Pennsylvania Local Food Purchasing Incentive Investigation

Findings From Interviews and Focus Groups with Key Stakeholders Within and Outside of Pennsylvania
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# Pennsylvania Local Food Purchasing Incentive (LFPI) Investigation – Findings From Interviews and Focus Groups with Key Stakeholders Within and Outside of Pennsylvania

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Executive Summary

Through Local Food Purchasing Incentive (LFPI) programs, state governments provide School Food Authorities (SFAs) additional funds to partially or completely offset the cost of local food as an incentive to purchase these foods and serve them in Child Nutrition Programs (CNP). An investigation was undertaken to gather information and perspectives about LFPI programs from various stakeholders both in states that have existing programs and within Pennsylvania. Information collected is intended to inform possible future decisions and efforts related to the potential establishment of a program in Pennsylvania. However, this information may also have value for groups outside of Pennsylvania who may be interested in establishing LFPIs or conducting similar investigations.

Qualitative data collection included the following:

1. Interviews with state agency employees (referred to as LFPI program administrators) representing six states that have LFPI programs.
2. Interviews with 10 CNP operators from five different states who participate in LFPI programs.
3. Three focus groups with a total of 24 Pennsylvania CNP operators.
4. Interviews with individuals representing eight suppliers of Pennsylvania-produced food.
5. Interviews with individuals representing two Pennsylvania state agencies that might be involved in administering a LFPI program if one was established in Pennsylvania.

Transcripts of all interviews and focus groups were developed and then summaries were developed based on the transcripts. An expert panel of nine individuals representing state agencies, CNP operators, non-profit organizations, and a producer-facing organization was recruited. Panel members were assigned selected data summaries to review so that each summary was reviewed by four panel members, who provided feedback and key takeaways through online forms. Feedback was compiled and presented to the expert panel during a 90-minute virtual meeting where it was discussed, and additional key takeaways and best practices were identified.

Key Takeaways and Best Practices

LFPI Program Design

- Legislative language for an LFPI program that is broad and general allows room for flexibility to be able to adapt and evolve as needed.
- State agency input into the development of LFPI program legislation is critical to ensure that the program is feasible and positively impacts the stakeholders involved.
- Funds would be needed for LFPI program administration and to support changes to existing systems or establishment of new systems to allow for
collection of required documentation.

- LFPI programs need to provide SFAs with a meaningful amount of funding to generate interest in participating in the program and impact participating CNP operators’ purchasing behavior.

- Short-term funding creates challenges for CNP operators and suppliers as it can lead to hesitation about changing mindsets and practices related to farm to school relationships because of concerns that the funding will not be sustained.

- Allowing some funds to be used for equipment purchases helps build necessary infrastructure for SFAs to be able to make use of the local products.

- Overly complex reimbursement structures and application requirements and lack of consistency in requirements and application review can create confusion and mistrust and be a barrier to participation in LFPI programs.

- Consider program objectives in deciding whether milk will be an incentivized purchase.

- LFPI programs for early care and education (ECE) settings may need to be designed differently than those for school settings given their unique needs and challenges.

**LFPI Program Administration**

- Dual agency approaches to LFPI program administration are error prone, cumbersome, and may delay decision-making.

- When considering the state agency that will be responsible for administering a LFPI program, consideration should be given to the current system and platform capacity within the agency and CNP operators’ familiarity with those systems and platforms.

- The plan for disbursing payments to SFAs should include input from the administering agency’s fiscal team to ensure that it is feasible.

- Strategies to ease the reporting burden on CNP operators associated with LFPI program participation, such as use of automated processes and existing platforms should increase CNP operators’ interest in participating.

- LFPI program administrators should clearly define qualifying purchases, including the definition of “local” and the criteria for processed products to qualify.

- LFPI programs employing universal eligibility should include strategies to ensure allocated funds will not go unused.
**LFPI Program Implementation**

- Partnerships are vital in supporting LFPI programs. Partners play advocacy roles, assist in providing training and technical assistance, and conduct program evaluations.
- Training and technical assistance needs for CNP operators are likely to include topics such as program requirements, connecting with local producers, procurement regulations, culinary skills, and food safety.
- LFPI program administrators cited food hubs as playing critical roles in LFPI programs by assisting with producer outreach and because of their ability to scale up to meet demand, provide required documentation, assume some responsibilities to lessen the burden on individual producers, and aggregate products to meet the needs of participating SFAs.
- Assessing the program impact and sharing the results can garner support and improve the likelihood that the program will be sustained.
- Informing suppliers about LFPI program documentation requirements in advance of program initiation might reduce some barriers and give suppliers time to make operational changes to provide documentation to SFAs.
- CNP operators’ requiring documentation from suppliers might be more effective than requests from state agencies, as CNP operators represent suppliers’ customer bases.

**Pennsylvania Farm to Child Nutrition Environment to Support a LFPI Program**

The Pennsylvania farm to child nutrition environment includes many initiatives, supporting organizations, and resources that could provide support for a LFPI program including a state farm to school network, a LFPI pilot program, a Pennsylvania Harvest of the Month program, farm to institution grower sessions, culinary trainings for CNP operators, farm to child nutrition summits, farm to early care and education initiatives, and more.
**Introduction**

Core elements of farm to school include educational activities for students related to food, agriculture and nutrition, gardens through which students engage in hands-on, experiential learning, and procurement of locally produced foods which are served in cafeterias or offered as taste tests. Farm to school programs benefit students by providing access to high-quality, nutritious foods and enhancing classroom education related to food, nutrition, and agriculture. Farm to school programs also have the potential to strengthen local economies by creating increased market opportunities for local producers and promoting family and community engagement.

Participation in farm to school activities is growing in recent years with the majority (57 percent) of SFAs responding to a 2019 USDA Farm to School Census survey indicating that they began participating during the previous three years. Procurement of local foods was the most common way SFAs indicated being involved in farm to school efforts with 80 percent of respondents who were involved in farm to school activities indicating that they served local foods and spend, on average, 20 percent of their total food expenditures on local foods (8 percent if local milk is not included). Results for Pennsylvania SFAs were similar to the national data.

While the benefits of participating in farm to school activities and procuring and serving local foods in CNPs are recognized, SFAs experience challenges and barriers to local procurement. Common constraints include limited availability of local foods, difficulty in finding local producers, delivery challenges, costs of local items, and lack of staff time to prepare local foods.

An increasing trend at the state level to encourage local food procurement for CNPs is the introduction of Local Food Purchasing Incentive (LFPI) programs usually established through state legislative action. Through these programs, state governments provide SFAs with additional funds to partially or completely offset the cost of local food. Some programs also allow a portion of the funds to be used for non-food items such as equipment and staff time. A detailed report, generated as a result of interviews with state-level coordinators in 15 states, presents an analysis of existing statewide LFPI programs, provides extensive information about the design of these programs, and includes recommendations for researchers, non-profit partners, incentive program designers, policy makers, and state farm to school coordinators.

While Pennsylvania has a competitive Farm to School Grant Program, established in 2019 through the PA Farm Bill, and administered through the Pennsylvania Department of Agriculture, there are no requirements that the funds must be used to support local procurement. Invoices must show that the food was produced on a Pennsylvania farm, but there is not a tracking mechanism beyond the invoices submitted for reimbursement. Eligibility is limited to schools serving students in pre-kindergarten through eighth grade. Therefore, a traditional LFPI program, in terms of program requirements and eligibility, does not exist in Pennsylvania.

The work described in this report was undertaken to gather information and perspectives about LFPI programs from various stakeholders both in states that have existing programs and within Pennsylvania and is intended to inform possible future decisions and efforts related to potential establishment of a program in Pennsylvania. However, this information may also have value for groups outside of Pennsylvania who may be interested in establishing LFPIs or conducting similar investigations.
Methods
Data-Gathering: Focus Groups and Interviews with Key Informants
Five stakeholder groups were identified as key informants in the data-gathering process.

Two groups involved individuals outside of Pennsylvania:

1. State agency employees who are involved in administering LFPI programs, who will be referred to throughout this report as LFPI program administrators
2. CNP operators who participate in LFPI programs

Three groups included individuals within Pennsylvania:

1. CNP operators
2. Suppliers of Pennsylvania-produced foods
3. State agency employees representing agencies that typically administer LFPI programs

Structured interview forms were developed for each group (see Appendix A). Prior to finalization of the interview questions for the LFPI program administrators, a short discussion was held with Pennsylvania’s State Director of Child Nutrition Programs to identify questions for state agencies administering these programs. Information from this discussion was used to revise and add to the initial interview questions. All interviews/focus groups were conducted virtually, through Microsoft Teams, and were recorded with the consent of the participants. Each interview/focus group was facilitated by one of the Co-Project Directors with the other asking clarifying questions as needed. Interviews and focus groups took place from January to June of 2023.

Stakeholder Groups in States with Existing LFPIs
Seven states were identified for recruitment of LFPI program administrators in their respective states. Criteria used to select the states included variability in the administering agency (LFPIs are largely administered either through the state Department of Education or Department of Agriculture) and in the length of time the program had existed. Similarities to Pennsylvania in terms of size and climate were also considered. Messages were sent via e-mail to LFPI program administrators representing the seven identified states requesting participation in a 60-minute interview. Individuals representing six states responded and agreed to the interview. Topics discussed included the following:

- Program establishment
- Project partners
- Reporting requirements
- Disbursement of funds to SFAs
- Training and technical assistance for SFAs
- Producer outreach
- Funds for program administration
- State agency appropriateness to administer the LFPI program
- Eligibility determination - advantages and disadvantages
- Program administration challenges
- Advice/lessons learned

LFPI program administrators who participated in the interviews represented the following states:

- Maine
- Michigan
- Minnesota
- New York
- Vermont
- Washington

Information about key aspects of each of these states’ LFPI program can be found in Appendix B.
At the completion of each interview, a request was made for contact information for a sample of CNP operators who participate in each state’s LFPI program for the purpose of interview recruitment. E-mail messages were sent to 11 CNP operators inviting their participation in a 60-minute interview. Ten CNP operators, all of whom were school food service directors, responded and agreed to be interviewed. Stipends of $100 were offered to each operator. Topics discussed during the interviews related to participation in the LFPI program included the following:

- Length of participation
- Impact on local purchasing behavior
- Financial impact
- Challenges
- Time commitment
- Training and technical assistance needs
- Reasons for participating
- Reasons some CNP operators do not participate

**Stakeholder Groups Within Pennsylvania**

An e-mail message was sent by PDE to all contacts for CNPs in Pennsylvania to recruit for participation in focus groups. The topic of the focus groups was framed as a discussion about local purchasing experiences. Participants were selected on a first-come, first-served basis and were offered $100 stipends for their participation. Participants were asked to complete a short on-line survey prior to each focus group to gather information about their current local purchasing practices and their awareness of LFPI programs. Thirty CNP operators were initially recruited with 10 CNP operators assigned to each of three focus groups, each planned to last 60 minutes. One focus group consisted of CNP operators representing ECE settings. The other two focus groups consisted of CNP operators representing school settings. Because LFPI programs were fairly unfamiliar to this group, a short overview presentation was developed to describe them and was conducted at the start of each focus group. Twenty-four CNP operators participated in the focus groups with each group ranging from seven to nine participants. Topics discussed included the following:

- Perceived value of a LFPI program in encouraging local purchasing
- Desired goals of a LFPI program
- Anticipated documentation/reporting challenges
- Anticipated training and technical assistance needs
- Anticipated supplier challenges
- Recommendations for operationalization of a LFPI in Pennsylvania

E-mail messages were sent to individuals representing nine entities involved in supplying Pennsylvania-produced food to schools. These included individuals representing regional produce distributors, broadline distributors, and the state Extension agency. Individuals representing eight entities responded and agreed to participate in 30-minute interviews. As was the case with the CNP operator focus groups, because it was assumed that this group was unfamiliar with LFPI programs, a short presentation was developed and conducted at the start of each interview. Topics discussed during the interviews included the following:

- Efforts to make Pennsylvania-produced foods available to customers
- Ability to respond to change in demand for products
- Ability to provide documentation for Pennsylvania-produced foods
- Anticipated outreach/training needs upon establishment of a LFPI program

In the majority of cases, LFPI programs are administered at the state level by either the Department
of Agriculture or the Department of Education. Therefore, individuals within both of these agencies in Pennsylvania were asked to participate in separate 60-minute interviews. The individuals who were contacted were those who would likely have oversight responsibilities if their agency assumed responsibility for administering a LFPI program. Prior to the start of each interview a presentation was shared which reviewed information about LFPI programs and also included selected pieces of information collected through the previous interviews and focus groups. Topics discussed included the following:

- Staffing needs and challenges related to administering a LFPI program
- Preference for eligibility determination for a LFPI program
- Documentation collection systems
- Payment disbursement systems
- Training and technical assistance capacity
- Anticipated key partners
- Other thoughts related to agency’s ability to administer a LFPI program

Data Compilation
Transcripts of all interviews and focus groups were automatically generated through Microsoft Teams. Transcripts were downloaded and edited for correction. In some cases, recordings were reviewed to fill in missing information or clarify statements that appeared in the transcripts, which were reviewed by both Co-Project Directors. While retaining the original transcripts, bulleted data summaries were developed for each interview and focus group by one of the Co-Project Directors and reviewed for accuracy and completeness by the other. Each data summary was approximately two pages in length.

Data Review, Analysis, and Synthesis
An expert panel of nine individuals was recruited. Expert panel members represented state agencies, CNP operators, non-profit organizations, and a producer-facing organization. Each expert panel member participated in one of two 30-minute virtual meetings to provide an overview of the project and discuss expectations of panel members. Data summaries were divided to create nine review assignments that would ensure that two expert panel members reviewed each data summary. Each Co-Project Director reviewed all data summaries, resulting in review of each data summary by four individuals. Following the initial meeting, expert panel members completed an on-line form to express preferences for data review assignments. These preferences, along with each panel member’s background and area of expertise, were considered when making assignments.

Data review assignments appear on the next page.
<table>
<thead>
<tr>
<th>Assignment #</th>
<th>Summary Review Responsibilities</th>
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</table>
| 1            | Maine LFPI Administrator Interview (1) & Maine CNP Operator Interviews (2)  
              | Minnesota LFPI Administrator Interview (1) & Minnesota CNP Operator Interviews (2) |
| 2            | Michigan LFPI Administrator Interview (1) & Michigan CNP Operator Interviews (2)  
              | New York LFPI Administrator Interview (1) & New York CNP Operator Interviews (2) |
| 3            | Washington LFPI Administrator Interview (1) & Washington CNP Operator Interviews (2)  
              | New York LFPI Administrator Interview (1) & New York CNP Operator Interviews (2) |
| 4            | Michigan LFPI Administrator Interview (1) & Michigan CNP Operator Interviews (2)  
              | Minnesota LFPI Administrator Interview (1) & Minnesota CNP Operator Interviews (2) |
| 5            | Maine LFPI Administrator Interview (1) & Maine CNP Operator Interviews (2)  
              | Vermont LFPI Administrator Interview (1) |
| 6            | Washington LFPI Administrator Interview (1) & Washington CNP Operator Interviews (2)  
              | Vermont LFPI Administrator Interview (1) |
| 7            | Pennsylvania CNP Operator Focus Groups (3)  
              | Pennsylvania State Agency Interviews (2) |
| 8            | Pennsylvania CNP Operator Focus Groups (3)  
              | Pennsylvania Suppliers of Pennsylvania-Produced Foods Interviews (8) |
| 9            | Pennsylvania State Agency Interviews (2)  
              | Pennsylvania Suppliers of Pennsylvania-Produced Foods Interviews (8) |

Data summaries were placed into shared folders and expert panel members were given access to these folders. They were also given access to the complete transcripts and were invited to review those if they wanted information beyond what was provided in the summaries.

Online forms were developed for each data summary category to collect feedback about key topic areas and key takeaways from review of the summaries. Expert panel members were asked to complete the forms corresponding to their review assignment. The Co-Project Directors compiled all feedback and developed a PowerPoint presentation summarizing the information collected. The expert panel convened for a 90-minute virtual meeting during which the summarized information was reviewed and key takeaways and best practices that emerged from the data review were discussed, as well as a plan for generating a report of the information.
Results

The results of this investigation are presented within topic areas discussed, incorporating findings from interviews and focus groups with stakeholders as appropriate.

Program Establishment

In most cases, LFPI programs were established as the results of advocacy efforts. Some have gone through evolutions to get to their current state as described below.

- Minnesota had a program that focused on grants to support SFAs in purchasing and updating equipment to allow them to process locally grown foods and then pivoted to allow funds to be used for local food purchases.
- Maine’s program initially passed with no funding attached to it and was then brought back to the legislature with a funding request.
- Michigan’s program began as a regional pilot in an agricultural area with pre-existing farm to school relationships and eventually expanded into a statewide program.
- New York’s program began through an advocacy-led effort to increase the state’s school meal reimbursement from six cents per meal to 25 cents per meal. The additional funding was used as a vehicle to incentivize local purchasing by only making it available to SFAs that reach New York’s local purchasing benchmark.
- In Washington, the program originated in the wake of the COVID-19 pandemic through a statewide food policy forum that was tasked by the governor to make recommendations to strengthen and create a more resilient food system. The recommendation for an LFPI program had appeared in a previous report by this group but was elevated during the pandemic to support school food budgets. Initial financial support for the program was through funds received by the state through the American Rescue Plan Act.

In Pennsylvania, one of the state agencies emphasized the importance of state agency involvement in LFPI program design in order to establish a program that is feasible to administer and not overly burdensome for the state agency or the SFAs. Informal communication between state agencies and partners that might be involved in advocating for a program were considered critical to designing a successful program. A recently established state food policy council was identified as a possible avenue through which to assess the level of support for a LFPI at the legislative and executive levels of state government. Establishment of a program in a pilot or roll-out format, beginning with a small number of schools before expanding to a statewide program, was also mentioned as a possible strategy to allow for refinement of program logistics prior to statewide roll-out.

Eligibility Models

Among the states involved in this investigation, a variety of strategies were used for determining eligibility for a LFPI program including competitive grant applications, universal eligibility, and performance-based eligibility.

An advantage of the use of a competitive grant application process that was mentioned, is that it requires SFAs to have plans in place for use of the funds and to have established connections with suppliers. Disadvantages include a lack of confidence in grant-writing skills among some SFAs and a concern among SFAs about allocating time to complete a grant application that might not be funded. It should be noted that, among the states involved in this investigation that employ a competitive grant application process, to this point the process has not been highly competitive given that the funds available have been adequate to fund most, if not all, applications.
Universal eligibility allows all SFAs to participate and does not require grant-writing which can be intimidating and time-consuming.

Performance-based eligibility models involve awarding funds to schools based on their achievement of established local procurement thresholds. A noted advantage of this model is that it demonstrates commitment to local purchasing and the ability to make connections with suppliers on the part of the SFAs involved. A disadvantage is that SFAs do not see a return until they have worked to achieve the threshold. Performance-based models, if based on a percentage of total food costs spent on local foods, may also incentivize SFAs to purchase more expensive local items to reach the threshold. Also, in the case of the New York program, because only costs related to reimbursable school lunches are considered in the calculation, SFAs must separate breakfast and lunch costs which can be cumbersome and may divert local foods away from the School Breakfast Program.

In some cases, formulas used to determine eligibility, the funding level available to SFAs, and even the name by which the program is referred have created confusion for SFAs which is sometimes a barrier to participation. For example, a Michigan informant stated that the program name, “10 cents a meal,” has led some CNP operators to think they would receive 10 cents for every meal that included a local component, which would be very cumbersome to track and could discourage participation. However, the program provides funding of up to 10 cents for every meal served the previous year in a CNP. Similar confusion was noted in New York in which an additional 19 cents per lunch meal is provided overall. Although not specifically asked, some informants in states with existing programs mentioned that SFAs’ free and reduced-price meal percentage is or is not considered as criteria in the award selection. One CNP operator in a state that considers this among their criteria expressed concern that their school district may not receive an award in the future, based on a low free and reduced-meal percentage, if applications from school districts with higher free and reduced meal eligibility increase. In a Pennsylvania CNP operator focus group, a participant expressed a hope that this would not be considered among the criteria as their school district is excluded from many funding opportunities because of a low free and reduced meal percentage.

Performance-based programs and competitive grant programs, by their nature, favor SFAs with farm to school experience. At least one state mentioned that consideration of this experience is part of the LFPI legislation. One Pennsylvania state agency representative expressed a hope that, if a program were to be established in Pennsylvania that was competitive in nature, a scoring system could be set up to favor SFAs with little experience.

“I think that you would need to come up with a scoring matrix that would give credit to schools that have not had some type of program in the past. Give them an opportunity to get a foothold into doing something like this. We talk about equity. I don’t want to see a smaller school, a more rural school that has smaller staffing capacity, lose out to schools that have larger staff or already have experience in this.”

LFPI program administrators mentioned being constrained, in some cases, by the specific legislative language and advised that legislation be broad and flexible. There were also constraints related to state agency capacity. One state agency representative in a state that uses a competitive grant application process speculated that a universal eligibility model would generate more participation, but they are constrained by the legislative language which specified that the funds would be awarded through a competitive process.

Pennsylvania informants from both state agencies agreed that the eligibility model used should be based on the amount of funding available. If funding is adequate, a universal eligibility model is preferred as it is the more equitable model. However, if funding is limited, in order to provide SFAs with a mean-
ingful amount of funding, a competitive process is preferred.

**Reporting Requirements**

The states involved in this investigation have varying systems for SFAs to use to document local purchases. Some collect documentation on a monthly or quarterly basis through the submission of a spreadsheet. In Michigan, documentation is submitted through the platform used by the Department of Education to conduct Administrative Reviews of SFAs. In Maine, documentation is submitted to the Department of Education along with monthly meal claims for reimbursement. A Maine informant expressed the importance of using an existing system, that is familiar to SFAs, for reporting purposes.

"I think that’s essential (that reporting be within an existing platform) ... we realize that any kind of tracking and reporting is so much of a burden that it becomes a barrier and schools aren’t likely to use it. So, in Maine, as part of their monthly claims, there’s a little line right there – ‘Local foods fund - upload your receipt’ that clearly show what items you’re seeking reimbursement for and enter the amount that you’re seeking for reimbursement, so it was right there. They see it every month when they’re filing their claims and that’s not an extra step.”

Because New York and Vermont employ performance-based systems, reporting is done related to the prior school year. In New York, SFAs complete a spreadsheet reporting the New York food purchases that they made throughout the previous school year that were served as part of reimbursable lunch meals and the local food costs as a percentage of total food costs is calculated to determine if the SFA has met the local procurement threshold. SFAs are audited the first year and every third year. This audit involves submission of all invoices with spot-checking being done on three weeks, three different products. In Vermont, additional questions were added to the financial report that SFAs are required to submit each December for other purposes. These questions assess the percentage of total food costs that were local purchases to determine eligibility and funding level. Currently all applicants are audited (submission of 10 receipts) but, in the future, only a subset will be audited. Otherwise, there is no reporting or receipt collection. The specific information collected across states varies but often includes the date of purchase, paid date, farm name, farm location, item description, item quantity, and county of origin. For processed products, product formulation statements are required.

The practice of using an existing platform that is already familiar to SFAs was encouraged by Pennsylvania CNP operators in focus groups if a program were to be established in Pennsylvania. They mentioned a reporting form developed by PDE to track Supply Chain Assistance funds as very user-friendly and suggested that a system modeled after that should be considered. The Pennsylvania Department of Agriculture (PDA) does not have a system through which documentation is routinely collected from SFAs but indicates there is potential to develop one within PA Meals, the platform through which SFAs currently manage their USDA Foods allocations. The Pennsylvania Farm to School Grant Program applications, administered by PDA, are collected via the Department of Economic and Community Development (DCED) online grants system. PDE is able to collect documentation through their Child Nutrition Program Electronic Application and Reimbursement System (CN PEARS), but modifications would need to be made to accommodate collection of documentation related to a LFPI program. Modifications to the PA Meals and/or CN PEARS system would have cost implications.

**Disbursement of Funds to SFAs**

State agencies that administer CNPs provide meal reimbursements to schools and therefore have existing systems through which to channel funds to SFAs. In the majority of cases, the Department of Education is the agency that administers CNPs and
has this capability. In two states in this investigation in which the LFPI program is administered through the Department of Agriculture, since they do not have systems in place to make payments to schools, payments are made through the Departments of Education. One state agency informant described this dual agency approach as “clunky and error prone.” In one state agency in which the program is administered through the Department of Agriculture, payments are made through that agency.

The process for disbursing funds to SFAs varies in states in which the LFPI program is administered through the state Department of Education. In Maine, payments are made through meal reimbursements. In Vermont, their existing system for meal reimbursements does not allow for lump sum payments so disbursement of funds is done outside of this system. In Michigan, calculations are performed outside of the reporting platform and a report is uploaded and payments are made through the system through which schools receive state aid dollars.

PDA is able to provide payments in the form of grants via the DCED grants platform. If the program would require another type of payment, a system would have to be developed, for which funds would be needed through the LFPI program legislation or via State Administrative Expense funds, perhaps through a cost-sharing scenario with PDE. Through CN PEARs, PDE can disburse funds on a per meal or lump sum basis. Alternately, PDE’s eGrants platform could be used to collect applications, with payments being channeled through the comptroller’s office and treasury.

State Agency Perceived Appropriateness to Administer LFPI Program

In all cases, the LFPI program administrators communicated beliefs that their agency was the appropriate agency to administer the program. Representatives from Departments of Education felt their agency was appropriate because they administer the CNPs. Representatives from Departments of Agriculture felt their agency was appropriate because of their connections with producers or lack of farm to school focus at their Department of Education. One LFPI program administrator at a Department of Education felt that, if the program were to be administered through the Department of Agriculture, the Department of Education would have to be heavily involved. One CNP operator in a state in which the program is administered through the Department of Agriculture expressed confusion about why that is the administering agency when the Department of Education administers the CNPs. A dual agency approach was described by LFPI program administrators as challenging.

In the Pennsylvania state agency interviews, both state agency representatives identified areas within their respective agencies where they felt the program could fit administratively. Although a dual agency approach was discussed, they anticipated challenges with this approach, including delays in decision-making when navigating two state agencies. The PDA representative felt that if the program were to be administered through PDA, they would likely need support from PDE to disburse funds to SFAs and to provide training on local food procurement.

Time Required and Funding Source for Program Administration

In most cases, LFPI program administrators reported that program administration requires one full-time equivalent (FTE) which is funded through the incentive legislation, with additional staff involved in some cases. In one state in which the program is administered through the Department of Agriculture, an interagency agreement is in place with the Department of Education to support 0.6 FTE for staff time to manage disbursement of funds to SFAs. No administrative funds were allocated in the New York legislation. Two people are involved in LFPI program administration with plans to hire two additional staff members. The LFPI program administrator in Vermont reported that less than one FTE is needed for program administration.
In Pennsylvania, both state agency representatives anticipated that one FTE would be required for program administration and funds would be needed for that position. However, there was also recognition that the amount of time needed would vary depending on the complexities and demands of the specific program. Within PDE’s Division of Food and Nutrition, all but one staff position is federally funded and staff members that are fully federally funded cannot work on state initiatives, so state funding would be needed. The PDA state agency representative mentioned a current effort by that agency to attempt to hire a farm to school coordinator, but that, if that position comes to fruition, LFPI program administration could not be that person’s full-time role. There was also discussion about challenges in filling positions within PDA.

Key Partners

LFPI program administrators mentioned a variety of partners that played key roles in supporting LFPI programs in their states and valued the roles that they played. Most often mentioned were state farm to school networks, non-profit organizations, Departments of Education/Agriculture, and Extension. Others that were mentioned included anti-hunger coalitions, anti-obesity advocates, school garden networks, and universities. Partners played a variety of roles including advocating for the LFPI programs, supporting SFAs in local purchasing efforts, conducting or assisting with training and technical assistance, and conducting program evaluations. New York has formalized a partnership with Cornell Extension, whom they refer to as their “most important partner.” The state provides funding for Extension to have regional coordinators throughout the state, described as “the boots on the ground,” managed by a team leader. They assist SFAs in a variety of ways including developing bid specifications, locating suppliers, tracking purchases, and developing resources.

The Pennsylvania state agency representatives envisioned similar partnerships to support a program in Pennsylvania and mentioned the regional USDA, Food and Nutrition Service office as potentially playing a support role. They also envisioned education and school food service professional organizations as partners.

Training and Technical Assistance for SFAs

States provide training and technical assistance related to LFPI programs for SFAs in a variety of formats. Many mentioned holding monthly “office hours” during which SFAs can have their questions addressed. Other formats include webinars, one-on-one assistance, websites, networking opportunities, and in-person sessions. Topics addressed include the following:

- Application and reporting processes
- Program requirements (e.g., qualifying products, definition of local)
- Purchasing local produce and meat
- Harvest of the Month
- Food safety
- Culinary training
- Procurement regulations
- Writing bid specifications
- Connecting with local producers

A Washington CNP operator mentioned that a presentation about procurement regulations by the person responsible for conducting SFA procurement reviews was very helpful. A Minnesota CNP operator mentioned that a food safety and Good Agricultural Practices training was very helpful even though it was geared toward producers. Several CNP operators mentioned the need for culinary training for their staff, in particular related to processing of local produce. A Minnesota state agency representative mentioned that they receive requests for culinary training for school food service staff but it’s not something they currently offer. In Maine, SFAs receive an additional $500 if their staff is represented at a culinary training. The need for this type of training was explained by a New York LFPI
“Most schools got away from scratch cooking, and so that’s a big piece of bringing local food in and bringing unprocessed produce into your building. You have to have folks that know how to safely handle it and beyond safely handle it, make it into something that kids are going to eat.”

The Maine LFPI program administrator reported that they conducted a survey of SFAs to try to understand the underutilization of their program and found that SFAs struggled with finding local producers. Based on this finding they began to use the information from receipts submitted by SFAs to track the farms from which SFAs were purchasing and the items being purchased to create a farm to school map that SFAs can use to locate local producers and producers can use to identify items that SFAs are interested in purchasing.

Training needs that Pennsylvania CNP operators identified generally aligned with the training topics offered in other states. In particular, they mentioned a need to make connections with local producers as efficient as possible. Suggestions included provision of a list of approved producers and products, a platform such as the one used for the Department of Defense (DOD) Fresh Program that would only include Pennsylvania products, or regional representatives to connect SFAs with local producers. They also mentioned the need for clear definitions of qualifying items and training on procurement regulations, processing of local products, documentation requirements, and food safety.

Both Pennsylvania state agency representatives stated that their agencies have the capacity to provide the training and technical assistance that would be needed to support a LFPI program and that the training could be virtual or in-person. The PDA representative indicated that PDE’s support would be needed to provide training on school food procurement regulations, that PDA has the expertise on connecting with local producers, and that office hours could involve both agencies with a Memorandum of Understanding between the two agencies delineating responsibilities.

**Producer Outreach**

Most LFPI program administrators described outreach efforts to producers and suppliers either by them or through partner organizations to share information about the LFPI program. Outreach formats included webinars, letter templates to be used by producers to introduce themselves to SFAs, listings in wholesale directories, outreach at producer meetings, direct emails to producers that have expressed interest in selling products to schools, one-on-one consultation, sharing of information through USDA-funded producer trainings, and producer/buyer networking sessions (supported through a Specialty Crop Block grant in Michigan). Producer outreach in Maine was said to be limited due to turnover at the Department of Agriculture.

Several LFPI program administrators mentioned the important role food hubs play both in producer outreach and in meeting CNP operators’ product needs. In Vermont, producer outreach was done to two large food hubs and a broadline distributor who were described as the major food distributors in Vermont, major partners in the LFPI program, and the primary connection to individual farmers and producers. The Michigan LFPI program administrator also saw food hubs as a solution to producer outreach due to a lack of a network or system of outreach to small and urban farms. LFPI program administrators mentioned the ability of food hubs to scale up to meet demand, to provide documentation that aligns with state requirements for LFPI programs, and to support small producers.

**Supplier Outreach**

Suppliers of Pennsylvania-produced food anticipated the need for information about how the program works, qualifying foods, documentation requirements for SFAs, how to approach SFAs, the school food service environment, and the extent of participation in the LFPI program. They envisioned a variety of formats for this outreach including
webinars, online documents, and in-person sessions. The Mid-Atlantic Fruit and Vegetable convention was mentioned as a possible venue through which to conduct outreach. A suggestion was made to consider outreach efforts in coordination with PDA’s “Bringing the Farm to School” producer training sessions. Suppliers mentioned the need for different types of outreach for individual producers as compared to distributors and requested that the information be made available prior to program initiation.

State Agency Challenges in LFPI Program Administration

LFPI program administrators mentioned several challenges in administering LFPI programs:

- Training and technical assistance challenges were related to the time and effort to respond to questions from SFAs about the program, developing training materials, and helping SFAs initiate programs.

- Difficulties were mentioned regarding defining and explaining the definition of local and qualifying foods. Making determinations about which value-added products qualify in the absence of a state branding program was also said to be challenging.

- Challenges were also noted related to misperceptions and confusion about the programs including the misperceptions among SFAs that they need to work directly with individual producers and that they need to track meals that include a local component.

- In the case of a competitive grant program, a challenge was mentioned regarding encouraging sustained investments with producers given the time-limited nature of grants as described below by a Minnesota state agency representative.

“When the state would talk to them, they didn’t care, because it wasn’t a customer…I could go to them say, it’s $5 million, that means districts are going to have to spend $10 million in local produce. If you’re costing districts $5 million, you have a problem … You need to stop putting this project at the back of the bus, you need to get this done now… And they just got it done.”

- Challenges were also noted related to state agency capacity. Departments of Agriculture lacked systems to disburse funds to SFAs and often had to work with their Department of Education to accomplish this. Sharing administrative responsibilities across two state agencies was said to be error prone. Even in cases where the state agency had systems or platforms in place to accept applications or receive documentation, they were sometimes not able to do so within these platforms because of system constraints.

- A challenge mentioned regarding working with suppliers, in particular with broadline distributors, was obtaining required documentation. This was mentioned as an ongoing struggle in Michigan that began to see resolution when the demands came from SFAs as opposed to the state agency. The impact of not providing the required documentation was pointed out as described by a Michigan CNP operator.

“Think about this as a sustained investment in partnerships with farms and not always grant-dependent? And we do see schools that are spending beyond their grant amount. They’re building relationships with farmers and that’s what we want to see. But I think that always is a challenge when it’s just this annual grant cycle… how are we building that connection to this being a sustained part of how schools think about the food they buy and serve?”
• Other challenges were programmatic in nature and sometimes related to the legislation. Some difficulties were mentioned in following the legislation as written and working out details about areas that were not clearly defined.

Pennsylvania state agency representatives did not identify training and technical assistance as an area that they envisioned being challenging if a LFPI program were to be established. It was anticipated that challenges might arise based on how the LFPI program legislation is written and strongly suggested that there should be state agency input and the legislation should be simple and general. The need to review documentation on a monthly basis was identified as a potential challenge. As previously noted, PDA mentioned a challenge in providing payments to SFAs and a dual agency approach to program administration was mentioned as a barrier to timely decision-making.

**LFPI Program Administrators’ Advice/Lessons Learned**

Based on their LFPI program administration experience, LFPI program administrators shared advice and lessons learned that they would offer to a state considering development of a program. These advice and lessons learned are listed and described below with selected quotes from LFPI program administrators.

1. **Establish partnerships to support LFPI program implementation.** As described on page 10, partners played valuable and varied roles in supporting LFPI programs.

   “It’s been huge to have the partnerships with different state agencies, but also different organizations who are already operating in the farm to school arena. We’re certainly not experts and we’re more than willing to collaborate with anybody who can help in providing that technical support. Everybody has their own little niche of knowledge, so I think it’s best to collaborate on developing the grant program and offering the support to grantees.”

2. **Allow funds to be used for equipment, in addition to local food purchases.** Lack of food preparation equipment can be a barrier to processing local products. Offering the option to use some of the funds to purchase equipment provides the necessary infrastructure for SFAs to be able to make use of the local products.

3. **Keep legislation broad and seek stakeholder input.** LFPI programs can be designed in a variety of ways and what works in one state may not work in another. Allow for stakeholder engagement and feedback. If the legislative language is overly prescriptive this does not allow room for flexibility to be able to adapt and evolve as needed.

4. **Separate K-12 schools and ECE as far as program design.** K-12 and ECE settings operate differently and have different needs.

5. **Avoid a dual agency administration approach if possible.** This creates room for error and confusion.

6. **Be consistent from the beginning.** For example, if the application review process involves multiple reviewers, be sure that all reviewers are reviewing the applications similarly, using the same criteria and standards. Also, changes in the application process or program requirements from year to year can lead to confusion among SFAs.

7. **Have a plan to tell the story of the impact of the LFPI program on local producers.** Program partners can be critical in helping to assess this impact and tell the stories.

   “Schools get so laser focused on the reimbursement that telling the story about...”
8. **Implement strategies to ease the reporting burden on SFAs as much as possible.** Create automated processes and/or use existing platforms for SFAs to do monthly reporting if possible.

9. **Provide support to enhance scratch-cooking skills among school food service employees.** Lack of scratch-cooking skills was identified as a challenge to using local products. Several states provided culinary training opportunities and one state that did not identified it as a need.

10. **Consider program objectives in deciding whether milk will be an incentivized purchase.** Milk served in CNPs is likely from local producers regardless of existence of a LFPI and is likely to comprise a substantial portion of local purchases if included in incentivized purchases.

11. **Establish and communicate clear definitions related to qualifying purchases.** Terms that will need to be defined include “local.” The Vermont state agency representative shared that almost all of Vermont’s counties border other states so what is the most geographically local might not be a Vermont product. If SFAs are purchasing items based on distance rather than state of origin, these items would not count toward value of purchases of in-state products as defined for purposes of the local food incentive program.

12. **Be prepared to provide assistance to SFAs in finding local producers.** Most state agencies or program partners implemented strategies to assist in making these connections through strategies such as producer/buyer networking sessions, development of a farm to school map identifying producers that are selling products to schools and products schools are purchasing, and regional coordinators who assist in making connections between SFAs and local producers.

13. **If the LFPI program involves universal eligibility, require SFAs that are not planning to participate to notify the state agency by a specific date so that funds can be reallocated.** This would prevent funds from going unspent and provide additional funds for schools that could use it.

14. **Seek input from the fiscal team within the state agency administering the program to ensure that the plan for disbursing funds is feasible.** Communicating with the finance team in advance brings them into the process and can alleviate issues that could arise when it’s time to disburse payments to SFAs.

15. **Communicate early with suppliers so they are aware of documentation requirements.** Challenges were noted with suppliers; in particular with broad-line distributors’, ability to meet documentation requirements. Time may be needed for them to make operational changes to allow them to provide the necessary documentation.
Time Commitment for CNP Operators

CNP operators discussed the time required to participate in their states’ LFPI programs which included time to complete grant applications, identify suppliers of local food, procure local food, compile and submit documentation to the administering state agency, and train staff on processing of local items. Most of the operators spoke in generalities about the time commitment with a few stating that there was an initial significant time commitment, but this decreased over time. For example, in Washington the application process requires submission of a purchasing plan. A Washington CNP operator reported that this plan took time to develop the first year but in subsequent years it could be used as a template, which saved time. Among CNP operators who estimated actual time commitments, variation was reported. A CNP operator in Maine estimated allocating one hour per month to the LFPI program. A Washington CNP operator estimated spending five to 10 hours per month with an assistant dedicating 1.5 hours/month on LFPI program-related tasks. A CNP operator in New York stated that the end-of-year gathering of documentation can take a couple of weeks to compile and submit and, upon that individual retiring, the district will be hiring a farm to school coordinator to ensure the program continues. A CNP operator in Minnesota has hired a farm to school coordinator who estimated spending about 50 percent of time on procurement, networking, and discussing menu planning with the CNP operator.

Pennsylvania CNP operators anticipated that participation in a LFPI program would take time and expressed concerns about this while still seeing value in a program.

“I had no idea about any local purchasing incentive programs, but also my challenges are where do you purchase locally, the time to procure appropriately. But these incentives are substantial enough to be like, I have to carve time out.”

LFPI Program Impact

Impact on CNP Operators’ Purchasing Behavior

Most of the CNP operators in states with existing LFPI programs stated that participation in the program had a large impact on their purchasing behavior. Examples of this impact included an expanded number of farms from which they purchase items; an increase in the frequency of deliveries from farms; an expansion to purchasing local items other than produce, such as dried beans, honey, maple syrup, and meat; and an increase in frequency of Harvest of the Month taste tests. The Michigan LFPI program administrator reported that, on the individual SFA level, their current focus is not on increasing local purchases as much as on identifying current purchases that are local, while on a macro level they are identifying farms, supporting producer training, and working on building local producer readiness to work with schools and understand the potential of the school market. The Maine CNP operators did not indicate a large change in purchasing behavior. One CNP operator mentioned that she has a personal passion for farm to school and has been doing local purchasing for quite a while before the LFPI program was introduced.

Financial Impact on CNPs

The LFPI programs’ reported financial impacts on CNPs varied across the states involved in this investigation with operators in Minnesota and Washington reporting the largest impacts. A Minnesota CNP operator reported spending $630,000 on locally produced food between three school districts over a three-year period, entirely supported by grant funding. Another Minnesota CNP operator reported the addition of $170,000 to that school nutrition program’s budget in one year through the

“One of our issues is how to integrate this into what we do every day. We’re short-staffed and have a million other things going on ... But it’s a great initiative. A lot of us are looking forward to seeing something happen.”
LFPI program. Operators in Minnesota and Washington pointed out not only the benefits of having funding to purchase local foods but also being able to use funds to purchase needed equipment to improve kitchen efficiency. The Washington CNP operator reported having knives sharpened, purchasing salad spinners, and replacing small sinks with larger ones in five schools which will reduce the labor time needed to wash fresh produce. Given the limited amount of funding available through Maine’s LFPI program (maximum $5,500) one CNP operator stated that the funds are used by October and another CNP operator reported relatively small financial impacts but appreciation for the support.

“Prior to the pandemic, it was really a boost that allowed me to try different foods to offer to students, and then also offers some funding for student engagement activities and hiring staffing to do that. And so that has been a positive... Through the pandemic... we’re in a situation where... we’ve had excess fund balances for the past three years. And so it hasn’t been a huge incentive for a lot of districts right now, because they have excess fund balances and are struggling to find ways to spend it.”

Pennsylvania state agency representatives agreed that a LFPI program should provide enough funding to participating SFAs to make it worthwhile for them to participate and provide a financial impact. While a program that allows universal eligibility is preferred, it was recognized that, if funding is limited, a competitive grant application approach through which each awarded SFA would receive a meaningful amount of funds would be preferred over providing all SFAs with a very minimal award. Pennsylvania CNP operators also discussed weighing the time commitment involved in participation with the funding amount available.

CNP Operators’ Reasons for Participating in LFPI Programs

CNP operators mentioned a variety of reasons for participating in LFPI programs. Many were related to the educational and health benefits for students and the ability to provide higher quality, better-tasting food. Many also mentioned interest in supporting local producers and small food systems. Several stated that they felt participation improves the perception of school meals and instills confidence, pride, and enthusiasm in school food service professionals, explained below by a CNP operator in Minnesota.

“I notice a big difference in our staff since we started this. They’ve really come into their own independence and their value in the teamwork in the kitchen... If I would have looked at that four years ago, sometimes I go into kitchens, and they were like machines, not really happy people, because you’re just doing the same thing every day. And adding this program, I think it really just made them feel more important in their job and they’re excited to come to work.”

Other reasons stated included the impact on BIPOC and socially disadvantaged producers, the impact of the funds on CNPs, and to demonstrate that funds are being used so the program continues to be funded.

Pennsylvania CNP operators, when asked what they felt the goals of a LFPI program should be, mentioned several of the same benefits mentioned
above as CNP operators’ reasons for participating. Goals centered around the health and educational benefits for students and the desire to support local producers.

**CNP Operators’ Reasons for Not Participating in LFPI Programs**

It should be noted that this investigation did not involve interviews with CNP operators in states with LFPI programs who do not participate in these programs. The CNP operators who were interviewed were asked to speculate about why they think some of their colleagues do not participate. In their responses, many referred to conversations they had with colleagues during which these reasons were discussed.

Many of the reasons given were related to the time commitment involved in participating. Issues related to this included the time involved in finding local products, writing bid specifications, developing recipes, gaining student acceptance for new items, completing applications, compiling and submitting required documentation, and processing local foods.

Some reasons were related to inherent complexities of the programs. These included a lack of understanding about qualifying products, complicated reporting processes, changes in program requirements from year to year, and confusion about eligibility criteria.

Other reasons were related to challenges with working with local producers. These included finding local producers, food safety concerns, delivery issues, local producers’ lack of ability to provide the volume of product needed for larger districts, and difficulties in adjusting to changes in product availability.

Other reasons included the funding level available not being worth the time involved in participating and lack of administrative support for local purchasing.

**CNP Operators’ Challenges Related to Participating in LFPI Programs**

Various challenges were reported by CNP operators involved in LFPI programs including issues related to the application and reporting processes, staffing, working with local producers and processors, and others.

**Application and Reporting Challenges**

Some CNP operators reported a lack of confidence in their grant-writing skills and challenges related to applications being due at a busy time of year, complexities in completing the application, and short timeframes between the release of the application and the due date. Some also described the documentation requirements as cumbersome and expressed challenges in getting the required documentation from suppliers, in particular from broadline distributors.

**School Food Service Staff Challenges**

Challenges were also mentioned related to school food service staffing including initial reluctance and lack of skills among staff to work with local products and the need for additional labor to process local products. Initial pushback from school food service staff was resolved by a CNP operator in Minnesota by providing necessary equipment and addressing questions.

“There was initial pushback from staff...I saw that coming and I just explained to them, we’re going to start slow with a few produce items. I’m going to get you the tools to make it easier. They had questions as far as how is the produce going to come in. They worried about it being dirty and coming in all different sizes. I just educated them, letting them know that if we provide them the tools, we’re really trying to help them out and not just have them figure it out on their own. We want them to be a part of this and we’re all going to problem solve.”
**Challenges Related to Working with Local Producers and Processors**

Several challenges were reported related to working with local producers and processors including figuring out how to work directly with local farms, delivery issues, challenges associated with working with multiple producers to procure the amount of product that is needed, and lack of product availability due to a short growing season. Reluctance from producers to become involved because they are not assured the program will be sustained was also mentioned as a challenge as explained by a CNP operator in Minnesota.

“The piece of pushback I get from farmers is, we don't know if this grant is going to be here every year. So why would we change our systems? And why would we change our business model to grow and invest in a carrot harvester and barrel washer when we don't know if you're going to buy the carrots next year?”

In states in which processed foods are qualifying purchases, CNP operators noted challenges with working with processors because of a lack of understanding among processors about product formulations that will meet the criteria of the LFPI program. The lack of ability to purchase food in a preferred form was also named as a challenge.

**Other Challenges**

Other challenges that were mentioned included the lack of student acceptance of some new items, the need to keep procurement regulations and meal pattern requirements in mind, and, in New York’s case, the need to separate school breakfast and lunch costs when submitting financial information to determine qualification for the increased reimbursement.

**Pennsylvania CNP Operators’ Anticipated Reporting Challenges**

Pennsylvania CNP operators were asked to comment specifically about anticipated documentation and reporting challenges. They agreed that cumbersome documentation requirements would discourage participation.

“Additional administrative burden on a very, very limited staff right now is a challenge. We already have a ton of federal compliance and administrative burden and to tack more on for five cents will not garner compliance or even participation in my opinion. We're pretty much tapped out on the administrative burden piece.”

Comments regarding the potential difficulty of obtaining documentation from suppliers that would include the degree of information that a LFPI program may require were mixed. Some thought it would be difficult while other stated they expected it would not be difficult.

“There is nothing on any document that I receive from (...) farm that designates anything as local. It doesn’t say local apples... Even with DOD, I think there's an asterisk that says local but it could mean New Jersey, Delaware, or Pennsylvania.”

“I am not aware that any one of my vendors, other than my milk vendor, denote a product as local so I would be hard pressed to supply that documentation.”

“I had some grant money for local produce and I purchased through a nonprofit distributor and found that they did local sourcing and they had products down to which farm it came from on the invoice. I had a really great experience.”
Pennsylvania CNP Operators’ Anticipated Challenges for Suppliers

Pennsylvania CNP operators were asked to comment specifically about challenges they might anticipate from the supplier side. Anticipated supplier challenges included lack of ability to respond to an increased demand for some items, the payment schedule of CNPs not aligning with producer expectations, lack of alignment of the growing season and the school year, delivery issues, and labor shortages on the supplier side impacting production and delivery. Pennsylvania CNP operators raised concerns about the cost of local items.

Other Stakeholders’ Comments About Potential Challenges Identified by Pennsylvania CNP Operators

Pennsylvania CNP operators anticipated challenges related to acquiring the documentation that would be required for participation in a LFPI program. Among the suppliers of Pennsylvania-produced foods that participated in interviews, those representing individual producers stated that these producers do not currently provide the level of documentation that would likely be required in a LFPI program but did not anticipate that it would be difficult for them to do so, as it would likely just involve providing an invoice.

Among the suppliers of Pennsylvania-produced foods who represented distributors, those who work directly with Pennsylvania farms expressed greater ease in making the required documentation available compared to other distributors. The ability to routinely provide the detailed documentation that might be required varied across suppliers. In general, they indicated the ability to provide state of origin and farm-specific information in some form, as this information must be available for traceability purposes. However, operational changes to current systems may be necessary to meet specific documentation requirements.

Pennsylvania CNP operators questioned if suppliers would be able to respond to an increase in demand for Pennsylvania-produced items. All suppliers involved in the interviews mentioned an ability to respond to an increase in demand for local products but recognized it would be more difficult for smaller farms and might take some time depending on the extent of the increase. Given Pennsylvania’s growing season one supplier mentioned that it would be more difficult to respond during winter months. However, another supplier expressed an opinion that Pennsylvania’s supply network has substantial potential for season extension as was demonstrated during the COVID-19 pandemic.

“Our Pennsylvania supply network is strong and has a ton of capacity. The COVID-19 pandemic really demonstrated what is possible for local and regional food systems. I had this mental model of, this is the level of volume we can move with local food and then when we were in a position where we had to activate our local suppliers and find additional local suppliers, it demonstrated just how much can happen here… Pennsylvania farmers are interested and open to season extension. I think that the pandemic demonstrated both the potential of what we can tap into within our existing network, but also there are so many farms and processors and opportunities that we just haven’t even tapped into yet.”

It should be noted that the suppliers involved in this investigation varied in terms of the variety of Pennsylvania-produced products they currently offer, and some would likely need to expand both the supply and variety of Pennsylvania-produced items if they intended to be sources of Pennsylvania-produced items for SFAs involved in a LFPI program.

A concern was also voiced by a supplier about short-term funding programs for which producers adjust supply and then are left without markets if funding ends.

“I think the worst thing that any of these programs could do is provide a short-term cat-
alyst and then it goes away and then you’ve created all this capacity and there’s not the sustainability behind it."

While Pennsylvania CNP operators raised concerns about the cost of local items, this challenge did not directly come up during the interviews with CNP operators in states with LFPI programs, possibly because they are receiving additional funds to offset the costs of these items. However, they did mention the need to still be conscious of cost and a CNP operator in Minnesota admitted that, while local products are not less expensive than non-local items, there are reasons beyond cost-savings for participating.

“Superintendents and school board members ask, do you save more because you’re buying local food? And the answer is no. We do it because, first of all, when we started during COVID, the supply chain was wrecked so it was a great time for us to transition because when we asked for burgers, we got burgers. When we asked for broccoli, we got broccoli. It was clean, local, fresh, and nutrient-dense…I think we’re finding long term is, does the health of our students slowly improve because they are being served high quality food? Do they eat more and perform better within school because they’re excited about the food? There’s all those hidden opportunities. Maybe it’s not going to be as expensive long-term.”

The Pennsylvania suppliers mentioned that costs for Pennsylvania products compared to products produced out of state vary by product and by season. When in season, some Pennsylvania-produced products are less expensive because of the savings on transportation costs. They also recognized that they have some customers who have an understanding that locally produced items are higher quality, and they are willing to pay more for them.

Key Takeaways and Best Practices

Key takeaways and best practices were generated upon review and synthesis of the information gathered. Some of these takeaways emerged from the advice and lessons learned shared by the LFPI program administrators, while others are based on the feedback from other stakeholders.

**LFPI Program Design**

- Legislative language for a LFPI program that is broad and general allows room for flexibility to be able to adapt and evolve as needed.
- State agency input into the development of LFPI program legislation is critical to ensure that the program is feasible and positively impacts the stakeholders involved.
- Funds would be needed for LFPI program administration which may require one FTE, but this could vary depending on the design and requirements of the LFPI program. Funds would also be needed to support changes to existing systems or establishment of new systems to allow for collection of required documentation.
- LFPI programs need to provide SFAs with a meaningful amount of funding to generate interest in participating in the program, impact participating CNP operators’ purchasing behavior, and have favorable financial impacts on CNPs.
- Short-term funding (e.g., grant programs that have specific end dates without guarantee of future funds) creates challenges for CNP operators and suppliers as it can lead to hesitation about changing mindsets and practices related to farm to school relationships because of concerns that the funding will not be sustained.
- Allowing some funds to be used for equipment purchases helps to build necessary infrastructure for SFAs to be able to make use of the local products.
• Overly complex reimbursement structures and application requirements and lack of consistency in requirements and application review can create confusion and mistrust and be a barrier to participation in LFPI programs.

• Consider program objectives in deciding whether milk will be an incentivized purchase. Because milk served in CNPs is likely from local producers, decisions will need to be made about whether the intent of the program is to reward SFAs for existing local purchases or encourage increased local purchasing.

• LFPI programs for ECE settings may need to be designed differently than those for school settings given their unique needs and challenges.

**LFPI Program Administration**

• Dual agency approaches to LFPI program administration are error prone, cumbersome, and may delay decision-making.

• When considering the state agency that will be responsible for administering a LFPI program, consideration should be given to the current system and platform capacity within the agency and CNP operators’ familiarity with those systems and platforms.

• The plan for disbursing payments to SFAs should include input from the administering agency’s fiscal team to ensure that it is feasible.

• CNP operators have many administrative responsibilities. Strategies to ease the reporting burden associated with LFPI program participation, such as use of automated processes and existing and familiar platforms should increase CNP operators’ interest in participating. Reporting requirements should balance the need for data to confirm qualifying purchases and assess program impact and the need to minimize the reporting burden on SFAs.

• LFPI program administrators should clearly define qualifying purchases, including the definition of “local” and the criteria for processed products to qualify.

• LFPI programs employing universal eligibility should include strategies to ensure allocated funds will not go unused (e.g., reallocation of unused funds to SFAs that will use them).

**LFPI Program Implementation**

• Partnerships are vital in supporting LFPI programs. Partners play advocacy roles, assist in providing training and technical assistance, and conduct program evaluations.

• In addition to training and technical assistance related to LFPI program requirements (e.g., application and reporting processes, key definitions, etc.) training and technical assistance is likely to be needed related to connecting SFAs with sources of local products, procurement regulations, culinary skills, and food safety.

• LFPI program administrators cited food hubs as playing critical roles in LFPI programs by assisting with producer outreach and because of their ability to scale up to meet demand, provide required documentation, assume some responsibilities to lessen the burden on individual producers, and aggregate products to meet the needs of participating SFAs.

• Assessing the program’s impact (on CNPs, students, producers, and local communities/economies) and sharing the results can garner support and improve the likelihood that the program will be sustained.

• Informing suppliers about LFPI program documentation requirements in advance of program initiation might reduce some barriers. Suppliers might need time to make operational changes to provide documentation to SFAs.
• CNP operators’ requiring documentation from suppliers might be more effective than requests from state agencies, as CNP operators represent suppliers’ customer bases.

Pennsylvania Farm to Child Nutrition Environment to Support a LFPI Program

The Pennsylvania farm to child nutrition environment includes many initiatives, supporting organizations, and resources that could provide support for a LFPI program as described below.

Pennsylvania Farm to School Network

The Pennsylvania Farm to School Network is a collaborative that works to advance farm to school strategies and policies across the commonwealth. The network is made up of members, working groups, a leadership team, and a coordinating agency (The Food Trust). The Network’s mission is to leverage and build upon collective resources and a shared vision to cultivate farm to school and farm to ECE initiatives that create opportunities for all children across the state to grow, learn about, and enjoy eating Pennsylvania foods; increase market opportunities for Pennsylvania producers; and connect growers, schools, ECE sites, and community members around food.

PA Farm to School Grant Program

The PA Farm to School Grant Program, administered through PDA, provides vital support to local procurement in child nutrition programs in two key areas. First, operators can use the money to buy food and evaluate the feasibility of local procurement from a budgetary standpoint as well as an operational one. Funds can also be used to provide training or buy equipment to prepare for, or aid in the processing of whole raw products within the foodservice operation.

Farm to Institution Grower Sessions

An obstacle for farmers interested in selling their products to child nutrition programs is profitability. Many small to medium sized farms are unprepared for the price points at which these programs generally need to purchase food. PDA holds an annual training with the goal of teaching farmers to sell profitably to schools and other institutions, thus preparing more farms every year to establish fruitful relationships with child nutrition programs.

Pennsylvania Harvest of the Month

Pennsylvania Harvest of the Month (PA HOM) is a program developed by the Pennsylvania Department of Education and Project PA (Penn State University) to promote a local agricultural product each month through schools, child and adult care centers/day care homes, and summer feeding sites. The program aims to provide participants with local, healthy products while supporting Pennsylvania farmers and producers. The PA HOM website includes many resources that can be used to promote each monthly Pennsylvania-produced item.

Culinary Training for CNP Operators

Since 2015, hands-on culinary training sessions have been offered for CNP operators to help them plan, prepare, and present attractive meals that students will enjoy through the PDE partnership with Penn State (Project PA). Sessions in 2023 through 2026 focus on PA HOM and are designed specifically to teach CNP operators how to select, handle, and prepare these items with discussion about successful ways to introduce them to students.

Pennsylvania Farm to Child Nutrition Summits

In 2022 the first statewide Farm to Child Nutrition Summit was offered at the Ag Progress Days site in Centre County. The purpose of the summit was to facilitate peer-to-peer learning and networking among CNP operators, establish connections between CNP operators and producers, showcase farm to child nutrition “best practices,” and deliver educational opportunities regarding the environmental, economic, nutritional, and equitable value of growing foods. Farm to Child Nutrition summits are planned for 2024 and 2026 and could facilitate connections between suppliers of Pennsylvania products and CNPs as well as for information sharing and LFPI programs.
Quarterback for Local
Quarterback for Local is a LFPI pilot program benefiting two early care and education settings in Philadelphia. Through this program, managed by The Food Trust, sites receive an additional 25 cents for Child and Adult Care Food program meals that include a local component. This pilot was initiated based on conversations in the PA Farm to School Network’s Policy Working Group to help inform future Pennsylvania LFPI programs, especially related to CNPs in ECE settings.

Keystone Kids Go
The Pennsylvania Department of Health (DOH) supports the Keystone Kids Go (KKG) Workgroup to develop and implement a results-oriented and equity-driven action plan to improve the health of Pennsylvania’s children, staff, and families within the ECE community through collaboration, resource development and systems change. KKG works with partners from DOH, PDE, Office of Child Development and Early Learning (OCDEL) and many stakeholder organizations to embed obesity prevention standards into Child and Adult Care Food Program (CACFP), the state Quality Rating and Improvement System (QRIS), and farm to ECE initiatives. Keystone STARS is Pennsylvania’s QRIS for ECE programs, overseen by OCDEL. KKG partners worked to align farm to ECE with QRIS by incentivizing programs who participate in quality initiatives such as farm to ECE with bonus points in a performance standard category. KKG also provided training to QRIS coaches on farm to ECE through a required online training, spreading awareness of farm to ECE so coaches can teach ECE programs about farm to ECE and how it ties into standards.

Local Food for Schools
The United States Department of Agriculture’s (USDA) Agricultural Marketing Service (AMS) has established the Local Food for Schools Cooperative Agreement Program (LFS) to help states deal with the challenges of supply chain disruptions brought on by the pandemic. Through the LFS program, USDA is awarding funding to states for food assistance purchases of domestic local foods for distribution to schools. The Pennsylvania Local Food for Schools Cooperative Agreement Program (PA-LFS) will provide sub-awards to SFAs in Pennsylvania that are operating the National School Lunch and/or Breakfast Program and demonstrate interest and some previous experience in sourcing local foods. Funds will be used by SFAs to purchase local and regional foods from local and regional vendors, with a focus placed on vendors who are socially disadvantaged or qualify as a small business. Through this program, PDA will work with increasing numbers of local producers, including socially disadvantaged farmers/producers and very small farmers whose production capacity can be matched with SFAs. Through the PA-LFS, PDA will work to increase sales opportunities for the local and regional food system and ensure that SFAs in Pennsylvania are afforded additional resources to feed school children.

Good Food Purchasing Policy
The Pittsburgh Good Food Coalition, led by the Pittsburgh Food Policy Council, successfully advocated for a Good Food Purchasing Policy at Pittsburgh Public School District. The policy was formally adopted in October 2021. The Good Food Purchasing Program creates a structure for large institutions to focus on value standards of nutrition, environmental sustainability, local economies, a valued workforce, and animal welfare in their solicitations and contracts. There is particular overlap between the ‘local economies’ standard and the creation of a LFPI program in Pennsylvania. Additionally, program development will likely require further discussion from stakeholders about values that guide program intent and evaluation.

Foodshed Mapping Project
The Foodshed Mapping Project is working to increase access to nutritious, fresh, and local foods; support farms in the region; improve emergency response planning; and support a thriving and resilient food system in the Commonwealth. By mapping Pennsylvania farms and food businesses, the Foodshed Mapping Project aims to facilitate new opportunities for connections with institutions and institutions.
consumers. Funded by a grant from the U.S. Economic Development Administration, the Foodshed Mapping Project is an ongoing, collaborative effort led by Pasa Sustainable Agriculture in partnership with Pennsylvania Department of Agriculture and PA Preferred, Feeding Pennsylvania, Pittsburgh Food Policy Council, Pennsylvania Farm Bureau, along with many other partners across the state. Each of the partners holds a different piece of the foodshed puzzle. Now they’re joining forces to put the pieces together—by connecting their data, testing out technology, and mapping more key players in the food system—in order to begin to address common issues around farmer needs, food access, and emergency response.

Pennsylvania Food Policy Council
The Pennsylvania Food Policy Council, established in December 2022 by Executive Order 2022-05, is an important policy initiative of the Shapiro administration. Tasked with evaluating and advancing solutions to issues facing Pennsylvania’s food system, the council will develop and implement strategies to improve food and nutrition security, public health, environmental sustainability and stewardship, local food economies, and to reduce food waste.

Areas for Future Investigation
This investigation involved interviews with CNP operators in states with LFPI programs who participate in these programs. They were asked to speculate about why some of their colleagues do not participate and many based their responses on conversations they had with colleagues. Future investigation could include interviews with CNP operators who choose not to participate to learn more about their reasons for not participating.

State agencies that administer LFPI programs must have platforms to collect documentation from participating SFAs. Establishing these platforms or making modifications to existing platforms to accommodate new requirements have cost implications that should be considered in establishing a program. It was beyond the scope of this investigation to examine these specific costs, but this is an area for further exploration.

While suppliers of Pennsylvania-produced foods were included in interviews, manufacturers were not represented among those interviews. Future investigations could include manufacturers to gain an understanding about their ability to respond to demands that could be created by establishment of a LFPI program.

CNP operators in ECE settings were involved in a focus group but no CNP operators in ECE settings who participate in LFPI programs were interviewed as part of this investigation, and discussion about ECE participation in LFPI programs in the interviews with LFPI program administrators was minimal. Future investigations could include a deeper exploration of how LFPI programs work in these settings and factors to consider when designing programs for ECE settings.

Other than brief mentions about roles partners could potentially play or have played in program evaluation there was little discussion of this topic in this investigation. Future investigations could include more in-depth exploration of LFPI program evaluation including, but not limited to, identifying appropriate entities to lead evaluation efforts, evaluation designs, relevant measures, and reporting strategies.
References

1. About Farm to School. National Farm to School Network website. https://www.farmtoschool.org/about/what-is-farm-to-school


7. Center for Good Food Purchasing. The Program. https://goodfoodpurchasing.org/program-overview/

APPENDIX A: INTERVIEW AND FOCUS GROUP QUESTIONS

Local Food Purchasing Incentive Program Administrators – Interview Questions

1. What were some key factors in getting the program established initially?

2. Who are your project partners and what role(s) do they play in supporting the program?

3. Describe the reporting requirements (e.g., what is collected, how frequently, is it done within some existing platform or structure?)

4. How is the funding amount requested/added into the system through which reimbursement is channeled? Is this tied to the monthly child nutrition programs meals claiming?

5. What types of training/technical assistance has been needed for SFAs and in what formats is that training/TA provided (e.g., webinars, one-on-one consultation, workshops, etc.) Is this provided directly by the State agency, or do you partner with anyone to provide it?

6. Describe the outreach, if any, that has been done to producers/distributors to make them aware of the program and educate them about the requirements.

7. Within the funding that was provided for this program, were any funds allocated for program administration (including training/TA)? Was/Is it sufficient? Did you bring in additional staff to handle this or assign responsibilities to existing staff? Since this is state funding, we assume federal funds cannot cover administrative responsibilities for this program—how have you addressed this?

8. The State agency that oversees and administers these programs varies across states. Do you think that the program is appropriately housed within your agency? Why or why not?

9. Local Procurement Incentive programs also vary in terms of eligibility (e.g., competitive grant applications, universal eligibility, performance-based) and funding determinations (e.g., lump sum, per meal, matching). Based on your experience, what do you see as the advantages and disadvantages of how eligibility and funding is determined in your state?

10. How did you determine the level of funding that makes the added effort for child nutrition programs operators meaningful/worthwhile?

11. What are the biggest challenges in program administration?

12. Any advice or lessons learned for a state in the initial stages?
Non-PA Child Nutrition Program Operators – Interview Questions

1. How long have you been participating in the program and how did you come to be involved?

2. Has participation in the program changed your local purchasing behavior, both in terms of extent of local purchasing and avenues through which you are purchasing local products? What sources are you using for local purchases (e.g., distributors, food hubs, individual producers, etc.)?

3. What challenges have you faced in participating in this program?
   a. If documentation is not mentioned, probe about this such as “How difficult/burdensome has it been to compile/submit required documentation?” “Do you think there could be a better/more efficient way to collect documentation?”
   b. Has it been difficult to find suppliers who can meet your procurement needs and provide required documentation?

4. Discuss the time commitment associated with involvement in the program (e.g., finding local products, compiling required documentation, submitting documentation, etc.) and has that changed over time (or do you expect it to change over time)?

5. In what areas have you needed training/technical assistance and what have you found most valuable? Are there areas where you feel training/technical assistance is needed but it hasn’t been available?

6. How much of an impact has participation in the Local Purchasing Incentive program had on your program financially?

7. What are your primary reasons for participating?

8. Considering CNP operators in your state who are not participating, why do you think they’re choosing not to do so?
Pennsylvania State Agency – Interview Questions

1. If a Local Purchasing Incentive Program was established in Pennsylvania and was to be administered/managed through the Department of Education/Agriculture, what would your staffing needs and challenges be? What would you consider the ideal scenario for meeting this staffing need?

2. Some Local Purchasing Incentive Programs are set up as competitive grant programs. Others offer universal eligibility and schools either opt-in or opt-out. From an administration perspective, which do you see as advantageous?
   a. If it was a competitive grant program, do you have a system in place to receive grant applications? Would you foresee the need for external reviewers?

3. Most states’ local purchasing incentive programs require participating SFAs to submit documentation to verify that they’ve purchased eligible products (e.g., receipts, invoices, farm info, spec sheets.) If there were a program in Pennsylvania that required this, do you have a system in place through which SFAs could submit this documentation? If so, would changes need to be made to the system and would these changes have cost considerations?

4. Do you have a system in place through which payments could be made to participating SFAs? If so, would changes need to be made to the system and would these changes have cost considerations? Could payments be made monthly, quarterly, or as a lump sum?

5. The administering agencies provide training and technical assistance to SFAs on a variety of topics (application process, documentation requirements, finding local producers, local procurement regulations) and in a variety of formats (webinar, print, phone/email). What resources would PDE/PDA need in order to provide this training?

6. What challenges do you see in administering this type of program? What are your ideas about how they could be addressed?

7. What would you see as the most helpful/important roles of partners in supporting this program? Who do you envision those partners would be?

8. Do you have any other thoughts you’d like to share related to the ability of the PDE/PDA to administer a local purchasing incentive program?
Pennsylvania Child Nutrition Program Operator – Focus Group Questions

1. Now that you have more information about local purchasing incentive programs, what are your thoughts about how valuable this type of program would be in encouraging local purchasing?

2. What do you think the goal(s) of a local purchasing incentive program should be?

3. Local purchasing incentive programs involve documenting/tracking local purchases and reporting about those purchases. What, if any, documentation/reporting challenges do you envision?

4. If a local purchasing incentive program was established in PA, what type of training or technical assistance would you need?

5. Based on your experience with local purchasing, what, if any, challenges/barriers from the supplier side would you anticipate if a local purchasing incentive program was established in PA?

6. What other thoughts/recommendations do you have about how a local purchasing incentive program should be operationalized in PA?
Suppliers of Pennsylvania-Produced Foods – Interview Questions

1. Describe your current efforts to make PA-produced foods available to your customers, especially schools. How do customers know where a food was produced?

2. If there was increased interest among schools for PA-produced items, to what degree would your supply be able to respond to a change in demand?

3. Although we realize that this differs by item and season, in general what are cost differences (generally or for specific items) between PA-produced items versus those produced outside of PA?

4. In states that have this type of local food purchasing incentive program, schools are required to submit documentation to their state agency to prove that they purchased qualifying items. This documentation may be required to include the item, amount purchased, price, name of the farm where the item was produced, and the county in which the farm is located.
   
a. Are you currently able to provide that information to schools? If so, in what format?

   b. If you are not currently able to provide this information, how possible would it be to make changes to your systems that would allow you to do so?

5. If a local purchasing incentive program was established in PA and the state or another organization conducted outreach to producers and distributors about the program, what questions would you like that outreach to address and in what form would you like it to occur (e.g., webinars, in-person meetings, print materials, etc.)?$
### Appendix B: Information about Key Aspects of the LFPI Programs in the States Involved in this Investigation

Information about Key Aspects of the LFPI Programs in the States Involved in this Investigation

<table>
<thead>
<tr>
<th>State</th>
<th># districts</th>
<th>Responsible Agency</th>
<th>Level of Funding</th>
</tr>
</thead>
<tbody>
<tr>
<td>ME</td>
<td>218</td>
<td>Dept. of Education</td>
<td>Maximum award is $5,000. Schools can receive an extra $500 for attending a training.</td>
</tr>
<tr>
<td>MI</td>
<td>886</td>
<td>Dept. of Education</td>
<td>10 cents x every CNP meal served the previous school year</td>
</tr>
<tr>
<td>MN</td>
<td>554</td>
<td>Dept. of Agriculture</td>
<td>“First Bite” grantees – up to $10,000; “Full Tray” grantees – usually up to $35,000, this year up to $100,000 because of Local Food for Schools funds.</td>
</tr>
<tr>
<td>NY</td>
<td>801 SFAs</td>
<td>Dept. of Agriculture</td>
<td>Extra 19 cents per lunch if at least 30% of purchases the prior SY were NY products.</td>
</tr>
<tr>
<td>VT</td>
<td>51</td>
<td>Dept. of Education</td>
<td>Baseline grant: 15 cents per lunch served prior school year. Subsequent years: 15% local = 15 cents per lunch; 20% local = 20 cents; 25% local = 25 cents.</td>
</tr>
<tr>
<td>WA</td>
<td>295</td>
<td>Dept. of Agriculture</td>
<td>Formula (12 cents per meal) is used to calculate maximum award amount. Schools are reimbursed for 100% of food costs and this is not tied to meals served.</td>
</tr>
</tbody>
</table>

(*Source: Bull C. Farm to School Incentives: State Program Compendium)
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