

2022 California Farm to School Incubator Grant Program

Summary of Public Comments and CDFA Responses

Public Comment Period: February 15, 2022 - March 7, 2022

TABLE OF CONTENTS:

Please note that all public comments that follow are based on the 2022 DRAFT RFA for Public Comment. Please click on any topic below to visit the corresponding section of this document.

- 1.1 Purpose
- **1.2 Definitions**
- **1.3 Four Funding Tracks**
- 1.4 Funding & Duration
- 1.5 Cost Share
- 1.6 Eligibility & Exclusions
- 1.7 Allowable & Unallowable Costs
- 1.8 Reporting
- 2.1 Indigenous Applicants
- 2.2 Previous Grant Recipients
- 3.0 Application, Review, and Notification
- 3.1 Grant Application & Review Criteria
- 3.2 How to Apply

RFA SI	RFA SECTION: 1.1 PURPOSE			
Track	Public Comment	CDFA Response		
All	The funding priorities are spot on! Love those	(1) Thank you for the comment of support.		
All	The Farm to School Program seeks to build climate resilience and cultivate equity while enhancing nourishment	(2) Thank you for the comment of support.		
All		(2) Thank you for the comment of support.		

Track	Public Comment	CDFA Response
All	communities. The partnerships encouraged in the Farm to School Program will accomplish these goals by supporting socially disadvantaged producers as well as climate smart agricultural practices like certified organic that protect children's health because they don't rely on the use of synthetic pesticides and fertilizers. Keep commitment to cultivating equity: We strongly support the Department's efforts to achieve the Farm to School Program's objective of cultivating equity by prioritizing projects that include small, midsize, veteran, socially disadvantaged, and limited-resource producers, and by including Tribal entities and producers. These efforts will support CDFA in implementing climate strategies that serve "in particular low-income, disadvantaged and vulnerable communities" as outlined in the Governor's Executive Order N-82-20 and "design[ing] grant programs with considerations or priority funding for socially disadvantaged farmers and ranchers as outlined in the 2020 Report to the California Legislature on the Farmer Equity Act." 1 Executive Order N-82-20 https://www.gov.ca.gov/wp-content/uploads/2020/10/10.07.2020-EO-N-82-20pdf 2 2020 Report to the California Legislature on the Farmer Equity Act. https://www.cdfa.ca.gov/farmerresources/pdfs/2020Farmer	(3) Thank you for the comment of support.
All	Develop pathway to support [organics] accessibility. Organic is still hard to access, both financially and locationally. it is stigmatized as "not for everyone". How do we make this more accessible with this grant funding?	(4) The CDFA is supporting "organics to school" connections through technical assistance for both schools and producers and through a new Farm to School Producer funding track. Grant recipients and non-grant recipients alike may contact the CDFA Farm to School Team by emailing cafarmtoschool@cdfa.ca.gov for assistance connecting with organic producers in California or for assistance connecting their organic California produce

Track	Public Comment	CDI	FA Response
All	[We recommend] adding to the funding priorities an objective of 'Promote nutrition security and education as part of solutions to address disparities that impact health outcomes for children and families.' Diet quality during childhood affects children's ability to succeed in school and life, and it impacts future health outcomes such as the likelihood of developing a chronic disease. Yet many children in California lack access to nutrition education, nutritious foods and support for optimal nutrition, which puts them at a disadvantage. Nutrient-dense foods like fruits, vegetables, whole grains, milk and dairy foods, legumes, and other high-quality protein sources are California grown and produced and are a vital part of school meals because they help children meet their daily nutrient needs for optimal health, development, and success.	(5)	to schools in California. Additionally, Track 4, a new funding track this year called the California Farm to School Producer Grant, intends to prioritize funding for producers who demonstrate that they are using climate smart agriculture practices and/or climate smart agriculture production systems such as certified organic and transitioning to certified organic. Track 4 grant recipients will be able to use grant funds to establish or enhance the use of climate smart agriculture practices, production systems, and other regenerative strategies when producing food to sell to schools. In this way, the CDFA hopes to make food produced through climate smart agriculture more accessible to schools by increasing the supply of this food. The CDFA recognizes the importance of promoting nutrition security and education and hopes to promote both through this grant program. Part of the overarching purpose of this grant program is to support projects that "nurture students." According to page 14 of "Planting the Seed," California's Farm to School Roadmap for Success, nurturing students means "to engage students with nutritious, delicious, culturally relevant meals that nourish their bodies and minds." To clarify the connection between this grant program and the roadmap, the CDFA added a paragraph in the Purpose section of the final RFA that the California Farm to School Incubator Grant Program is in alignment with California's report entitled <i>Planting the Seed: Farm to School Roadmap for Success</i> .

RFA SI	ECTION: 1.2 DEFINITIONS	
Track	Public Comment	CDFA Response
All	Firstly, we appreciate the reference to prioritization of small to mid-sized producers in the RFA, but particularly Track 4. Over 21,000 of XXX's 36,000 farming members constitute small farms in accordance with the U.S. Department of Agriculture's small farm definition (i.e., gross farm income less than \$250,000). While we acknowledge that solely relying on gross farm income in distinguishing farm sizes in California is incomplete, we agree that it is the metric that which is most readily available and adopted nationally. We encourage the Department to consider future definitions that may encompass additional variables as they are offered [acreage, net farm income, primary occupation, business structure, etc.].	(6) Thank you for the comment of support and for the suggestion for future definitions.
All	Update definition of small to midsize food producers: We respectfully request that CDFA update the RFA definition of small and midsize producer to be consistent with the USDA definitions for the Farm to School Program. We acknowledge that there is an ongoing stakeholder process to define small farms more broadly at the state level and are committed to continuing to engage in that process. However, in order to maximize the equity goals of this program, we respectfully request that CDFA update the definition of small and mid-size producer to be consistent with the Federal USDA definitions for small, and mid-sized producers. A small farm is defined by the USDA ERS as "those with gross cash farm income (GCFI) less than \$350,000." A mid-sized farm is defined by the USDA ERS as "farms with GCFI between \$350,000 and \$999,999" We welcome the participation of mid-sized producers in Farm to School, though the equity provision should prioritize small-scale farmers who currently lack access to these	will receive the same amount of priority points for the small to midsize food producer funding priority, while any food producer who does not meet this criterion wireceive zero priority points for the small to midsize for producer funding priority. The CDFA will continue to revisit this conversation throughout the year to create definition that it can use across the department's programs.

Track	Public Comment	CDF	A Response
TIGOR	supply chains. We strongly recommend that small-scale producers receive additional points toward the overall scoring criteria because these farmers have been disproportionately left out of farm to school programs. Additionally, we strongly recommend farmers be able to self-certify their farm scale status. If there were to be requirements for farmers to submit personal documentation, that could pose an unnecessary barrier for these farmers thus we recommend maintaining the option for these farmers to be able to self-certify their farm size. 1 Updating the USDA ERS Farm Typology by Robert A. Hoppe and James M. MacDonald, USDA< Economic Research Service, April 2013, accessed: https://www.ers.usda.gov/publications/pub-		
All	details/?pubid=43744we agree with the Department that the current definition of "socially disadvantaged" farmer or rancher in state law is not fully reflective of the challenging regulatory, historical and social context of farming. In that respect, we appreciate the inclusion of women and LGBTQ+ in this draft RFA.	(8)	Thank you for the comment of support.
All	Keep organic in the definition of climate smart agriculture: We strongly support the inclusion of organic and transitioning to organic as climate smart agriculture systems and commend CDFA for prioritizing projects that include producers who utilize climate smart agriculture systems, such as certified organic and transitioning to organic. In addition, we recommend CDFA clarify in the definition section that organic is part of climate smart agriculture practices. Prioritizing climate smart agriculture systems will help CDFA implement "actions to accelerate natural removal of carbon and build climate resilience" as outlined in the Governor's Executive Order N-82-20.1 We appreciate the Department's	(9)	Thank you for the comments of support. The CDFA expanded the definition of climate smart agriculture practices in the Definitions section of the final RFA into a broader definition of climate smart agriculture practices, climate smart agriculture production systems, or other regenerative strategies. The definition specifies that climate smart agriculture production systems include certified organic or transitioning to certified organic to clarify that organic is part of climate smart agriculture.

Track	Public Comment	CDFA Response
	efforts to align the Farm to School Program with the State's overarching climate strategies by incentivizing climate smart agriculture, including organic and transitioning to organic. Organic production and transitioning to organic are climate smart agriculture because organic producers implement multiple climate smart practices recognized by CDFA's Healthy Soils Program (HSP) including conservation crop rotation, conservation cover, compost application, nutrient management, and prescribed grazing, in order to meet the federal requirement that organic producers conserve or improve the natural resources of the farm, including soil and water quality. ² Long-term research at UC Davis demonstrates that as a result of implementing multiple climate smart practices, organic agriculture improves soil health, sequesters more carbon, and builds climate resilience. ^{3,4}	
	¹ Executive Order N-82-20 https://www.gov.ca.gov/wp-content/uploads/2020/10/10.07.2020-EO-N-82-20pdf ² 7 CFR § 205.200 General. ³ Wolf, K., Herrera, I., Tomich, T. P., & Scow, K. (2017). Long-term agricultural experiments inform the development of climate-smart agricultural practices. <i>California Agriculture</i> , 71, 120-124. ⁴ De Gryze, S., Wolf, A., Kaffka, S. R., Mitchell, J., Rolston, D. E., Temple, Six, J. (2010). Simulating greenhouse gas budgets of four California cropping systems under conventional and alternative management. <i>Ecological Applications</i> , 20(7), 1805-1819.	
All	within the definitions section of the RFA, we do request additional clarity related to "climate smart agriculture practices." The proposed definition includes those conservation management practices recognized by USDA-Natural Resource Conservation Service and the Department's Healthy Soils Program as considerations. We	(10) The CDFA revised the definition of climate smart agriculture practices in the Definitions section of the final RFA to include practices identified by the CDFA Office of Environmental Farming and Innovation via the Healthy Soils Program (HSP), Alternative Manure Management Program (AMMP), Dairy Digester

Track	Public Comment	CDFA Response
	encourage the Department to also include practices recognized by the Department's Alternative Manure Management Program (AMMP) and Dairy Digester Research and Development Program (DDRDP) for manure management and those operations those farms that have adapted to incorporate water and energy efficiencies through the State Water Efficiency and Enhancement Program (SWEEP). These three programs offer a suite of climate smart practices to a broader array of California producers than those serviced by the Healthy Soils Program or NRCS programs, such as the Environmental Quality Incentives Program (EQIP), and have demonstrable and verifiable greenhouse gas reduction benefits. We also encourage the Department to consider farm producers that have incorporated the practices on-farm independently and not through a federal or state-funded grant as eligible under this definition. Many of California's farmers and ranchers have undertaken these practices for years on their own accord, without public funds, and their exclusion would be punitive.	Research and Development Program (DDRDP), and State Water Efficiency and Enhancement Program (SWEEP). The Track 4 application includes an opportunity for food producers who have incorporated climate smart agriculture practices independently to describe those practices and earn priority points. Additionally, the CDFA updated the Track 4 application to include an opportunity for food producers who can demonstrate evidence of their climate smart agriculture practices through third-party verification to receive additional priority points. This was in response to public comments the CDFA received that recommended Track 4 applicants provide verification of climate smart agriculture practices to receive priority points.

RFA SE	ECTION: 1.3 FOUR FUNDING TRACKS		
Track	Public Comment	CDFA Response	
All	I like the four tracks and think the use of funds and eligibility requirements look fair and comprehensive.	(11) Thank you for the comment of support.	
All	It would make a lot of sense to be able to apply for more than one track. We are connecting with different locations and deliver all over - trying to work regionally. To work with all those people, we would need more than one track.	(12) Yes, applicants may apply to multiple tracks based eligibility and project type. Thank you for the common of support.	
All	most grant funding streams are only interested and excited to fund new and novel ideas. But it would be nice if a grant could receive scoring/review points for scaling, implementing or simply copy an established program built on a solid idea. For example Harvest of the Month type	(13) Both projects that propose implementing new and innovative ideas and projects that propose implementing established ideas and programming a eligible to receive competitive scores in the Project Description section of the application if projects app	

Track	Public Comment	CDFA Re	esnonse
Hack	projects. Instead of spending time trying to develop a proposal that sells you on the novel application of the HOTM program at that school district or site, why not just give the applicant points because they decided to implement a good idea with a track record (and are not reinventing the wheel, if you will).	feasi prop fund secti clarit final imple long	ible and if applicants demonstrate how their osed projects will meet the goals of the applicable ing track (as outlined in the Four Funding Tracks on of the final RFA). The CDFA added a fication in the Four Funding Tracks section of the RFA that it welcomes projects that propose ementing new ideas and/or established ideas as as projects align with the goals of the applicable ing track.
1	Have you considered expanding the range to include pre- K? Given the number of schools that support transitional kindergarten and other pre-K programming, this could ensure that funding can be used for all students served by the applicants.	appli In th RFA enco educ pres prog proje inter	the CDFA welcomes and encourages Track 1 icants to include pre-K in their proposed projects. e Eligibility and Exclusions section of the final, there is language that says, "The CDFA burages public school districts, county offices of cation, and directly funded charter schools with chool, transitional kindergarten, and/or Head Start rams to include those programs in their Track 1 ect, and to explore the Track 3 grant opportunity if ested in maximizing funding for farm to early care education."
1	CDFA shouldupdate page 8, Track 1, section (2) to align with the wording used throughout the rest of the RFA by adding the words "or additional" in the paragraph that specifies funds can be used to "procure new or additional California grown or produced, whole or minimally processed foods for incorporation into school meals, especially foods that are culturally relevant, climate smart, and from small to midsize food producers, veteran food producers, socially disadvantaged food producers, and/or limited-resource farm households in California."	phra read minii mea fund whol into sentiti items their offer prog that	CDFA removed the word "new" altogether in this se throughout the final RFA. The phrase now s, "procure California grown or produced, whole or mally processed foods for incorporation into school ls" This indicates that grant recipients may use s to procure any California grown or produced, e or minimally processed foods for incorporation school meals. The CDFA recognizes that school ies that already feature many California grown s on their menus may require funding to expand offerings of these same items or even to continue ing these same items. Please note that the grant ram will still prioritize projects that procure foods are culturally relevant, climate smart, and from ll to midsize food producers, veteran food

Track	Public Comment	CDFA Response	
		producers, socially disadvantaged food producers, and/or limited-resource farm households in Californi	ia.
1	We are interested in using the [full award amount] to fund a staff person to increase our capacity to purchase more local fruits/veggies for meals and expand school garden and nutrition education to other schools and connect learning to the cafeteria. The [full award amount] would only cover the cost of this staff person, and the Child Nutrition Services department would fund the increase in local procurement from small to medium-sized farmers. Even though the cost of CA crops wouldn't be reimbursed from the grant, we'd still identify grant goals to increase our local procurement. I recommend that grantees have the flexibility to determine how the grant dollars are allocated to meet grant goals (i.e. just because a grant goal is to increase local procurement, we aren't required to allocate grant dollars to this).	(16) The CDFA recognizes that each Track 1 applicant in have different funding needs for implementing an integrated farm to school program that incorporates both procurement and education and meets the Tract 1 goals outlined in the Four Funding Tracks section, enable flexibility, there are no minimums or maximum for the various spending categories in the Allowable and Unallowable Costs section (except for indirect costs, which has a cap). This indicates that grant recipients may determine how to allocate the grant dollars to meet grant goals (e.g., a grantee could allocate 100% of their award amount to farm to school staffing). Applicants do not need to allocate funds to procurement and/or education in their proposed but as long as they can demonstrate in the Project Description section that the proposed project will implement both procurement and education and integrate these pieces together. The CDFA added a clarification about this flexibility in the Allowable and Unallowable Costs section of the final RFA.	ck . To ms col ol dget
2	We are really interested to learn more about the statement that reads "implement farm to school procurement and/or education strategies that are part of larger regional or statewide food system development plans." We think it is pretty exciting to see this grant program make an intentional connection to larger food system efforts, and we hope to hear more about your vision here. Will you be defining what this means in more detail in the final RFA?	(17) Examples of food system development plans include but are not limited to the Seattle Food Action Plan at the Greater Philadelphia's Food System Plan, as we as other California-specific plans that focus on coun level or regional food system planning. The CDFA added these examples in the Eligibility and Exclusio section under Track 2 of the final RFA. Partnerships that have a regional or statewide food system development plan in California and would like to implement farm to school procurement and/or education strategies as part of that larger plan are welcome to apply to Track 2 and should demonstrat	ind ell ity- ons

Track	Public Comment	CDF	A Response
			in their application how farm to school fits into their larger food system efforts.
3	"Track 3 will fund intermediary organizations and multi-site child care centers in California to establish new or expand existing farm to ECE programs that: (1) coordinate foodand garden-based hands-on learning and play opportunities for young children" Add:and their families. Early childhood is a time for high family involvement and the creation of lifelong patterns, it would be helpful to not only focus on programming for students, but Farm to School resources for the entire family (ie. parent/caregiver workshops). A how-to garden workshop for teachers is great for a school garden but including caregivers will have families starting gardens at home.	(18)	The CDFA updated this language in the Four Funding Tracks section under Track 3 of the final RFA to say, "coordinate food- and garden-based hands-on learning and play opportunities for young children and, if desired, for their families."
3	"Track 3 will fund intermediary organizations and multi-site child care centers in California to establish new or expand existing farm to ECE programs that:(3) offer ECE providers farm to ECE technical assistance and/or peer learning spaces This means training for teachers, parents, staff and kitchen staff, correct?	(19)	Correct; training for teachers, parents, staff, and kitchen staff at ECE sites would align with this element of Track 3. The CDFA updated this language in the Four Funding Tracks section under Track 3 of the final RFA to say, "offer farm to ECE technical assistance and/or peer learning spaces to ECE staff, ECE teachers, and/or ECE families."
4	Thank you so much for track 4 and a producer specific funding stream! This will be super helpful to our farm partners.	(20)	Thank you for the comment of support.
4	Thank you so much for Track 4! One of the biggest challenges we have faced for so many trying to sustain Farm-to-School in our District has been the lack of funding to pay people to actually grow the food! It's great to fund the start of programs and equipment, but if we can't pay someone to actually implement the programs that only goes so far. We partner with a non-profit that manages our high school farm to grow food for our cafeteria. If we are awarded Track 4 funding we will be able to finally expand the production and get more locally grown produce in our	(21)	Thank you for the comment of support. Please note that while a school district itself cannot apply to Track 4, a non-profit that operates a farm on school district property is eligible to apply to Track 4. The CDFA added this clarification about Track 4 eligibility to the Eligibility and Exclusions section of the final RFA. Additionally, please see response #52 below regarding why school districts are not eligible to apply to Track 4.

Track	Public Comment	CDFA Response
	school meals. THANK YOU for recognizing this need and making funds available.	
4	Track 4: The California Farm to School Producer Grant: This is a very important track. This track gives producers motivation to be involved with schools.	(22) Thank you for the comment of support.
4	"Track 4 will fund California food producers to increase food production, processing, and/or distribution for the school food market." Can this be used for start-up costs for new food production projects, or is it only for already established ones?	(23) Yes. Track 4 applicants may apply to fund start-up costs for their food production operation if the costs follow the Allowable and Unallowable Costs for Track 4. However, please note that Track 4 applicants must be able to demonstrate an established relationship with at least one school nutrition services department in the application and that the CDFA will prioritize Track 4 applicants who can demonstrate an ability to produce food for schools in the application. The CDFA added this clarification to the Eligibility and Exclusions section under Track 4 of the final RFA.
4	"Track 4 will also fund California food producers to provide educational opportunities for youth that complement food sales to schools." Could this be expanded to include food producers that donate food to schools?	(24) Yes. The CDFA expanded this language in the final RFA to read "food sales or donations to schools." Please note that a food producer who is donating food to schools still needs to demonstrate school buy-in in the "Relationships with School Nutrition Services Departments" section of the application to ensure that the school can accept the producer's donations.
4	"Producers may use funds to: (1) upgrade infrastructure and equipment and purchase supplies to increase production, processing, and/or distribution capacity to sell food to schools" Maybe something like "sell or provide food to schools"	(25) The CDFA expanded this language in the final RFA to read "sell or donate food to schools." Please see response #24 above for additional information.

RFA SE	RFA SECTION: 1.4 FUNDING & DURATION			
Track	Public Comment	CDFA Response		
All	Provide advance payments: We encourage CDFA to adopt	(26) Thank you for the comment. Grant recipients may be		
	an advance payment model, rather than a reimbursement	eligible to receive Advance Payments for project		
	model, for grant recipients. Advance payments ensure	expenditures. Advance payments shall not exceed the		

Track	Public Comment	CDFA Response
	equitable participation from schools in underserved communities and producers who are socially disadvantaged. Given the budget challenges at many schools and viability challenges facing many farming businesses, providing grantees with at least 25%, and ideally 50%, advance payment will allow less-resourced applicants to participate. This approach will also enable schools to set up advance procurement contracts with producers, which reduces financial and logistical burdens for both schools and producers.	amount necessary for project expenses for a three-month period and cannot reduce the project balance below 10% of the award amount. If eligible and approved for advance payment, recipients must follow the Advance Payment regulations. The reason why an advance payment model is not the default is that grant recipients must be able to demonstrate low to no cash flow to be eligible. Additionally, grant recipients that receive advance payments must agree to follow the Advance Payment regulations linked above, and the CDFA recognizes that some grant recipients may prefer to receive grant funds through a reimbursement model rather than following these Advance Payment regulations. After the award notification and announcement, the CDFA will work with any grant recipients that are interested in the advance payment model to determine if they are eligible, review the Advance Payment regulations, and walk through the process.
1	First, I want to comment that we're extremely happy that these grants are continuing and that the minimum [award amount] has been raised. We were awarded a grant for 2021 and have found the invoicing, reports and checkups straightforward. We truly appreciate your support and shared excitement in our accomplishments!	(27) Thank you for the comment of support.
1	"If an applicant's formula produces a number LESS THAN \$150,000, the applicant may apply for up to \$150,000." Thank you for including this! This will certainly help smaller schools, like those on our Reservation, be eligible to apply for funding significant enough to implement a project.	(28) Thank you for the comment of support. Please note that individual schools are not eligible to apply to Track 1, unless they are a single-site public school district or a single-site directly funded charter school. However, public school districts, county offices of education, and directly funded charter schools that apply may identify in their application that their proposed project will focus on one or more specific school sites within their organization. Public school districts, county offices of education, and directly funded charter schools are

Track	Public Comment	CDF	A Response
1	The funding formula is a bit disappointing. But the only fair way to divide the available funds.	(29)	each limited to one application in Track 1. The CDFA added this clarification about Track 1 eligibility to the Eligibility and Exclusions section of the final RFA. Thank you for the comment. Please email the CDFA at cafarmtoschool@cdfa.ca.gov if you have thoughts on how you might like to see the funding formula change in the future. The CDFA welcomes feedback to inform next year's round of funding.
1	Award Dollar Amount: If the \$150k minimum grant budget must include line items for procurement of CA specialty crops/foods, \$150k is not enough to fund a district staff person AND procurement costs. Increasing this dollar amount to a minimum of \$200k would be required. Another option is to allow districts to include matching costs or cost share to align grant goals and the budget.	(30)	Please see response #16 above.
2, 4	Would be nice to consider a larger allocation in Tracks 2 and 4 if possible.	(31)	In the Funding and Duration section of the final RFA, the CDFA removed the approximations of how many funds are available in each funding track, as the amount of funds that the CDFA will award in each funding track will depend on the number of competitive applications the CDFA receives in each funding track.
2	"Award amounts: \$100,000 to \$500,000." I appreciate this increase I think this will help tribal programs like mine be able to increase our impact.	(32)	Thank you for the comment of support.
4	I love the addition of this Track. If possible with additional funding in the future, I think it might be more impactful to increase the upper limit on project proposals in this area.	(33)	Thank you for this feedback. For this round of funding, the CDFA maintained the maximum award amount for Track 4 at \$150,000. The CDFA plans to test out this maximum award amount for Track 4 during this round of funding to see how it works and can visit it in the future. The CDFA recognizes that \$150,000 may not cover the full cost of a food producer's project but hopes that it will be enough to cover a substantial portion, if not all, of a food producer's project. Through Track 4, the CDFA intends to spread the funding around to food producers across the state and

Track	Public Comment	CDF	A Response
4	I love that you added a producer track this year! Providing funds for small to medium-sized growers to increase their capacity to engage in Farm to School is key. I recommend increasing the project funding limit to \$500k to give the option for producers with creative, transformational projects like ours to apply. \$150k isn't enough funding to help jumpstart a project like ours. Converting school owned-land to a small farm OR purchasing farm land to grow exclusively		therefore decided not to increase the maximum award amount above \$150,000 for this round of funding because the higher the maximum award amount, the fewer the number of food producers across California who would be able to receive funding. However, the CDFA welcomes feedback on the Track 4 maximum award amount for future rounds of funding. Thank you for the comment of support. Regarding the recommendation to increase the maximum award amount in Track 4, please see response #33 above. Additionally, please see response #52 below regarding why school districts are not eligible to apply to Track 4.
4	for school cafeterias is an exciting model to pilot and expand around the state!!! Award Dollar Amount: Increasing the award amount to mirror track 2. Currently the funding range (\$5,000-\$150,000) only supports producers who are already established. Giving people the option to apply for funding up to \$500,000 will allow producers who are just starting out to cover more upfront expenses such as labor, equipment,	(35)	Please see response #33 above.
4	starts, etc. With the funding as is, \$150,000 can only cover one farmer's salary over the course of two years, but nothing additional. For Track 4, the award amount feels small. We received a quote for the cost to build out our 1-acre [farm], and it is	(36)	Please see response #33 above.
	\$500K. That includes educational signage, pathways, plants, irrigation, etc. If farms are being built on school property for farm to school programs, they're subject to prevailing wage, which makes the costs higher.		

RFA SE	FA SECTION: 1.5 COST SHARE				
Track	Public Comment	CDFA Response			
All	Are there scoring advantages to showing matching funds as part of a proposal?	(37) No. This grant program does not require matching funds in an effort to increase accessibility to this funding. This is in alignment with the grant goal to cultivate equity by creating opportunities for those who have been historically excluded to improve the health and well-being of the people, places, and communities that define California's food system. Applicants will not receive additional points for showing matching funds as part of a project proposal. However, as noted in the Cost Share section of the final RFA, applicants must be able to show a commitment to farm to school programming in the application. For Tracks 1 through 3, applicants must show this commitment in the application under sections "Project Team" or "Project Partners" and "Description of Farm to School History and Motivation," as well as through letters of support. For Track 4, applicants must how this commitment in the application under sections "Relationships with School Nutrition Services Departments" and "Description of Food Production History and Farm to School Vision."			

Track	Public Comment	CDFA Response
All	Applying for multiple tracks is confusingand needs more clarification.	(38) It is true that applicants may apply to multiple funding tracks based on eligibility and project type. There is a separate online application for each funding track; the CDFA added the links to each online application in the How to Apply section of the final RFA. Additionally, the CDFA created a new resource – called an Eligibility Decision Tree – and posted this on the program website as well as added a reference to it in the Four Funding Tracks section of the final RFA to assist

Track	Public Comment	CDFA Response
		prospective applicants with determining which funding track(s) may be a good fit for them.
1	"Public school districts that serve as the School Food Authority (SFA) for multiple school districts may include those districts in their proposed project if desired." There might need to be some clarification here if they are allowed to submit only one application, or if it is one per school district.	(39) A public school district, county office of education, or directly funded charter school that is <i>not</i> a School Food Authority (SFA) itself is <i>not</i> eligible to apply to Track 1. This is because the goals of Track 1 are to coordinate the school nutrition services program with educational opportunities for students and to procure California grown or produced, whole or minimally processed foods for incorporation into school meals, both of which require the Track 1 applicant to have a school nutrition services department (or equivalent entity) that operates school meal programs.
		However, public school districts that serve as the SFA for multiple school districts, for a county office of education's school sites, and/or for directly funded charter schools may include those entities in their proposed project if desired by including those sites' student enrollment numbers in the funding formula in the application, their data in the Community Need section of the application, and how the project will serve them in the Project Description section of the application. Please note that a public school district that serves as the SFA for multiple entities and would like to include those entities in their proposed project is still limited to submitting one application in Track 1. Additionally, the entities that are not SFAs themselves are <i>not</i> eligible to submit their own separate applications. The CDFA added this clarification about Track 1 eligibility to the Eligibility and Exclusions section of the final RFA.
2	Can an entity be a "supporting project partner" if they are located outside of CA? For example an organization with a nationwide reach?	(40) Yes. For Track 2, farm to school support organizations, whether the lead applicant or a supporting project partner, may be organizations that are based outside

Track	Public Comment	CDFA	A Response
		t f f f	of California but serve California farm to school corograms (unless otherwise indicated in the list of eligible Track 2 farm to school support organizations in the Eligibility and Exclusions section of the final RFA). Please note that such organizations must use any funding they may receive through Track 2 for project activities that support California farm to school crograms and that make regional or statewide food system impact in California. The CDFA added this clarification about Track 2 eligibility to the Eligibility and Exclusions section of the final RFA.
2	Upon reviewing the RFP and who can apply for track two-can a national organizationthat has a state wide project and office in the state of California be an applicant? I think being a regional or state focused project, rather than the organization itself having to be a state organization, makes sense.		Yes. Please see response #40 above.
2, 3	I have a question about tracks 2 <u>and</u> 3: The California Farm to School Partnership Grant - #3 - a small organization that provides training and support to schools and districts could include ECE programs. Partners in this category can work with all sorts of entities (public school districts to small in-home daycares). This would increase reach and impact of your funding (more bang for your buck, so to speak). But as it reads now, an organization like ours wouldn't know whether to apply for track 2 or 3 because the work covers both categories. For us to invest in building the training/sourcing farm and developing programming for other educators is a large investment that wouldn't make sense if we were to exclude one or another group (K-12 vs ECE). If track 3 were to increase in grant size and include older kids or if track 2 were to include ECE partners, then it could work.	; ; ; ; ; ; ; ; ; ; ; ; ; ; ; ; ; ; ;	Farm to school support organizations applying to Track 2 may incorporate early care and education (ECE) partners into their proposed project as long as they partner with at least one K-12 farm to school implementing organization (i.e., public school district, county office of education, and/or directly funded charter school) and their partnership focuses on regional or statewide food system impact that meaningfully supports more than one farm to school implementing organization that serves elementary and/or secondary students. Farm to ECE support organizations that would solely like to focus on farm to ECE in their proposed project should apply to Track 3 (please note that the CDFA recognizes that ECE orograms may serve school-aged children in addition to children birth through age five; at least 50% of the students that each Track 3 project serves must be

Track	Public Comment	CDF	A Response
	This way, we could also include in-home daycare centers to help them build small gardens and train them on how to grow/cook foods they grow, when they otherwise wouldn't qualify.		may also include school-age children if they attend the ECE sites that the project will serve). The CDFA added these clarifications about Track 2 and Track 3 eligibility to the Eligibility and Exclusions section of the final RFA.
	Does this fall into the mini-grant category? How does one tie this in with the regular grant app?		Applicants to any of the funding tracks may incorporate mini grants into their proposed project budgets. Mini grants may fall under the Contractual Costs or Other Costs spending categories, depending on an organization's internal procedures. Please note that grant recipients must ensure their mini grant recipients follow all allowable and unallowable costs of this grant program as well as financial reporting requirements such as documenting how they used the funds. The CDFA added this clarification about mini grants under the Allowable and Unallowable Costs section of the final RFA.
2, 4	In partnership with XXX, I am building [an]organic marketplace connecting local, organic farms with California schools interested in purchasing nutritious, fresh foods. The goal is to streamline the process of discovery and procurement for both California farms and school foodservice teams. XXX and I will pilot this resource with XXX Unified first then expand to schools across California. I would like to apply for track #2 and track #4. How is the CDFA considering distributors and intermediaries in this grant program? I've seen how complex the K-12 food procurement process can be for many suppliers and manufacturers. And on the flipside, I've seen how difficult it can be for school foodservice teams to find and purchase items from local suppliers that are prepared to do business with the K-12 channel (i.e formal documentation, bid process, P.O timing,	(43)	A distributor is eligible to apply to Track 2 if it is a certified small business in California that is certified through California's Small Business Certification Program and listed in the Cal eProcure database. Please note that small businesses in California that are in the process of getting certified through California's Small Business Certification Program may apply, but if awarded, receipt of the award is contingent upon confirmation of their certification. The CDFA added certified small businesses to the Track 2 Eligibility and Exclusions section of the final RFA. Please note that any applicant to Track 2 must ensure that their project partnership includes the required entities that make up a Track 2 project partnership (i.e., at least two farm to school implementing organizations or at least one farm to school support organization). See the Eligibility

Track	Public Comment	CDE	A Response
HIGCK	etc). I am hoping to utilize these funds to pilot thiseCommerce marketplace with XXX and XXX so that we can break down these barriers. We plan to empower local farmers, provide a resource on the K-12 purchasing cycle and USDA requirements, and provide meal prep tools for foodservice teams. To my knowledge a resource that focuses on both organic and local food does not exist. I hope with the CDFA help, we can enable the further progress of organic, fresh, nutritious foods in schools.	CDF	and Exclusions section of the final RFA for definitions of farm to school implementing organizations and farm to school support organizations.
3	Can nonprofits doing farm to school programming at multiple ECE sites apply?	(44)	Yes. The CDFA expanded Track 3 eligibility in the Eligibility and Exclusions section of the final RFA to include a broader list of intermediary organizations (now referred to as farm to ECE support organizations), including non-profit organizations, UC Cooperative Extension offices, and Tribal government entities. The CDFA also expanded Track 3 eligibility in the Eligibility and Exclusions section of the final RFA to include single-site child care centers in addition to multi-site child care centers, with a note that child care centers may apply in partnership with other ECE providers (e.g., other child care centers, family child care homes, or family, friend, or neighbor settings) if they would like to increase their project reach. Please note that when making award determinations, the CDFA will seek to maximize impact by considering relative project reach (i.e., number of young children served, number of ECE providers engaged) among child center applicants and, separately, among farm to ECE support organization applicants.
3	Are small non-profits eligible for Track 3?	(45)	Yes. Please see response #44 above.
3	Can [an intermediary organization] be a nonprofit that works with ECE providers regionally? Our org, along with others		Yes. Please see response #44 above.

Track	Public Comment	CDFA Response
	we know in the field, are nonprofit entities that provide tech assistance and training on Farm to ECE/Preschool, procurement, and curriculum to networks of ECE providers. If we are not able to be the lead applicant, we would have to limit our impact to a single partner.	
3	It was helpful to learn that Cooperative Extensions are currently not included as an eligible agency for Track 3. I would love for us to be included and here's why: UC Cooperative Extension of Alameda County has been serving students age 3-5 in Oakland Unified School District for over 20 years. We are the only organization that provides training, support, materials and technical assistance around nutrition education, edible gardening, physical activity, to the 28 child development centers in XXX School District. Additionally, we provide education for parents and caregivers at these sites. We work very closely with the school district and nutrition services and hope to deepen that partnership for the 2022-23 school year by implementing Harvest of the Month tasting and education at all preschools. However, our CalFresh Healthy Living, UCCE funding is limited and hence our interest in applying for the Farm to ECE grant We would love to be eligible to apply for the upcoming grant cycle.	(47) UC Cooperative Extension offices are now eligible to apply to Track 3. Please see response #44 above.
3	"Who can apply?Statewide organizations, commissions, and associations that are non-profits, projects with a non-profit fiscal sponsor, or government entities." Is it possible to add in the clarification that Tribal government entities can apply here? It seems like it is allowable, but the clarity might be good.	(48) Yes. Tribal government entities are eligible to apply to Track 3. Please see response #44 above.
3	Track 3, under ECE, I wouldn't limit to multi-site childcare providers as many of these are for-profit entities. I know that the goal is to have maximum reach, but I personally don't know of many multi-site non-profit providers. What if a group of independent non-profit schools were to apply together?	(49) Single-site child care centers are now eligible to apply to Track 3. Please see response #44 above.

Track	Public Comment	CDF	A Response
4	Potential restriction Our farm is a unique entity, in that the property is owned by the Karuk tribe and the farm itself is run by/through the Karuk Tribe's Department of Natural Resources. I am not sure if we fit the definition [of food producer] or not, as it is written.	(50)	The CDFA added a clarification about Track 4 eligibility in the Eligibility and Exclusions section of the final RFA to include Tribal government entities that lease, rent, or own land in California (whether the land is publicly owned, privately owned, or Tribal land) and cultivate crops, raise livestock, and/or use Indigenous food production practices on this land.
4	"Who Can Apply?" "Food producers in California" is narrowly defined as: "A person, group of individuals, or collaborative that leases, rents, or owns land in California (whether the land is publicly owned, privately owned, or Tribal land) and cultivates crops, raises livestock, and/or uses Indigenous food production practices on this land, and/or A California seafood harvester" I urge your team to add "Food Processor, or a California-based company, collaborative, or co-operative who processes, packs, or fabricates products that are grown in California by California Food Producer (farmer, rancher, cultivator, or indigenous food production practice." Food production supply chains are multi-faceted (food production/cultivation > food processing (cleaning, fabrication) > food packing > food distribution) and many producers (defined as: farmers or ranchers who cultivate crops or raise livestock directly) rely on Food Processors (defined as: handlers, packers, processors, manufacturers, further fabricators, etc.) to get the food they produce to a "sellable" state. By sellable, I mean, packaged and ready for distribution. Dairy and Meat products absolutely require further handling and fabrication beyond the ranch or the dairy farm. Speaking specifically from a meat perspective, as written now, this grant will supply a small amount of money to farmers/ranchers who could use it to investment in processing equipment, but the cost of establishing USDA processing is very high and the desire by most farmers/ranchers to be responsible for their own USDA	(51)	Track 4 is for food producers to apply directly. Food processors are not eligible to apply to Track 4. However, food processors in California are eligible to apply to Track 2 as a farm to school support organization in partnership with food producers. The final RFA defines a food processor in California as, "a California-based company, collaborative, or cooperative that processes, packs, and/or fabricates minimally processed products that are 100% made with California grown or produced food from California food producers." They may propose projects that will increase collaboration and coordination between California food producers and school nutrition services departments to increase procurement of California grown or produced, whole or minimally processed foods. The maximum award amount for Track 2 is \$500,000, which is higher than Track 4 to allow for farm to school support organizations to scale up the award by, for example, scaling up their food producer partners and thus make broader impact beyond an individual food producer. The proposed project budget for Track 2 may incorporate mini grants to individual food producers. Please note that farm to school support organizations that apply to Track 2 must partner with at least one farm to school implementing organization (i.e., public school district, county office of education, or directly funded charter school) and their partnership must focus on regional or statewide food

Track	Public Comment	CDF	FA Response
Hack	processing, packing, and distribution is quite low. So, as	OD.	system impact that meaningfully supports more than
	written in this draft RFA, the agents who could generate		one farm to school implementing organization. The
	great change in this space by investing in systems to		individual food producers that the food processor is
	support K-12 sales and distribution – the Processors – are		partnering with for the Track 2 application may also be
	excluded from applying. This is a big oversight if the		eligible to apply individually to Track 4. The CDFA
	intention of the CDFA F2S program is to support more		added food processors in California as eligible Track 2
	clean meat products raised by CA farmers getting into		farm to school support organizations in the Eligibility
	public schools.		and Exclusions section of the final RFA.
4	Food Producer Definition: XXX School District purchased	(52)	School districts are not eligible to apply to Track 4.
	10 acres of farmland to create an Agricultural Center. The		Please note that while a school district itself cannot
	goal is to produce organic food for school meals and		apply to Track 4, a food producer, including an
	engage students in farm-based education. We are exploring		individual or non-profit organization, that operates a
	different models to begin production for the cafeteria [i.e.		farm on school district property is eligible to apply to
	contract with a local farm or employee farmer(s)].		Track 4. School districts that themselves operate a
	Regardless of the chosen model, the school district will own		farm on their own school district property may be
	the land and food produced, and Child Nutrition Services		eligible to apply to Tracks 1, 2, and 3. For example,
	would purchase this food from the district. These dollars		Track 1 may be a good fit if the school district is a
	would then move into a fund that would sustain farm		School Food Authority and is looking to incorporate the
	operations. We are a school district, School Food Authority,		farm into procurement and education efforts to serve
	AND a producer. I'm sharing this context with you to ensure		their individual school district community. Track 2 may
	that school districts operating like I explained would qualify		be a good fit if the school district is looking to
	to apply as a producer.		incorporate the farm into a larger regional or statewide
			farm to school project that will engage multiple school
			districts. And Track 3 may be a good fit if the school
			district operates a district-based preschool program,
			California State Preschool Program, transitional
			kindergarten program, and/or Head Start program and
			is looking to incorporate the farm into procurement and
			education efforts to serve their early care and
			education (ECE) population. The intent of Track 4 was
			not to add another funding track for school districts but
			to add a funding track that would enable the grant
			program to fund the entire farm to school food system
			by funding the producer/supply side, particularly small
			to midsize, socially disadvantaged, veteran, limited-

Track	Public Comment	CDF	A Response
			resource, and/or climate smart food producers. The goal is to increase the capacity of local California food producers to sell or donate food to and work with schools. The CDFA added this clarification about Track 4 eligibility to the Eligibility and Exclusions section of the final RFA.
4	Who can apply: I'd like to see School Districts also be considered as "Producers".	(53)	School districts are not eligible to apply to Track 4. Please see response #52 above.
4	Who can apply: I see veteran food producers can apply, but what about adding new producers just starting?	(54)	New food producers may apply to Track 4 and may apply to use Track 4 funds for start-up costs. Please see response #23 above for additional details.
4	USDA grant applications are very dense and applicants often need technical assistance, especially when not versed in grant writing. When funding opportunities require dense applications it reduces the number of small farms who will be able to apply and will favor larger farms who have the capital to hire a grant writer. I would suggest allowing a separate entity apply on behalf of farmers and distribute funds appropriately. This would allow a greater number of small and socially disadvantaged farms to have a more equitable opportunity to receive funding from this opportunity.	(55)	Track 4 is for food producers to apply directly. Farm to school producer support organizations are not eligible to apply to Track 4. However, food producer support organizations may be eligible to apply to Track 2 as a farm to school support organization in partnership with food producers. They may propose projects that will increase collaboration and coordination between California food producers and school nutrition services departments to increase procurement of California grown or produced, whole or minimally processed foods. The maximum award amount for Track 2 is \$500,000, which is higher than Track 4 to allow for farm to school support organizations to scale up the award by, for example, scaling up their food producer partners and thus make broader impact beyond an individual food producer. The proposed project budget for Track 2 may incorporate mini grants to individual food producers. Please note that farm to school support organizations that apply to Track 2 must partner with at least one farm to school implementing organization (i.e., public school district, county office of education, or directly funded charter school) and their partnership must focus on regional or statewide food system impact that meaningfully supports more than

Track	Public Comment	CDFA Response	
		one farm to school implementing organization. The individual food producers with whom a farm to sch support organization partners for the Track 2 application may also be eligible to apply individual Track 4. Please see the list of eligible farm to scho support organizations for Track 2 in the Eligibility a Exclusions section of the final RFA to see if your for producer support organization fits any of these eligibility types (e.g., non-profit organization, resource conservation district, regional farmers' market association, etc.).	ly to pol and pod gible
4	"To be eligible, California food producers must both: (1) Intend to sell California grown or produced food to" Can this be expanded to "sell or provide"?	(56) Yes. The CDFA expanded this language in the fina RFA to read "sell or donate California grown or produced food to" Please see response #24 for additional information.	al
4	"To be eligible, California food producers must both:(2) Demonstrate an established relationship with at least one school nutrition services department through:at least one past purchase order, invoice, or receipt for California grown or produced food sold to any of the above entities in California for school meals." Can this be expanded to include proof of donation?	(57) The CDFA removed this piece of the application altogether that would offer Track 4 applicants the opportunity to provide proof of past food sales to schools as a demonstration of their established relationship with a school nutrition services department. In the final RFA, <i>all</i> Track 4 applicants must now provide a letter of intent to collaborate fr school nutrition services director (or equivalent dis wide/organization-wide decision-maker who overs and coordinates the school meal program). This w response to a public comment the CDFA received suggested that proof of past food sales is not enouto fully demonstrate a quality relationship between schools and producers. Please see response #120 additional information.	om a trict- ees as in that ugh
4	"The CDFA will ask applicants to include a basic food safety plan as a required component of the application" If start-ups are allowed, can this be expanded to allow for the creation of a food safety plan?	(58) Yes. The CDFA added a clarification in the Allowa	at

Track	Public Comment	CDFA Response
		Please note that while the CDFA will still expect Track 4 grant recipients to meet a level of food safety consistent with their farm or business operations, the CDFA will no longer ask food producers to provide a basic food safety plan as part of the Track 4 application and will not evaluate applications based on current food safety practices.
4	There are a couple things about the Producer Track that may make it difficult for smaller farms to participate. Smaller farms do not have a lot of staff, and often have limited experience applying for grants. I was hopeful that it would be possible for a farmer support organization, such as a farmers market association, to apply on behalf of their member farms. We are already talking with our local market association and making a plan for how to do outreach and support Humboldt farmers to apply, but past experience really shows that it is much more effective, efficient, and successful to have an organization take the lead. This will be especially true with the F2S grant given that the application period is going to be in the middle of spring, a very busy time for farmers.	(59) Please see response #55 above.
4	For Track 4 can a non-profit representing multiple producers apply? Our producers are so tiny they cannot supply school districts themselves.	(60) Please see response #55 above.

RFA S	RFA SECTION: 1.7 ALLOWABLE & UNALLOWABLE COSTS		
Track	Public Comment	CDFA Response	
All	"For this grant program, if an organization has a federally negotiated indirect cost rate that is higher than 10% and provides documentation of its federally negotiated indirect cost rate in the application, the CDFA may accommodate this rate or an indirect cost rate of up to 30% of direct costs, whichever is less."	(61) Thank you for the comment of support. The CDFA revised this part of the RFA to say that the maximum indirect cost rate for all applicants is up to 30% of direct costs. This removes the documentation requirement and simplifies the process for applicants to apply an	

Track	Public Comment	CDF	A Response
	Thank you for this! This is huge for tribes to be able to apply.		indirect cost rate that is up to 30% of direct costs for this grant program.
All	some of the culturally appropriate food to potentially be integrated into our farm to school program (acorns) might be sourced from the forest, which is the original source of food for the Karuk people.	(62)	California produced acorns qualify as a whole or minimally processed food that Track 1 and 3 grant recipients may purchase with grant funds for school meals and/or student education, that Track 2 grant recipients may purchase with grant funds for student education, and that Track 4 grant recipients may produce with grant funds for schools. The CDFA added a note to the Allowable and Unallowable Costs section of the final RFA that CDFA staff will work with grant recipients to identify food products that meet the grant program values of "California grown or produced, whole or minimally processed" foods and will review every food procurement purchase made with grant funds to make sure it is in alignment with these values. CDFA staff intend to convene a working group to figure out the detailed 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.
All	After reviewing the application I didn't see animal feed as an allowable use of grant funds. Is that an allowable expense? If so, would it be beneficial to include that in your Allowable and Unallowable Costs information?		Feed for animals is not an allowable use of grant funds for any of the funding tracks. The CDFA noted this in the Allowable and Unallowable Costs section of the final RFA.
1, 3,	Why only 5 ingredients in the processed foods? What about many different seeds or blended whole grain flours?	(64)	The CDFA revised the criteria for grain products in the Allowable and Unallowable Costs section of the final RFA to incorporate this feedback. In the final RFA, 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 100% of the grains in the product are whole grains, and the remaining grain, if any, must be enriched.

Track	Public Comment	CDFA Response
Track	Public Comment	There is no cap on the number of ingredients in the whole grain-rich products at this time. The CDFA added a note to the Allowable and Unallowable Costs section of the final RFA that CDFA staff will work with grant recipients to identify food products that meet the grant program values of "California grown or produced, whole or minimally processed" foods and will review every food procurement purchase made with grant funds to make sure it is in alignment with these values. CDFA staff intend to convene a working group to figure out the detailed 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. The CDFA will also collaborate with the working group to determine if there should be any additional parameters beyond what is currently in the final RFA, around whole grain-rich products, yogurt and cheese dairy products, and other food products that this grant program may
1, 3,	What about making a five-ingredient exemption for combined whole grain flours or combined whole seed/nut flours?	fund. (65) Please see response #64 above.
1, 3,	Grain products should follow WGR standards for school meals, otherwise it is too complicated to track at the district level. I agree that 5 ingredients is too small. Thinking of a rice mix with spices. Some common exemptions are salt, spices and water.	(66) Please see response #64 above.
1, 3,	The way that added sugar is calculated should be changed to CA Smart Snacks standards which is 35% of added sugar by weight. By using "serving" you only get people cutting the serving size.	(67) The CDFA removed the language about sugar from the final RFA and will discuss parameters around sugar in the working group it intends to convene to figure out the detailed parameters for "minimally processed" food products that this grant program may fund.

Track	Public Comment	CDFA	Response
1, 3,	Some other items I think should be included [as allowable costs] are honey, nut butters, vinegars, flavored olive oils, dried herbs and dried herb/spice blends with at least XXXX amount of CA grown items.	a T a p	California-produced, single-ingredient honey would be an allowable minimally processed food product for Track 4 grant recipients to produce and for Tracks 1, 2, and 3 grant recipients to purchase as part of this grant program. Please see response #85 below for additional letails.
		d c s if	Regarding nut butters, vinegars, flavored olive oils, lried herbs, and dried herb/spice blends, the CDFA will collaborate with the working group mentioned in the second paragraph of response #64 above to determine these products are allowable food procurement burchases within this grant program.
1, 3,	[Allowable Costs > "dairy products like yogurt"] For further specification add cheese.	(69) T ir fi la C C W p	The CDFA revised the language about dairy products in the Allowable and Unallowable Costs section of the sinal RFA to incorporate this feedback. The revised anguage is that yogurt and cheese dairy products that are 100% produced, processed, and manufactured in California are allowable. Please note that purchasing California produced fluid milk or fluid milk substitutes will still not be reimbursed as part of this grant program.
		#	Also, please see the second paragraph of response 464 above for additional details.
1, 3	[Our] comment on the definition of minimally processed foods: Foods contain complex structures of nutrients and other bioactive compounds that can be modified with differing levels of processing such as cooking, fermenting, preserving or refining. Food processing is a centuries-old practice, embraced in food literacy, that helps ensure food safety and freshness. In some instances, processing can even enhance the nutrition of a food. The quality of foods, altered by processing and other factors, can fall on a spectrum of how the foods impact health. The food matrix	d d p p to ro p	The CDFA is aligning the minimally processed foods definition for this grant program with the USDA's definition of minimal processing, i.e., "Minimal processing may include: (a) Those traditional processes used to make food edible or to preserve it or make it safe for human consumption, e.g., smoking, coasting, freezing, drying, and fermenting, or (b) those physical processes that do not fundamentally alter the law product or that only separate a whole, intact food into component parts, e.g., grinding meat, separating

Public Comment CDFA Response Track refers to the relationships between the nutrient and noneggs into albumen and yolk, and pressing fruits to nutrient components of foods, including vitamins, minerals produce juices." The intention behind specifying that and bioactive components as well as physical structure, this grant program will fund the procurement of whole texture and form (e.g., solid, gel, liquid). The dairy food or minimally processed foods is to encourage scratchmatrix provides a unique example of the advancement of cooking in school meal programs and to encourage research in this area, as dairy is a diverse group of foods partnerships with California food producers. Track 1 that contain nutrients and bioactive components that vary in and 3 grant recipients may also use grant funds for kitchen infrastructure that will increase capacity to cook amount and macro- and micro-nutrient structure. The food matrix concept can be used to address how the California grown or produced, whole or minimally processed foods from scratch. relationships between nutrient and non-nutrient components impact digestion, absorption and physiological functions important for health. For example, not all foods containing Please note that while California produced whole grainsugar are equal, and evidence shows that using sugar as rich products, yogurt, and cheese do not meet this an indicator of carbohydrate's impact on health is highly minimally processed definition, the CDFA will make dependent on the food source. Some high-quality food exceptions for these products and make them sources that contain carbohydrates and sugar, such as allowable food procurement costs through this grant yogurt, kefir, fruit, 100% fruit juice and certain breakfast program (see the Allowable and Unallowable Costs cereals, are shown to be beneficial to health. These foods section of the final RFA). This is in recognition that it contain naturally occurring sugars, and although they may may be unrealistic to expect school nutrition contain limited added sugars, they also provide important departments to cook whole grain-rich products, yogurt, nutrients needed for health. This scientific insight supports and cheese from scratch. the importance of considering whole foods, alongside the individual components they contain to enhance overall diet Please see responses #64 and #69 above for quality and support healthy dietary patterns. additional details about these exceptions. Additionally. please see response #67 above regarding sugar. A definition of minimally processed foods that factors the food matrix and quality would allow for support of California produced dairy products such as yogurt. Most of the yogurts in California schools comes from out of state. Limiting added sugars to this low level, as currently defined in this RFA framework, prohibits school districts from reducing the transportation climate impacts of yogurt as they will continue to purchase from out of state. The American Academy of Pediatrics (AAP) Policy Statement on snacks,

sweetened beverages, added sugars and schools supports

Track	Public Comment	CDFA Response
	the addition of small amounts of sugars to nutrient-dense foods to increase consumption by children. Dietary recommendations and guidelines for the public that restrict single nutrients or food components without focusing on diet quality, could unintentionally limit access to and consumption of nutritious foods like milk and dairy foods, which nourish children and communities.	
1, 3	"The CDFA will develop a reimbursable foods resource list for grant recipients." [Our organization] can help with the list of dairy items on this resource list.	(71) Thank you for the comment of support. The CDFA intends to convene a working group to figure out the detailed parameters for "minimally processed" food products that this grant program may fund.
1, 3	Clarify procurement priority in Tracks 1 and 3: We commend CDFA for allocating at least \$16M for procurement and recommend that CDFA require applicants to allocate at least 50% of grant totals in Tracks 1 and 3 on food purchasing. This will ensure that a substantial portion of these resources are spent directly on the provision of healthy school meals. The remaining 50% can be spent on other priorities in these tracks, including education and farm to school staffing.	(72) The CDFA decided not to place a minimum on the percentage of funds that Track 1 and 3 grant recipients must use for food procurement. The intention behind this is to allow more flexibility for these grant recipients to put funds toward what they need to establish or expand their integrated farm to school program. For example, the CDFA recognizes that some may already be able to put substantial dollars toward local food procurement but want to primarily use grant funds to coordinate educational opportunities with the school nutrition services program. Regardless of how a Track 1 or 3 applicant decides to design their proposed project budget, they must demonstrate in the application how both procurement and education are components of their proposed project, even if they are not planning to use grant funds to directly fund procurement or education. The CDFA added a clarification about this in the Allowable and Unallowable Costs section of the final RFA. The CDFA also added a clarification in the Reporting and Evaluation section of the final RFA that all Track 1 and 3 grant recipients must submit data to the CDFA annually regarding California food procurement practices for the duration of the grant and the following

Track	Public Comment	CDF	A Response
			year after the end of the project term, even if they
			decide not to use grant funds for this procurement.
1	Positive: no matching required, funding for personnel. This	(73)	Thank you for the comments of support.
	is especially helpful as we try to expand our program.		
	Infrastructure dollars are very helpful when it comes to		
4	getting students into the school kitchen.	/ 7 4\	
1	Allowable CA Crop Procurement: I recommend broadening the definition of the CA grown crops that meet grant goals	(74)	Using grant dollars to increase procurement of crop varieties that a grant recipient is already purchasing is
	and qualify for grant reimbursement. While purchasing new		now allowable in Track 1. Please see response #15
	crop varieties is a valuable and important component of		above.
	Farm to School, increasing the number of purchases and		above.
	quantities of certain varieties is also valuable and		
	strengthens Farm to School programming and district-		
	producer relationships. For example, we are currently		
	purchasing Harvest of the Month crops one time per month.		
	In February, we purchased Cara Cara oranges once for all		
	our schools. We'd like to use grant dollars to increase our		
	capacity to purchase these Cara Cara orange purchases		
	next February to 4 times per month (weekly). Under the		
	current definition, this is not an allowable cost or grant goal.		
	I strongly recommend that the definition of allowable CA		
	crops includes an increase in procurement of varieties.	(75)	TI: : 11 - 11 : T - 1 4 B)
1	"If a grant recipient currently purchases California grown	(75)	This is allowable in Track 1. Please see response #15
	Flat-leaf spinach, then California grown Savoy spinach is reimbursable (or vice versa)."		above.
	It might be worth clarifying if replacing currently purchased		
	flat-leaf spinach with a new savoy spinach is reimbursable		
	or not. Total amount of spinach remaining the same, just		
	changing varieties.		
1	Is there a school district that could apply for track 1 but	(76)	Yes, as long as the contractual costs are in alignment
	partnering with a local bakerywhere the bakery would	(- /	with Sections 319, 320.1, 320.2, and 320.3 of the
	contract with the farmer to purchase the wheat so they can		CDFA Grant Administration Regulations. In Track 1, a
	mill it and make bread, and sell to the school. However, in		public school district may partner with a contractor
	order for the bakery to do it they would need to fund their		(e.g., a local bakery) and include this contractor in their
	mill to do it. In track 1, could a food service director apply		proposed project budget under Contractual Costs if the
L		<u> </u>	propossa project baaget ander contractad costs if the

Track	Public Comment	CDFA Response
	and add a line item to help the bakery pay partially for that mill?	contractor's services will help the school district to achieve their grant project objectives. Please note that grant recipients distributing grant funds to contractors must ensure that contractors follow all allowable and unallowable cost parameters of this program as well as financial reporting requirements such as documenting how they used the funds. For example, a mill would be an allowable purchase for a Track 1 grant recipient under School Kitchen Infrastructure Costs, so it would be an allowable cost for a contractor that is part of a Track 1 project.
3	"Infrastructure, equipment, materials, and supplies to increase young children's access to food- and garden-based hands-on learning and play." Add: and their families	(77) The CDFA updated this language in the Allowable and Unallowable Costs section under Track 3 of the final RFA to say, "Infrastructure, equipment, materials, and supplies to increase young children's access and, if desired, their families' access, to food- and gardenbased hands-on learning and play."
3	"Intermediary organizations must offer technical assistance and/or peer learning spaces to ECE providers they serve; multi-site child care centers must offer technical assistance and/or peer learning spaces to ECE providers at their child care sites." Would "peer learning" include workshops etc. for caregivers/parents?	(78) Yes. The CDFA updated this language in the Allowable and Unallowable Costs section under Track 3 of the final RFA to say, "Farm to ECE support organization grant recipients must offer technical assistance and/or peer learning spaces (including but not limited to workshops and trainings) to ECE staff, ECE teachers, and/or ECE families who are affiliated with the ECE providers that the project will serve. Child care center grant recipients must offer technical assistance and/or peer learning spaces (including but not limited to workshops and trainings) to ECE staff, ECE teachers, and/or ECE families who are affiliated with the child care site(s) that the project will serve."
3	it would be helpful for ECE providers to be able to apply for funding for sending their staff to onsite training (to pay for subs/coverage + travel/lodging?). it would also be helpful for partners to be able to provide this funding to	(79) Costs associated with participating in a training that is directly related to the goals of the applicable funding track and the goals of the applicant's proposed project are allowable in all four funding tracks. The costs may

Track	Public Comment	CDFA Response
Irack	participants (eg, if we were hosting an onsite training session at our farm, to be able to give the ECE providers a stipend that would enable them to attend: for substitutes while they're gone, travel etc).	include transportation, lodging, and meals, which would all fall under Travel Costs in the budget worksheet. The costs may also include registration fees for the training, which would fall under Other Costs in the budget worksheet. Additionally, the costs may include stipends for participants, which would fall under Staff/Labor Costs in the budget worksheet if the participants are employees of the grant recipient's organization and under Other Costs if the participants are not. The CDFA updated the Allowable and Unallowable Costs section of the final RFA to reflect this clarification. Coverage for substitutes in this context is also allowable – these costs may fit under Staff/Labor Costs in the budget worksheet if the substitutes are employees of the grant recipient's organization and under Other Costs if the substitutes are not. Please note that travel costs are allowable subject to Section 322 of the CDFA Grant Administration Regulations and that reimbursement for travel within California shall not exceed the maximum allowable rates and amounts established by the California
	A lat of shild ages contains us a large Maybe year should	Department of Human Resources.
3	A lot of child care centers use vendors. Maybe you should have a way to include subcontractors. So maybe they work with the vendors to come up with a CA fun day or something where they pay the vendor a premium price to include some of these products. That should be an allowable expense but is not addressed in the criteria.	(80) Contractual costs for the purpose of achieving the grant project objectives are allowable in all four funding tracks. Please see the Contractual Costs category in the Allowable and Unallowable Costs section of the final RFA. Please note that contractual costs are allowable subject to Sections 319, 320.1, 320.2, and 320.3 of the CDFA Grant Administration Regulations.
4	Track 4: should education be defined? Would ads on NPR or videos count as education? Might want to convey that a hands-on education is ideal here—something to firm up the kind of farm to school program these funds are intended	(81) In the Four Funding Tracks section, Eligibility and Exclusions section, and Allowable and Unallowable Costs section of the final RFA, the CDFA specified "hands-on educational opportunities" for Track 4.

Track	Public Comment	CDFA Response
	for–and set these funds apart from something like Specialty Crop Block grants.	
4	"Acceptable food products to sell to schools as part of this grant program include:" when defined for meat is limited to "Raw poultry, meat, and seafood" AND "Minimally processedpoultry, meat, seafoodwithout additives (e.g., roasted, smoked, shredded, chopped, sliced, frozen, dried, fermented, ground) I believe "without additives" needs to be further defined or explained. We produced a ready-to-eat cooked 100% beef patty (one that is made with CA organic beef and one that is made with CA grass fed beef). While there are no fillers or other additives, we do season the patty with sea salt and organic black pepper. Technically, those could be considered additives. Additionally, Raw meat is wonderful – but most schools do not have the facilities, programs, or staffing to be able to support scratch cooking – either from a literal cooking stand point or a handling / food safety stand point. I urge you to include ready-to-eat meat products that are made without additives or fillers, but can be seasoned or blended with mushrooms or other whole-foods.	(82) The CDFA removed this list of "acceptable food products to sell to schools" from the Track 4 Allowable and Unallowable Costs section of the final RFA and replaced it with the specification that foods must be whole or minimally processed. Minimal processing, as defined by the USDA, may include: (a) Those traditional processes used to make food edible or to preserve it or to make it safe for human consumption, e.g., smoking, roasting, freezing, drying, and fermenting, or (b) those physical processes that do not fundamentally alter the raw product or that only separate a whole, intact food into component parts, e.g., grinding meat, separating eggs into albumen and yolk, and pressing fruits to produce juices. For now, meat products with seasonings would not be allowable according to this definition. The CDFA is, at this point, trying to encourage scratch-cooked meat in schools. However, the CDFA added a note to the Allowable and Unallowable Costs section of the final RFA that CDFA staff intend to convene a working group to figure out the detailed parameters for "minimally processed" food products that this grant program may fund. The CDFA plans to bring this question to the working group about what the parameters for allowable meat products should be within this grant program. The CDFA will collaborate with this working group to develop an allowable foods resource list for grant recipients.
4	"Equipment and Supplies Examples:" The critical step of meat processing, packing, and distribution are not explicitly stated in this list. I understand the list is not exhaustive, but I urge you to include the following language to this list:	(83) The CDFA updated this list in the Allowable and Unallowable Costs section for Track 4 of the final RFA to include the following language: "Distribution vehicles, refrigerated vehicles, or other equipment necessary for transporting whole or minimally

	"Meat Processing and Packing Equipment and Supplies" "Distribution vehicles or equipment necessary for transport of goods to school districts"		processed foods to school districts" and "Meat processing and packing equipment and supplies."
4	"Farm to School Infrastructure, Equipment, and Supplies Costs: To increase production, processing, and/or distribution capacity to sell food to schools" Can this be expanded into "sell or provided" to allow for donations?	(84)	Yes. The CDFA expanded this language in the final RFA to read "sell or donate food to schools." Please see response #24 for additional information.
4	"Acceptable food products to sell to schools as part of this grant program include" Would honey fall under this list?	(85)	Yes. California-produced, single-ingredient honey would be an allowable minimally processed food product for Track 4 grant recipients to produce and for Tracks 1, 2, and 3 grant recipients to purchase as part of this grant program. Please note that the honey product must contain honey only (i.e., honey is the single ingredient). If the name of a single-ingredient honey contains the chief floral source of the honey (e.g., "Clover Honey" or "Orange Blossom Honey"), this would still be allowable under the grant as long as honey is the sole ingredient. However, if the honey consists of more than one ingredient (e.g., a sweetener like sugar or corn syrup), then it would not align with the grant parameter that the food be "whole or minimally processed," and would not be allowable under the grant. Also, please see the second paragraph of response #64 above for additional details about minimally processed foods in this grant program.

RFA SECTION: 1.8 REPORTING					
Track	Public Comment	CDFA Response			
All	Like how the reporting requirements have been streamlined	(86) Thank you for the comment of support.			
	and simplified from Incubator 1 to 2. Thank you!				
All	You might consider to have as part of grant reporting and	(87) The CDFA will consider structuring Grantee Office			
	evaluation, a cohort program by track so that when people	Hours to sometimes focus on small-group discussions			

Track	Public Comment	CDI	A Response		
HACK	are sharing their grows and glows, that it is more targeted	CDI	by funding track and to sometimes focus on small-		
	with other projects that share similarities.		group discussion by farm to school topic area. The		
	• •		CDFA will welcome feedback from grant recipients		
			about how to structure Grantee Office Hours to make		
			them most meaningful and engaging for grant		
			recipients.		
All	Would be great to know more about the pre-survey	(88)	The CDFA will develop the pre-survey in collaboration		
	requirements for all tracks in the grant reporting area.		with the external evaluation team. While the CDFA has		
			not yet fully developed the pre-survey for the 2022		
			round of funding, the pre-survey may request baseline		
			metrics including but not limited to: current California		
			food procurement practices (for Tracks 1 and 3);		
			current farm to school educational impacts (for Tracks		
			1 and 3); current food sales or donations to schools and use of climate smart agriculture practices (for		
			Track 4); and current collaboration strategies (for Track		
			2). The CDFA added this list of possible baseline		
			metrics in the Reporting and Evaluation section of the		
			final RFA.		
1, 3	Make the procurement sheet EASY. What is the minimum	(89)			
	information you NEED, not just the stuff that would be	, ,	time to include the fewest number of questions		
	interesting and fun to know.		possible and values this feedback. The purpose of this		
			worksheet is twofold: (1) the CDFA is utilizing this		
			worksheet as the method for Track 1 and 3 grant		
			recipients to submit evidence of food procurement		
			costs as part of the required financial reporting, rather		
			than requiring grant recipients to submit each individual		
			food procurement invoice, in an effort to minimize		
			burden on the grant recipients; and (2) the CDFA is		
			utilizing this worksheet to gather data that will help tell		
			the story and demonstrate the impact of California food		
4	I naticed that all grantees will be required to attend Office	(90)	procurement and this grant program.		
4	I noticed that all grantees will be required to attend Office Hours once a quarter. This will…be a challenge for small	(90)	The CDFA updated the Reporting and Evaluation section of the final RFA to make participation in		
	farms depending on the time of year. If a farmer support		Grantee Office Hours optional for all grant recipients.		
	Tairing depending on the time of year. If a fairner support		Grantee Onice Flours optional for all grant recipients.		

Track	Public Comment	CDFA Response
	organization was able to be the lead, they could participate in the calls and facilitate information sharing between their farmers and the other grantees.	The CDFA will encourage participation but not require it.
4	One barrier to producers' success is the time and resources required for grant reporting. To make the reporting requirements less burdensome for producers, we recommend that CDFA provide a simple template (with examples and benchmarks) to support producers in fulfilling the requirement to submit quarterly check-ins; make it optional for grantees to attend one virtual office hours session per quarter; and ensure that the requirement to "participate in external evaluation activities" is as flexible as possible to account for the seasonal cycles of agricultural production.	(91) The quarterly check-ins will consist of a series of questions for grant recipients. Grant recipients will be able to view the questions and submit responses to these questions via an online portal. Grant recipients can print out the questions if they like to use as a template while drafting their responses. The CDFA will endeavor to make the questions as simple and minimally burdensome as possible. CDFA staff will send quarterly reminders via email about submitting the check-ins to help keep grant recipients on track and will also be available to support grant recipients if they have any questions about submitting their quarterly check-ins. Regarding the external program evaluation, the CDFA Farm to School Evaluation Team will work with grant recipients to address external evaluation questions and gather necessary evaluation data and will be respectful of grant recipients' schedules. Additionally, please see response #90 above regarding making office hours optional.

RFA SECTION: 2.1 INDIGENOUS APPLICANTS		
Track	Public Comment	CDFA Response
All	is it possible to change [traditional ecological knowledge] to "traditional ecological knowledges"? Making it plural helps avoid the idea of all tribes using the same knowledge base when each is different.	(92) Yes. The CDFA updated the language in the Indigenous Applicants section of the final RFA to reflect this suggestion.

RFA SI	ECTION: 2.2 PREVIOUS GRANT RECIPIENTS	
Track	Public Comment	CDFA Response
1	As a 2021 grantee, we are very interested in the possibility of using the 2022 grant to sustain and grow our current projects after 2021 grant funding ends in March of 2023. Can the 2022 grant be used to continue the grant activities started in 2021, i.e. can we use the 2022 grant from April 2023 – August 2024 to continue and expand on what we have built? We are concerned about our ability to keep up with our previously planned projects while adding entirely new ones in the overlapping time period of September 2022 – March 2023. But we would REALLY love to have the additional funding after March 2023.	(93) Yes, if previous grant recipients receive a 2022 grant award, they may use 2022 grant funds to sustain and grow their existing project after their 2021 grant term ends. The CDFA clarified the parameters for previous grant recipients in the Previous Grant Recipients section of the final RFA. Additionally, the CDFA posted a new resource called the Previous Grant Recipients Decision Tree on the program website and mentioned the resource in the Previous Grant Recipients section section of the final RFA to further clarify and provide guidance.
1	Will we get points marked against us if we are not able to spend the full current grant due to nutrition services staffing unknowns that we're working around and planning on spending a bulk in spring 2022?	Please note that previous grant recipients must complete their 2021 project by the end of the grant term stated in their 2021 grant agreement. All 2022 grant recipients must complete their 2022 project by the end of the 2022 grant term. (94) The CDFA understands that the COVID-19 pandemic and other factors beyond grant recipients' control may present challenges for project implementation and cause project delays. The Review Criteria that the external technical reviewers will use for this grant program does not allocate any points to past grant performance. However, as noted in the Review Process section of the final RFA, during the CDFA's initial administrative review of applications (which occurs before the external technical review), the following may result in disqualification of a grant application:The entity previously received a grant award through this program and their past performance

Track	Public Comment	CDFA Response
2	For return grantees – demonstration of acceptable performance is required and past performance will be considered. Will this be determined by the Office Farm to Fork and/or will this be part of the application scored by reviewers? If so, will applicants have an opportunity to discuss current project in the application?	(95) Please see response #94 above. Please note that during the initial administrative review, the CDFA will base its assessment of past performance on a 2021 grant recipient's performance in the grant program to date and not on responses that the grant recipient provides in their 2022 grant application.

RFA SI	RFA SECTION: 3.0 APPLICATION, REVIEW, & NOTIFICATION		
Track	Public Comment	CDFA Response	
All	For section 3.0, beginning on page 32 I suggest that you put section 3.2 before 3.1 so people are crystal clear this is an online application process	(96) The CDFA reversed the order of these two sections in the final RFA so that the How to Apply section is now 3.1 and the Grant Application and Review Criteria section is now 3.2.	

RFA SI	RFA SECTION: 3.1 GRANT APPLICATION & REVIEW CRITERIA		
Track	Public Comment	CDFA Response	
All	At the beginning of section 3.1 emphasis that the tables to follow are templates to help applicants draft a narrative that can then be cut and pasted into the online application when final.	(97) The CDFA posted documents that contain the detailed application questions and review criteria for each funding track on the program website and linked to the program website in the Grant Application and Review Criteria section of the final RFA. In the beginning of these documents that contain the detailed application questions and review criteria, the CDFA clarified that "The following is a preview of application questions intended to provide potential applicants with an idea of what to expect; questions in the online application may slightly differ. Applicants may use the questions below to draft application responses before filling out the online application, but please note that all applicants must submit their responses through the online application portal. The review criteria outlined below is	

Track	Public Comment	CDFA Response
		what the external technical review committee will use when reviewing applications."
All	Under points available you have – perhaps "none awarded" or "not applicable" may minimize confusion.	(98) The CDFA revised the application overview tables in the Grant Application and Review Criteria section of the final RFA to clarify that there are no points available for certain required sections of the application.
All	I do not see word counts in these [application overview] tables, people love word counts so I suggest you either state there is no word count or add a word count for each section.	(99) The CDFA posted documents that contain the detailed application questions and review criteria for each funding track on the program website and linked to the program website in the Grant Application and Review Criteria section of the final RFA. In these documents that contain the detailed application questions and review criteria, the CDFA noted the word limits for questions that have word limits in the online application portal.
All	people love checklists, maybe a checklist for a complete application. You have a nice one already in the PPT application overview slide 9 I think maybe just turn that into a checklist in the RFA	(100) The CDFA condensed the application overview tables in the Grant Application and Review Criteria section of the final RFA and noted that applicants may uses these tables as application checklists. The CDFA also posted documents that contain the detailed application questions and review criteria for each funding track on the program website and linked to the program website in the Grant Application and Review Criteria section of the final RFA.
All	"Activities funded under the California Farm to School Incubator Grant Program cannot duplicate activities funded by another federal or state grant program." It might be worth clarifying here if it can be duplicative of a grant from a private foundation or other source.	(101) Activities funded under this grant program may supplement (i.e., enhance or expand) but not replace activities funded by another federal or state grant program. If an applicant has funding from a non-federal or non-state grant source such as a private foundation, activities funded under this grant program should similarly enhance or expand the impacts of that funding.

Track	Public Comment	CDFA Response
All	What if applicants do not have access to Microsoft applications (for downloading and uploading the budget template)?	(102) Applicants may email the CDFA for support at cafarmtoschool@cdfa.ca.gov if they are unable to utilize the Microsoft Excel format of the budget worksheet. The CDFA noted this in the online application portals and in the documents containing the detailed application questions and review criteria for each funding track. The CDFA posted these documents on the program website and linked to the program website in the Grant Application and Review Criteria section of the final RFA.
All	Can you please define the documentation requirements for mini grants?	(103) Grant recipients distributing funds via mini grants must ensure that mini grant recipients follow all allowable and unallowable cost parameters of this program as well as financial reporting requirements such as documenting how they used the funds. The CDFA added this clarification about mini grant documentation requirements in the Allowable and Unallowable Costs section for each funding track of the final RFA.
All	Provide scorecards: Although the RFA includes a review criteria overview, many of the "Points Available" sections appear blank, it is not clear how points are delineated within the specific criteria, and there was no minimum score listed in the final RFA. To ensure full transparency and accountability that these values-based criteria are being honored it is important to have a fully developed scorecard available for public review to ensure full transparency that CDFA is using these scoring criteria when selecting grant awardees.	(104) The CDFA posted documents that contain the detailed application questions and review criteria for each funding track on the program website and linked to the program website in the Grant Application and Review Criteria section of the final RFA. The CDFA was not able to provide fully developed review criteria in the draft RFA because there were many details that could change through the public comment period. The CDFA's development of the detailed review criteria published in the final RFA incorporated updates that the CDFA made to the final RFA based on feedback from public comments. There will be no minimum score requirement.
All	Project Team/Letters of Support Tracks 1-4 allocate no points for Project Team or Letters of Support, suggesting that there is no scaled evaluation for the 1) quality/commitment of partners selected and 2) history of	(105) Please see response #120 below for information regarding how the CDFA modified the application and review criteria for Track 4 in the final RFA to further value demonstration of quality relationships.

Track	Public Comment	CDFA Response
	that partnership. "Description of F2S History and Motivation" requires only past F2S activity and existing motivations. F2S doesn't work without committed, meaningful partnership and broad-based support. Demonstrated commitment and the evaluation of a partners' ability to deliver on their commitments should be factored into a proposal's evaluation. > We recommend that this be done by either assigning points to Project Team and/or Letters of Support. At the very least, the prompts in "Description of F2S History and Motivation" should be expanded to capture the extent of existing F2S relationships or the good faith intention to build quality F2S relationships.	The CDFA added a new question worth two points in the "Project Team" section of the Track 1 and 3 applications and in the "Project Partners" section of the Track 2 application. The question is: "Collaboration History: Please describe how your project team / project partnership has collaborated on farm to school projects in the past (or on related projects if new to farm to school)." Applicants can receive two points if they clearly describe how their project team / project partnership has collaborated in the past and demonstrate strong partnership. The CDFA posted documents that contain the detailed application questions and review criteria for each funding track on the program website and linked to the program website in the Grant Application and Review Criteria section of the final RFA.
All	[Regarding the binary scoring system in the healthy, equitable, resilient food system section of Track 4 for veteran food producers, socially disadvantaged food producers, and/or limited-resource farm households] Is it also binary in the other tracks as well, or is it specific to Track 4?	(106) The CDFA clarified the scoring system in each funding track for this funding priority in the documents that contain the full application questions and review criteria. The CDFA posted these documents on the program website and linked to the program website in the Grant Application and Review Criteria section of the final RFA. For Track 4, the scoring is binary and is based on whether the applicant self-reports that their operation is at least 50% owned by veteran food producers, socially disadvantaged food producers, and/or limited-resource farm households or not. For Tracks 1, 2, and 3, points are available for applicants who self-report that, as part of their grant project, they plan to work with food producers who meet any of the above criteria and the scoring is then scaled based on how clearly applicants describe their producer partners who meet the criteria and/or describe a detailed plan to partner with producers who meet the criteria.

Track	Public Comment	CDFA Response
1, 2, 3	Increase points allocation for Healthy, Equitable, Resilient Food System: We applaud CDFA for prioritizing the advancement of a healthy, equitable and resilient food system for all four tracks of the RFA. To maximize the impact of these procurement strategies, we urge CDFA to increase the points allocation for this section from 10 to at least 25 points in Tracks 1, 2, and 3. This will send a clearer signal to applicants that these priorities are important to achieving the Program's stated goals. Points within this section should also be split between the three values (small producers, socially disadvantaged producers, and climate smart producers) rather than combined, to allow CDFA and program evaluators to track procurement patterns and progress toward the Program's separate equity and resilience goals. I like the fact that a "Description of Farm to School History and Motivation" is required in each track. As the pandemic	 (107) The CDFA modified the review criteria for Tracks 1, 2, and 3 to allocate 40 points for Community Need and 20 points for Healthy, Equitable, Resilient Food System (out of 100 points total). Additionally, the point allocations for the small to midsize food producer funding priority; veteran, socially disadvantaged, and/or limited-resource food producer funding priority; and climate smart agriculture funding priority are separate rather than combined. The CDFA posted documents that contain the detailed application questions and review criteria for each funding track on the program website and linked to the program website in the Grant Application and Review Criteria section of the final RFA. (108) Thank you for the comment of support.
1	restrictions have loosened we are finding that organizations are coming out the woodwork to partner with our school district. The "History and Motivation" element is key to having solid partners. Page 33 – Track 1, point 2: Would applicant's list Incubator	(109) The CDFA removed the question in the "Project
	#1 here because it is also in section 11b below?	Description" section of the application for each funding track that addressed previous grant recipients. Any applicants who have previously received a California Farm to School Incubator Grant (view the list of 2021 grant recipients) should address this source of funding as part of their response to Question 2a, "Previous California Farm to School Incubator Grant Program project" in the Eligibility section of the application for each funding track. Applicants should describe how their proposed project will supplement but not replace the existing project and how the additional grant funding will ensure project sustainability after the 2021

Track	Public Comment	CDFA Response
		and 2022 grant terms end. The CDFA posted documents that contain the detailed application questions and review criteria for each funding track on the program website and linked to the program website in the Grant Application and Review Criteria section of the final RFA.
1	For community need – you'll find lots of districts have concentrated areas of community need. When looking at community need, you might want to include an areas of concentrated need within the district. Alternately, free and reduced meal priced meal participation, you'll find in a district where maybe 35% of the kids overall are eligible for free and reduced priced meals but 90% of meals are going to those kids. By not taking that into consideration, you are overlooking the people that you are trying to reach.	(110) The Track 1, 2, and 3 applications ask for a variety of quantitative and qualitative data to get a more comprehensive picture of community need in the Community Need section of the application. The CDFA posted documents that contain the detailed application questions and review criteria for each funding track on the program website and linked to the program website in the Grant Application and Review Criteria section of the final RFA. Please note that the Track 1, 2, and 3 applications provide an opportunity for applicants to share data both about the districts/organizations as a whole that the proposed project will serve, as well as about any
2	Impacts of working with multiple partners – in application content/structure and scoring (eg Track 2 application parts 7-12) We believe that the highest ROI on investment from CDFA that we can provide is serving maximum # of students which could mean supporting aspects of our program across 5-11 LEAs in California. Many areas of the application require articulation of details for each partner LEA (eg: Community Need, Farm to School History). Is there a way to increase application space per partner so that we may give each partner equal, but brief, "airtime" and/or would an application actually be disadvantaged when it comes to scoring if you have multiple partners b/c	specific school sites within those districts/organizations that the proposed project will serve. (111) There is no disadvantage in Track 2 when it comes to scoring if an applicant has multiple partners. The CDFA assigned a fairly high word limit in the "Project Partners" and "Description of Farm to School History and Motivation" sections of the Track 2 application to allow ample space for applicants to describe their partnerships. Please note that applicants are welcome to write less than the word limit if they do not require all of the space to provide a complete response. The CDFA posted documents that contain the detailed application questions, word limits, and review criteria for each funding track on the program website and

Track	Public Comment	CDFA Response
	you can only touch lightly on each one within allocated space?	linked to the program website in the Grant Application and Review Criteria section of the final RFA.
2	Community Need – Organizational Data You note very specific data requested in this area. Will you be providing preferred source data for this section so that applicants can be certain we are submitting comparable statistics?	(112) Yes. The CDFA posted documents that contain the detailed application questions and review criteria for each funding track on the program website and linked to the program website in the Grant Application and Review Criteria section of the final RFA. These documents, as well as the online applications, link to the sources that the CDFA will ask applicants to use when submitting various data points.
2	Healthy, Equitable, Resilient Food System: This section requests and scores based on plans for different types of producer partners. Would not having specific producers already identified reduce the score allocation and is that realistic at this stage? What status of partnership would be required at the grant application phase? Would points be available based on a clearly articulated and documented plan/criteria for partnership? We believe this section could be challenging for some applicants who are actively developing and pursuing ongoing new and ongoing partnerships.	(113) For the "Healthy, Equitable, Resilient Food System" section of the Track 1, 2, and 3 applications, applicants will be able to earn points for clearly describing their producer partners who meet the criteria for small to midsize food producers, veteran food producers, socially disadvantaged food producers, limited-resource food producers, and/or food producers who utilize climate smart agriculture practices or for clearly describing a detailed <i>plan</i> to partner with producers who meet these criteria. The CDFA clarified this in the documents that contain the full application questions and review criteria. The CDFA posted these documents on the program website and linked to the program website in the Grant Application and Review Criteria section of the final RFA.
2	"Please upload a letter of support from the school nutrition services director (or equivalent) at each farm to school implementing organizationthat is a part of your project partnership. Would this include the school principal or similar if only working with one school within the district (the school on the reservation)?	(114) For Track 2, applicants may focus project activities on one or more specific school sites, rather than all school sites, within the farm to school implementing organizations (i.e., public school districts, county offices of education, and/or directly funded charter schools) that are part of their project partnership. However, the application still needs to include a letter of support from the school nutrition services director (or equivalent district-wide/organization-wide decision-maker) who ultimately oversees and coordinates the

Track	Public Comment	CDFA Response
		school meal program at each farm to school implementing organization, as this person needs to be on board for project goals regarding farm to school and school food procurement to succeed. In addition, applicants are welcome to submit a letter of support from the decision-maker at the specific school site(s) with which they are partnering for their project. The CDFA clarified this in the document that contains the full Track 2 application questions and review criteria. The CDFA posted this document on the program website and linked to the program website in the Grant Application and Review Criteria section of the final RFA.
4	We support allowing producers to report their farm scale by	(115) Thank you for the comment of support.
	providing their average annual gross farm revenue.	(440) TI ODEA LI LII "II E "I LI D "I" I
4	Include a fair and transparent verification process for climate smart agriculture: We strongly urge CDFA to implement a fair and transparent verification process for evaluating the Healthy, Equitable, Resilient food system portion of the application. At present, the RFA does not state what verification mechanism the Department will utilize for producers utilizing climate smart agriculture systems, climate smart practices, or regenerative strategies, to ensure they are carrying out the practices proposed in the applications. This does not align with the robust processes required for grant applicants of other CDFA-administered grant programs and is contrary to the science-based procedure the Department typically follows. For example, the HSP 2021 Request for Applications includes a multiple level review process, including a technical review of proposed climate smart practices.¹ Independent verification, rather than self-certification, of climate smart farming practices and systems is essential to accurately evaluate the Program's objective to build climate	 (116) The CDFA updated the "Healthy, Equitable, Resilient Food System" section of the Track 4 application to include a verification process for the climate smart agriculture funding priority. The climate smart agriculture funding priority in the Track 4 application now includes the following questions: (a) Description: Within the past 12 months at your operation, have you utilized: climate smart agriculture practices, climate smart agriculture production systems like certified organic or transitioning to certified organic, and/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 carbon in the soil? If yes – please briefly describe. (b) Verification: Please respond "Yes" to all that apply and, if applicable, provide the requested documentation. Please note that only one "Yes" that the CDFA can verify is needed to receive

Track	Public Comment	CDFA Response
	resilience. Without a consistent verification system, CDFA	points for this verification section. If you prefer not
	will not be able to accurately assess and demonstrate	to answer, please check, "Prefer not to answer."
	progress toward that goal. This also hinders the	 Is your operation currently registered as
	Department's ability to accurately track agriculture's	organic with the CDFA or currently certified
	contributions towards California's goal of achieving carbon	organic? If yes, the CDFA will verify organic
	neutrality. ²	registration through the State Organic Program
	Verification is also required to ensure fairness in the	and will verify organic certification through the
	application process. A fair application process must verify	USDA Organic Integrity Database.
	that all applicants are implementing the practices they claim	 Is your operation currently participating in a
	on their applications. CDFA should request verification from	transitional organic program? If yes – please
	producers using climate smart production systems as well	upload documentation to demonstrate this from
	as producers using climate smart practices and	your organic certifier.
	regenerative strategies.	 Has your operation participated in the CDFA
	Organic is a verifiable climate smart system because all	Healthy Soils Program (HSP), CDFA
	organic producers must be compliant with the National	Alternative Manure Management Program
	Organic Program regulations to receive their annual organic	(AMMP), CDFA Dairy Digester Research and
	certification and CDFA can verify this through the State	Development Program (DDRDP), and/or CDFA
	Organic Program without the need for organic producers to	State Water Efficiency and Enhancement
	submit any additional paperwork. Producers participating in	Program (SWEEP)? If yes – the CDFA will
	transitional organic programs can provide documentation	verify this through the CDFA Office of
	from their organic certifier. For applicants claiming to use	Environmental Farming and Innovation.
	climate smart practices or other regenerative strategies and	- Has your operation participated in the NRCS
	who are not certified organic or transitioning to organic, we	Conservation Stewardship Program (CSP),
	recommend that the Department only prioritize producers	NRCS Environmental Quality Incentives
	who can demonstrate participation in CDFA's Healthy Soils	Program (EQIP), NRCS Regional Conservation
	Program or NRCS's Conservation Programs. If CDFA is not	Partnership Program (RCPP), NRCS
	able to implement verification for climate smart practices	Conservation Innovation Grant (CIG), and/or
	and regenerative strategies, we recommend that applicants	NRCS Conservation Incentives Contract
	who are using verifiable climate smart agriculture systems,	(CIC)? If yes – please upload documentation of
	like certified organic or transitioning to organic, receive	your contract with NRCS for any of these
	greater point allocation on the RFA.	programs.
	1 0004 0054 1100 054	- Within the past 12 months, has your operation
	¹ 2021 CDFA HSP RFA.	received conservation technical assistance
	https://www.cdfa.ca.gov/oefi/healthysoils/IncentivesProgram	(CTA) from a CTA provider (including but not
	.html	limited to a UC Cooperative Extension,

Track	Public Comment	CDFA Response
TI GUN	² Executive Order B-55-18 to Achieve Carbon Neutrality. https://www.ca.gov/archive/gov39/wp- content/uploads/2018/09/9.10.18-Executive-Order.pdf	Resource Conservation District, NRCS office, or other CTA provider) to implement climate smart agriculture practices or other regenerative strategies? If yes – please upload a signed letter, stamped letter, or your intake form from your CTA provider to demonstrate the relationship. (c) Looking Forward: Do you plan to begin to utilize or continue to utilize climate smart agriculture practices, climate smart agriculture production systems, or other regenerative strategies? If yes – please describe. Applicants who respond "yes" to question (a) and provide a description will receive priority points; the intention behind this is to include an opportunity for any food producer who has incorporated climate smart agriculture practices (with or without verification) to describe those practices and earn priority points. Applicants who respond "yes" to any of the five options in question (b), which the CDFA can then verify through the applicable methods described in question (b), will receive additional priority points; the intention behind this is to allocate an additional points value for food producers who can demonstrate evidence that they practice climate smart agriculture. Applicants who, in response to question (c), describe a plan to begin to utilize or continue to utilize climate smart agriculture practices, climate smart agriculture production systems, or other regenerative strategies will receive further priority points; the intention behind this is to encourage food producers to adopt or expand climate smart agriculture at their operation, specifically as it relates to farm to school.

Track	Public Comment	CDFA Response
		The CDFA posted a document that contains the detailed application questions and review criteria for Track 4 on the program website and linked to the program website in the Grant Application and Review Criteria section of the final RFA.
4	Track 4 – [recommend] implementing in the scoring or making higher priority for ranchers that have some sort of monitoring of what their climate smart practices are showing or verifying, rather than self-selection. There is still some learning around what climate smart is right now and there's a lot of people going to great lengths to make sure they are doing it right and improving their land. So I would like to see some more priority for those that are taking steps.	(117) Please see response #116 above.
4	Food Safety Plan The CDFA F2S Incubator Grant is requiring producers to include a food safety plan as a component of the application. However, as noted elsewhere in the RFA, this track is only eligible to producers who have established relationships with at least one school NSD. The existence of this relationship in of itself indicates that the producer has already met a level of food safety consistent with their business operations that satisfies their end-customer (NSD). While the RFA notes that applicants won't be evaluated on their current food safety plan, will they be evaluated on their submitted food safety plan? Who will be conducting the evaluation, and by what standards? How does a producer's food safety plan affect scoring? This is an onerous requirement for small producers in the early stages of F2S. > We suggest that this requirement be dropped. If this requirement is included in the final RFA, please include an example of what is meant by a "basic" food safety plan – formal food safety plans are 100+ page documents, and it is unclear what is being asked for and why it's required.	(118) The CDFA will no longer ask food producers to provide a food safety plan as part of the Track 4 application. The CDFA will still expect Track 4 grant recipients to meet a level of food safety consistent with their farm or business operations, but this will not be part of the application and the CDFA will not evaluate applications based on current food safety practices. The CDFA added this clarification to the Eligibility and Exclusions section of the final RFA. Track 4 grant recipients may use grant funds for costs to meet necessary food safety requirements for their projects (see the Track 4 Allowable and Unallowable Costs section of the final RFA). Track 4 grant recipients should work with their school nutrition partners to determine what level of food safety they must meet to sell or donate food to these partners.

Track	Public Comment	CDFA Response
4	Please provide more guidance about what you are looking for in terms of a "basic food safety plan" from producer applicants. How official does the plan need to be?	(119) Please see response #118 above.
4	Relationship with School Nutrition Services Departments While Track 4 requires an established relationship with at least one school NSD, there is no scaled evaluation/points awarded for the quality of this relationship. F2S doesn't work without strong support and solid coalitions, and one purchase order/invoice/receipt does not capture a producer's relationship with a NSD. > We recommend that either 1) points be awarded based on the quality of relationships described in Part #6 and/or 2) that the "burden of proof" in demonstrating an established relationship (Part #7) be higher.	(120) In Question 7b in the "Relationships with School Nutrition Services Departments" section of the Track 4 application, the CDFA added a question that asks applicants to briefly describe their relationship and history building a partnership with each public school district, county office of education, directly funded charter school, and/or center-based program for children that they named in Question 7a as entities with which they are partnering through their proposed project. Applicants can receive five points if they clearly describe their relationship with these partners and demonstrate a strong partnership or a clear potential for building a strong partnership.
		Additionally, in Question 8 in the "Relationships with School Nutrition Services Departments" section of the Track 4 application, the CDFA will now require all Track 4 applicants to submit a letter of intent to collaborate from at least one school nutrition services director (or equivalent district-wide/organization-wide decision-maker who oversees and coordinates the school meal program) at any of the entities named in Question 7a. Submitting a past purchase order, invoice, or receipt for California grown or produced food sold to any of the entities named in Question 7a will no longer be a sufficient way to demonstrate a relationship with a school nutrition services director, as it does not tell the story of the relationship like a letter can. The final letter of intent template includes a space for the school nutrition partner to describe their relationship with the food producer who is applying to Track 4. While the letter of intent to collaborate will not

Track	Public Comment	CDFA Response
		receive a score, submitting at least one complete letter of intent is now a required element of the Track 4 application.
		Furthermore, the CDFA expanded the "Description of Farm to School Vision" section of the Track 4 application to be the "Description of Food Production History and Farm to School Vision" section. This section of the Track 4 application will now not only ask applicants to describe their farm to school vision for their operation but also their history with food production. While the food production history question is not worth points in the review criteria, the CDFA noted in the review criteria for this question that it will prioritize applicants who demonstrate an ability to produce food for schools. For the farm to school vision question, applicants can still receive two points for clearly describing their vision for their business/organization regarding farm to school.
		Applicants can view the document containing the full Track 4 application questions and review criteria on the program website. The CDFA linked to the program website in the Grant Application and Review Criteria section of the final RFA.
4	we'd like to thank the Department and their staff in their acknowledgement that a host of on-farm pressures disallow farmers to sell into the school procurement system. This challenge is recognized in the broad list of allowable costs within Track 4. XXX agrees that as barriers to entry and conditions that make it uneconomical to scale are removed, opportunities to service schools for pupil meals becomes a greater reality. In that vein, we encourage the Department to consider supporting information provided by a grant recipient to meet the standards of "evidence of an	(121) While the CDFA recognizes that distributors or wholesalers facilitate school food procurement relationships, part of the intent of Track 4 is to encourage direct relationship-building between school nutrition services departments and food producers, even if a distributor facilitates the relationship. Therefore, a letter of intent to collaborate from a school nutrition services partner is a required element of the Track 4 application. However, the school nutrition services partner does not need to state in the letter

Track	Public Comment	CDFA Response
	established relationship with a school nutrition department." While many producers would like to envision the capacity of direct marketing with a school site or district, the reality is that most procurement relationships are facilitated through distributors or wholesalers. Therefore, to carry out a farm to school vision that is practicable, we cannot omit those entities from the current and future systems. We encourage the Department to consider that a producer who can offer, beyond letters of commitment to purchase from an LEA or prior purchase order, notice that a school has requested their chosen distributor source products from them as meeting this RFA standard.	how they intend to procure from the food producer, whether directly, through a food hub, through a distributor, or through another method.
4	Demonstrate an Established Relationship A great deal of funding is being made available to producers, but the Track 4 application doesn't evaluate the producer's experience, quality, or commitment to F2S. This track, unlike Tracks 1-3, does not require a "Description of F2S History and Motivation." Strong partnerships and coalitions are the bedrock for long term F2S success, and should be required for a track designed to help existing F2S producers. > We recommend that there be some metric by which the producer's relationship to a NSD, experience with F2S, and/or participation in an existing F2S coalition be factored into the evaluation of a Track 4 proposal. This can be done through scoring "Relationship with School Nutrition Services Departments;" including a scored "Description of F2S History and Motivation" section; and/or requiring and scoring Letters of Support from the partners named in Part #6.	(122) Please see response #120 above.
All	[The CDFA received a recommendation that the Budget Template the CDFA Specialty Crop Block Grant Program utilizes in their application may be a good model for the CDFA Farm to School Incubator Grant Program to utilize. The CDFA also received a recommendation that it may be	(123) The CDFA updated the Budget Worksheet, utilizing the budget template from the CDFA Specialty Crop Block Grant Program as inspiration. The CDFA also added an additional tab in the Budget Worksheet that features an example of how to complete the worksheet.

Track	Public Comment	CDFA Response
	helpful to include an example of how to complete the	
	Budget Worksheet.]	

RFA SI	RFA SECTION: 3.2 HOW TO APPLY			
Track	Public Comment	CDFA Response		
All	Maybe include a link to a video tutorial about how to set up a wizehive account if you are a new applicant.	(124) The CDFA posted a video tutorial about how to use the WizeHive application portal on the California Farm to School Incubator Grant Program website and noted this resource in the How to Apply section of the final RFA.		
All	I would like to recommend that access to the WizeHive Portal is provided in future grants to two representatives, the coordinator of the project and the CBO, or someone that can process invoices and quarterly reports. The process of providing access to two individuals will make it easier for submitting reports on time, in case one of the representatives is out of the office or has a conflict of schedule. The above-described process is common for CTE grants: Perkins, CTEIG, and California Community Colleges Strong Workforce Grants	(125) Unfortunately, this is currently not possible within the WizeHive system. The CDFA appreciates this recommendation and will look into this further.		