

September 29, 2011

Kathleen Merrigan  
Deputy Secretary  
U.S. Department of Agriculture  
1400 Independence Ave., S.W.  
Washington, DC 20250

Dear Deputy Secretary Merrigan,

We would first like to thank you for hosting a recent teleconference regarding the upcoming Fresh Fruit and Vegetable Pilot program in Florida and Michigan. We are excited about and support the pilot's intended goal of allowing schools to develop additional avenues to purchase fresh produce. We believe the program should result not only in increased purchases of healthy, locally and regionally grown foods by school districts but also in expanded access to school markets for small and medium-sized producers.

The members and stakeholders of the Community Food Security Coalition, National Farm to School Network, National Sustainable Agriculture Coalition, and School Food FOCUS, as well as regional organizations in Florida and Michigan, have some questions, concerns, and recommendations about the proposed program that we would like to share with you.

We look forward to your response to our questions, and we hope that USDA will take these recommendations into consideration in further developing the pilot, including the immediate task of writing the Request for Proposals.

### **Geographic Preference**

According to USDA's information sheet, the pilot takes into account the needs expressed by schools and other stakeholders to allow greater use of locally and regionally grown foods in school meal programs. However, some communications about the pilot to stakeholders have been ambiguous with regard to local purchasing. For example, we were told that although schools can prefer local, they must "go with the lowest bid." We are unclear about what this means. If a school prefers local blueberries but non-local blueberries are cheaper, must they go with the cheaper non-local blueberries? If the answer is yes, we are uncertain as to how this pilot will meet its intended goal of boosting schools' local purchasing.

We urge you to affirm the flexibility of school districts in the pilot states to apply geographic preferences in fulfillment of their orders for foods purchased under the pilot program. Given the final rule issued earlier this year, the geographic preference should allow not only for additional points, but also for a bid award, even if the price is higher.

### **Products Included**

The pilot currently includes only six products: lettuce, apples, grapes, oranges, carrots, and blueberries. We are concerned that this selection is too limited and could reduce the pilot's economic and capacity-building benefits for small to medium-sized farmers as well as its health benefits for children.

On the stakeholder teleconference, AMS said that it would consider adding particular products but could face administrative challenges. We would like to explore how our organizations can work with you to suggest additional products and to help address any related administrative issues. The pilot provides a perfect opportunity for testing out new avenues for purchasing the many products consumed by American schoolchildren.

## **Vendor Certification and Participation**

We are concerned that the pilot presents barriers to some small and medium-sized farms that are currently selling to schools and that it could inadvertently reduce these producers access to the school food market on which their economic security depends. Unless these barriers are removed, if this pilot is used as a precedent for other Farm to School programs where USDA is involved, it could seriously decrease the number of small and medium-size farmers who supply school food.

For example:

- 1) The vendor solicitation process seems to favor suppliers who are already USDA approved.
  - How many small or medium-scale farmers are currently USDA qualified vendors in the target states?
  - Has USDA considered any potential negative impacts of the pilot on small and medium-sized growers that are currently supplying produce to schools in FL and MI? Is USDA able to take any measures to mitigate these impacts?
  - Generally, how long does it take for new producers/vendors to become qualified USDA suppliers?
  - Can the approval process be expedited in any way for this pilot?
  
- 2) Farmers in these pilots are required to be GAP certified, or to provide documentation of their food safety and quality programs to AMS for review and evaluation. All firms submitting proposals must also meet Food Defense requirements. However, the pilot provides no food safety training for producers.
  - How does USDA intend to ensure that growers who are not currently GAP certified have the opportunity to participate in the pilot—particularly in light of the difficulty of harvest-time audits?
  - Can we get clarification that food safety and sanitation plans qualify as “other documentation,” and that third-party audits are not required?
  - Has USDA identified existing training projects that may be relevant to this pilot?
  - How does USDA plan to connect small and medium-sized growers with training resources? What assistance from organizations such as ours is needed in making those connections?
  - How does Food Defense affect growers of all sizes?

We recognize that this is a new pilot and thus that there are questions without answers. However, we strongly encourage USDA to address the aforementioned points in this year’s pilot to the maximum extent possible. If the goal for future years is to expand the pilot, this first year is the best, most effective time to test the waters, identifying challenges and opportunities. Should already-approved vendors be mandated and GAP certification without training be the norm this

year, we fear this will become the norm in years to come. It will be harder to backtrack than to include these considerations from the start.

### **Request for Proposals**

Our organizations would welcome the chance to provide additional input into the pilot. On the stakeholder teleconference, AMS acknowledged that the RFP will include numerous government requirements, and expressed a commitment to do what it can to help small firms or farmers.

- 1) How does USDA intend to help small firms and farmers with the RFP?
- 2) Would it be possible for USDA to consult with a handful of small to medium-sized producers and school district representatives as it develops the RFP, in order to remove potential barriers in advance—and thereby avoid having to help applicants overcome them down the road?
- 3) How will USDA encourage small firms and farmers to bid? What steps will be taken to ensure that no region or district is underserved by the limited reach of approved vendors?

### **Evaluation**

We understand that the evaluation plan has not yet been designed. We offer our organizations' assistance in reviewing and/or suggesting evaluation questions based on our members' expertise in increasing the availability of healthy, locally and regionally grown food in school meals in and tracking key metrics. Please let us know when such stakeholder input would be most valuable and through what channels we should provide it.

Thank you for your consideration of these questions and recommendations. We look forward to your reply, and to working with USDA to shape and implement this pilot in a way that meets the dual goals of bringing more fresh, healthy food into schools and of supporting small and medium-size local farmers.

Sincerely,

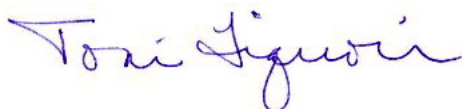
### **National Groups**



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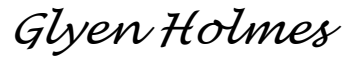


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