July 13, 2020

Jinee Burdg, MPP, RDN, LDN
Food and Nutrition Services
U.S. Department of Agriculture
1320 Braddock Place
5th Floor
Alexandria, VA 22314

RE: Agency Information Collection Activities: Proposed Collection Comment Request for the School Food Purchase Study IV

Dear Ms. Burdg:

United Fresh Produce Association represents the full fresh produce supply chain, including growers, shippers, fresh-cut processors, wholesalers, distributors, retailers, industry suppliers, allied associations, and foodservice operators (including K-12). We value and appreciate the importance of data made available through previous School Food Purchase studies, and support future data collection.

As was included in the Agency’s announcement, in the last decade, the school nutrition environment has undergone considerable changes including implantation of the Healthy, Hunger-Free Kids Act. The nutrition standards in particular dramatically increased the amount and variety of fruits and vegetables that students received as part of a reimbursable meal. Understanding purchasing trends as a result of this update is incredibly valuable to better understanding the impact these nutrition standards have made to the supply chain and student health. Studies have already shown that there are positive health and obesity-related outcomes for children due to the more nutritious and fruit and vegetable-dense school meals, but the School Food Purchase study can help us all better understand the connection between procurement and health outcomes.

We specifically wish to address question “C” posed by the agency: *Opportunities to enhance the quality, utility, and clarity of collected information.* We ask that Food and Nutrition Service (FNS) consider the following:

- In order to minimize collection burden on schools, we support FNS’ intent to only require schools provide data over their assigned quarter. Due to the seasonality of fresh produce, we ask that FNS be mindful of this as it reviews data and that it consider domestic growing seasons and schools’ geographical location when observing fresh produce purchases by quarter.

- Due to COVID-19, there is still much unknown about the serving environment for the 2020-2021 School Year. Based on service in Spring/Summer of 2020, there was an increased demand for individually-wrapped, single-serve fresh produce items. In situations where school food
authorities were providing multiple meals at once, larger packages (i.e. clamshells of strawberries or 2lb bags of baby carrots) were sometimes distributed. Salad bars – which have been a staple for many schools over the last decade and impacted the variety and form of produce that was procured – were no longer utilized in the same way during school closures. If schools continue to operate alternative distribution in the future, including the utilization of temporarily waivers, USDA should consider these factors when collecting, analyzing, and publishing data. We believe that collection of this data during the age of COVID is still important, but it may not be an accurate reflection of procurement over the last decade. To help mitigate, we believe that FNS should analyze USDA DoD Fresh procurement data over the last several years, by quarter, to better capture procurement trends for fresh produce in particular. This, however, will not reflect fresh produce purchases outside of the USDA DoD Fresh program, so FNS should consider other ways to collect this information, including asking school food authorities how procurement differed during the COVID-19 emergency. Specific questions could include the following:

- **Menu Development**
  - To what degree did the COVID-19 pandemic disrupt your menu development and therefore your procurement practices?
  - What types of products are no longer available, or challenging to menu, because of changes in service model?
  - How has the size of your district impacted your food availability with limited or high demand items?
  - How has the amount of packaging increased and has there been an impact of the nutrient density or quality of available items?
  - How did you work with your suppliers and distributors to procure items that you would not normally serve, but fit your needs during the COVID-19 emergency?

- **Equipment and Supplies Procurement**
  - To what degree has the COVID-19 pandemic impacted your service model and what additional pieces of equipment did you purchase to support reopening for the 2020-2021 school year?
  - What equipment did you no longer utilize during the COVID19 pandemic and why?
  - To what degree have your supply costs increased in the 2020-2021 school year?
  - To what degree did you have trouble finding the equipment you needed to reopen in the 2020-2021 school year?
  - To what degree did you have trouble affording the equipment you needed to reopen in the 2020-2021 school year? Why?
  - What additional equipment needs still exist in your district?
  - What new or additional supplies have you needed to procure to accommodate new service models?

- **Local Farmer/Grower Relationships**
  - To what degree were your relationships with local farmers disrupted or improved because of the pandemic?

- **Food Costs**
  - To what degree have your food costs been impacted by the pandemic?
• Market Challenges
  o To what degree have your bid processes been impacted by market disruptions?
  o What types of flexibilities or waivers would be necessary to improve the procurement process during market disruptions and emergencies?
  o What types of additional financial, USDA Foods, or USDA DoD Fresh resources would be helpful during market disruptions and emergencies?

United Fresh appreciates the opportunity to provide information as the Agency considers moving forward with the School Food Purchase Study IV. The fresh produce industry stands ready and willing to assist in any way possible as we continue to ensure that all children receive a nutritious meal at school. Please contact us with any questions at mvanlieu@unitedfresh.org.

Sincerely,

Mollie Van Lieu
Senior Director, Nutrition Policy
United Fresh Produce Association