



2023-24 California Farm to School Incubator Grant Program

Summary of Public Comments and CDFA Responses

Public Comment Period: November 29, 2023 – December 14, 2023

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Please note that all public comments that follow are based on the 2023-24 **DRAFT** Request for Applications (RFA) that the California Department of Agriculture (CDFA) posted for public comment. Please click on any topic below to visit the corresponding section of this document.

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Track 1: CA Farm to School TK-12 Procurement and Education Grant

RFA Section(s)	Public Comment 1 (received 11/30/2023)	CDFA Response
1.2 Definitions	Thank you so much for the well run informational session that you provided today. I learned a lot and I hope providing feedback and information about the context of our LEA will provide you with valuable information in finalizing the RFA for this grant.	Thank you for your comments.
3.2 Grant Application and Review Criteria	<p>[1a] I feel as though the definition of "disadvantaged students" should be altered or broadened for this particular</p>	<p>Response 1a: In the draft RFA and final RFA, the Community Need section of the Track 1 application asks a question about the average free/reduced-price meal eligibility rate across school sites the project will serve in order to include a quantitative measure of community need. The final RFA publishes the tiered scoring structure</p>

<p>type of award. Specifically, in Track 1, I think points should be awarded in the Community Need section for rural schools and one-site districts. Additionally, areas that can be considered "food deserts" should also receive additional points. All three of these designations provide obstacles that result in greater needs that are often not reflected in the funding formulas used by the state that are currently cited in the Community Need section of the draft application for Track 1.</p> <p>Our district is a case that illustrates the need for an expanded definition in this area. XXX is a small (376 current enrollment) single school site in rural Tulare County. We have traditionally run just under the state threshold to be considered a school with high numbers of disadvantaged students as defined by the CDE. Currently we have 48% "unduplicated pupils"(a technical term that encompasses free and reduced price meal students and Title 1 students). California provides additional funds to schools who have 50% or more "unduplicated pupils". Consistently falling just shy of this definition of disadvantaged students leaves us with high needs, but not enough money to address those needs. Additionally, we lack the economies of scale that larger districts benefit from, so each dollar is not spent to maximum effect.</p> <p>This grant is being awarded by the CDFA not the CDE. It is for expanding access to nutritional, ethically produced local foods and educating children about nutrition. I realize it is convenient to use the CDE definition of disadvantaged, but I can attest from personal experience that this definition is somewhat flawed and does not always capture the full picture of the need in certain areas.</p> <p>[1b] I also feel that awarding only one point for the first item under the CA Food Procurement Goal in Track 1 is</p>	<p>for this question, which allocates more points for higher rates.</p> <p>However, the final RFA removes the scored question about the percentage of students in Title I schools from the Community Need section of the Track 1 application. Rather, the final RFA asks about Title I schools that the project will serve in an unscored question within the Foundational Information section of the Track 1 application. The Track 1 application asks this question because the budget bill language for this round of funding requires that "\$30,000,000 shall be made available to fund project applications from schools that receive funds under Title 1, Part A of the federal Elementary and Secondary Education Act of 1965 (20 U.S.C. Sec. 6301 et seq.) first."</p> <p>The CDFA recognizes that the quantitative metric of free/reduced-price meal eligibility rate may not fully reflect a school community's need. So, the Community Need section of the Track 1 application in the draft RFA and final RFA also includes a qualitative "Making the Case" question, which provides an opportunity for applicants to describe data points, characteristics, or other information that demonstrate their community need in different ways than the preceding quantitative questions. This "Making the Case" question is an opportunity to discuss how characteristics such as being a rural school, being a one-site school district, and being located within a food desert demonstrate community need and how the proposed project would meet those community needs. In the draft RFA, the Track 1 review criteria made up to 10 points available for the Making the Case question and up to 25 points available for the quantitative questions about free/reduced-price meal eligibility rate and percentage of students in Title I schools. In the final RFA, the Track 1 review criteria makes up to 15 points available for the</p>
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	<p>unfair. More points should be possible for school farms, especially those that are larger scale operations. Our project encompasses an ambitious school farm project for which we already have land, community support, a credentialed agriculture teacher and some equipment. This will not be a school garden with small amounts of food contributed to the school nutrition program. This will be a working farm with row crops, orchards and animals. We will truly produce impactful amounts of food for our small school population. Additionally, should our school farm seek organic certification (which is the plan) we should be eligible for the points awarded to those projects that utilize climate smart agricultural practices in both the overall "Goal" section of the Procurement Work Plan and the "Activities and Timeline" section. This full circle opportunity - having students involved in every step of the "farm to fork cycle" - will create maximum impact, fully immersing students in the environmental and nutritional concepts that CDFA is seeking to impart with these grants.</p> <p>Thank you so much for taking the time to consider my feedback. I am so excited to move forward with our school farm as I know the vision that we have will result in positive lifelong health and educational impacts on our students.</p>	<p>Making the Case question and up to 20 points available for the question about free/reduced-price meal eligibility rate, in order to increase the proportion of points that are available for describing community needs that this quantitative data may not reflect. Also, in the final RFA, the definition of "Underserved Communities" now includes rural locale and limited access to affordable and nutritious food in the part about specific challenges that the "Making the Case" question may include.</p> <p>Response 1b: The final RFA no longer includes points for the CA Food Procurement Goal question, as the draft RFA did. However, based on the goal(s) an applicant selects, they will have an opportunity to earn points for their description of <u>how</u> they will achieve the goal(s) when they fill out the CA Food Procurement Activities & Timeline section. Applicants will be able to earn up to 5 points for each goal they select, including the required goal #1: increase procurement of California grown or produced, whole or minimally processed food for incorporation into school meals. Farm to cafeteria is a welcome element of Track 1 procurement work plans under goal #1, but the scoring structure encourages applicants to also include procurement from external food producers in their proposed project. Additionally, applicants will have an opportunity to receive points in the Education Work Plan section for farm to cafeteria activities that engage students in hands-on food education.</p>
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RFA Section(s)	Public Comment 2 (received 12/8/2023)	CDFA Response
<p>Program Timeline</p> <p>1.4. Funding and Duration</p>	<p>Congratulations on the release of the 2023-2024 California Farm to School Incubator Grant Program RFA — and the many farm to school projects that will benefit California students, schools, farmers, and communities. XXX would like to offer the following public comments on the RFA, for your consideration:</p>	<p>Thank you for your comments.</p> <p>Response 2a: The CDFA will announce awards for the 2023-24 CA Farm to School Incubator Grant Program as quickly as possible, following an approximately two-month application period and a thorough review process, which</p>

	<p>[2a] 1. Announce funding awards no later than April 2024. The program timeline currently states that awards will be made in “Spring 2024.” For the sustainability of the grant program, we strongly encourage an expedited award timeline by April 2024, as this timing would be advantageous for farm to school advocacy in the California legislature.</p> <p>[2b] 2. Consider limiting the maximum funding for Track 1. With the strong demand for the program in 2022 — just 53 awards for 106 applicants in Track 1 — we respectfully suggest considering lowering the cap to \$1 million to allow more SFAs to participate. Given the funding formula, this limitation could allow an additional seven or eight smaller SFAs to participate in the program and receive funding awards.</p> <p>Thank you for considering these comments and your work to administer this grant program.</p>	<p>consists of both an initial administrative review and an interagency technical review. The final RFA includes an updated estimated program timeline in the Program Timeline section.</p> <p>Response 2b: The final RFA incorporates this comment about Track 1 funding by including a Track 1 maximum award amount of \$1 million for districts that qualify based on the funding formula. This is a slight decrease from the \$1.5 million maximum award amount that the draft RFA proposed.</p>
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RFA Section(s)	Public Comment 3 (received 12/14/2023)	CDFA Response
<p>1.4 Funding and Duration</p> <p>1.8 Reporting and Evaluation</p>	<p>I have reviewed the CDFA Farm to School Incubator Grant Track 1 draft RFA.</p> <p>Comments:</p> <p>[3a] 1. Area of concern: Track 1 funding formula and minimum award amount of \$200,000. My district enrollment from Oct 2022 is 11,095 so \$15/student yields \$166,425 so I would look at applying for the minimum \$200,000. I am a mid-sized district with an operation that already puts high priority on minimally processed items, we have some existing local procurement already happening, and we prioritize fresh produce over processed items or fruit juice. I am considering this grant to help address some infrastructure limitations/challenges that we are experiencing. A higher funding amount would be</p>	<p>Thank you for your comments.</p> <p>Response 3a: The final RFA maintains that the minimum award amount in Track 1 is \$200,000 and that the funding formula is \$15 per student in order to enable more SFAs across California to participate in Track 1 of the grant program than may be able to participate if these numbers were higher.</p> <p>Response 3b: Per the Reporting and Evaluation section of the draft RFA and final RFA, this grant program does <u>not</u> require monthly reporting. This grant program requires grant recipients to submit check-in surveys about their project progress on a quarterly basis and enables grant</p>

	<p>beneficial to really address some key areas so that it can be sustainable once the grant is completed. It would be helpful to increase the per student funding to \$25 or increase the minimum funding amount to \$250,000.</p> <p>[3b] 2. Reporting: recommend not requiring monthly reporting. If semi-annual reporting is possible that would be better</p> <p>Thank you for considering my comments.</p>	<p>recipients to submit financial reporting (i.e., reimbursement requests) on a monthly or quarterly basis, based on their preference.</p>
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Track 2: CA Farm to School Technical Assistance (TA) Grant

RFA Section(s)	Public Comment 4 (received 12/1/2023)	CDFA Response
<p>1.2 Definitions</p> <p>1.6 Eligibility and Exclusions</p>	<p>After reading the RFA and the different tracks for the upcoming CDFA Farm-to-School grant cycle, I wanted to ask you a clarifying question.</p> <p>[4a] Would you say that the California Wheat Commission will best qualify to apply under Track 2?</p>	<p>Thank you for your question.</p> <p>Response 4a: [Per the draft RFA], CA Agricultural Marketing Programs like the California Wheat Commission would be eligible to apply in either:</p> <ul style="list-style-type: none"> • Track 2 (if applying as a Farm to School Technical Assistance Organization that (a) has an established history supporting California School Food Authorities or California educators with implementing farm to school initiatives or (b) has an established history supporting California food producers and institutional food procurement) or • Track 3 (if applying as a Farm to ECE Technical Assistance Organization that provides support to ECE providers in CA) <p>The final RFA adds CA Agricultural Marketing Programs to the list of eligible Farm to School Technical Assistance Organizations and the list of eligible Farm to ECE Technical Assistance Organizations in the Definitions section. Please note that the CDFA slightly updated the above “established history” phrasing in the final RFA.</p>

RFA Section(s)	Public Comment 5 (received 12/6/2023)	CDFA Response
<p>3.2 Grant Application and Review Criteria</p>	<p>Thanks for the great presentation today! Really great to see this CDFAs F2S RFA go out.</p> <p>Two small technical questions I wanted to follow up on as we're wrapping our heads around this opportunity:</p> <p>[5a] Question 1: For the proposed Track 2 scoring criteria it looks like there are a total of 35 points in the "Farm to School TA Activities & Timeline" section (pages 10-11), but I'm curious about whether all 35 points would be available to each project, since we're only picking one category under track 2 (school food OR education OR producer). While each project would pick the applicable 15pt bucket, it seems like some of the 2 pt questions might be most applicable to each category as follows:</p> <p>School Food (possible points: 2)</p> <ul style="list-style-type: none"> • Expand the use of Scratch/Speed Scratch/Freshly prepared meals with CA grown foods <p>Education (possible points: 4)</p> <ul style="list-style-type: none"> • Expand the use of standards-aligned hands-on food education opportunities (please include a list of the standards with which your project will align) • Support or work with credentialed or certificated educators <p>Producers (possible points: 6)</p> <ul style="list-style-type: none"> • Support climate smart agriculture and CA food producers that utilize climate smart agriculture practices • Support socially disadvantaged, limited-resource, and/or veteran CA food producers 	<p>Thank you for your questions and for this feedback.</p> <p>Response 5a: Regarding the draft RFA's scoring structure in the Track 2 TA work plan section, the intention was for all three project categories (School Food, Education, and Producer Training) to be eligible for the same amount of points and to enable applicants to select the project elements that align with their proposed project. The final RFA includes an updated Track 2 TA work plan section to reflect this intention – each project category is now eligible to select up to eight project elements and receive up to 35 points in the work plan section.</p> <p>Response 5b: Based on both the draft RFA and final RFA, in the "Audience" section of the Track 2 application, the applicant should include all School Food Authority (SFA) project partners. If 100 SFAs will be project partners, then the rest of the application must align – e.g., the Project Team + Letters of Support section and Community Need section would need to include all 100 SFAs and the work plan, budget, and other application materials would need to align. If instead the applicant plans to use grant funds to support a smaller group of 10 SFAs, rather than a larger group of 100, then the rest of the application must align – e.g., the Project Team + Letters of Support and Community Need section would need to include the 10 SFAs and the work plan, budget, and other application materials would need to align. Ultimately, it is up to the applicant to determine the partners for their Track 2 proposed project and then align the rest of the application accordingly.</p>

	<ul style="list-style-type: none"> • Support small to midsize CA food producers <p>Everyone (possible points: 8)</p> <ul style="list-style-type: none"> • Incorporate culturally relevant programming • Utilize peer-to-peer learning • Utilize both virtual and in-person gathering • Utilize community engagement and storytelling elements <p>I suppose my question is whether the intention is to design a project that meets all of these elements and/or to create a preference for one of the three types of supportive project, or perhaps if we'd want to consider a scoring structure here that would evenly distribute possible points across the three categories and/or focus on specific priorities for each category.</p> <p>[5b] Question 2: Since we work with a network of 100+ public school districts, would the criteria we'd use in the community need section be based on the characteristics of the school districts that submit LOS for this project (who we'd likely work more closely with for this project), or the network as a whole?</p> <p>Thanks again, and happy to jump on a quick call to talk this through if it's easier!</p>	
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RFA Section(s)	Public Comment 6 <i>(received 12/14/2023)</i>	CDFA Response
1.6 Eligibility and Exclusions	<p>After reviewing the draft RFA, our team at XXX would like to provide the following feedback.</p> <p>[6a] Track 2: Farm to School TA Grant Track 2 requires a partnership with a School Food Authority (SFA). In a large district like LAUSD, where most of the school garden programs are operated by nonprofit</p>	<p>Thank you for your comment.</p> <p>Response 6a: The Eligibility and Exclusions section of the final RFA clarifies that proposed projects in the Track 2 Education category must partner with at least one California public school district, county office of education, charter school, or Tribal school that is a California School</p>

	<p>organizations at the school level, this may prevent the majority of well-established school garden support organizations from submitting an application, as they do not engage at the district level, or with the Food Service Dept.</p> <p>The RFA also requires that technical assistance education be geared toward supporting SFAs, but particularly at such a large district, garden programs that are run or coordinated by the district are typically overseen by the Wellness or Facilities vs the Food Service Dept, which does not deal directly with garden education programming.</p> <p>Replacing the requirement for SFAs with "school site" or "school principal" would make the RFA significantly more inclusive of school garden and other decentralized/school-level Farm to School programs at large school districts.</p> <p>Thank you for your consideration.</p>	<p>Food Authority currently operating the National School Lunch Program. The Track 2 application often uses the phrase School Food Authority to refer to this type of entity, and not to specifically refer to the school nutrition department within this type of entity. The Project Team + Letters of Support section of the Track 2 application in the final RFA clarifies that for proposed projects in the Track 2 Education category, the project representative from each School Food Authority (SFA) partner is typically a chief education officer or similar position. The Track 2 Education category does not expect applicants to partner with the school nutrition department of each SFA partner.</p> <p>While an individual school site that is not an SFA is <u>not</u> an eligible project partner in Track 2, the draft RFA and final RFA include a paragraph in the Track 2 Eligibility and Exclusions section that says, "Track 2 applicants may identify in the application that their proposed project will focus on one or more specific school sites within each California School Food Authority that is part of the project partnership."</p>
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Track 3: CA Farm to Early Care and Education (ECE) Grant

Please see the [Multiple Tracks](#) section below for public comments that included feedback about Track 3.

Track 4: CA Farm to School Producer Grant

RFA Section(s)	Public Comment 7 (received 12/6/2023)	CDFA Response
3.2 Grant Application and Review Criteria	[7a] For Track #4 Budget Category #1 can you please elaborate on how to properly approximate and document the proportion of the budget item costs for grant vs non-	<p>Thank you for your question.</p> <p>Response 7a: Approximating a proportion of an equipment or infrastructure cost that can be charged to the</p>

	<p>grant activities? Below is the excerpt from the Grant Draft from Track #4 that I am referring to.</p> <p>"NOTE: In accordance with the CDFA Grant Administration Regulations, Section 330.1(c)(1), if an equipment or infrastructure cost will benefit both grant project activities and non-grant project activities, then please approximate (using reasonable and properly documented methods) the proportion that is for proposed grant project activities as the proportion that may be charged to the grant award."</p>	<p>grant refers to estimating the percentage of time that the organization would, if awarded, use the item for grant project activities (versus for non-grant project activities). For example, perhaps a Track 4 producer applicant proposes to purchase a refrigerated delivery truck, which they plan to sometimes use for food deliveries to schools (as part of their proposed grant project activities) and other times use for food deliveries to restaurants (which would be considered non-grant project activities). In this case, the referenced excerpt from the grant application is asking the producer applicant to approximate (using reasonable and properly documented methods) the proportion of the truck that is for proposed grant project activities (i.e., the estimated percentage of time that the producer would, if awarded, use the truck for food deliveries to schools) as the proportion of the truck's total cost that they may propose to charge to the grant award. Please email cafarmtoschool@cdfa.ca.gov with any additional questions about this topic.</p>
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RFA Section(s)	Public Comment 8 (received 12/6/2023)	CDFA Response
<p>1.2 Definitions</p> <p>1.4 Funding and Duration</p> <p>1.6 Eligibility and Exclusions</p> <p>1.7 Allowable and Unallowable Costs</p>	<p>Thank you for the Farm to School grant seminar. I have a few questions:</p> <p>[8a] To confirm, Track 4 includes minimally processed value-added products from the farmer. Does this include apples pressed into juice, dried apples, or frozen apple slices?</p> <p>[8b] Our farm self-distributes to schools for many years. Can we also apply as an Aggregator/Distributor? Or could there be additional funds for self-distributing farmers? For instance, if we had a refrigerated truck we could deliver our organic heirloom apples to more schools. An additional \$100,000 would cover a truck and driver for 2 years.</p>	<p>Thank you for your questions.</p> <p>Response 8a: Track 4 will fund California food producers to increase production, processing, and/or distribution capacity to sell California grown or produced, whole or minimally processed foods to the school food market. The full definition of minimally processed products is in the Definitions section of the final RFA. Per this definition, apples pressed into juice, dried apples, and frozen apple slices would be eligible minimally processed products in Track 4 if they do not contain additional ingredients. The final RFA adds a note to this definition that if a minimally processed fruit or vegetable (e.g., a dried, frozen, or pressed-into-juice fruit or vegetable) includes additional ingredients, then the CDFA will consider such products on</p>

	<p>[8c] Lastly, processing equipment (like dryers, fruit graders, etc) is very expensive and is often a huge barrier for small farmers, but can be very helpful for long-term sustainability. An apple grading/packing line is about \$250,000–500,000.</p>	<p>a case-by-case basis and allowability is subject to CDFA approval.</p> <p>Response 8b: We have a few responses to the questions about Track 4 eligibility and funding amounts. First, regarding submitting multiple applications to Track 4: applicants are limited to one Track 4 grant application per unique tax/business identification number. Second, regarding Track 4 eligibility: a California farm that self-distributes its own food to schools would be eligible to apply as a California food producer in Track 4. However, if the farm does not aggregate and distribute food for other local or regional farms or ranches as a supply chain intermediary, then it would not be eligible to apply as a public-serving aggregation and distribution enterprise in Track 4. Third, regarding the award amounts for Track 4: the draft RFA proposed a maximum award amount of \$250,000; the final RFA increases the maximum award amount to \$350,000. This higher maximum award amount applies both to California food producers who apply to Track 4 and public-serving aggregation and distribution enterprises that apply to Track 4.</p> <p>Response 8c: Additionally, regarding processing equipment, the final RFA adds a line under the Track 4 Allowable and Unallowable Costs section that “processing equipment to minimally process produce” is allowable.</p>
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RFA Section(s)	Public Comment 9 (received 12/7/2023)	CDFA Response
<p>3.2 Grant Application and Review Criteria</p>	<p>I’m writing to submit a comment about DRAFT Track 4: California Farm to School Producer Grant.</p> <p>[9a] In the section titled “Production Practices and/or Aggregation/Distribution Practices,” there’s a question about “Evolution of Practices” asking how the grower would evolve their production to provide more food for the</p>	<p>Thank you for your comment.</p> <p>Response 9a: The final RFA no longer includes the “Evolution of Practices” question in the Track 4 application. As a result, the possible points in the Farm to School Work Plan section of the Track 4 application have increased.</p>

	<p>school market. I think this question, without clarification, may seem repetitive of the “Farm to School Work Plan” section’s “Farm to School Activities & Timeline” table. I’m curious if the “Evolution of Practices” question is trying to get at more specific practices around food safety, climate-smart agriculture, etc. since that’s the theme of the section? I would recommend that the language of that question is adjusted for clarification.</p>	
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RFA Section(s)	Public Comment 10 (received 12/12/2023)	CDFA Response
<p>1.6 Eligibility and Exclusions</p> <p>1.4 Funding and Duration</p>	<p>Please see questions below regarding the Farm to School Incubator Grant Program. Both questions pertain to TRACK 4:</p> <p>[10a] Track 4, Question 1: Small independent family farms often own one to two separate business entities (separate tax ID’s) for the administration, farming type (bees [honey] vs. walnuts vs. livestock), and bookkeeping aspects of growing foods and providing farming services. May more than one grant proposal be submitted by the farm for each corporate entity and considered for award?</p> <p>[10b] Track 4, Question 2: Our family evaluated the grant program as it pertains to our farming process, equipment, and labor used to generate food for schools. To support sustainable practices and ensure continued school food program participation, we evaluated the costs of aging equipment (i.e., refrigeration motors, small tractors, and small farm vehicles [side by side, atv]), irrigation practices (i.e., drip vs. flooding), desired food (i.e., peaches vs. walnuts) to be purchased by school programs, and additional ancillary support services and equipment. The costs to perform the minimum improvements to our farming program quickly reached \$250,000. Would the State consider raising the threshold amount to \$400,000 per grant awarded to ensure adequate budget for</p>	<p>Thank you for your questions.</p> <p>Response 10a: Yes. Per the Track 4 Eligibility and Exclusions section of the draft RFA and final RFA: "Applicants are limited to one Track 4 grant application per unique tax/business identification number. Applicants who operate more than one business entity may submit separate Track 4 grant applications on behalf of each entity that has a unique tax identification number."</p> <p>Response 10b: The Track 4 maximum award amount in the final RFA is \$350,000, which reflects this feedback to increase the award amount. This is an increase from the proposed award amount in the draft RFA of \$250,000. However, it is not quite \$400,000 in order to enable more food producers and public-serving food aggregation and distribution enterprises across California to participate in the grant program.</p>

	necessary and sustainable farming program improvements?	
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RFA Section(s)	Public Comment 11 (12/8/2023)	CDFA Response
1.4 Funding and Duration	[11a] If awarded the grant how does it affect your farms taxes	<p>Thank you for your question.</p> <p>Response 11a: The CDFA cannot give direct accounting advice on this topic. However, to ensure producers have the support they need, this grant program allows Track 4 producer applicants to include the following cost in their project budget: accounting consultation during the grant term for funding received through the CA Farm to School Incubator Grant Program. The Track 4 Allowable and Unallowable Costs section of the final RFA adds this as an allowable cost.</p>

RFA Section(s)	Public Comment 12 (received 12/12/2023)	CDFA Response
1.7 Allowable and Unallowable Costs 3.2 Grant Application and Review Criteria	<p>My name is XXX and I am contacting you on behalf of our ranch in Northern California. We are a small ranch that raises beef and sells to the local schools and food banks. We are so excited for the farm to school grant and I have viewed your recorded webinar. I had a couple questions and a couple comments. Please see below.</p> <p>[12a] 1. For track 4 allowable costs: infrastructure to scale up production: can you please define infrastructure? Does this allowable cost include construction costs for building ? Most grants I found are not including “construction” or buildings as allowable costs..and while we won’t be including infrastructure in our grant proposal it may be something the CDFA defines and decides what might be allowable. For instance: our grant application will be requesting funding for scaling up production of beef which will include request for funds for purchasing more cattle and processing costs... but with added cattle to our current</p>	<p>Thank you for your comments and questions.</p> <p>Response 12a: The draft RFA and final RFA include a list of allowable Track 4 infrastructure costs under the Track 4 Allowable and Unallowable Costs section. Please note that the list is not exhaustive and the CDFA will consider other items that align with the funding purpose. The list includes "improvements to existing buildings or facilities" and "capital expenditures for buildings, with prior written approval from the CDFA," both of which may include construction costs for building if necessary to the performance of the grant award and included in the approved budget. Please note that depending on the nature of the construction costs, they may fit under "Contractual Costs" rather than "Infrastructure Costs."</p> <p>Response 12b: The final RFA increases the amount of points available for the “Business History” question from 5 points (as proposed in the draft RFA) to 10 points. This</p>

	<p>program it would be amazing if we could designate funding to building out some more infrastructure which may require building awnings, more storage space for freezers to store the beef once processed etc It's just an idea for the future although I understand why many grants do NOT include that type of infrastructure costs as allowable</p> <p>[12b] One comment I would like to mention, (and I'm not sure if this is already a requirement) I realize the applicants have to check various boxes to be eligible and get school support as well which is fantastic, I do believe it would behoove the CDFA to also prioritize farms that have filed schedule F for at least three years. I have found many beginning farmers wanting to take advantage of grant programs because they see the dollars but they are not as invested long term and eventually fall off the map. I only mention this because our ranch has put all our assets and money back into our projects and it is our life, we will always ranch and raise cattle, sometimes I see the waves of people wanting funding but they are not committed to their community nor farming/ ranching in the same way that some of us are. I do believe that people that are filing taxes schedule F and in year three of their farm or ranch are more dedicated and hopefully can get grants that uplift their work and elevate the food systems locally.</p> <p>I was so happy to see the webinar and we may miss tomorrows live stream because we do have to take cattle into the processors. But I hope to still catch it after it's recorded Thank you again for making this grant accessible and comprehensive for farmers and ranchers. I just finished my registration and process for a USDA grant and it was very difficult, I had to ask a CDFA employee to assist me because they make the USDA grant sites so difficult to navigate for average people. It is empowering to know your organization wants farmers and ranchers to</p>	<p>question asks producer applicants to describe their history farming and offers up to 10 points for clearly demonstrating significant experience farming.</p>
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	<p>access funds and be able to make projects have long term success for years to come. Thank you again for all your hard work</p>	
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RFA Section(s)	Public Comment 13 (received 12/13/2023)	CDFA Response
<p>3.2 Grant Application and Review Criteria</p>	<p>[13a] My main comment on the grant is for Track 4 - Funding Priority: small to midsize producers: _/5 points. Would you consider using Adjusted Gross Income or starting the scale at \$500,000 or less. My main concern is that those of us currently doing Farm to School work have a much larger Gross Income even with very few schools. One district alone could order anywhere between \$20,000-\$40,000 per week. That number may seem large but keep in mind Gross vs. Net are two entirely different propositions. Most farms on a good year hope to make 10% on sales, also the operating costs needed to service and maintain these districts can be very high. I also fear farms with \$250,000 or less in Gross Income would not be able to fulfill the mission of this program. For example an Apple and or Stone Fruit Orchard that has a revenue of \$250,000 would likely look like this: \$60.00 per box average sales 4,166 boxes 65 pallets That is just one item and may not be as sustainable as the aggregation model. Also with only \$250,000 in Gross Income they may not have the infrastructure in place to scale. I understand this grant is to help with infrastructure but there are a lot of needs of those that are currently in the process of scaling and because of the work done on Farm to School the Gross Income will be substantially higher than the current \$250,000 minimum and I believe most would be in the 1-5 million category. I know from previous years of applying that every point counts and I hope you would take this into consideration.</p>	<p>Thank you for your comment and questions.</p> <p>Response 13a: The final RFA maintains the tiered scoring system that the draft RFA proposed for the small to midsize producer question in Track 4. However, the dollar amounts of the tiers themselves in the final RFA are now slightly higher than in the draft RFA in order to better align with the USDA Economic Research Service farm typology. Producer applicants with an average annual gross cash farm income during the previous three-year period of less than \$350,000 are now eligible to receive 5 points in this question. Producer applicants with an average annual gross cash farm income during the previous three-year period of between \$350,000 to \$999,999 are now eligible to receive 3 points in this question. Producer applicants with an average annual gross cash farm income during the previous three-year period of between \$1 million to \$1,999,999 are now eligible to receive 2 points in this question. And producer applicants with an average annual gross cash farm income during the previous three-year period of between \$2 million to \$4,999,999 are now eligible to receive 1 point in this question.</p> <p>Additionally, the Definitions section of the final RFA updates the definition of small to midsize food producers to those for which the average annual gross cash farm income during the previous three-year period is less than \$1 million (rather than \$750,000 or less, which the draft RFA proposed). This update also aligns with the USDA Economic Research Service farm typology.</p>

	<p>Please feel free to reach out if more details about this are needed.</p> <p>[13b] Lastly, one question for clarification: Are these grants an all or nothing proposition? If not, how will decisions be made on funding priorities for the grant? Is that something we should outline if multiple items are being requested for the grant track?</p>	<p>Response 13b: Track 4 applicants may apply for any award amount between the Track 4 minimum and maximum award amounts. All line items in an applicant's proposed budget should align with the applicant's proposed project work plan. The technical review process will assess the merit of an application in the context of the award amount that the applicant requested, not based on a potential partial award amount. In terms of award notification and announcement, per the Funding and Duration section of the draft RFA and final RFA, "the CDFA reserves the right to offer an award amount less than the amount requested." In this case, the applicant would have an opportunity following award notification to adjust their project work plan and project budget to align with the award amount that the CDFA offered, while still aligning with the originally proposed project that received the award.</p>
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RFA Section(s)	Public Comment 14 (received 12/14/2023)	CDFA Response
<p>1.4 Funding and Duration</p>	<p>[14a] Thank you for taking comments for the 2024 CDAF F2S Incubator grant. My comments are specifically directed towards Track 4. We will be applying under this track as a Food Hub and are very excited about the possibilities this funding could provide to our expanding operations.</p> <p>We are applying for the grant for the purpose of adding processing equipment designed to increase our fruit packing capabilities by 4X. We will also be hiring two full time positions with this funding: 1) Sales Account Manager and 2) Production Coordinator.</p> <p>Hiring two qualified individuals and purchasing capital equipment is the best next step for our development as a Food Hub and will allow us to service additional Schools districts. We currently service 10 districts and have more</p>	<p>Thank you for your comment.</p> <p>Response 14a: The Track 4 maximum award amount in the final RFA is \$350,000. This is an increase from the proposed award amount in the draft RFA of \$250,000. However, it is not higher than this in order to enable more food producers and public-serving food aggregation and distribution enterprises across California to participate in the grant program. Additionally, the maximum award amount is not higher for public-serving aggregation and distribution enterprises than it is for food producers in order to avoid confusion that may arise around who is eligible to apply for the higher award amount within Track 4 and who is not.</p>

	<p>looking to on-board as customers. We are limited in the volume we can process however with our current infrastructure. We feel the award cap of \$250k is a little light for the development needed for our own expansion goals and believe this may be the case for other Food Hubs in the state as well. Most of our contacts at other food hubs have expressed their goals to dramatically expand their operations. As local Food Hubs, we are all working to increase output in order to satisfy the amazing funding opportunities for local food being utilized by School districts. Rough numbers for our projected expansion goals (2 full time hires + processing equipment) puts the total expense at about \$500k. We humbly submit a recommendation for an increase in Track 4 award to up to \$500k.</p> <p>Thank you so much for taking the time to review my comment and please let me know if you have further questions or need clarification.</p>	<p>The CDFA encourages food hubs in California to also explore other funding opportunities such as Resilient Food Systems Infrastructure.</p>
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RFA Section(s)	Public Comment 15 (received 12/14/2023)	CDFA Response
<p>3.2 Grant Application and Review Criteria</p>	<p>We have one comment to be considered for the 2023-24 California Farm to School Incubator Grant.</p> <p>[15a] There are sections of the application in which points feel weighted towards more established businesses, ie; page 3 of track 4 "Years in Operation."</p> <p>This is a bit discouraging for younger farms/businesses, and may not accurately reflect the broader goal to support more small farm development. Established businesses generally already benefit from the economy of scale, brand recognition, established customer base/ financial security. While they may therefore be in the best position to produce at scale, giving priority for grant funding to businesses at this stage of</p>	<p>Thank you for your comment.</p> <p>Response 15a: The final RFA removes the "Years in Operation" question from the Track 4 application. However, the "Business History" question remains in the final RFA – this question is broader than the Years in Operation question, asking producer applicants to describe their history farming rather than to check a box about the length of time their business has been in operation.</p> <p>Please note that while the 2023-24 CA Farm to School Incubator Grant Program does prioritize small to midsize food producers, it does <u>not</u> fund start-up costs for <u>new</u> food production operations (per the Track 4 Eligibility and</p>

	<p>development does not necessarily result in a broader, more redundant and resilient foodshed with more small farms supplying children in local schools and communities.</p> <p>We thought point opportunities like this one could be structured in a bell curve, still offering more points to established businesses (such as 3 years in operation), with similar scoring for both recently and thoroughly established businesses.</p> <p>A second strategy could be to not associate a point system with years in operation.</p> <p>We offer these potential strategies as an attempt to encourage more small farms/businesses to get going and apply for this grant.</p> <p>Thank you for your time and consideration.</p>	<p>Exclusions section of the draft RFA and final RFA). Applicants must currently produce food or currently aggregate and distribute food to be eligible to apply. The CDFA encourages beginning farmers to explore the CDFA Beginning Farmer and Farmworker Training Grant Program.</p>
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Multiple Tracks

RFA Section(s)	Public Comment 16 (received 12/7/2023)	CDFA Response
<p>1.2 Definitions</p> <p>3.2 Grant Application and Review Criteria</p>	<p>[16a] Issue:</p> <p>Schools are used to buying from Big Box trucks (Sysco, etc.). This is convenient for them, and usually provides lower prices on food. For schools to change to local growers and producers will take effort and willingness to pay more. The CDFA definition of “local” to mean from anywhere in California is a disincentive for schools to make such changes in procurement.</p> <p>When you listen carefully to school nutrition directors, what they most strongly hear in tracks one and three is to get free money to buy the same produce/meat/dairy they are already buying.</p>	<p>Thank you for your comments.</p> <p>Response 16a: The CDFA Farm to School Incubator Grant Program defines "local" as California grown or produced in order to include the variety of ways that School Food Authorities across California define local and procure locally based on their geographic location in the state. Beyond the requirement that grant-funded food for school meals must be California grown, the program prioritizes projects that procure California grown or produced, whole or minimally processed food from small to midsize food producers; veteran, socially</p>

	<p>This lack of focus on the real meaning of local may result not in increased production and viability in true small and medium farms, but instead reward the large farms in central and southern California which are industrial in their ag practices (even when they are organically-certified). As F2S proves itself an economic engine in the coming years, it is not hard to imagine some of these existing food factories breaking up into nominally smaller units, able to legally stay under the \$750K annual income level.</p> <p>Additionally, the smaller the farm, the less willing and able they are to get organic certification; both for financial and ethical reasons. And without that certification, CDFA grant readers will have to take applicants' word for the climate-smart nature of their practices. And larger guys will be better at co-opting the story (I probably don't have to repeat the story from the 2022 USDA Climate Smart Grant, which was almost exclusively awarded to big guys who told a great "no-till" story, which involved increased amounts of glyphosate to implement).</p> <p>If you don't find a way to reward local, you will bake into the F2S program a serious limitation from the outset. Carbon footprint (due to longer refrigeration times and greater number of highway miles) will not be lessened, which works against the "climate smart" mandate. Soil and biodiversity improvements will be less likely to occur, since federal organic certification does not require them and provides "air cover" for industrial farmers who have simply switched out input types. Kids won't have access to neighborhood farms to visit and people they know to come speak to them in schools. Food will be less nutrient-dense.</p> <p>Recommendations:</p>	<p>disadvantaged, and limited-resource food producers; and producers that practice climate smart agriculture.</p> <p>The CDFA Office of Farm to Fork acknowledges that verification of climate smart agriculture practices can be a challenge and plans to revisit this in future grant programs. The 2023-24 CA Farm to School Incubator Grant Program offers producer applicants up to 5 points in the Track 4 application for climate smart agriculture verification. Options for this climate smart agriculture verification include: verification that the producer is certified organic, registered organic, or transitioning to certified organic; verification that the producer has participated in a USDA Natural Resources Conservation Service (NRCS) program or a CDFA Office of Environmental Farming and Innovation (OEFI) program; or verification that the producer has received conservation technical assistance in the last 12 months.</p> <p>To examine the climate smart agriculture component of the grant program, the independent CA Farm to School Evaluation Team's evaluation plan includes questions such as:</p> <ul style="list-style-type: none"> • To what extent, and how, does the grant program support producers using climate smart agricultural practices? • What are the environmental impacts of supporting these producers, especially related to climate? <p>The final RFA publishes the scoring system in Tracks 1 and 3 for the procurement work plan.</p>
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	<ul style="list-style-type: none"> • Stop recognizing the term “hyper-local” in your conversations. Local is local (defined as, "belonging or relating to a particular area or neighborhood, typically exclusively so".) Giants fans don't see Dodger stadium as “local”; Central Valley farmers see Nancy Pelosi as being from another planet. • Publish your tiered scoring system in Tracks 1 & 3 for procurement, and give top points for a procurement work plan that identifies and makes overtures to farmers within a 50 mile radius. (I know it is challenging for some schools - say, in Modoc or Imperial Counties - to find enough food within 50 miles; but they could try, and might give birth to a small farmer or two by doing so; for an area like Sacramento, virtually all of its procurement could come from within 50 miles, and should). • Work with The Real Organic Project to put together a Track 2 project for \$500,000 to review all of the farms who made “Climate Smart” claims on their grant application, and report on them. This will uncover many abuses to the system, and provide input for the 2024-5 grant cycle. It will also help the State of California make a true statement of commitment to our environment, and be a wedge to improve the federal organic standards. <p>If CDFA F2S can't initiate this with ROP, but would be behind it, ask me and I'll pursue it.</p>	
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RFA Section(s)	Public Comment 17 (received 12/7/2023)	CDFA Response
1.2 Definitions	<p>[17a] Here is my comment for the current language for whole grains:</p> <p>Current Language: Whole grain-rich flours and other whole grain-rich products that are 100% grown, milled, processed, and manufactured in California are allowable. In alignment with the USDA, whole grain-rich means that at least 50 to</p>	<p>Thank you for your comment.</p> <p>Response 17a: Because one of the foundations of this grant program is to connect California schools with California agriculture, expanding the criteria around whole grain-rich products to allow a significant proportion of non-California grown ingredients is not part of the final RFA. The final RFA maintains that whole grain-rich products that</p>

	<p>100% of the grains in the product are whole grains, and the remaining grain, if any, must be enriched.</p> <p>Comment: We have really struggled with finding 100% ca grown and milled sifted and enriched flour to blend with CA 100% whole wheat flour. From our research there is not a mill in CA that is sifting and enriching 100% CA grown grain (if there is one please let us know!) This has lead us to a standstill of not being able to purchase a min processed item from a bakery who is milling 100% ca grown grain because the remainder of their flour is organic usa milled but not in CA.</p> <p>I think that in order for more districts to be able to support CA grown grain farmers , products should be at least 51-60% 100% whole wheat CA grown and milled flour. The remaining enriched flour should be USA grown and milled. This will allow MORE districts to support farmers and millers in CA and get more local minimally processed foods into schools such as bread from a local bakery, pizza dough, pretzels etc. More districts buying from CA grown grain farmers and millers= more \$ for grain farmers and millers to expand their business and mill and sift 100% ca grown flour.</p> <p>Thank you!!</p>	<p>are 100% grown, milled, processed, and manufactured in California are allowable.</p> <p>However, the CDFA intends to explore this topic further. The draft RFA and final RFA include a line that says: "CDFA staff intend to convene a working group to work out the detailed parameters for 'minimally processed' food products that this grant program may fund." This working group may make recommendations to refine the parameters around whole-grain rich products that are allowable in this grant program.</p>
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RFA Section(s)	Public Comment 18 (received 12/1/2023)	CDFA Response
<p>1.2 Definitions</p> <p>1.3 Four Funding Tracks</p>	<p>[18a] Quick question- I have looked and cannot find the requirements/definitions for " credentialed or certificated educators," in the education tracks. What kind of certifications are acceptable?</p>	<p>Thank you for your question.</p> <p>Response 18a: The draft RFA did not include a definition of “credentialed or certificated educators” for Tracks 1 and 2. If you have feedback about acceptable types of certifications, please let us know by December 14th at 5pm.</p>

	I saw under track 3 that a Child Development Teacher Permit is required but did not see anything else. Apologies if I've missed it.	
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RFA Section(s)	Public Comment 19 (received 12/11/2023)	CDFA Response
1.3 Four Funding Tracks	<p>[19a] I am commenting regarding the stipulation that school garden educators have a "credential or certification."</p> <p>This new policy is very onerous to small nonprofits, schools and individuals that might want to support school gardens, especially in small, rural communities, like the ones in the Northstate (where I am) and the Central Valley. We have a difficult time getting good employees. While the ones we have love the work, we do not have the resources to send them to school, nor do they have the time or resources to get one. This will discourage school gardening and feels like an unfair and privileged expectation to put on school garden programs, especially in lower income areas.</p> <p>Teachers and principals are excited about and appreciate these programs and have never asked or required any kind of certificate or credential to have a school garden. Why all of a sudden is this a requirement, given the success of so many school garden programs without it?</p> <p>My first choice would be that you delete this requirement entirely. But if you decide to keep it in, my request is that the bar be very manageable and cost effective, and have a variety of options that are easily attainable for distance learning.</p> <p>Some thoughts are: Permaculture certification, Master Gardener's Certification or programs like the online ones offered below:</p>	<p>Thank you for your comment.</p> <p>Response 19a: This grant program does <u>not</u> require school garden educators to have a credential or certificate, neither in the draft RFA nor in the final RFA. However, the <i>prioritization</i> of projects that incorporate <u>credentialed</u> educators remains in the final RFA – Tracks 1 and 2. While it is not a requirement, projects that incorporate this optional project element are eligible for priority points in the review criteria. The intention is to promote the institutionalization of hands-on food education in school districts' education programs by encouraging projects to collaborate with credentialed public school educators. The final RFA removes the phrase "<u>certificated</u> educators" in order to clarify that the focus of this optional project element is collaboration with public school educators who have a teaching credential. For additional clarity, the final RFA adds a definition of "credentialed educator" in the Definitions section, under "Educator."</p> <p>To clarify the scoring: (a) not all educators involved in a Track 1 or 2 proposed project need to have a credential, and (b) educators that do not have a credential may participate in a proposed project. In the Track 1 application, if applicants select the following optional education project goal ("Our proposed project will increase opportunities for students to engage in hands-on food education that is led by credentialed public school educators"), then they will have the opportunity to receive up to 5 points in the Hands-on Food Education Activities & Timeline section for describing how they will achieve this</p>

	<p>https://www.childhoodbynature.com/nature-based-educator-trainings/ https://workspace.oregonstate.edu/certificate/school-garden-coordinator-certificate-training Very expensive for a small nonprofit https://www.lifelab.org/educator-certification-program/ https://www.pollinator.org/psc</p> <p>I love what you guys are doing for the kids and appreciate you, but this one is, in my opinion, ill-considered and a huge mistake.</p> <p>Thank you kindly for your consideration.</p>	<p>goal. In the Track 2 application, if applicants in the Education project category select the following optional project element ("Work with credentialed public school educators), then they will have the opportunity to receive up to 2 points in the Technical Assistance Activities & Timeline section for describing how they will achieve this project element.</p>
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RFA Section(s)	Public Comment 20 (received 12/11/2023)	CDFA Response
<p>1.3 Four Funding Tracks</p>	<p>[20a] A credential or certificate for garden educators should be required so there is learning and success with the school gardens. It should not, however, be required of teachers or staff who are already overworked and short on spare time to do added training. Can't the State offer a stipend or fund a part-time garden educator position at each awarded school if there is a need? This would add jobs for many who need to work and get paid instead of laboring and putting in time and effort for free.</p> <p>Please reconsider this onerous requirement and change the language for the school incubator program grants</p>	<p>Thank you for your comment.</p> <p>Response 20a: Please see response 19a regarding credentialed and certificated educators.</p>

RFA Section(s)	Public Comment 21 (received 12/12/2023)	CDFA Response
<p>1.3 Four Funding Tracks</p>	<p>Friends, [21a] This is to request further reflection on the requirement, in Track One, that school garden educators have a "credential or certification." The very best farmers we have, and the ones we want interacting with kids, will not have formal credentials or certifications. And the easiest creds to earn are from the conventional farming</p>	<p>Thank you for your comment.</p> <p>Response 21a: Please see response 19a regarding credentialed and certificated educators.</p> <p>Response 21b: Regarding Track 4, please see response 16a.</p>

	<p>world, which is not known for its sense of stewardship/participation with the visible and invisible players in the great miracle of life on the planet. Perhaps you can request that school garden educators have “a demonstrated history in regenerative farming and/or livestock management”.</p> <p>[21b] And, again, perhaps seek engagement on this question - and that of “climate smart” practices in Track Four - from The Real Organic Project. I propose that The Real Organic Project play a leading role in California’s effort to forge meaningful definitions for “organic”, “climate smart”, “regenerative” and “local”.</p>	
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RFA Section(s)	Public Comment 22 (received 12/13/2023)	CDFA Response
1.3 Four Funding Tracks	<p>[22a] I support and agree with the opinion submitted by XXX regarding the new stipulation that school garden educators have a “credential or certification.” At XXX we have an amazing farmer that has transformed our program and our cafeteria menu. We also have a master gardener who volunteers. Both of these individuals couldn’t be more qualified to teach and demonstrate the benefits of fresh, local, organic food and sustainable farming. As XXX mentioned, we also live in a very small rural community in the Sierra foothills and feel so grateful that we have attracted these two individuals to our team.</p> <p>I am very grateful for all the support the CDFa has given us and hope you will reconsider this stipulation.</p>	<p>Thank you for your comment.</p> <p>Response 22a: Please see response 19a regarding credentialed and certificated educators.</p>

RFA Section(s)	Public Comment 23 (received 12/13/2023)	CDFA Response
1.3 Four Funding Tracks	<p>[23a] Hello. I am writing to comment on the proposed CDFa requirement that would require those teaching students about gardening to have relevant credentialing. I believe this is an unreasonable and onerous requirement, particularly for smaller rural communities. It is likely that this requirement will only hamper our rural communities’</p>	<p>Thank you for your comment.</p> <p>Response 23a: Please see response 19a regarding credentialed and certificated educators.</p>

	efforts to get kids interested in growing their own food. Isn't that the main point of these programs?	
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RFA Section(s)	Public Comment 24 (received 12/13/2023)	CDFA Response
1.3 Four Funding Tracks	<p>[24a] I support the State in combining so many programs with outcomes that are impacted by food in this grant program. It's comforting to see so much expertise involved and looking for leverage in their collective efforts.</p> <p>However, I don't believe we should do anything that stifles community driven school garden projects. If they do exist at all, it's usually because there is already a demand being met. In some communities, these programs are actually initiated and driven by the community. There are examples of community driven gardening programs at school sites at the Reinvestment Fund - Strategies for Healthier Cities case studies in food systems.</p> <p>I do not believe that adding a layer of compliance or credentials to gardening, a pursuit long associated with humanity's development, is warranted. I understand the desire to educate our youth on the seriousness of our common plight, but I think we under estimate our youth and their awareness.</p> <p>Plus, gardening remains at best a trial-and-error affair. I'd caution against adding anything that might thwart or stifle a community's journey of self-directed inquiry. Even the most under resourced communities in our many disadvantaged ones, have someone who knows how to garden if the internet ever goes down.</p> <p>In many of those disadvantaged communities, those gardeners are the ones who have built collaborations with local agencies to secure resources, including school sites, which I believe are our most underutilized taxpayer</p>	<p>Thank you for your comment.</p> <p>Response 24a: Please see response 19a regarding credentialed and certificated educators.</p>

	<p>supported, public land use assets. Many school sites have no gardening or food producing programming at all.</p> <p>I'd hate to see any well intended requirement become a wedge between community relationships that lead to the exact opposite of promoting program support. Gardening is a path of self-discovery. I think anything that is added to 'make it official' has the potential to preclude school gardens from ever getting established. I don't think this requirement warrants the risk. Thanks for your consideration.</p>	
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RFA Section(s)	Public Comment 25 (12/14/2023)	CDFA Response
<p>1.3 Four Funding Tracks</p>	<p>[25a] This comment is regarding the stipulation that school garden educators have a "credential or certification".</p> <p>A credential or certification to implement garden education should not be required. It will disproportionately impact schools in rural areas where much of the farm to school and garden-based education is implemented via educators that work in community-based programs that work directly with schools, after school and summer enrichment program coordinators, and perhaps most importantly, special education teachers.</p> <p>As a Community Health and Nutrition Program Advisor, I oversee a federally funded program (CalFresh Healthy Living, UC) that provides garden-based education to schools where the majority of students qualify for free or reduced-price school meals in a five-county region (Butte, Colusa, Glenn, Sutter and Yuba) in the North State. Our program implements successful school garden education programs using evidence-based curricula via our community education specialists.</p>	<p>Thank you for your comment.</p> <p>Response 25a: Please see response 19a regarding credentialed and certificated educators.</p>

	<p>School gardening has been in high demand in recent years, and we have been working to meet that demand by providing technical training and assistance on how to teach our evidence-based garden education curricula to a variety of school garden leaders including youth volunteers, parents leading school garden clubs, afterschool program coordinators, summer enrichment program coordinators, and K - 8th grade teachers including special education teachers. This has resulted in more students, in rural and low income areas, engaging in garden-enhanced nutrition education. It is my professional opinion that requiring an additional certification for those just listed above, would create a significant barrier in the form of time and financial cost that would outweigh any potential benefit.</p> <p>None of the educators listed previously, including our community education specialists, has a credential or certification to teach gardening - nor should they be required to - in order to benefit from funding opportunities to enhance farm to school and garden-based education.</p> <p>I ask that you consider removing this requirement entirely.</p>	
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RFA Section(s)	Public Comment 26 (received 12/14/2023)	CDFA Response
1.3 Four Funding Tracks	<p>Thank you for your work in supporting Farm to School efforts. As a previous grantee, I realize that keeping track of everything and working with both the federal program and local efforts is a lot of work!</p> <p>[26a] My comment regards the requirement for school garden facilitators to have a "certification or credential" to run school garden programs in this current funding cycle. As a member of the Butte County Local Food Network, and a parent who helped at my children's school garden, I believe this requirement would place a burden on many</p>	<p>Thank you for your comment.</p> <p>Response 26a: Please see response 19a regarding credentialed and certificated educators.</p>

	<p>organizations that would benefit from this funding, and thus limit the benefit to our students. I respectfully request that you do not require this certification.</p> <p>I did a quick Google search and I did find that such certification is available both from Universities and non-profits in other states, but the only one I could find in California was at Olivewood Gardens in City of Industry: \$1,500 for 7.5 hour training, I believe in person, which would be difficult for those of us in the North State. I work closely with UC Cooperative Extension and have suggested to them that providing a low- or no-cost certification would be an good opportunity, but they would need to find the resources (personnel, time, and money) to do this, which, if possible, will take some time and not available in 2024.</p> <p>Thank you for your consideration of my comment; please let me know if you would like additional information.</p>	
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RFA Section(s)	Public Comment 27 (received 12/14/2023)	CDFA Response
1.3 Four Funding Tracks	<p>XXX would like to submit these comments on the Farm to School Incubator Grant Program draft RFA -</p> <p>[27a] 1. Please exclude the focus on farm to school education opportunities in Tracks 1 and 2 being led by credentialed or certificated educators. Our non-profit organization's Youth Education Team are experts in delivering farm to school education on-farm, supporting school garden education at school sites, hosting school garden teacher trainings, and developing standards aligned garden- and farm-based K-12 curriculum. We have also been piloting very successful cross-age garden-based education between high school students and younger grades, and would love to be able to lift this up as a strategy to expand upon. None of our staff educators or</p>	<p>Thank you for your comment.</p> <p>Response 27a/27b: Please see response 19a regarding credentialed and certificated educators.</p>

	<p>college interns (save one) hold teaching credentials or certificates. We are concerned that this focus would disqualify our program from receiving funding and doing good work to support partner schools.</p> <p>[27b] 2. If the focus on education led by credentialed or certificated teachers does remain in the final RFA, please clarify a) If all instructors need to be credentialed, or just one, and b) If programs using non-credentialed/certified instructors are allowed, what kind of proposal scoring points are attached to the preference for credentialed/certified educators? The current use of the word "especially" in the sentence "especially programs that are standards-aligned, culturally relevant, incorporate credentialed or certificated educators, and complement the school meal program" makes it unclear if this is a preference or a requirement.</p> <p>Thanks for your consideration of these comments, and for all the great work you do!</p>	
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RFA Section(s)	Public Comment 28 (received 12/12/2023)	CDFA Response
<p>1.4 Funding and Duration</p> <p>3.2 Grant Application and Review Criteria</p> <p>3.3 Review Process</p>	<p>I attended one of the informational webinars about the next round of grant funding and wanted to share feedback/thoughts/questions:</p> <p>[28a] -For the Track 2 Technical Assistance grants, is it feasible for multiple grants to be awarded to the same region? We are currently providing lots of support for building capacity with both the local food procurement from farms and building a school food hub, while also supporting development of educational programs. We view both components as united and essential to complete the Farm to School mission of connecting students to where their food comes from. It is hard to only pick one area to work on, and we will likely always be engaged in</p>	<p>Thank you for your comments and questions.</p> <p>Response 28a: It is feasible for the same region to receive multiple Track 2 awards, but will depend on the number of Track 2 applications that the CDFA receives, as well as the amount of funding that is available for Track 2 based on the number of applications that the CDFA receives across all four funding tracks. The final RFA says that this grant program will "aim to distribute awards geographically across California to the extent possible." For Track 2, this means that the CDFA will aim to award at least one technical assistance project in each of the 8 regions on this map. Please note that in the 2022 grant round, the CDFA received 54 Track 2 applications and</p>

	<p>supporting local food systems and farmers as F2S organization.</p> <p>[28b] -We had hoped to allocate a significant amount of funding to grow our school food hub and see that only 250K would be available for food hubs in Track 4...while our food hub would not be eligible to apply for the larger funding available in Track 2.</p> <p>[28c] -What is the funding formula for the Track 3 programs? It seems like allocating up to \$200 for Early Childhood Programs is a much larger per child ratio than the formula for Track 1 School Districts. Preschools are generally much smaller than elementary schools. I would like to work with the early childhood programs in our community but they don't have kitchens or any infrastructure that would allow for bringing in unprocessed local crops. This is a challenge enough in the school districts with actual kitchens. It seems more fair to lower the amount available for Track 3 and reallocate funds to increase the amount available for Track 4, especially the farms and food hubs that need large expensive equipment.</p> <p>Otherwise this looks like a really exciting grant round and we are so grateful for your work and the opportunity to participate in the process!</p>	<p>was able to fund 11. The CDFA encourages collaboration in Track 2.</p> <p>The final RFA maintains that Track 2 applicants must focus their proposed project on one of the following project categories: School Food, Education, or Producer Training. However, in order to incorporate this feedback that some farm to school TA organizations work in multiple categories, the final RFA also includes an opportunity for applicants to build connections with the other two project categories. In the Technical Assistance Work Plan section of the Track 2 application, the School Food project category includes three optional project elements that relate to producers (i.e., support climate smart agriculture and CA food producers who utilize climate smart agriculture practices; support veteran, socially disadvantaged, and/or limited-resource CA food producers; support small to midsize CA food producers) and one optional project element that relates to education (i.e., engage students and credentialed public school educators in school food transformation). The Education project category includes one optional project element that relates to school food (i.e., incorporate hands-on food education opportunities that complement the school meal program) and one optional project element that relates to producers (i.e., expand the incorporation of CA food producers in hands-on food education opportunities for students). The Producer Training project category includes one optional project element that relates to school food (i.e., facilitate collaboration and coordination between CA food producers and CA School Food Authorities) and one optional project element that relates to education (i.e., train producers to provide hands-on food education opportunities to students and staff from CA School Food Authorities).</p>
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RFA Section(s)	Public Comment 29 (received 12/13/2023)	CDFA Response
1.6 Eligibility and Exclusions	<p>Hi! I've completed listening to the recorded sessions, but have a clarification question...</p> <p>[29a] You mention there being two ways (tracks 1 & 4) that school-based gardens/farms can receive funding, depending on whether the project is staffed through the school (track 1) or supported by a third-party (track 4).</p> <p>The wording of the grant (Track1 and Track4 say "individual school districts"), which reads to me to indicate the whole district, not one particular school within that district.</p>	<p>Thank you for your question.</p> <p>Response 29a: In the draft RFA and final RFA, there is a paragraph under the Track 1 Eligibility and Exclusions section that says: "Please note that individual schools are not eligible to apply to Track 1, unless they are a single-site public school district, single-site charter school, or Tribal school that meets the Track 1 eligibility criteria. However, applicants may identify in the application that their proposed project will focus on one or more specific school sites within their SFA." In the case of San Francisco Unified School District and Alvarado Elementary School, San Francisco Unified would be eligible to submit one application to Track 1. Alvarado Elementary School</p>

	<p>For example this is the distinction between coordinating with San Francisco Unified School District as a whole vs. with one particular elementary school, Alvarado Elementary, within that district.</p> <p>Please clarify: Is it possible for an individual district school - not a charter but within SFUSD to apply under track1. And/or Is it possible for a small producer to apply under Track 4 with the intention of working with Alvarado Elementary School, or does the collaboration need to be on a district-wide level.</p>	<p>would <u>not</u> be eligible to apply to Track 1. However, San Francisco Unified could choose to focus their proposed project on Alvarado Elementary School if they wish. The applicant should indicate this in the application.</p> <p>Track 4 is similar. In the draft RFA and final RFA, there is a paragraph under the Track 4 Eligibility and Exclusions section that says: "Applicants must apply in collaboration with at least one of the following entities: California public school district, county office of education, charter school, or Tribal school (such as those administered through the Bureau of Indian Education) that is a School Food Authority (SFA) currently operating the National School Lunch Program (NSLP) [or] California child care center currently participating in the Child and Adult Care Food Program (CACFP)." Additionally, "each of the School Food Authority or child care center entities that the applicant includes as a project partner must provide a letter of intent in the application" and "the letter of intent must be from the director of the entity's school meal program." In the case of San Francisco Unified School District and Alvarado Elementary School, San Francisco Unified would be an eligible Track 4 project partner and the letter of intent would need to come from San Francisco Unified School District's food service director. Alvarado Elementary School would <u>not</u> be an eligible Track 4 project partner on its own. However, the Track 4 applicant and San Francisco Unified could choose to focus the proposed project on Alvarado Elementary School if they wish. The applicant should indicate this in the application.</p>
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RFA Section(s)	Public Comment 30 (received 12/13/2023)	CDFA Response
<p>1.2 Definitions</p> <p>1.6 Eligibility and Exclusions</p>	<p>Good afternoon, and thank you for reading these comments on the Draft 2023-2024 California Farm to School Incubator Program.</p>	<p>Thank you for your comments.</p> <p>Response 30a: According to the definition of minimally processed in the draft RFA and final RFA, a product such</p>

<p>1.7 Allowable and Unallowable Costs</p>	<p>[30a] Section 1.2: Minimally Processed Foods Comment: Many farms, ours included, have made efforts during the last decade to capture value from crops that cannot be sold either to distributors or at farmer’s markets for cosmetic reasons. If a farm is producing value added products in a certified commercial space, (for instance, tomato sauce) it would seem to be in line with the intent of the program that these items be allowable for schools to purchase if they meet the nutritional requirements for schools. I would suggest that value added products that are produced on California farms be eligible for purchase by schools.</p> <p>[30b] Section 1.2: Small to Midsize Producers Comment: While gross income is one way of looking at a farm’s finances, it does not tell the whole story. For example, a farm might make significantly more than that but net significantly less than a small or midsize producer because they are paying their employees higher wages, a large percentage of employee healthcare or investing more of their gross income into climate smart practices. I would suggest looking at a net income of under a certain amount rather than a gross income, or having other metrics such as how many employees they employ on a year round basis, what average wages are, how much health insurance they cover, and commitment to sustainability.</p> <p>[30c] Section 1.6b: Eligibility and Exclusions - Track 2 Comment: Education and Training go hand in hand. I would suggest allowing applicants to apply in both categories rather than in one or the other.</p> <p>[30d] Section 1.6b Allowable and Unallowable Costs - Track 2</p>	<p>as tomato sauce would be allowable if all of the following are true: the tomatoes are California grown, the processing of the tomatoes into sauce occurs in California, and there are no additional ingredients beyond tomatoes in the sauce. The final RFA adds a note that if a minimally processed fruit or vegetable includes additional ingredients, then the CDFA will consider such products on a case-by-case basis and allowability is subject to CDFA approval. Additionally, the CDFA intends to explore the topic of minimally processed foods further. The draft RFA and final RFA include a line that says: "CDFA staff intend to convene a working group to work out the detailed parameters for 'minimally processed' food products that this grant program may fund." This working group may make recommendations to refine the parameters around foods that are allowable in this grant program.</p> <p>Response 30b: The final RFA maintains that the small to midsize producer metric for this grant program is annual gross cash farm income. This aligns with the USDA Economic Research Service farm typology, which also centers on annual gross cash farm income. The intent of the small to midsize producer funding priority is to increase access to the school food market for producers that operate at a smaller scale. A producer's net income may not reflect the scale at which they operate if they have both relatively high sales and high expenses. Please note that while there is a small to midsize producer funding priority in Track 4 (meaning applicants may receive up to 5 points in the review criteria based on their annual gross cash farm income), eligibility is not limited to small to midsize producers.</p> <p>Response 30c: The final RFA maintains that Track 2 applicants must focus their proposed project on one of the following project categories: School Food, Education, or</p>
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	<p>Comment: I would suggest clarifying whether insurance costs are allowable or not in Track 2. Running educational programs for farms is a large added liability, so having grant funding to make sure farms and programs are insured for this activity seems crucial.</p> <p>Thank you for your consideration</p>	<p>Producer Training. However, in order to incorporate this feedback that some farm to school TA organizations work in multiple categories, the final RFA also includes an opportunity for applicants to build connections with the other two project categories. In the Technical Assistance Work Plan section of the Track 2 application, the School Food project category includes three optional project elements that relate to producers (i.e., support climate smart agriculture and CA food producers who utilize climate smart agriculture practices; support veteran, socially disadvantaged, and/or limited-resource CA food producers; support small to midsize CA food producers) and one optional project element that relates to education (i.e., engage students and credentialed public school educators in school food transformation). The Education project category includes one optional project element that relates to school food (i.e., incorporate hands-on food education opportunities that complement the school meal program) and one optional project element that relates to producers (i.e., expand the incorporation of CA food producers in hands-on food education opportunities for students). The Producer Training project category includes one optional project element that relates to school food (i.e., facilitate collaboration and coordination between CA food producers and CA School Food Authorities) and one optional project element that relates to education (i.e., train producers to provide hands-on food education opportunities to students and staff from CA School Food Authorities).</p> <p>Response 30d: In all four funding tracks, costs associated with insurance are allowable as an <u>indirect cost</u> to the grant award. Per #12 of the CDFA List of Allowable and Unallowable Items of Cost, costs associated with insurance may be allowable as a direct cost to the grant award if necessary to the performance of the grant award,</p>
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		<p>and with prior written approval of the Department. Applicants interested in including insurance as a direct cost should include justification in their proposed project budget. Please note that because liability insurance may be necessary to the performance of the grant award in Track 4, the draft RFA and final RFA state in the Track 4 Allowable and Unallowable Costs section that: "costs related to pursuing and attaining...insurance that the producer needs to sell whole or minimally processed food to schools" are allowable as a direct cost.</p>
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RFA Section(s)	Public Comment 31 (received 12/13/2023)	CDFA Response
<p>1.6 Eligibility and Exclusions</p>	<p>I am writing to submit comments on the TRACK 2 and 4 of the Farm to School grant program.</p> <p>[31a] TRACK 2 In regards to requiring that the applicant have a history working directly with public schools, I suggest that you allow connections and working relationships with individual accredited teachers as qualification. For one, the pandemic disrupted in-school activities and greatly reduced time and resources for extra curricular programs such as field trips and farm/nutrition programs. Also, often an individual teacher will make direct contact with a farm and incorporate farm and nutrition education into their class lessons. These relationships are often less formal and not facilitated directly through the school curriculum or regular activities. For example, during the distance learning period of the pandemic, our farm partnered with an accredited outdoor education teacher to create a farm education program on our farm. Because kids could not gather in schools, we wanted to provide a safe outdoor environment where they could still get social stimulation, while learning how to feed and care for our farm animals and crops. Due to the success of our program, we have continued to conduct</p>	<p>Thank you for your comments.</p> <p>Response 31a: The final RFA maintains that Track 2 applicants in all three project categories (School Food, Education, and Producer Training) must partner with at least one California School Food Authority (SFA). (Note: Track 2 applicants in the Producer Training project category must additionally partner with at least one California food producer). This is because the purpose of Track 2, as stated in the Four Funding Tracks section of the draft RFA and final RFA, is to fund farm to school technical assistance organizations to help California School Food Authorities and California food producers implement resilient and sustainable farm to school programming. The final RFA includes further clarification about what this means with the following paragraph: "Providing technical assistance and building capacity refer to activities like coaching, training, and supporting California School Food Authorities, California educators, or California food producers to implement farm to school activities <u>themselves</u>. Track 2 does <u>not</u> intend to fund organizations to directly implement procurement, education, or food sales <u>for</u> project partners."</p>

<p>farm education activities, led by the same teacher, and offered publicly to elementary aged children. We have primarily run our program during summer and other school breaks, so we didn't have a need to formally integrate with the schools. But now, we wish to expand to offer our farm based education to local public schools for field trips, nutrition education, hands-on activities, and growing food to be served in the schools food distribution programs. It is our hope that we can apply for the track 2 grant to fund expansion of our production infrastructure to produce food for schools and build an onsite classroom to accommodate regular school field trips and activities at our farm.</p> <p>[31b] Furthermore, while we are not a non-profit organization, our farm education program is being sponsored by a local non-profit organization that promotes these types of educational programs in our community. For track 2, in which the applicant receiving the grant in their name must be the one that has the history and connection with farm to school education, this may not be appropriate for non-profit fiscal sponsors. As I stated above, our farm does have that type of history, but our non-profit sponsor does not. Therefore, I suggest that there should be qualifications for farms, such as mine, to be able to accept grant funds through a non-profit fiscal sponsor even if the farm/organization is not directly named in receiving the funds.</p> <p>[31c] TRACK 4 My comment for track 4 is the same as above regarding history with working with schools.</p> <p>Thank you for your time and allowing for public comments on these very important grants. Please feel free reach out if you need any further clarification regarding my comments. Thank you!</p>	<p>The Definitions section of the final RFA clarifies that there are <u>three</u> types of established history an organization may have in order to qualify as a Track 2 farm to school technical assistance organization: (a) supporting California School Food Authorities with implementing farm to school procurement programs; (b) supporting California educators with implementing hands-on food education programs in TK-12 settings; or (c) supporting California food producers and institutional food procurement. Organizations in the eligible list of Track 2 entities that believe they have an established history that meets this criteria may apply and will have an opportunity to describe their history in the Farm to School Experience section of the application and justify how it meets this criteria.</p> <p>Response 31b: Regarding projects with a non-profit fiscal sponsor: Projects with a non-profit fiscal sponsor are eligible to apply to Track 2 if the project is a farm to school technical assistance organization. The sponsored organization, not the fiscal sponsor, would be the main applicant and must clearly identify the fiscal sponsor in the application. If awarded, the fiscal sponsor would be the grant recipient and responsible for executing the grant agreement and ensuring all project activities and costs follow grant requirements. In the Farm to School Experience section of the Track 2 application, such an applicant would describe their farm to school experience as the sponsored organization, rather than describing the experience of their fiscal sponsor.</p> <p>Response 31c: Please note that if a California farm would like to fund expansion of its food production infrastructure to sell food to schools and build an onsite classroom to host school field trips, then the funding track that most closely aligns is Track 4, not Track 2. Track 4 applicants must apply in collaboration with at least one of the</p>
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		<p>following entities: California public school district, county office of education, charter school, or Tribal school (such as those administered through the Bureau of Indian Education) that is a School Food Authority (SFA) currently operating the National School Lunch Program (NSLP) [or] California child care center currently participating in the Child and Adult Care Food Program (CACFP). However, Track 4 applicants do <u>not</u> need to have an established history implementing farm to school programs with one of these entities. Rather, Track 4 applicants must show evidence of an <u>established relationship</u> with each California School Food Authority or child care center operator of the Child and Adult Care Food Program (CACFP) to which they intend to sell food. In the application, they must show evidence of this relationship via a letter of intent from the director of each entity's school meal program.</p>
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RFA Section(s)	Public Comment 32 (received 12/14/2023)	CDFA Response
<p>1.2 Definitions</p> <p>1.8 Reporting and Evaluation</p> <p>3.2 Grant Application and Review Criteria</p> <p>Miscellaneous</p>	<p>Thank you for the opportunity to comment on the 2023-24 California Farm to School Incubator Grant Program's draft request for applications (RFA) issued by the California Department of Food and Agriculture (CDFA) on November 29, 2023. The undersigned environmental and sustainable agriculture organizations submit this joint feedback for your consideration.</p> <p>[32a] Overall, we are pleased with the approach the Department is taking with this latest grant cycle and support the idea of having four complimentary tracks as proposed. Our aim in submitting the recommended amendments below is to ensure that this RFA helps maximize the goals of the 2022 <i>Planting the Seed</i> report (“Roadmap”). We are especially interested in lowering participation barriers for small and</p>	<p>Thank you for your comments.</p> <p>Response 32a: Thank you for this feedback.</p> <p>Response 32b: The final RFA removes the phrase "sustainable pest management" from the definition of climate smart agriculture.</p> <p>Response 32c: The final RFA maintains that it will award additional points during the grant review process for projects that include California food producers who utilize climate smart agriculture practices; climate smart agriculture production systems like certified organic or transitioning to certified organic; or other regenerative strategies that increase resilience to climate change, improve the health of communities and soil, protect water and air quality, increase biodiversity, and help store</p>

	<p>mid-sized growers who aren't already receiving Farm to School grants and for expanding procurement of climate-smart foods. It is important to ensure the Farm to School program remains grounded in a core Roadmap goal to prioritize <i>food system equity</i> and partners that have been historically excluded from economic development, particularly small or midsized and socially disadvantaged producers.</p> <p>2023-24 California Farm to School Incubator Grant Program Request for Applications Document</p> <p>[32b] We appreciate the reiteration of Roadmap goals in the purpose section of the RFA document. This sends a clear and meaningful signal to applicants about what these grant programs are aiming to achieve. However, we suggest the Department reconsider the use of the phrase "sustainable pest management" (SPM) in this section and in the description of Climate Smart Agriculture Practices, et al. on page 7, until a clear set of standards is agreed upon by various stakeholders that have been engaged in this process. While we are pleased with the Newsom Administration's commitment to sustainable pest management, at this time no measurable benchmarks have been formally established for SPM either at CDFA or at the Department of Pesticide Regulation. There also is no program in place yet to oversee SPM implementation and therefore little in the way of clarity on how its inclusion would play out in the Farm to School context.</p> <p><i>We recommend the RFA to revert back to the original definition of climate-smart agriculture included in the Roadmap report.</i></p> <p>[32c] We also encourage the Department to include a procurement target for this round of grants. This will help</p>	<p>carbon in the soil. However, the final RFA does not include a 20% organic procurement goal in Tracks 1-3 in order to enable applicants to determine what is feasible for their proposed project.</p> <p>Response 32d: In the final RFA, there are no longer points available in Tracks 1 and 3 for selecting project goals from the list of options. Rather, based on the goals the applicant selects, they will be eligible to receive up to 5 points per goal in the Activities/Timeline section for describing how they will achieve it. Because each applicant may have different scratch cooking capacities and be at a different stage in their adoption or expansion of California food procurement, increasing California food procurement for incorporation into school meals may look different for each applicant, and so the final RFA does not offer extra points specifically for integrating purchases into entrées or core meal components.</p> <p>Response 32e: The final RFA adds language in the Reporting and Evaluation section that: "Track 1 and 3 grant recipients must verify with their vendor that each grant-funded item they include in their food procurement worksheet is California grown or produced and retain documentation on file of this verification. Verification documentation may include, but is not limited to: an indication of the food's farm origin on the invoice from the vendor or a written attestation from the vendor that the food is California grown or produced." The final RFA also clarifies the Farm-Level Data portion of the Reporting and Evaluation section with the following language: "Track 1 and 3 grant recipients procuring California grown or produced foods with grant funds must request farm-level data from vendors and make efforts to include farm-level data when completing the CDFA food procurement worksheets. Farm-level data refers to information such as</p>
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<p>the state begin to more carefully track impact and progress toward achieving its goals around expanding climate-smart agriculture. The AB 1757 Natural and Working Lands Expert Advisory Committee included an organic procurement goal in its November 2023 recommendations report to the California Natural Resources Agency.¹ That entity saw this procurement goal as an essential intervention to help California meet the 20% organic by 2045 goal in the 2022 Climate Scoping Plan.² Setting a procurement target will ensure that the Farm to School Program is an integral part of the state’s broader strategy to increase organic production in California. Given that incentivizing this type of procurement is already part of the Farm to School strategy, a procurement goal will send another clear signal to applicants that this is a priority.</p> <p><i>We recommend that the RFA include a 20% organic procurement goal for Tracks 1-3.</i></p> <p>Recommendations for Procurement-Focused Applicants (Tracks 1 and 2)</p> <p>[32d] 1. Structure points and criteria so that schools are incentivized to increase F2S grant-sourced offerings as part of their main entree or core meal components rather than on Harvest-of-the-Month, salad bars, or other occasional purchases.</p> <p><i>To accomplish this, schools that integrate F2S purchases into entrees or core meal components should receive extra points on their applications.</i></p> <p>This could be achieved by removing the point currently proposed for “increasing procurement of California grown or produced, whole or minimally processed food for school meals” (see Track 1, Proposed Project – Procurement</p>	<p>the name of the farm that grew the crop and the county where they are located. If grant recipients are procuring through a distributor, aggregator, or other intermediary, then gathering farm-level data may require requesting velocity reports from these vendors. If a grant recipient verifies that an item is California grown but is unsure of the farm origin, then the recipient must provide justification of why farm-level data is unknown. Grant recipients that would like support with requesting farm-level data from vendors may email cafarmtoschool@cdfa.ca.gov.</p> <p>Response 32f: To keep as much funding as possible available to support farm to school projects directly, the 2023-24 CA Farm to School Incubator Grant Program did not set aside funding from the \$60 million to establish a formal technical assistance program that would provide TA to applicants during the application period. However, CDFA staff will host weekly Q&A sessions via Zoom throughout the application period to answer questions and support applicants throughout the application process. CDFA staff is unable to advise on specific aspects of an individual’s proposal as this would provide unfair advantages. During the project implementation period, the CDFA’s regional farm to school staff throughout the state will be available to provide direct, one-on-one support and technical assistance to grant recipients. Additionally, Track 2 (The CA Farm to School Technical Assistance Grant) provides an opportunity for organizations to propose projects that will build producer capacity to sell whole or minimally processed foods to SFAs; mini grants are an allowable cost.</p> <p>Regarding the Track 4 letter of intent requirement, the Track 4 Eligibility and Exclusions section of the draft RFA and final RFA includes a paragraph that says: Food producers and public-serving aggregation and distribution</p>
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	<p>Work Plan + Budget, p. 6, as an example). Because the latter is a core requirement for any applicant that can be described in the project summary, this doesn't need to receive a point. Any applicant who can't meet this baseline should be eliminated from consideration.</p> <p>Instead, this +1 point should be allocated toward projects where schools integrate F2S-sourced products on a regular basis in main entree or core meal components.</p> <p>[32e] 2. Require verified farm-level source identification data for all procurement projects.</p> <p>Track 1 Procurement Work Plan and review criteria do not currently require any farm-level source identification data. The reporting and evaluation section of the RFA states, <i>"If applicable, grant recipients must request farm-level data and velocity reports from distributors to help track the farm-level impacts of farm to school project activities."</i></p> <p>We believe this data should required, not just requested if applicable. Without required verification, there is reason to worry that the program will drift away from its stated mission and values of prioritizing local, small, and underserved producers and towards status-quo sourcing from large distributors and producers. Additionally, the review criteria do not describe how California-grown procurement will be documented and verified.</p> <p><i>To address this we encourage CDFA to require farm-level invoice documentation or other tracking systems to provide transparency and confirm that products procured using Track 1 or 2 funding are California-grown.</i></p> <p>Recommendations for Producer Applicants (Track 4)</p>	<p>enterprises in California that are not able to provide a letter of intent are <u>not</u> eligible to apply to Track 4. However, they are eligible for free, non-competitive technical assistance from the CDFA Farm to School Team to begin building relationships with the school food market. Please email cafarmtoschool@cdfa.ca.gov for support and to connect with your CDFA Farm to School Regional Producer Engagement Specialist.</p> <p>The advance payment regulations that the draft RFA and final RFA reference are from Title 3, California Code of Regulations, Division 1, Chapter 5. These are the advance payment regulations that all CDFA grants funded by non-federal funds (such as this one) must follow. Once the grant agreement is in place and the grant term begins, grant recipients may request advance payment. During the grant term, CDFA staff will be available to assist grant recipients with the advance payment request process.</p> <p>Response 32g: The CDFA appreciates this comment about verification but is unsure of which specific question(s) in the draft RFA's draft Track 4 application this comment is referencing. The CDFA welcomes future guidance regarding verification of grant application responses.</p> <p>Response 32h: The final RFA adds the phrase "like certified organic or transitioning to certified organic" to most mentions of climate smart agriculture.</p>
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[32f] 1. Reduce barriers to participation for historically underserved or under-represented farmers.

We are pleased once again to see that producers have the opportunity to apply for these grants independently and increase the capacity for more California farmers and ranchers to participate in this program. However, we remain concerned that the current application is complex enough to serve as a barrier to entry, especially for the smaller scale and BIPOC producers that the Farm to School program is aiming to attract. The applications supporting Tracks 1-3 are likely going to be completed by staff who have experience with government grant programs. Whereas Track 4 will likely apply to individual farmers who are running small businesses, do not have full-time grant writers on staff, may not have access to the technology or language and cultural skills to engage in this program, and ultimately may choose to opt out of this opportunity due to historical disenfranchisement and the heavy burden government grants put on small businesses with limited capacity.

Access to technical assistance during the application period is crucial. We urge the Department to fill the remaining outreach positions and also resource grassroots partners who hold trusted relationships with the community and farmers to serve as a key part of the Farm to School support system. Other CDFA programs like the California Underserved Producer Program (CUSP) and the Healthy Soils Program are valuable models - in both, established grassroots organizations are provided with upfront resources to support underserved farmers with grant applications.

Furthermore, these applications can continue to be simplified - CDFA programs like the Beginning Farmer &

	<p>Farmworker Training program (BFFTP) and the Urban Agriculture Program have both received exceptional levels of engagement with the communities they serve because the applications were accessible and well-tailored for the entities they are designed to serve. For example, farmers new to Farm to School we have spoken to about this RFA are looking for better guidance and details about how to contact school food authorities to secure the necessary letters of intent. They are also unclear about the payment aspect: the RFA states that farmers can apply for advanced payment rather than reimbursement, yet the stipulations are confusing and intimidating.</p> <p><i>To address this, we urge CDFA to update Producer track requirements with best practices with a proven track record of success in other programs.</i></p> <p>[32g] 2. Increase verification requirements to ensure the validity of claims.</p> <p>While we are pleased to see resources for small and underserved producers be named as a priority for funding, we are concerned about the verification requirements for this track. Producers that qualify under this category can simply self-certify and be easily verified. However, for Public-Serving Aggregation and Distribution Enterprise Applicants, it is unclear how CDFA will verify that the responses to these questions are accurate.</p> <p><i>We recommend that CDFA institute substantial verification requirements for Track 4, especially for aggregation and distribution enterprises that could be sourced from many farms. These entities should be able to meaningfully demonstrate values-based accountability.</i></p> <p>Recommendation Across Tracks 1-4</p>	
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	<p>[32h] We acknowledge and appreciate that this RFA continues to lift up the need for expanded climate-smart procurement and gives schools, early childhood educational facilities, technical assistance providers and producers extra points if they propose to accomplish this in their projects. However, we are concerned that applicants who aren't steeped in policy may not be familiar with that term and understand all that it encompasses. At minimum, those folks will need to cross-reference against multiple documents to understand what qualifies.</p> <p><i>Because certified organic products (or those from producers in the organic transition process) are the most commercially available climate-smart options for purchasers, we recommend that the phrase "such as organic or transitioning to organic" be included as part of the climate-smart descriptions across all documents associated with this RFA.</i></p> <p>We appreciate the chance to provide input on this latest Farm to School Program RFA. Should you have questions or require additional detail on our recommendations, please reach out to XXX.</p> <p>-----</p> <p>¹ 1757 Expert Advisory Committee (EAC) Recommendations for Implementation Targets for Natural and Working Lands (NWL) Sector Climate Actions, November 2023, accessed on December 13, 2023 https://resources.ca.gov/-/media/CNRA-Website/Files/Initiatives/Expanding-Nature-Based-Solutions/1757_EAC_Recommendations_Implementation_Targets_for_NWL.pdf</p> <p>² 2022 Climate Scoping Plan available at https://ww2.arb.ca.gov/our-work/programs/ab-32-climatechange-scoping-plan/2022-scoping-plan-documents</p>	
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RFA Section(s)	Public Comment 33 (received 12/14/2023)	CDFA Response
<p>1.6 Eligibility and Exclusions</p> <p>1.7 Allowable and Unallowable Costs</p> <p>1.8 Reporting and Evaluation</p> <p>3.2 Grant Application and Review Criteria</p> <p>3.3 Review Process</p>	<p>Thank you for the opportunity to submit feedback on the 23-24 Farm to School Incubator Grant. Please see our feedback below.</p> <p>Feedback for CDFFA Incubator Grant Public Comment:</p> <ul style="list-style-type: none"> • [33a] We appreciate and applaud the CDFFA for allowing up to 30% indirect costs in the budget. It truly recognizes the real cost of implementing programs that are actively addressing systems change. • [33b] Regarding Farm-Level Data reporting requirements, please describe the type of assistance that CDFFA will be providing to acquire velocity reports from distributors. There is concern that this is not a reasonable expectation for small and mid-sized farmers who may not have the resources to acquire this type of data. It is also a burden on food service employees to manually track local procurement in a spreadsheet. Is there a way to get big distributors like Sysco and Goldstar to provide this level of data in their velocity reports instead of placing the work on small teams? • [33c] Regarding Track 2 Project Partnership Categories, we strongly recommend to not limit the number of Technical Assistance Categories to just one. Some applicants may qualify for all three and limiting it to one category, could easily limit project innovation. • [33d] Similarly, for Track 2 please consider allowing for more than one Project Goal as some projects may accomplish more than one goal. • [33e] If there is an extended report every six months, the questions should not be repetitive of 	<p>Thank you for your comments.</p> <p>Response 33a: The final RFA maintains that the maximum amount for indirect costs is up to 30% of direct costs.</p> <p>Response 33b: The final RFA clarifies in the Reporting and Evaluation section that this reporting requirement applies to Tracks 1 and 3 only; this is because Tracks 1 and 3 are the funding tracks that allow recipients to use grant funds to procure California grown or produced, whole or minimally processed food for school meals, as well as for student education. This reporting requirement does not apply to food producers in Track 4. Additionally, the final RFA clarifies the description of this reporting requirement: “Track 1 and 3 grant recipients procuring California grown or produced foods with grant funds must request farm-level data from vendors and make efforts to include farm-level data when completing the CDFFA food procurement worksheets. Farm-level data refers to information such as the name of the farm that grew the crop and the county where they are located. If grant recipients are procuring through a distributor, aggregator, or other intermediary, then gathering farm-level data may require requesting velocity reports from these vendors. If a grant recipient verifies that an item is California grown but is unsure of the farm origin, then the recipient must provide justification of why farm-level data is unknown. Grant recipients that would like support with requesting farm-level data from vendors may email cafarmtoschool@cdfa.ca.gov.”</p> <p>The food procurement metrics worksheet is an important reporting element of Tracks 1 and 3 of this grant program.</p>

	<p>the quarterly report questions. For example, asking for “any new connections” versus “new partnerships” depending on the report.</p> <ul style="list-style-type: none"> • [33f] Track 2, under Community Need, Section 1, please hyperlink CDFA CDE data look up that is required: FRPM and Title 1 so applicants understand the data source you need. • [33g] All tracks: please consider a user-friendly budget template in excel or an alternative to a table format that doesn’t sum or calculate automatically. • [33h] Track 4 Applicant Type: Could there be a third category of “partnership” to create funding for a collaborative project? This could allow for multiple farmers to apply for a project and share the administrative costs between partners. Additionally, could this partnership category submit for funding up to \$250,000 x Number of partners? (i.e. 4 producers submit a collaborative project and apply for \$1M in funding to create a larger impact and efficiently maximize resources) • [33i] Finally, we would like to encourage reviewers to consider applications that cross-track for region-wide collaborative efforts between partners (i.e. producers, schools, and non-profits (Track 1,2,4) and potentially offer additional points for integrating multiple track partners. <p>We look forward to working with you as we apply for the 23-24 Grant Program.</p>	<p>It enables the CDFA and the CA Farm to School Evaluation Team to track how grant recipients are using food procurement dollars within the grant program and to analyze the procurement impacts of the program. However, the CDFA recognizes that manually entering data into the food procurement worksheets does take time; please note that Track 1 and 3 grant recipients may allocate grant funds in the Staff/Labor Costs section of their proposed project budget for staff time associated with managing and implementing the farm to school project, which may include staff time for filling out the food procurement worksheets.</p> <p>Response 33c/33d: The final RFA maintains that Track 2 applicants must focus their proposed project on <u>one</u> of the following project categories: School Food, Education, or Producer Training. However, in order to incorporate this feedback that some farm to school TA organizations work in multiple categories, the final RFA also includes an opportunity for applicants to build connections with the other two project categories. In the Technical Assistance Work Plan section of the Track 2 application, the School Food project category includes three optional project elements that relate to producers (i.e., support climate smart agriculture and CA food producers who utilize climate smart agriculture practices; support veteran, socially disadvantaged, and/or limited-resource CA food producers; support small to midsize CA food producers) and one optional project element that relates to education (i.e., engage students and credentialed public school educators in school food transformation). The Education project category includes one optional project element that relates to school food (i.e., incorporate hands-on food education opportunities that complement the school meal program) and one optional project element that relates to producers (i.e., expand the incorporation of CA food</p>
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		<p>producers in hands-on food education opportunities for students). The Producer Training project category includes one optional project element that relates to school food (i.e., facilitate collaboration and coordination between CA food producers and CA School Food Authorities) and one optional project element that relates to education (i.e., train producers to provide hands-on food education opportunities to students and staff from CA School Food Authorities).</p> <p>Response 33e: The CDFA will consider this feedback when developing the 2023-24 Quarterly Check-in Surveys.</p> <p>Response 33f: The final RFA clarifies that applicants do <u>not</u> need to provide a response to the Data Look-up questions in the Track 1, 2, and 3 applications. This is data that the CDFA will gather in order to relieve the data collection burden on applicants. The final RFA adds links in the Track 1 and 2 applications that link to publicly available spreadsheets from the California Department of Education’s website that the CDFA will use to calculate the free/reduced-price meal eligibility rate metric.</p> <p>The final RFA removes the Title I schools metric from the Community Need section of the Track 1 and 2 applications. See response 1a for additional details.</p> <p>Response 33g: During the application period, the CA Farm to School Incubator Grant Program website will include a budget worksheet, which sums automatically, that applicants may use as a resource to prepare their proposed budget before entering the information into the budget sections of the online application.</p> <p>Response 33h: The final RFA maintains that there are <u>two</u> eligible applicant types in Track 4 – food producers</p>
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		<p>and public-serving aggregation and distribution enterprises. A collaborative of CA food producers would be eligible to apply within this structure.</p> <ul style="list-style-type: none"> • Scenario 1: If the collaborative is its own entity with its own tax/business identification number, then the collaborative itself could apply to Track 4. Each of the CA food producers would also be eligible to apply individually to Track 4 as food producers if they each have a unique tax ID number that differs from the collaborative's number. • Scenario 2: If the collaborative is <u>not</u> its own entity with its own tax ID number, then one or more of the CA food producers could apply individually to Track 4 and could include the other food producers as contractors or mini grant recipients in their proposed project if they wish. Per the Eligibility and Exclusions section of the RFA, applicants must ensure that proposed projects are not duplicative and there is no duplication of project costs in order for the CDFA to consider each application. <p>The final RFA does not add an option for a Track 4 applicant to calculate the maximum award amount based on the number of food producers that are project partners in the application. However, the two above scenarios outline the ways in which a collaborative of food producers can maximize Track 4 funds.</p> <p>Response 33i: The CDFA encourages collaboration across funding tracks. However, the final RFA clarifies in the Eligibility and Exclusions section that while proposed projects may complement each other, they should each be able to stand on their own in case one of the complementary projects receives funding but another does not. For this reason, the technical review criteria considers the merits of each application individually. Additionally, please note that eligible entities that are a project partner</p>
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		in multiple tracks must ensure that proposed projects are not duplicative and there is no duplication of project costs in order for the CDFA to consider each application.
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RFA Section(s)	Public Comment 34 (received 12/14/2023)	CDFA Response
1.2 Definitions	<p>XXX appreciates the opportunity to submit comments for consideration by the California Department of Food and Agriculture (CDFA) on the 2023-24 California Farm to School Incubator Grant Program’s draft request for applications (RFA).</p> <p>As a science-based nutrition organization, XXX collaborates with partners to elevate the health of children and communities through the pursuit of lifelong healthy eating patterns. Funded by California’s dairy farm families and milk processors and under the guidance of California Department of Food and Agriculture, XXX’s registered dietitian nutritionists and experts in nutrition science, education, agriculture literacy and community health engage with a variety of partners in school, health care and community settings, working together to achieve nutrition security. Each year these collective efforts improve access to nutritious foods and provide nutrition education and resources for millions of people in California, across the nation and beyond, demonstrating the dairy community’s contribution to sustainable nutrition and community health.</p> <p>We thank you for the opportunity to submit these comments.</p> <p>Comments Related to Section 1.2 Definitions</p> <p>[34a] California Grown or Produced, Whole or Minimally Processed Foods (pg. 6): “<i>CDFA staff intend to convene a working group to work out the detailed</i></p>	<p>Thank you for your comments.</p> <p>Response 34a: Thank you for the offer to participate in the working group about minimally processed foods.</p> <p>Response 34b: The final RFA does not add the phrase “nutrition education curricula” to the examples of hands-on food education in the Definitions section because the definition instead focuses on the <i>types</i> of hands-on food education activities – such as tasting activities – that may be <i>part</i> of a nutrition education curriculum.</p>

parameters for “minimally processed” food products that this grant program may fund and will collaborate with this working group to develop an allowable foods resource list for grant recipients.”

- **Summary Statement:**

Dairy Council of California appreciates the inclusion of yogurt and cheese dairy products that are 100% produced, processed and manufactured in California in the list of allowable foods. Food processing plays an important role in food security and food safety and allows for a broader variety of foods to meet personal preferences while ensuring adequate intake of nutrients.ⁱ The registered dietitian nutritionists from Dairy Council of California have demonstrated expertise in nutrition science translation and supporting evidence-based nutrition.ⁱⁱ We are eager to extend an invitation for one of our registered dietitian nutritionists to contribute valuable insights as a member of your working group.

[34b] Hands-on Food Education (pg. 9): *“Hands-on food education refers to activities in which students learn by doing and gain knowledge through experience. Hands-on food education may include but is not limited to: activities in school gardens, on school farms, in school greenhouses, in other food production environments, and in culinary classes; experiential lessons celebrating traditional foodways and cultivating food sovereignty; cooking and tasting activities; food-based student internships; farm tours, field trips, or school visits from producers; student-led recipe creation; student-run farm/food stands featuring produce from school*

	<p><i>gardens/farms; or other transformative opportunities for students to better understand the relationships between food and the world around them. Please note that posters and marketing materials are not considered hands-on food education.”</i></p> <ul style="list-style-type: none"> <p>Summary Statement: Dairy Council of California is a science-based nutrition organization that has provided nutrition education and resources in schools for over 100 years. Nutrition education equips students with important skills they can use to improve their health throughout life, yet the average student in the United States receives than eight hours of nutrition education each school year.ⁱⁱⁱ When students are taught nutrition, they are able to adopt new behaviors that contribute to increased nutrient intakes.^{iv} Dairy Council of CA recommends adding a nutrition education curriculum to hands-on food education activities to reinforce students’ foundational knowledge and skills.</p> <p>Students have improved knowledge of where their food comes from and selection of healthy foods when nutrition education is provided in the classroom along with food tasting opportunities. In a survey conducted by Dairy Council of California of more than 350 classroom teachers from 43 counties educating 11,762 students in California schools demonstrated that those who participate in the California Ag in the Classrooms Taste and Teach program found that nutrition education enhanced student view of foods they tasted.</p> 	
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	<p>Interactive education through nutrition, ag literacy and food experiences is a comprehensive approach to improve food and nutrition knowledge.</p> <p>-----</p> <p>ⁱ Weaver CM, Dwyer J, Fulgoni VL III, et al. Processed foods: contributions to nutrition. <i>Am J Clin Nutr.</i> 2014;99(6):1525-1542. DOI:10.3945/ajcn.114.089284</p> <p>ⁱⁱ Rosales A, Young S, Mendez T, Shelden K, Holdaway M. Collaborative strategies to improve nutrition security and education: lessons learned during a pandemic. <i>J Sch Health.</i> 2023;93(2):148-152. DOI:10.1111/josh.13247</p> <p>ⁱⁱⁱ Nutrition Education in US schools. Centers for Disease Control and Prevention. Accessed December 14, 2023. https://www.cdc.gov/healthyschools/nutrition/school_nutrition_education</p> <p>^{iv} Cotton W, Dudley D, Peralta L, Werkhoveva T. The effect of teacher-delivered nutrition education programs on elementary-aged students: an updated systematic review and meta-analysis. <i>Prev Med Rep.</i> 2020;20:101178. DOI:10.1016/j.pmedr.2020.101178</p>	
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RFA Section(s)	Public Comment 35 (received 12/14/2023)	CDFA Response
3.2 Grant Application and Review Criteria	<p>We appreciate your ongoing efforts to engage with the community as you develop and expand farm to school programming. Thank you for the opportunity to provide comments about the upcoming CDFA Farm to School Incubator Grant Request for Applications.</p> <p>[35a] Track 1: No questions or suggestions. Our hope is that as districts develop and deepen their involvement that they can stay engaged with the programming through new and different proposed projects. Your description of previous grant recipients (section 2.2 in the RFA) and considerations as they apply is helpful.</p> <p>[35b] Track 2: XXX has intentionally worked in the intersection between school food service departments and the farmers, ranchers and other school food producers</p>	<p>Thank you for your comments.</p> <p>Response 35a: Thank you for this feedback.</p> <p>Response 35b: The final RFA maintains that eligible entities may submit one application to the grant program in order to enable more entities to participate in the program. The final RFA also maintains that Track 2 applicants must focus their proposed project on one of the following project categories: School Food, Education, or Producer Training. However, in order to incorporate this feedback that some farm to school TA organizations work in multiple categories, the final RFA also includes an opportunity for applicants to build connections with the other two project categories. In the Technical Assistance Work Plan section of the Track 2 application, the School</p>

<p>that they can buy from. We have been convening both parties and introducing them to one another through our work. With the new grant design our assessment of track two is that we would need to approach a project from one “direction” (“School food” or “Producer Training” or even “Education”). We understand this change may have been set up to open up the opportunity to additional singularly focused technical providers. We will certainly adapt our approach and plan to the programming, but we would like to see if there are ways that those parties who are connecting the various project category teams together through technical assistance and connectivity convenings still be able to highlight the benefits and impacts that this intersectional work enables. This could be done by asking a direct question about how the proposed team is or would connect with other constituents or possibly adding some points or credit for solutions that engage more than a single category. Additionally, by only allowing a single application for each tax identify, we would need to choose which to apply for. We see a couple of possibilities to address this:</p> <ol style="list-style-type: none"> 1. Include a question that allows technical assistance providers to directly address how they have or plan to coordinate with the other stakeholders. While parties could provide that information in the “Project Team + Organizational Commitment” section, “Community Need 2. Making the Case” section, “Farm to School Experience” section or “Proposed Project” section, it might be easiest for the review team to have a specific place where you ask for that coordination and can evaluate the coordination considerations that the applicants have or will plan to make. 3. Allow points that take into account projects that serve more than one objective by either adding a set of points to the question proposed above in our first point or 	<p>Food project category includes three optional project elements that relate to producers (i.e., support climate smart agriculture and CA food producers who utilize climate smart agriculture practices; support veteran, socially disadvantaged, and/or limited-resource CA food producers; support small to midsize CA food producers) and one optional project element that relates to education (i.e., engage students and credentialed public school educators in school food transformation). The Education project category includes one optional project element that relates to school food (i.e., incorporate hands-on food education opportunities that complement the school meal program) and one optional project element that relates to producers (i.e., expand the incorporation of CA food producers in hands-on food education opportunities for students). The Producer Training project category includes one optional project element that relates to school food (i.e., facilitate collaboration and coordination between CA food producers and CA School Food Authorities) and one optional project element that relates to education (i.e., train producers to provide hands-on food education opportunities to students and staff from CA School Food Authorities).</p> <p>For each project element that a Track 2 applicant selects, the applicant will have the opportunity to receive up to 2 points per element for describing how they will achieve it in the TA Activities and Timeline section.</p> <p>In terms of points, this means that applicants to the Track 2 School Food category will be able to receive points both for serving California School Food Authorities with high community need (in the Community Need section) and for supporting CA food producers who utilize climate smart agriculture practices; veteran, socially disadvantaged, and/or limited-resource CA food producers; and small to</p>
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<p>highlighting where the coordinated response question would be answered and shifting points so that this is taken into consideration.</p> <p>4. On the points front, it would also be helpful to allow those who are working in school districts with high need (that would score high school points) and producers who are focussed on climate smart ag, are small, and socially disadvantaged (that would ALSO score high on the producer points) to showcase that they would be providing benefits in both areas and get credit for those mutual benefits.</p> <p>5. Allow technical assistance providers who serve multiple parties to apply for more than one track so that they could give you an approach that looks at the work from the “direction” of the single specified category. A technical assistance provider could then have a school focused proposal that might minimally reach into producers AND a producer focused proposal that would still connect to schools. (NOTE: we recognize that this is probably the least beneficial solution as it would make more work for all parties since application numbers would increase, but would still allow very focused proposals that may differ substantively in what the provider would offer.)</p> <p>We recognize that your goals are to narrow the Track 2 focus, but would like you to consider how that might impact organizations who bridge multiple of the three specified categories. Our experience has been that we have been able to more quickly and efficiently engage school food teams when we can introduce them to a group of farmers to procure from and that the farmers are more eager to work with us if they know there are more schools interested in buying directly from those farmers. Our team will certainly review all possible ways to work within the framework of the next grant round and recognize that this may mean different structures and/or different</p>	<p>midsize CA food producers (in the TA Activities and Timeline section). Additionally, the Making the Case question in the Community Need section is an opportunity for Track 2 applicants to further make the case for their project beyond the data points that the quantitative portion of the Community Need section includes.</p> <p>Response 35c: Thank you for this feedback.</p> <p>Response 35d: Please see response 15a.</p> <p>Response 35e: For the small to midsize producer question in the Track 4 application (and all other questions in the Foundational Information section of the Track 4 application), producer applicants should respond based on the Legal Business Name that they provide as the applicant name. The final RFA includes an additional note under the Legal Business Name question within the Track 4 application that says, "All other responses in this Foundational Information section should correspond with the Legal Business Name you provide."</p> <p>Response 35f: In the Track 4 application, there are two applicant types: California food producers and public-serving aggregation and distribution enterprises. Each applicant type is eligible for up to 10 points in the question about veteran, socially disadvantaged, or limited-resource food producers. Within this question, public-serving aggregation and distribution enterprises that are for-profits may receive up to 5 points based on the operation's ownership and enterprises that are non-profits may receive up to 5 points based on the operation's board/staff.</p> <p>Response 35g: In the Track 4 application, producers who are participating in a transitional organic program are eligible to receive full points in the climate smart</p>
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<p>partnerships. We hope that you can provide a way for applicants to show value and receive credit for more complex and collaborative approaches.</p> <p>[35c] Track 3: No comment though the changes to the ECE approach seem beneficial</p> <p>[35d] Track 4: We appreciate the efforts to directly support farmers and other producers, particularly those who are small and from underserved communities. Several of our farmers have worked as farm laborers prior to participating in farmer development programming and over time have learned the skills needed to run a full fledged farming enterprise. We would hope that the criteria for the “Years in Operation” on page 3 of the Track 4 guide could include some allowance for farmers who have been either farming for longer and/or in a formal training program to establish their business.</p> <p>[35e] For projects that include multiple farm operations who are working together on distribution or logistics, please clarify if the total size of the farm can be the average three year for the applicant whose tax ID is used. (It is not clear if there are partners if you would have to add the totals together). Ideally, two small farmers working together would still be treated as small and not penalized by having to aggregate their production sales together.</p> <p>[35f] We would also hope that the questions that allow for aggregators to get points credit for farms that are at least half staffed AND half board led by the minorities does not raise the overall points totals for large operations that might take away the opportunity from smaller minority owned farms. We expect that with your calculations, you are accounting for that, but hope that aggregators and</p>	<p>agriculture Verification question if they are able to provide documentation that verifies this from their organic certifier. The final RFA does not include additional points specifically for producers who have been certified organic for a longer period of time relative to other producers, as this question is considering current organic practices, not historical organic practices.</p> <p>Response 35h: The final RFA updates the Looking Forward question in the Track 4 application so that it now focuses on an applicant's future climate smart agriculture plans in the context of their proposed grant project, rather than their future climate smart agriculture plans more broadly. Track 4 applicants may still receive up to 5 points for this question, but the points are now based on the applicant's description of how their proposed project will incorporate climate smart agriculture. Producer applicants may also still receive up to 10 points for current climate smart agriculture practices in the description and verification questions that precede the looking forward question.</p>
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	<p>distributors who are led by small business owners as well would still get effective points credit.</p> <p>[35g] We are pleased to see that the climate smart agricultural practices are factored in with specific points around those practices in the “Production Practices” section. We hope that an organic producer who is in the process of getting certified but has also been part of a certification training program would still be provided with full points. This may need to loop back to the time the farmer has been in business so that if there are long term organic producers they would get more credit than a newly minted organic producer. Perhaps the “time as an organic/climate smart provider” only needs to be included in the description section, but it should probably be requested so that you are sure to work with some new organic/climate smart ag farmers as well as some long established ones. There is probably some more complicated assessment that will occur in this category to decide how best to score producers.</p> <p>[35h] Because we are aware of numerous existing organic producers who are trying to get an audience at school sites we would ask that you consider weighting the points so that the “current practice” climate smart agricultural points are weighted more favorably than at parity with “looking forward” points. Perhaps this means three categories</p> <ol style="list-style-type: none"> 1. Current practices (earn points) 2. Grant specific requests that will support climate smart ag (earn point, but less than current practice points) 3. Plans to move towards organic/climate smart (consideration in the description, but unless this is really a part of their grant project, keep as a mention but not a way to earn points since there is no way to prove or require the actions noted in the statement) 	
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	Thank you again for your ongoing work to increase farm to school activities across California. We are honored to work with you on creating positive change for kids, communities and planet!	
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RFA Section(s)	Public Comment 36 (received 12/6/23)	CDFA Response
1.6 Eligibility and Exclusions	[36a] Are there any limits to the number of grants or tracks that partners can be subcontracted/written in on?	<p>Response 36a/36b: [Per the draft RFA and final RFA], there is no limit to the number of grant applications that can include the same entity as a partner/contractor. Also, [per the draft RFA and final RFA], it would be allowable for an eligible entity to submit one application as the lead applicant and to also appear as a partner/contractor in other applications.</p> <p>Per page 15 of the draft RFA: “Please note that eligible entities must select one funding track and may submit one application. However, eligible entities may be a project partner in multiple funding tracks. Eligible entities that are a project partner in multiple tracks must ensure that projects are not duplicative and there is no duplication of project costs in order for the CDFA to consider each application.”</p> <p>The final RFA expands this language to clarify the piece about being a lead applicant and a project partner: “Please note that eligible entities must select one funding track and may submit one application. However, eligible entities may be a project partner in multiple funding tracks. Also, eligible entities that submit one application as a lead applicant may be a project partner in other applications. Eligible entities that are a project partner in multiple tracks, or that are a lead applicant in one application and a project partner in another, must ensure that proposed projects are not duplicative and there is no duplication of project costs in order for the CDFA to consider each application.”</p>
1.6 Eligibility and Exclusions	[36b] I guess that as well as whether you can lead AND sub on apps	

RFA Section(s)	Public Comment 37 (received 12/15/2023)	CDFA Response
<p>1.3 Four Funding Tracks</p> <p>1.6 Eligibility and Exclusions</p>	<p>Greetings from the otherside of the screen!</p> <p>Thank you for your time! Thanks for reaching out to the public and asking for feedback! Thank you for reading these words written in this email!</p> <p>I appreciate you :)</p> <p>There are a couple of items I'd like to share related to the new grant application draft.</p> <p>[37a] 1. I'd like to confirm that a School Garden Support Organization (SGSO) could partner on a track one grant and apply for track two as a lead applicant.</p> <p>[37b] 2. Under track two, The project I facilitate is called XXX and we have been providing school garden education, garden design + installation, and program development. We do have existing partnerships with schools and are looking to expand our offerings to other schools. We looked at applying to this grant a few years ago and there was an option for small businesses to register with the state to apply for the grant. This would be an ideal option for us. Currently it seems like we would need a non-profit fiscal sponsorship to apply.</p> <p>[37c] 3. Something I believe makes our team valuable allies to the school communities is that our team's education comes from diverse backgrounds. Much of our focus has been in social-emotional learning and incorporates art in the garden including 2-d, 3-d, movement and music. I noticed there were specifications around credentialed and certificated educators. I would advocate to include an option for alternative forms of</p>	<p><i>NOTE: Although the CDFa received this public comment shortly after the public comment period closed, Public Info Session #3 included a note that the CDFa would accept comments submitted slightly after the due date.</i></p> <p>Thank you for your comments.</p> <p>Response 37a: Yes, this is possible. Please see response 36a/36b.</p> <p>Response 37b: In the draft RFA and final RFA, the definition of Farm to School Technical Assistance Organization includes a note that says, "The CDFa acknowledges that other types of organizations not listed above may operate as farm to school TA organizations. Beyond the list above, the CDFa will determine eligibility of farm to school TA organizations on an individual basis and encourages interested applicants to connect via email at cafarmtoschool@cdfa.ca.gov." If an organization considers themselves a farm to school TA organization and has an established history supporting farm to school programs, the CDFa encourages them to reach out during the application period to share about their entity type and see if they are eligible to apply.</p> <p>Response 37c: Please see response 19a regarding credentialed and certificated educators.</p>

	<p>learning- having training and certificates in areas such as horticultural therapy, arts degrees, community organizing, trauma informed training, etc. as being valid forms of education and qualification.</p> <p>Thanks for listening to my thoughts!</p>	
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RFA Section(s)	Public Comment 38 (received 12/16/23)	CDFA Response
<p>1.2 Definitions</p> <p>1.4 Funding and Duration</p> <p>3.2 Grant Application and Review Criteria</p>	<p>I know I am outside the comment period so these ideas cannot be included but last week got away from me and I wanted to share my perspective.</p> <p>This is an amazing grant opportunity and I can see the work that went into improving this from the 2022 and 2021 versions. The RFA is a much less intimidating application than the federal grants I have filled out. XXX is looking forward to submitting a project proposal.</p> <p>[38a] Comment on Track 4 Food hubs should be eligible for more funds than a single farm. By definition hubs are aggregating from multiple producers (that should always be identified) with a focus on improving distribution and sales for the farms. If a single farm is eligible for \$250k a collection of farms should be eligible for more. I would suggest this amount to be \$500k.</p> <p>[38b] I would also augment the current hub definition with the USDA food hub definition. If an aggregator cannot source identify the product it is selling to schools it should not be eligible to apply for a grant.</p> <p>Current definition: this entity serves as a supply chain intermediary for local or regional farms or ranches, particularly those optimizing climate smart agriculture</p>	<p><i>NOTE: Although the CDFa received this public comment shortly after the public comment period closed, Public Info Session #3 included a note that the CDFa would accept comments submitted slightly after the due date.</i></p> <p>Thank you for your comments.</p> <p>Response 38a: Please see response 14a regarding Track 4 funding.</p> <p>Response 38b: The final RFA updates the definition of public-serving aggregation and distribution enterprises to require that they must be able to farm identify sourcing for 100% of products they sell to ensure state dollars support California farms and ranches.</p> <p>Response 38c: Please see response 13a regarding Track 4 gross cash farm income thresholds for small to midsize food producers.</p> <p>Response 38d: Please see response 14a regarding Track 4 funding. Additionally, the final RFA updates the Track 2 maximum award amount to \$350,000. This is a decrease from the Track 2 maximum award amount of \$500,000 that the draft RFA proposed. In the final RFA, the maximum award amount for Tracks 2 and 4 is now the same: \$350,000.</p>

	<p>production practices or methods and following state labor practices. An eligible enterprise must prioritize to the greatest extent possible, but is not limited to, serving farms or ranches that are 500 acres or less; cooperatively owned; or owned by farmers who are socially disadvantaged, beginning, limited resource, veterans, or disabled. Additionally, an eligible enterprise must handle 100% CA grown products within CA or be able to farm identify sourcing for 100% of products to ensure state dollars support CA farms and ranches.</p> <p>USDA definition: A business or organization that actively manages the aggregation, distribution and marketing of source-identified food products, primarily from local and regional producers to strengthen their ability to satisfy wholesale, retail and institutional demand.</p> <p>[38c] Further rationale for this change comes from the proposed rules on scoring farms by revenue. As currently proposed, farms with revenue under \$250K are awarded the highest number of points. While I understand the intention to support smaller operations, my experience in selling products from such farms leads me to believe that those under this revenue threshold are often ill-suited for selling to institutions. Typically, these operations focus primarily on direct-to-consumer sales. In the context of a two-year project, it seems improbable for a business with revenue below \$250K to pivot its model effectively to serve institutional buyers.</p> <p>However, collaborating with a hub that aggregates smaller farms can provide a more substantial and efficient avenue for institutional buyers. In contrast to individual small providers attempting to build redundant sales and distribution capacity, a larger investment in the aggregator</p>	
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	<p>can have a more significant impact, benefiting multiple farms collectively.</p> <p>As an aside, I believe that farms with between \$500k - \$1.5M in sales that focus on wholesale are the sweet spot for farm to school projects.</p> <p>[38d] Comment on funding levels track 2 vs track 4 I appreciate the clarification provided during the webinar regarding the prioritization of funding for track 1 and track 4. Recognizing the significance of SFAs and farms as crucial entities deserving funding priority aligns well with the core goals of the grant.</p> <p>While I understand the importance of TAs in supporting the program, the current funding structure appears to convey a message that TAs are valued more than the farms they assist.</p> <p>In the context of the small farming environment, there seems to be a potential imbalance between those directly engaged in agricultural work and those providing technical assistance. To address this, I suggest considering a reversal of the funding allocation, with farms eligible for \$500k and TA providers eligible for \$250k.</p> <p>This adjustment not only emphasizes the critical role of farms but also ensures a more equitable distribution of resources, recognizing the substantial impact that direct agricultural activities have on the success of the overall program.</p>	
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Public Comment Period Info Session Recordings

During the public comment period for the 2023-24 California Farm to School Incubator Grant Program, the CDFA hosted three public info sessions via Zoom to provide an overview of the **DRAFT** RFA and allow time for questions and comments. The info session recordings are below.

Date	Info Session	Link to Recording
11/30/2023	Public Info Session #1	https://www.youtube.com/watch?v=bpohVxAKRfU
12/6/2023	Public Info Session #2	https://www.youtube.com/watch?v=ScrxXwvZhFs
12/13/23	Public Info Session #3	https://www.youtube.com/watch?v=nk39smaSOX4