards and requirements could be revised or streamlined to reduce administrative burden. This section describes additional themes from the SFA work group session related to eligibility for Special Provisions, Smart Snacks in Schools standards, and nutrition standards for school meals.

(a) Consider alternative methods for determining eligibility for participation in Special Provisions that allow schools to serve all meals for free

SFA work group participants felt that Special Provisions provide children with better access to nutritious meals than the typical application process. However, they felt strongly that the current method of establishing or reestablishing a baseline of community (or small area) poverty estimates should be changed. SFA participants believed that the current method is more a measure of how successful a district is at collecting and processing school meal applications than an accurate measure of poverty in the community.

Instead, they suggested that FNS consider using census-tract-level data such as those available from the Bureau of Labor Statistics, which are valid and widely accepted measures of community poverty levels. SFA participants felt this would result in a more efficient way to determine eligibility for schools and

districts to participate in Special Provisions during a base-year period. Such data could also be used to determine whether a district is eligible for CEP.

(b) Clarify the role of SFAs in monitoring compliance with Smart Snacks in Schools standards

SFAs are asked to ensure compliance with Smart Snacks in Schools standards for all foods provided in schools, including those sold by entities other than the school food service department. However, work group participants noted that their SFA staff do not have the authority to enforce compliance. SFA work group participants noted, for example, that it is challenging for them to ensure compliance related to school fundraisers that sell candy. SFA work group participants emphasized that, if SFAs are expected to ensure compliance with Smart Snacks standards across all foods sold in schools, they should be given additional authority to do so.

According to participants, it would also be helpful for FNS to develop a uniform Smart Snacks rule that applies to every district across all SAs. Such a rule would identify what food items are (and are not) allowable. In addition, SFA work group participants felt that foods offered as part of reimbursable meals should always be allowable under the Smart Snacks Standards. That is, if a food is allowable in terms of the meal pattern for a reimbursable meal, then SFA participants thought it should be always be allowable under the Smart Snacks Standards.

(c) Establish permanent flexibility for certain school meal nutrition standards

SFA work group participants believed there should be permanent waivers for meeting certain nutrition standards. These waivers would give districts more flexibility in creating menus for school lunches and breakfasts. Some SAs take a restrictive approach and do not allow SFAs to use any waivers related to the nutrition standards; therefore, if FNS allowed permanent flexibility, it would help SFAs.

3. MANAGEMENT EVALUATIONS, FINANCIAL MANAGEMENT REVIEWS, AND ADMINISTRATIVE REVIEWS

In general, SA and SFA work group participants described administrative reviews as burdensome and time-consuming. SA work group participants said that, at the individual level, Management Evaluations and Financial Management Reviews are not necessarily difficult; however, when taken together with other audits, such as those by the Office of Inspector General and other agencies in the State, they become challenging. The following additional themes were discussed by SA and SFA work group participants related to administrative reviews, Management Evaluations, and Financial Management Reviews:

(a) Increase consistency in administrative reviews across all CN programs

SA participants noted that more consistency in administrative reviews across all CN programs would improve the process. They believed that increased consistency would lead to more efficient program implementation across all CN programs. It also would reduce any negative administrative review findings (i.e., deficiencies or violations identified during the review) that result from confusion due to differences across specific program requirements rather than true compliance violations.

(b) Make the administrative review a more interactive process that focuses on providing onsite technical assistance and timely feedback to SFAs

According to SFA work group participants, a more interactive approach to the onsite portion of the administrative reviews that focuses on TA would be beneficial. SFAs expressed a desire for TA to be provided during the onsite review that discusses findings from the review in a way that focuses on continuous improvement. This TA could be provided (1) when the reviewer identifies a finding during the review or (2) during the exit interview. SFAs would also benefit from receiving administrative review findings more promptly; some participants reported waiting a year or more to receive findings. After such a delay, it is difficult for SFAs to take any meaningful corrective actions.

(c) Streamline administrative review preparation activities for SFAs, focusing on reducing required documentation

SFA work group participants felt that administrative reviews require a substantial amount of preparation time, sometimes up to a year before a review. They expressed frustration with the amount of paperwork they are required to gather and noted that some requirements related to documentation are outdated. These preparation activities require SFAs to shift staff resources away from program operations or to spend resources to hire additional staff. SFA participants suggested that the requirements associated with preparation and documentation for administrative reviews be reviewed and revised as needed. SFA work group participants also noted that updated and better integrated technology could help streamline data entry or documentation when preparing for reviews.

(d) Change the culture of Management Evaluations and Financial Management Reviews to one that focuses on continuous improvement

Some SA work group participants expressed that reviewers who conduct Management Evaluations and Financial Management Reviews currently focus more on devising review findings than attempting to help SAs improve. These work group participants wanted a shift away from a penalty-based approach toward one that focuses on process improvement.

Changing the culture of Management Evaluations and Financial Management Reviews could take many steps. For example, SA work group participants believe that, if reviewers have identified an issue during the offsite portion of their evaluation, that information should be shared immediately with the SA. This would afford the SA some time to begin to address the issue, make corrections, and potentially avoid a negative review finding.

Similarly, reviewers should be trained to only identify findings rooted in program regulations that were in effect during the time period under review. SA participants noted that findings from their Management Evaluations or Financial Management Reviews are often based on being inconsistent with best practices and not on issues of compliance with regulations, or they are being held accountable for updated regulations or interpretations of regulations that were announced after the time period under review.

(e) Encourage and support RO staff to visit States outside of the formal monitoring process

To facilitate a better understanding between SA staff and RO staff, some SA work group participants recommended that FNS encourage RO staff to visit SAs outside of the formal Management Evaluations and Financial Management Review process. Doing so would allow RO staff to see how the process works from the SA perspective and to build more effective working relationships between RO and SA staff.

(f) Encourage and support regional SA director meetings

To facilitate communication and help ensure a consistent understanding of program requirements for which SAs and SFAs are held accountable during reviews and evaluations, SA work group participants believed it would be beneficial for SA directors in each region to meet more frequently. These meetings would also allow SAs to share their own best practices and provide feedback on how Management Evaluations and Financial Management Reviews are being implemented in their States.

4. PROCUREMENT STANDARDS AND REQUIREMENTS

SA and SFA work group participants viewed the procurement process as complex and challenging, although SFA experiences with procurement vary based on SFA size. The SA and SFA work group discussions yielded the following additional themes related to procurement standards and requirements:

(a) Provide a list of foods considered exempt from the Buy American provision without the SFA having to maintain additional justification

SA and SFA work group participants indicated that preapproved waivers for food items such as bananas, pineapple, Mandarin oranges, and olives would make the overall procurement process more efficient. It would also make compliance with the Buy American provision more effective. SA work group participants said that many SFA staff are overburdened with different responsibilities and competing priorities. According to work group participants, if FNS provided preapproved waiver lists, SFA staff could eliminate repetitive tasks, allowing them more time to focus on core duties.

(b) Align the procurement review and administrative review cycles

SA work group participants frequently noted overlap across key components of procurement reviews and administrative reviews. Therefore, it would be beneficial to align both review cycles to make collecting similar information more efficient and less burdensome on SAs and SFAs. One SA work group participant mentioned that their SA had successfully aligned the review cycles, which the participant believed had substantially reduced the overall burden on their SFAs.

(c) Conduct another procurement review cycle without the threat of fiscal action

School food procurement regulations are extremely complex and numerous. Although SAs and SFAs are making strides in ensuring compliance with procurement regulations, work group participants believed that all SAs would benefit from another cycle of procurement reviews that did not raise the threat of fiscal action. This would not only acknowledge the complexity of procurement regulations but also shift the focus of ongoing reviews to learning and making improvements rather than assigning blame. This would be especially helpful for smaller SFAs, which often have staff with many responsibilities and could benefit from more time to gain experience with procurement reviews.

(d) Reconsider the micro-purchase standards

To comply with micro-purchase standards, SFAs must develop written purchase specifications, document their purchases, prove the price for the good or service is reasonable, and show that purchases are distributed equitably across vendors. For many SFAs, the additional effort their staff must exert to prove they have complied with these standards is burdensome. Although SFA work group

participants acknowledged the responsibility of SFAs to ensure money is being spent appropriately, they perceived these standards as burdensome. A revised standard for micro-purchases should account for the time, travel, and other administrative burden and costs that SFAs incur (or would incur) in meeting these standards.

5. REPORTING REQUIREMENTS

SA and SFA work group participants identified aspects of CN reporting requirements that could be updated, streamlined, or otherwise improved, as detailed in the considerations below. In general, SFA work group participants questioned why there have not been regular efforts to reduce burden related to reporting requirements. As the requirements and responsibilities of operating CN programs have grown dramatically over the past 7 to 8 years, SFAs noted that the number of staff they have to meet those responsibilities has not kept pace. The phrase “weed the garden” was a common refrain during the SFA work group session, reflecting the group’s desire to have FNS and SAs reconsider the need for the data SFAs are required to provide and to eliminate data requirements that are no longer perceived as necessary.

(a) Consider sunseting select reporting requirements

SA work group participants raised the idea of letting specific reporting requirements expire so that the reports do not outlast their usefulness. Participants recognized that, as new program requirements are added, there may be a need to track implementation in the early stages. However, tracking this information may become less necessary and less useful over time. In such cases, SA participants felt that these reporting requirements should be phased out. SA participants specifically mentioned retiring the 6-Cent Certification report, the Ameliorative Action report, the School Food Safety Inspection report, and the FNS-874: Local Educational Agency Second Review of Applications report.

(b) Provide assistance to address data quality and validity concerns with SFA-level data

SA work group participants expressed concern about data that are self-reported by SFAs, particularly the data on FNS-742 (School Food Authority Verification Collection Report). Although the participants acknowledged spending a great deal of time and effort working with SFAs on reporting requirements, they have concerns related to the integrity and validity of SFA-reported data. SA work group participants want access to comprehensive data quality tools and TA to help identify and address data errors, which would help improve data quality and integrity.

This perspective from SA work group participants dovetails with SFA work group participants’ observations that across the country, and even within a State, the availability of technology that can help SFAs meet reporting requirements is inconsistent. SFA work group participants emphasized that many districts still do a great deal of data collection and submission manually. These challenges led SFA work group participants to share the same concern as SA work group participants about the validity and comparability of data reported by SFAs and SAs.

(c) Simplify and streamline the household application process across all CN programs

Collecting school meal applications was identified as challenging by SFA work group participants. Many larger SFAs hire temporary staff whose sole responsibility is to collect and process school meal applications. The districts’ permanent staff are also dedicated to this effort, which starts before the school year and does not ebb until mid-November. SFA work group participants discussed the myriad of

ways SFAs and their staff attempt to encourage the submission of school meal applications, including sending out reminder letters and emails, making robocalls and individual telephone calls, and conducting other forms of outreach. In multilingual districts, SFAs translate these efforts into the appropriate languages to improve response rates.

SFA work group participants suggested that simplifying the applications would be helpful. This would mean families would be required to provide less information, and SFAs would have less information to review and retrieve if missing. The application process is made even more complex when the district must create, process, and review different applications across the varied CN programs. SFA work group participants desired a single, consolidated application that can be used for all CN programs.

(d) Revisit the underlying intent of the application verification process and, if the process cannot be eliminated, consider alternatives to lessen the burden on SFAs

SFA work group participants voiced that the school meal application verification process, the results of which are reported in Section 5 on FNS-742, is an inefficient use of limited resources. They believed that the process itself minimizes the chances to successfully verify information on school meal applications. SFA work group participants described the following issues with verification of school meal applications:

- The verification process that continues through mid-November and the FNS-742 reporting process that continues through mid-March can be time consuming and burdensome for SFA staff.
- SFAs must "chase down" the most vulnerable families among all program participants and ask them to provide personal information for a second time, with only the threat of a loss of program benefits to force compliance.
- If program benefits are taken away due to nonresponse, this can embarrass children, put kitchen staff in an awkward position, and anger parents and school boards.
- Reporting results as percentages only is perceived as unfair because small verification samples can lead to misleading interpretations (for example, 0 percent when an SFA is unable to reach two families in a sample of two).

More generally, SFA participants were unsure how this process supports the mission of the CN programs. If the intent is to eliminate fraud on individual applications, their experience has been that little fraud is found. If the intent is to confirm district-level program integrity, SFA participants believed other, more efficient alternatives exist, such as using census-tract-level information on small area poverty estimates from the Census Bureau or similar data from the Bureau of Labor Statistics.

(e) Align the FNS-742 and FNS-834 timeframes

SFA work group participants indicated that the timing of key data used to determine the NSLP direct certification rates are misaligned in such a way that they do not cover the same time period. On the FNS-834 (State Agency [NSLP/SNAP] Direct Certification Rate Data Element Report), SAs report the count of children receiving Supplemental Nutrition Assistance Program (SNAP) benefits in CEP and Special Provision schools operating in a non-base year, which is based on data that many SAs pull in April of the previous school year. SAs also report the count of school-age children in SNAP households for determining NSLP direct certification rates, although those data are from July through September of the current school year.

On FNS-742 (School Food Authority Verification Collection Report), SAs report data gathered by SFAs on the number of students directly certified for free school meals based on SNAP participation. These data are gathered as of October of the current school year. However, the FNS-742 report is not submitted until March of that school year, even though SFA work group participants indicated that their actual counts of direct certification continue to increase during the rest of the school year (sometimes by 2 to 2.5 percentage points).

SFA work group participants believe that the timing of the data for these reports should be aligned to make the calculation of the SA and national direct certification rates more reliable.

6. RESEARCH AND EVALUATION STUDIES AND AD HOC INFORMATION REQUESTS

SA and SFA work group participants indicated they appreciate being invited to participate in research and evaluation studies, because this reflects strong interest in and support of the CN programs. However, SA and SFA work group participants noted that the frequency with which they are asked to provide data and the time required to respond to requests can be burdensome. The following additional themes related to research and evaluation studies arose during the SA and SFA work group discussions:

(a) Encourage researchers to consider SA input regarding SFA participation in research studies

SAs possess tremendous insight about the SFAs in their State that could benefit research study designs. SA work group participants expressed that they can often help researchers avoid SFAs that are outliers, overburdened, or nonresponsive. Researchers should be encouraged to obtain feedback from SAs about the availability of SFAs to participate in a study, as well as the likelihood that specific SFAs would provide high-quality information.

Some SA work group participants expressed frustration that they have provided useful information about SFA participation that was ignored—for example, information about SFAs that would not be able to participate or SFAs that were an anomaly and would not provide useful information for the study. Although there may be occasions when legitimate research design considerations would limit the type and amount of sample replacement, researchers should be more willing—with FNS approval—to share their rationale on sampling decisions directly with SAs.

(b) Develop an SOP for FNS ad hoc requests for data or information

SA work group participants emphasized that they are not opposed to providing data to FNS on a quick-turnaround schedule. Similar to concerns work group participants raised about FNS-funded research studies, SA work group participants wanted a more effective way for FNS to communicate the timeline and purpose of ad hoc requests for data or other information (that is, outside of formal surveys or studies). SA work group participants indicated that they typically do not receive much information or context to help them differentiate between FNS requests that are emergency requests for data and requests that are not. Receiving this critical information would help SAs prioritize requests that are truly urgent and would enable SAs to plan more effectively for (and even develop a calendar schedule for) the delivery of less-urgent (semi-regular) requests. SA work group participants voiced particular frustration with requests that are initially communicated as emergencies but then are ultimately not used by FNS.

Developing an SOP for all FNS ad hoc requests would help mitigate these challenges. The SOP could include the following:

- A clear, concise statement about the intent and purpose of the ad hoc request
- A clear and reasonable timeline for when the data need to be submitted to FNS
- As much advance notice as possible for regularly recurring ad hoc requests

(c) Ensure SAs and SFAs receive results of research studies and ad hoc requests

Consistent with seeking greater understanding on the intent, purpose, and benefits of research studies and ad hoc requests, SA and SFA work group participants requested access to the results or findings that are drawn from their participation. For research studies, SAs and participating SFAs would like FNS to provide links to any public reports or presentations resulting from the study. For ad hoc requests, SAs would like to receive an overview or summary of the analyses done by FNS. In addition, SAs and SFAs would strongly appreciate direct feedback if analyses from either research studies or ad hoc requests suggest ways to improve program operations.

(d) Establish limits on the number of research studies any SFA would be required to participate in during a school year

SFA work group participants felt overburdened with the number of requests for participation in research studies. Several work group participants expressed frustration about the frequency with which they are asked to provide data, host site visits, and participate in online surveys.

SFAs want to be reassured that FNS is attempting to distribute the burden of study participation among SFAs, rather than approaching the same SFA for each study. To do so, SFA work group participants suggested that FNS establish guidelines for the maximum number of research studies that a single SFA would be asked to participate in during any given school year. FNS could monitor SFA participation by maintaining a centralized database that identifies each district selected to participate in a given study in each school year. Alternatively, SFAs could be told that they can decline participation for any request beyond the maximum number for the school year.

(e) Incorporate studies into the FNS research agenda that are focused, have a faster turnaround, and move beyond the scope of typical research projects

SFA work group participants believe that FNS-sponsored studies are often overly broad with too many research objectives. Such studies require large amounts of time for planning, data collection, and analysis. Many work group participants stated that this leads to reports released several years after the SFA has participated in the study, and results are no longer relevant to their SA or SFAs.

SFA work group participants suggested that studies could be more narrowly focused and have fewer objectives. In their opinion, this would lead to timely reporting of the results and could potentially provide SAs and SFAs with relevant suggestions to improve CN programs.

In addition, work group participants hoped that future research studies would explore topics beyond CN program operations, processes, or procedures. For example, several participants expressed the desire for studies connecting school meals and nutrition to student learning and academic achievement. SFAs believed research that focuses on and highlights the positive benefits of CN programs would result in greater support for these programs at the local level.

