



April 1, 2014

U.S. Department of Agriculture
1400 Independence Ave., S.W.
Washington, DC 20250

Under Secretary Avalos and Under Secretary Concanon,

Congratulations on the passage of the five-year farm bill. Following years of advocacy on the “Agriculture Act of 2014,” both the National Farm to School Network and the National Sustainable Agriculture Coalition look forward to working with USDA on implementation of the new law, including Section 4202, the “pilot project for procurement of unprocessed fruits and vegetables” for the National School Lunch Program. We are excited about the prospect of a farm to school pilot program for multiple states, especially as farm to school programs have been increasing in popularity around the country and provide multiple benefits: improving the health of children and communities, while supporting local and regional producers and the local economy.

The National Farm to School Network (NFSN) and the National Sustainable Agriculture Coalition (NSAC) have been closely involved in advocating for the creation of a farm to school pilot program in the Farm Bill to explore a variety of local procurement options. NSAC with NFSN and other member groups crafted and secured legislative champions for the Local Farms, Food, and Jobs Act, a marker bill which included a provision creating pilot programs for at least 10 school districts to test alternative farm to school models to USDA food procurement and distribution.

As you determine next steps and details for the pilot program, NFSN and NSAC (on behalf of its 40 Represented Members¹) offer the following recommendations, which are based on initial conversations with USDA, the farm bill listening sessions, and discussions with the farm to school community.

¹ Agriculture and Land-Based Training Association - Salinas, CA; Alternative Energy Resources Organization - Helena, MT; California Certified Organic Farmers - Santa Cruz, CA; California FarmLink - Santa Cruz, CA; C.A.S.A. del Llano (Communities Assuring a Sustainable Agriculture) - Hereford, TX; Center for Rural Affairs - Lyons, NE; Clagett Farm/Chesapeake Bay Foundation - Upper Marlboro, MD; Community Alliance with Family Farmers - Davis, CA; Dakota Rural Action - Brookings, SD; Delta Land and Community, Inc. - Almyra, AR; Ecological Farming Association - Soquel, CA; Farmer-Veteran Coalition - Davis, CA; Fay-Penn Economic Development Council - Lemont Furnace, PA; Flats Mentor Farm - Lancaster, MA; Florida Organic Growers - Gainesville, FL; GrassWorks - New Holstein, WI; Hmong National Development, Inc. - St. Paul, MN and Washington, DC; Illinois Stewardship Alliance - Springfield, IL; Institute for Agriculture and Trade Policy - Minneapolis, MN; Iowa Natural Heritage Foundation - Des Moines, IA; Izaak Walton League of America - St. Paul, MN/Gaithersburg, MD; Kansas Rural Center - Whiting, KS; The Kerr Center for Sustainable Agriculture - Poteau, OK; Land Stewardship Project - Minneapolis, MN; Michael Fields Agricultural Institute - East Troy, WI; Michigan Food & Farming Systems (MIFFS) - East Lansing, MI; Michigan Organic Food and Farm Alliance - Lansing, MI; Midwest Organic and Sustainable Education Service - Spring Valley, WI; National Catholic Rural Life Conference - Des Moines, IA; The National Center for Appropriate Technology - Butte, MT; Nebraska Sustainable Agriculture Society - Ceresco, NE; Northeast Organic Dairy Producers Alliance - Deerfield, MA; Northern Plains Sustainable Agriculture Society - LaMoure, ND; Northwest Center for Alternatives to Pesticides - Eugene, OR; Ohio Ecological Food & Farm Association - Columbus, OH; Organic Farming Research Foundation - Santa Cruz, CA; Rural Advancement Foundation International – USA - Pittsboro, NC; Union of Concerned Scientists Food and Environment Program - Cambridge, MA; Virginia Association for Biological Farming - Lexington, VA; Wild Farm Alliance - Watsonville, CA.

Timeline

It is our understanding that USDA aims to implement the pilot program beginning with the 2014-2015 school year. We support this proposed timeline as we are eager to see the pilots underway. USDA has worked hard over the past few years to launch the Michigan and Florida pilots, and we know this sustained effort will contribute to the success of this new pilot program. As the most recent Michigan and Florida pilots issued RFPs in the Fall of 2013 for deliveries to be made from January 2014 to June 2014, we recommend that the RFPs for the pilot program be issued in Summer 2014 to enable deliveries for the Fall 2014 start of the school year.²

As we will discuss below, success of the new pilot program hinges on extensive outreach as well as the availability of training and technical assistance. Therefore, we recommend that implementation provide for adequate time and attention to outreach, training, and technical assistance. From the state selection process, to engaging pilot schools, to signing up farmers, there are many steps along the way that will require ample and careful planning and outreach to ensure success.

Agency Administration

We applaud USDA's decision to involve both the Agricultural Marketing Service (AMS) and Food and Nutrition Service (FNS) in the pilot program, as has occurred with the Michigan and Florida pilots. Farm to school – and specifically the local procurement aspect of farm to school – cuts across both agencies as it addresses all aspects of the school food supply chain, from the farm to the child's plate. We commend the role the Know Your Farmer, Know Your Food (KYF) initiative has played in bringing various agencies together, and we hope this new pilot program will perpetuate KYF's solid foundation of AMS/FNS collaboration. Finally, we commend the work of USDA's Farm to School team in implementing the Farm to School Grant Program and associated technical assistance and are pleased to know that this team will be involved in the pilot program.

State Selection

We encourage USDA to select states that represent the diversity of U.S. agriculture and its communities. More specifically, we recommend that USDA consider a balance of urban and rural states, in addition to including states with socially disadvantaged communities (e.g., tribal communities). Regarding the process of selecting states, we were pleased to hear during the FNS listening session that USDA will likely issue an RFP. We support this as a good mechanism for identifying states that have the interest and capacity to carry out the goals and intention of the program.

The 2014 Farm Bill Statement of the Managers for the pilot program points out that Vermont, Oregon, and New York have demonstrated experience with local procurement practices. While we do not have recommendations on the specific states to be selected, we would be remiss not to commend the efforts of Members of Congress in those three states, as well as Maine, Ohio, North Carolina, Hawaii, and Washington, who advocated for some type of a farm to school pilot program in the final farm bill. Those eight states should certainly receive serious consideration provided they have strong proposals.

² <http://www.ams.usda.gov/AMSV1.0/getfile?dDocName=STELPRDC5105530>

The National Farm to School Network connects farm to school stakeholders and initiatives across all 50 states and the District of Columbia. We are happy to serve as a resource should USDA have questions about the history of local procurement efforts in a given state or D.C.

Number of State Pilots

Based on the legislation, up to eight and at least five states will be selected for the pilot program, with one state selected from each of the following five regions of the country: Pacific Northwest, Northeast, West, Midwest, and South. We urge you to utilize the full authorization for eight pilot states. While we recognize that each additional state chosen will require extra work on the part of the Agency, we think it is important to have as many pilots as possible in order to explore and evaluate various elements of agricultural and school food supply chain diversity across the country, and to test out a variety of approaches.

State-Level Administration

Through conversations with USDA staff, it is our understanding that the pilot program will be administered in each selected state by the State Agency that currently administers child nutrition programs. While in the majority of states the Department of Education serves in this role, there are several states in which the Department of Agriculture serves in this role. While it will ultimately be up to the discretion of each state as to which state agencies to involve in the program, we ask that USDA recommend that states develop cross-agency collaborations so that education, agriculture, and even health departments all engage in some aspect of the program. Farm to school is uniquely positioned at the intersection of education, agriculture, and health and we can think of no better way to strengthen farm to school initiatives, such as this pilot program, than by engaging all important state level partners. In the long run, doing so will truly foster the goal of farm to school: supporting children, farmers, and communities.

Geographic Preference and Local Procurement

Section 4302 of the 2008 Farm Bill attempted to clarify a 2002 Farm Bill provision that created a “geographic preference” option for schools to use in the procurement process. USDA’s Final Rule explains that “geographic preference is a tool that gives bidders in a specified geographic area a specific, defined advantage in the procurement process.” NFSN and NSAC advocate for procurement of locally and regionally grown and raised foods for school meal programs, and thus, the 2008 Farm Bill “geographic preference” provision was considered a victory for our community.

Unfortunately, the legislation apparently has not provided USDA with sufficient guidance on how to implement geographic preference in light of other procurement requirements. Therefore, sadly, utilization of the geographic preference rule has been difficult for school food authorities (SFAs) wanting to prioritize local purchasing.

Given the difficulties that SFAs have had in utilizing geographic preference, we recommend that USDA provide training and technical assistance to help them in implementing the geographic preference approach that best fits their schools. Along with USDA’s geographic preference resources, there are other training materials available such as the “Schools Guide to Purchasing Washington Grown Food” created by NSAC member Washington Sustainable Food and Farming Network and the Washington State Department of Agriculture.

We are grateful that language in the 2014 Farm Bill allows for a geographic preference to be used in procurement for the pilot program. Thus, we recommend that (a) USDA make full use of the option for states to use geographic preference by identifying as many local producers and distributors in each pilot state as possible, and (b) challenges and successes for states using geographic preference be closely monitored and evaluated.

While supportive of the pilot project geographic preference language, we also continue to strongly urge the Department to clarify its implementation of the geographic preference language from the 2002 and 2008 Farm Bills on a nationwide basis. We recommend the Department allow school districts to use locally grown and locally raised as a product specification. This change, we believe, would clear up the ongoing problems with implementation of the farm bill language.

Innovation

As a pilot, we believe it is important for USDA to allow a wide range of possible options and innovations to test out and evaluate. In the RFP, the Department should encourage and welcome different approaches to increasing local and regional procurement of fruits and vegetables. Once particular pilot options have been chosen, we believe it is important that USDA (and administering State Agencies) clearly articulate to participating farmers and SFAs the unique role of the particular pilot program options in a particular state.

For example, in some instances, USDA might “certify” farmers for participation and then make the food purchases on behalf of schools. In other instances, the school district might be making the food purchases itself. Some pilots may utilize existing food service delivery, while others might use food hubs to procure local fruits and vegetables for schools. Additionally, many schools have found forward contracting to be an effective tool for local procurement and we would like to see at least one pilot testing the utility and benefits of this approach.

The pilot program should also include among its components distribution and delivery services that provide for open and fair competition. Thus, USDA should allow for both large and small distribution and delivery companies who understand local procurement to work with schools within the pilot program. A unique opportunity for innovation is presented through this pilot program, and inclusion of a diverse range of distribution and delivery services is important in exploring all innovative approaches to local procurement for schools.

No particular option should be precluded. Awards should be made with an eye toward encouraging diversity and innovation. Each selected pilot should include an evaluation component that will allow the Department and other states and school districts to learn from the successes and failures of the full range of pilot projects.

Outreach, Training, and Technical Assistance

As we have discussed with USDA staff, this pilot program will realize success only if there are a sufficient number of farmers and SFAs signed up to participate. NFSN and NSAC encourage USDA to develop a robust outreach effort associated with this pilot program. USDA is uniquely situated with field offices where farmers actively seek services and information. USDA could create promotional materials, such as flyers, for these field offices to distribute to farmers about the pilot program.

Additionally, the Office of Advocacy and Outreach could also assist in promoting the program. In light of the increases in minority farmer ownership as indicated by the February 2014 preliminary report on the USDA Agriculture Census, we encourage USDA to coordinate with State Agencies and local stakeholder organizations to target pilot program outreach efforts to socially disadvantaged farmers and to provide interpretation services and translated outreach materials in languages utilized by minority farmers, such as Spanish, Hmong, and Korean.

Not only are farmers going to need to know about the program, but schools will also need to buy in to the concept of purchasing fruits and vegetables through a new channel. USDA could use the same outreach approach used for the recent USDA Farm to School Census to notify SFAs in selected states of the new pilot program and provide them with information and promotional materials. We encourage USDA to work with the implementing state agencies to conduct outreach and promotion efforts to both farmers and SFAs.

Finally, we ask that the excellent resources developed through USDA's Farm to School Program be distributed to schools in target states. These broad-ranging resources will be useful in promoting farm to school and its many benefits.

NFSN and NSAC are fully committed to doing our part to assist with outreach and technical assistance. We will use channels such as our e-newsletters, social media, blog posts, and webinars to help promote the program. We will also ask our partners to help spread the word. Given NFSN's unique structure in having a farm to school State Lead in each state and NSAC's presence around the country with grassroots organizations working with small, beginning, and socially disadvantaged farmers and ranchers, we are confident that the NFSN and NSAC will be able to serve in assisting farmers and schools alike.

Requiring Food Safety Certification

Given that GAP (or GFSI) certification will be required of participating farmers, it is imperative that there be training and technical assistance provided to support farmers in attaining this certification. With the costs and time commitments required of certification, we fear the smallest, newest, and most underserved farms will be discouraged from participating.

We know that USDA has been exploring "group GAP" and other food safety training models to address these barriers. We encourage USDA to include GAP training in the pilot program training and technical assistance that will be provided.

Additionally, we recommend that, as noted in the October 2013 Information Sheet for the 2014 Fresh Produce Pilot for schools in Michigan and Florida,³ that suppliers be allowed to show proof of GHP/GAP certification from either USDA or from an accredited third party.

Finally, we encourage USDA to explore the possibility of providing a GAP certification cost share option; this would be extremely helpful in ensuring participation by small, beginning, and socially disadvantaged farmers.

³ <http://www.ams.usda.gov/AMSV1.0/getfile?dDocName=STELPRDC5105250>

Small, Beginning, and Socially Disadvantaged Farmers

The farm to school community involves a wide range of farmers and ranchers. We encourage USDA to maximize Section (f)(2)(A) of the program, which states that a purpose of the program is to “utilize *multiple* suppliers”. Oftentimes, small, beginning, and socially disadvantaged farmers are reluctant to participate in large USDA programs like USDA Foods and DoD Fresh due to a perception that they do not have enough product quantity or farming experience or simply due to a lack of historical interactions with USDA. However, it is these farms that are often most interested in selling to schools in their own community. With the next generation of farmers as a top priority for Deputy Secretary Harden, we believe the pilot program provides a perfect opportunity to engage these farmers in the school food supply chain. We encourage USDA and participating states to target pilot program outreach efforts to small, beginning, and socially disadvantaged farmers and to collaborate with state agencies and local stakeholder organizations on materials, trainings, and technical assistance, including those requiring languages other than English.

Included Products

The Michigan and Florida pilots were originally slated to focus on only six products: lettuce, apples, grapes, oranges, carrots, and blueberries (and in the latest pilots include two additional products, broccoli and strawberries). We encourage USDA to take a broader approach with the new pilots, allowing participating states to include greater variety.

First, since the number and locations of states involved will be expanding, it is important to keep in mind the regional diversity of crops. We do not want to exclude other fruits and vegetables that might be common to a specific region but not included on the Michigan and Florida pilots list of eight products.

Second, while we understand that an important objective of the program is to explore alternative procurement methods for the current crops being served in schools, we also think it would be worthwhile to use the pilot program as an opportunity to increase children’s access to a diverse array of fruits and vegetables that grow in their communities and regions as a way to bolster health and nutrition education, as well as to strengthen local economies by supporting more farmers.

Third, given that one of the goals of the pilot is to explore procurement of local products to benefit local producers and school districts, it will be important to have a broad range of crops that will be spread out over the course of the school year and to take advantage of the seasonality of produce. Additionally, to the extent possible, SFAs with previous farm to school experience should be encouraged to identify and document produce seasonal availability and promote school menus that reflect this seasonal availability.

Evaluation

In order to measure the effectiveness of the innovative options utilized by the various schools and states in their pilots, USDA should provide a robust evaluation mechanism that measures impact along the school food supply chain. With a strong evaluation component linked to the pilot program, further light will be shed on important questions including, but not limited to: What are the most profitable models for farmers engaging in the school food supply chain? Does profitability vary across agricultural product sectors when farmers engage in farm to school? Are there barriers

or opportunities to be addressed through policy or programmatic change? By identifying the economic viability of farm to school procurement, these pilot programs will help attract more farmers to participate in farm to school. As schools increase their participation in local food procurement, the need for a steady supply of local products will grow, thus requiring more participation from local food producers.

Supporting Farm to School

In conclusion, we would like to thank you again for USDA's tireless efforts in the last few years to implement the Michigan and Florida pilots and to thank you in advance for all you will do moving the farm bill pilot program forward. We are excited to see the program rolled out to foster greater innovation and efficiencies in farm to school procurement. By providing more options for schools to participate in local procurement, USDA highlights its support for the farm to school community and the concept of local procurement. Thank you for all you do to support children, family farmers, and communities.

Please feel free to contact us with any questions and let us know how we can be of help going forward.

Respectfully,



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