

CDFA – 2021 Farm to School Incubator Grant Program
Summary of Public Comments and CDFA Responses
Comment Period: November 13, 2020 – December 4, 2020

RFA Section	Comment	CDFA Response
Purpose	This represents a wonderful and much needed step forward in bringing better nutrition to our K-12 students AND improved income for small farmers!	Thank you for the comments of support.
	Thank you for creating this meaningful opportunity to advance Farm to School procurement and education that will ultimately help nourish students with quality food and engaging lessons that grow stronger, healthier bodies and minds.	
	I support the 2021 California Farm to School Incubator Grant Program because as a parent and having had a career in public education, I can see the benefits that this program will bring to schools, to students, to communities, and to our independent farmers. I hope this program will receive the required support to expand statewide.	
	I applaud CDFA for initiating this funding program and taking leadership in an opportunity to improve children’s health, the local agriculture economy, and the environment.	
	The CA Farm to School Grant - Request for Applications looks great! Excited to see a grant that can actually be used to cover the cost of the locally sourced produce! I can see this being very helpful in expanding our Farm to School efforts. Look forward to applying for these funds once the application period opens.	
	Being in a school district that has a comprehensive high school agriculture program, I would like to see another track (3), that would help bridge school farm production to district food services. Many school farm programs would benefit from addition money to help with equipment, tractors and time to plan and implement collaboration and curriculum development.	<p>Regarding funding for the integration of school farm production and district food services, we have added the following components to the RFA:</p> <ol style="list-style-type: none"> (1) Under "Funding and Duration" for Track 1, we have removed the 30% cap on using funds to integrate farm to school education and procurement programs. Now, awardees must use "at least 30%" of the grant award total to integrate education and procurement, and are allowed to use more than 30% if they so choose. (2) We then added a line that says, "Farm to school education can include, but is not limited to: school gardens, school or district farms, hands-on culinary education, agricultural education/experiences, nutrition education, Harvest of the Month taste tests, farm field trips, and school visits from farmers. CDFA welcomes innovative ideas to integrate educational and student engagement activities with procurement of California grown or produced foods." (3) Under "Review Criteria," in the Scorecard for Track 1, we added a Scoring Category called "Comprehensive Plan," which includes a preference for applicants that "plan to leverage existing Local Education Agency resources (e.g., school or district farms, school gardens, etc.), if applicable."
In both tracks, I'm happy to see a focus on culturally relevant foods, the valuing of BIPOC producers, the focus on climate smart, organic and regenerative agriculture. These emphases are very likely to bring new, small producers closer to school nutrition services and result in healthier meals for students as well as improved income for participating producers.	Thank you for the comment of support. We maintained the components of the RFA that encourage the incorporation of culturally relevant foods (in the "Review Criteria" section), as well as partnerships with BIPOC producers and partnerships with producers that have demonstrated and documented climate smart practices (in the "Purpose" section).	

<p>I strongly urge you to ensure that California’s “Farm-to-School” program is as healthy, climate-friendly, and equitable as possible.</p> <p>California schools are preparing meals for millions of low-income students and students of color during the COVID-19 pandemic. Given how many California students rely on school meals as their primary source of sustenance, we want them to be as nourishing as possible.</p> <p>Please ensure that the final plan for this program:</p> <ul style="list-style-type: none"> • Encourages schools to buy from California’s organic farmers who produce healthy food without toxic pesticides and use climate-friendly practices. • Supports local farmers—especially farmers of color—whose livelihoods and farms are threatened by economic fall-out from the ongoing COVID-19 crisis. • Prioritizes schools in low-income Black and Latino communities, and offers much-needed resources to purchase local, healthy, organic foods. <p>Getting more organic food in schools will safeguard California children and farmworkers from dangerous pesticides. It will encourage farmers to use practices that protect health and the environment. It will protect honeybees and other pollinators that are dying off in droves because of toxic pesticides.</p>	<p>We have maintained the component of the RFA that encourages applicants to partner with diverse producers, including producers with small or medium sized farms, producers that identify as BIPOC, women-owned, LGBTQ+, veteran-owned, and/or socially disadvantaged farmers or ranchers (see “Purpose” section of RFA). We have also maintained the component of the RFA that encourages applicants to partner with producers that have demonstrated and documented the use of Climate Smart Agricultural management practices (see “Purpose” section of RFA). Additionally, under "Review Criteria," one of the primary Scoring Categories for both grant tracks is "Identified Community Need," which takes economic factors, community diversity, and other factors into account.</p>
<p>We are especially pleased to see the inclusion of RFA language that encourages applicants to partner with “producers that have demonstrated and documented climate smart practices.” ...Research demonstrates that investments in organic farming can move California toward its climate action goals while also protecting farmworkers and communities from pesticide exposure. Increasing organic procurement for school meals will benefit students, farmers, and California communities...</p> <p>We also appreciate the inclusion of RFA language that encourages applicants to partner with small or medium sized farms and farms run by Black, Indigenous, Latinx, and other producers of color, women, people who identify as LGBTQ+, veterans, and other socially disadvantaged farmers and ranchers. These farmers have been systematically excluded from many public agricultural support programs, and the state has an important role to play in remedying past injustices. Prioritizing these farmers in the Farm to School program is an important step in the right direction.</p>	
<p>We support the inclusion of RFA language that encourages applicants to partner with organic and transitioning producers and other producers who do not use synthetic (fossil-fuel derived) pesticides and fertilizers, as well as other practices that make agriculture more climate friendly. The manufacturing and use of fossil fuel-based pesticides and fertilizers harm our communities, and public dollars should support producers who have invested in safer practices.</p> <p>We support the inclusion of RFA language that encourages applicants to partner with small or Black, Indigenous, Latinx and other socially disadvantaged farmers and ranchers. Our communities need economic development opportunities, and we have been systemically excluded from many public agricultural support programs. The state has an important role to play in remedying past injustices, and the Farm to School program should maximize opportunities for the farmers who are struggling the most.</p>	

	<p>What is meant by “new” in the description of Track 1? Many LEA’s have done some sort of Farm to School projects or programming – are you really asking for projects that start from scratch? You ask LEA’s to provide their Farm to School history so it seems that you expect them to have some sort of experience here. Clarification on how you define “new” could be helpful.</p>	<p>Under "Purpose" for Track 1, we have revised the description to include both new and existing programs: "The California Farm to School Innovation Grant will fund Local Education Agencies (LEA) to establish new or expand existing integrated farm to school programs that: (1) procure California grown or produced whole or minimally processed foods and integrate these foods into school meals; and (2) coordinate educational opportunities between cafeterias, classrooms, and communities."</p>
<p>In the application, will you be looking for programs with existing capacity? Such as curriculum, number of staff, etc.? Is the intent to shore up existing, strong programs? Because the word "innovation" keeps being used, and it's so vague, it makes me afraid that they only want "new" programs. But new doesn't always equal innovative, and existing capacity to leverage the funding feels like a stronger gauge. Use more specific language about what you're looking for.</p>		
<p>On page 1, it states that Track 1 funding is available for “new” programs to procure CA-produced foods. Does that mean there cannot have been any previous efforts at all? Or in the event previous or existing efforts have not seen much success, can the funding be used to establish processes and relationships to build a successful program?</p>		
	<p>Regarding the socially disadvantaged definition: For consistency with the state framework for meeting the needs of underserved producers, we recommend that CDFA use the definition of socially disadvantaged farmers and ranchers from the Farmer Equity Act of 2017, rather than the federal definition highlighted in the RFA.</p>	<p>We maintained the USDA definition for consistency because this grant program aligns with other USDA initiatives like the National School Lunch Program.</p>
<p>For consistency with the state framework for meeting the needs of underserved producers, we recommend that CDFA use the definition of socially disadvantaged farmers and ranchers from the Farmer Equity Act of 2017 (FAC § 512), rather than the federal definition highlighted in the RFA.</p>		
	<p>Local and regional is often up to debate and applicants will appreciate having the definition remain flexible for their region but further guidance would be helpful as applicants plan out their seasonal procurement, e.g. the RFA should specify if it wants school districts to purchase within their specific sub-region (e.g. 100-250 miles) and whether regional boundaries always must fall within California state lines.</p>	<p>We have changed all wording throughout the RFA from "local procurement" to "procurement of California grown or produced foods," "California food procurement," or similar phrasing.</p>
<p>Funding and Duration</p>	<p>Track 1 surprised me in taking over 3/4 of available grant funding. I'd hoped for a more equal division of funds between Track 1 and 2 if the intent is to pioneer innovative ways of bringing farmers and food services together.</p>	<p>The intent of both tracks is to support innovative ways of bringing farmers, school food services, and farm to school education together. We allocated substantial funding to Track 1 in order to ensure that we provide significant support to LEAs for their procurement and educational integration efforts. We added a line in this section under Track 1 that says, "CDFA welcomes innovative ideas to integrate education and student engagement activities with procurement of California grown or produced foods."</p>
<p>Funds can off-set costs of local purchases? New products only? New vendors only? (ok to select new products from vendors we have existing relationships with?)</p>	<p>We have clarified that funds for Track 1 can only be used to procure new California grown or produced products (that the awardee has not procured in the past) by adding a line under "Allowable costs" for Track 1 that reads: "Up to 70% of the total award can be used for procurement of new and whole or minimally processed California grown or produced foods." Awardees can select new products from vendors with whom they have existing relationships.</p>	
<p>Track One Funding: How was the funding formula arrived at, and how does it align with the outcomes CDFA is seeking to achieve through this grant program?</p>	<p>Regarding the funding formula, we decided to use 12 cents for smaller LEAs and 8 cents for larger LEAs in the calculation to ensure that the funding can be more equitably distributed among smaller and larger LEAs. We also decided to use number of National</p>	

		School Lunch Program meals served in the 2018-19 school year in the calculation to be able to capture the scale and magnitude of LEAs' school nutrition programs.
	Clarify the funding formula for Track 1. The decision to base funding on the number of National School Lunch Program meals served is wise as it helps scale the funding to the magnitude of the school food program. A further clarification of whether it is all NSLP meals (breakfast, lunch, and snack), or just breakfast and lunch that will be used for the funding formula would be welcome.	We have clarified that by National School Lunch Program meals served, we mean lunch meals only. Under "Funding and Duration" for Track 1, the first bullet point now says, "Project award totals will be determined by the following funding formula, which is dependent on LEA enrollment. For small LEAs (less than 5,000 students enrolled), the total award available for each LEA is equal to the number of National School Lunch Program meals served (lunch meals only) during the 2018-19 school year multiplied by twelve (.12) cents per meal. For all other LEAs (5,001 students or more enrolled), the total award available for each LEA is equal to the number of National School Lunch Program meals served (lunch meals only) during the 2018-19 school year multiplied by eight (.08) cents per meal."
	For Track 1, we appreciate how you created two different funding formulas for districts based on their size. However you give a minimum funding amount of \$20,000. We have some really tiny districts in our region who would not come close to \$20,000 with the \$.12 per meal calculation. Are they disqualified from applying? Or do they need to apply for a minimum of \$20,000 even if they come in way under with \$.12 per meal formula? Please clarify.	Under "Funding and Duration" for Track 1, we have added the following clarification: "Please note that if, based on the funding formula, a small LEA does not meet the minimum award amount, the LEA will automatically be eligible for \$20,000."
	Overall, we would love to see a larger portion of the funds be allocated to Track 2 vs. Track 1. Of course you probably have lots of reasons for why you allocated it the way you did! We just think that California has so many districts who have some sort of Farm to School programming already in place that putting money into expansion makes a lot of sense.	Because LEAs with existing farm to school programs are now eligible to apply to Track 1, we hope this will address the suggestion to allocate more money to expansion.
	Track 1 vs Track 2 -- reimbursement vs advance payment. I think that is because Track 2 will fund infrastructure and that might be a burden to grantees to make a large purchase (i.e. front the money)? Appreciate that on behalf of RCDs for whom I know that would be an issue.	We have maintained the component of the RFA that offers advance payment as an option for Track 2.
	Reimbursement vs. advance funding: We have heard anecdotally that not having upfront funding for school districts aiming to procure from small and medium-sized farmers can be a barrier to contracting, especially for larger school districts wishing to procure large volumes. Is there the possibility for an exception to the reimbursement requirement if it is a barrier to school districts sourcing from, for example, BIPOC or organic farmers, which tend to be smaller in scale and may need advance payment?	Regarding reimbursement vs. advance payment for Track 1, the monthly invoices and reimbursement procedure are a departmental requirement for this type of funding in this grant program to reimburse procurement costs.
	The RFA says that the max project term is 2 years 9 months and then says that you can only expend funds over a 1 year 10 month period - this needs to be clarified.	Regarding the grant term, under "Funding and Duration" for both grant tracks, we have updated the language to say, "The maximum grant project term is 1 year, 10 months" so that it now matches the line that says, "Grant funds cannot be expended before June 1, 2021 or after March 31, 2023."
	Pg 1: Refers to coordination educational opportunities between cafeteria, classroom and garden in description of grant but not building them in each in the first place.	Regarding a clarification that Track 1 funds can be used to build farm to school educational opportunities, we included a line under "Funding and Duration" for Track 1 that says, "Please note that funds can be used to develop new farm to school education opportunities if they do not yet exist, but the ultimate goal is to integrate these new or existing educational opportunities with procurement programs."
	Pg 2: "...new, whole or minimally processed" makes it look like a list. Comma should be removed.	Under "Funding and Duration" for Track 1, we removed the comma so that the phrase now reads, "...new and whole or minimally processed..." rather than, "...new, whole or minimally processed..."

	<p>"70% of grant award total must be used to reimburse procurement of new, whole or minimally processed California grown or produced foods, and 30% of grant award total must be used to integrate farm to school education and procurement programs."</p> <p>There are a lot of grant programs that pay for food costs, yet not enough focused on programming and infrastructure. 70% of a \$500K grant is \$350K. I would rather see more funds go towards programs for kids. For a program that's just starting to integrate classroom and educational elements, that leaves only \$50K/year for a 3-year grant. That's just 1 staff person, which means maybe reaching only 1-2 schools/week for well-oiled programs. Why place restrictions on this at all? One school might want 80% for food costs, while another wants 90% for its programming, because it has other funds for the food costs. Let the programs tell you what they need, rather than assuming it for them since this is a pilot. Kids won't eat the beautiful local food they're buying if they don't have taste education. I don't think this allocation of funding demonstrates that balance.</p> <p>In your purpose statement, you say you're looking for a "high quality student experience," yet the focus of the grant seems heavily skewed towards the food, not the students eating that food. If you want it culturally relevant, etc. you need someone spending more time with the kids, and right now, you're really not funding much staff time and programming to do so. Let's equal that out!</p>	<p>Under "Funding and Duration," we have updated the language to say, "At least 30% of grant award total must be used to integrate farm to school education and procurement programs." This means that grant recipients can choose to use more than 30% of funds for farm to school educational integration if desired. We have also updated the language about procurement in this section to say, "Up to 70% of grant award total can be used to reimburse procurement of new and whole or minimally processed California grown or produced foods." This means that grant recipients are no longer required to use 70% of funds for procurement if they so choose.</p>
	<p>Preserve the 30% allocation for education in Track 1. Farm to school education helps all students experience and understand how food affects their health, the health of their communities, and the health of the environment. Research has found that it takes 35-50 hours of nutrition education to create long-term behavioral changes such as consuming more fruits and vegetables; yet most children receive only 3.4 hours a year – less than a tenth of the recommended amount. By creating and implementing learning and education programs, the Farm to School program can transform students' lives and help address the public health crises of food insecurity and obesity.</p>	
	<p>Unconventionally, our programs take a long view of food, nutrition, local food systems, and education. Without going into the details of the programs here, we do support our local growers, and we do get nutritious food directly to students. We support local farms and growers by procuring young vegetable and herb seedlings (plugs) which we then up-pot and grow larger (supporting local ag-based businesses along the way) so students can successfully grow healthy food at home with their families, as well as in school gardens vs. traditional procurement of food that fills a more immediate need. We support school lunch programs by working with the school districts to distribute various garden kits and educational materials directly to students, teachers, school gardens, and school families.</p> <p>With the unknown status of school salad bars, I hope the final RFA language will find a way to reflect that this is a time when innovation will be key for truly nourishing our students, as well as supporting a variety of local growers and agricultural businesses.</p>	<p>Regarding programs that take a long view of food, nutrition, local food systems, and education, we have updated the "Funding and Duration" section for Track 1 to read: "At least 30% of grant award total must be used to integrate farm to school education and procurement programs" and "Up to 70% of grant award total can be used to reimburse procurement..." There is no longer a 30% cap on funds that can be used toward farm to school educational programming and integration. We hope this will help support creative integration efforts between California food procurement and farm to school education.</p> <p>Regarding innovation, we have added a line under "Funding and Duration" for Track 1 that reads, "CDFA welcomes innovative ideas to integrate education and student engagement activities with procurement of California grown or produced foods."</p>
	<p>Reimbursement rate of 45 days is so long. Let's make this 30 days and make this important commitment to the grantee.</p>	<p>Regarding the reimbursement period, we maintained that, "If awarded a grant, recipients will fund the project and submit monthly invoices to CDFa to be reimbursed within 45 days after invoices are approved in most circumstances." This is the most realistic reimbursement period we can offer, given the numerous steps that are involved in the reimbursement process.</p>

	<p>Seems like the maximum grant amount on Track 1 and Track 2 should be flipped. \$500K should be the max for a project that needs infrastructure and programming. \$250K should be the max for a program that's mostly buying food.</p>	<p>Regarding the maximum grant amounts for each track, we hope that by allowing a greater percentage of Track 1 funding to be spent on educational integration, and by allowing applicants to request to use up to 20% of Track 1 funds on kitchen infrastructure (see "Allowable and Unallowable Costs" section of RFA), we have addressed the concern that too much funding was being allocated toward food procurement.</p>
	<p>Track 2 advance payment = great! Tracking interest earned, etc. = not a great use of those funds. It costs me \$50/hr for my bookkeeper, who will be tracking the .11 cents earned in a year to file a bunch of paperwork. Let's do the math. On a max grant of \$250K, spread over 33 months, that 3-month advance payout is about \$22.7K. No one is earning enough interest on that to buy a single apple. Just let them keep it. Let the funds and the staff time be focused entirely on succeeding in the program. Spend your staff's time on something other than reviewing an .11 cent report.</p>	<p>Regarding the tracking of interest earned for advance payments under Track 2, this is a requirement that we have to maintain based on our department's grant procedures.</p>
	<p>Maintain the two-track structure. The local procurement funding for school districts is a proven model for advancing farm to school programs that has shown great success in other states including Michigan, Oregon, and New York. By directing a larger portion of California's \$2.4 billion school meal industry to local farmers, this program can help support thriving local economies and food producers with every dollar schools invest – generating between \$1.03 - \$2.40 of economic activity. Coupling the district-based activities in Track 1 with regional partners in Track 2 will help ensure that the school districts have the support they need to succeed and can learn from one another instead of reinventing the wheel.</p>	<p>We have maintained the two-track structure for the grant program.</p>
	<p>For future grant cycles, we recommend an adjustment and greater balance between funding allocations for track #1 and #2 as well as an adjustment in the size of grants. Specifically, we recommend reducing the maximum of \$500,000 per grant for track 1 because such a large grant size could reduce the overall participation by a broader number of school districts. For example, if all the largest school districts submitted grants for the maximum amount allowed (.08 per reimbursable school lunch meal), it would quickly use up all available funds. While the grant program does indicate that CDFA reserves the right to offer an award amount less than the award requested, it would establish clearer expectations for everyone around expected grant awards.</p> <p>We also recommend providing higher total funding allocations and grant size for track #2 in order to boost the long-term viability of future farm to school programming across our state and provide meaningful financial support to the multiple entities that would be involved in implementing projects in this track. Track #2 will boost business innovation across our state by providing opportunities for food businesses to partner with school districts to enable them to expand their good food procurement options over time. We see a particular opportunity in the ability of Track #2 funds to support small and mid-scale farms or food businesses to invest in collective distribution channels as well as the necessary equipment to prepare food in a manner that meets the specific needs of the school food market. For example, many districts experience challenges with funding additional capacity for food preparation and processing which goes beyond the scope of this grant program. When districts can't procure whole, mildly processed food items due to staff or infrastructure limitations, they rely on food businesses to prepare food items accordingly. If this track could support farms or businesses to create the appropriate processing facilities, it could benefit dozens of school districts. Furthermore, the benefits</p>	<p>Thank you for the recommendation regarding shifting the funding allocation for future grant cycles.</p>

	<p>of the innovative procurement efforts and business growth generated by track #2 funds will be long lasting and likely surpass the grant period timeline, especially when compared to reimbursement incentive programs (track #1) where the funds are spent down within the grant period.</p> <p>If CDFA decides to maintain the current RFA funding levels in track 2 we would strongly recommend establishing a new category in the Specialty Crop Block Grant funding in the next cycle for this purpose.</p>	
Eligibility and Exclusions	<p>Thank you for your work in this important arena. I'm especially pleased that BIPOC farmers are highlighted.</p> <p>I would also recommend that LEAs with Preschool programs be encouraged to include them in this work. The earlier you start children in learning and developing healthy habits the better. It is also a better grade level to engage families. Will there be a family engagement component to the desired outcomes?</p>	<p>Thank you for the comment of support. Regarding the inclusion of preschool programs, we have added the following language under "Eligibility and Exclusions" for Track 1: "CDFA encourages LEAs with preschool programs to include those programs in their project."</p> <p>Regarding family engagement, under "Purpose," the Track 1 grant includes a component to "coordinate educational opportunities between cafeterias, classrooms, and communities." Although we do not explicitly mention family engagement in the RFA, engaging families could definitely be a part of applicants' and awardees' efforts to engage communities in educational opportunities that are tied to student engagement and California food procurement.</p>
	<p>Wording Change: In the Eligibility and Exclusions section, the bullets under the Regional Partnership Grant are a little confusing. Consider changing to something like the following:</p> <ul style="list-style-type: none"> Partnerships must include at least two LEA's and one regional partner. Any one of the entities in the partnership can serve as the applicant. The applicant will serve as project lead. The other entities must provide letters of commitment. 	<p>Under "Eligibility and Exclusions," we have revised the bullet points below Track 2 to read: "Partnerships must include at least two LEAs and at least one regional partner. Any one of the entities in the partnership can serve as the lead applicant. The other entities must provide letters of commitment."</p>
	<p>Number of applications: Do you want to limit the number of applications an LEA or agency can be a part of, either as a lead or a partner?</p>	<p>Under "Eligibility and Exclusions," we added the following clarification to both tracks, "Please note that applicants are limited to one application in each funding track."</p>
	<p>After reading the RFA a few times from the perspective of our nonprofit's Farm to School work, I wonder if there is a way to clarify some basic definitions in track 2. Specifically, my concern is that "producers" and "procurement" conjure traditional images of farmers providing fresh fruits, vegetables, and commodities to school lunch programs.</p>	<p>Regarding clarification of basic definitions in Track 2, under "Eligibility and Exclusions," we have added a line that says, "Food producers can include those who produce food in a variety of ways (e.g., farmers, ranchers, fishers, those using indigenous agriculture practices, etc.). We hope that this demonstrates our encouragement of collaboration with a variety of types of food producers.</p>
	<p>It would be helpful to clarify the language around eligible entities. For example, the use of "LEAs" and "school districts" interchangeably can be confusing and possibly discourage applications. For example, as we mentioned in Western Nevada County two School Food Authorities provide the meals for 8 school districts. If they were required to apply as a school district, neither would meet the threshold for a minimum project amount of \$20,000 using the 12 cents per meal calculation. However it is likely both would qualify if they could apply as a School Food Authority.</p>	<p>We have clarified the language around eligible entities by using "LEA" consistently throughout the RFA, rather than using "LEA" and "school district" interchangeably.</p>
	<p>Expand the partnership eligibility for Track 2. There are a number of potential farm to school projects, particularly at large school districts, that have the potential for regional impact even though they involve a single LEA collaborating with two or more farm to school partners. One example of a past project that fit this model would be the Riverside Food Hub, which was born out of a collaboration with one school district and two farm to school partners that now provides food from local farmers to other school districts in the surrounding area. Given the potential for innovation at a single large district that can scale</p>	<p>Regarding the partnership eligibility for Track 2, we decided to maintain that partnerships must include at least two LEAs and at least one regional partner. Because a primary goal of the grant program is to support LEAs and schools in establishing and expanding farm to school programs, we wanted LEAs to be the primary focus of both tracks, while also encouraging and supporting strong regional partnerships in Track 2.</p>

	both within the district and across the state, we urge you to broaden the eligibility criteria for Track 2 to any three partners, at least one of which must be an LEA.	
Reporting	I...worry that smaller districts will be discouraged by the detailed data gathering and invoicing they would be required to do in addition to all they already do for their USDA School Lunch Programs. In my experience, smaller districts are much more creative in reaching out to farmers and improving student meals than are large districts, and Track 1's allocation of grant funding may miss some of their best innovative practices.	Regarding reporting and invoicing requirements for Track 1, we do need to collect monthly invoices from awardees detailing allowable procurement costs and other costs in order to reimburse the awardees. However, the quarterly reports will simply require a brief narrative summarizing project progress, successes, and challenges, rather than extensive data collection. We hope to encourage smaller LEAs to apply to Track 1 by adding a line under "Funding and Duration" that says, "Please note that if, based on the funding formula, a small LEA does not meet the minimum award amount, the LEA will automatically be eligible for \$20,000." Additionally, LEAs are welcome to apply to both grant tracks (but please note that applicants are limited to one application in each track).
	Quarterly reports are a heavy lift for a government grant this long. Should be pretty simple to not be overwhelming (we recognize that this is likely the plan).	Regarding quarterly reports, the goal is to make them minimally burdensome by simply requiring a brief narrative summarizing project progress, challenges, and successes.
	Can the reporting be bi-annual instead of quarterly? Most programs won't even have a post-test administered within a quarter, because they'll be mid-programming. So, 2 of the 4 reports each year will state that results will be in the next report. The real results will only show up in the twice annual reports anyway. Save the paperwork and allow the programs to focus on delivering programs instead of filling out extra reports. That's still 6 reports over a 3-year grant. Plenty!	
	Track 2 strongly motivates community partnerships - something MUCH needed to improve nutrition services, and something smaller districts can do well. The period of the grant, its invoicing and documentation requirements are reasonable and well within the capacity of smaller school districts as well as larger ones.	Thank you for the comment of support.
	Our biggest suggestion is that reporting includes the farm name whenever possible and that identifying farms is recommended. Whether this comes from a farm direct purchase or an aggregator like a food hub or distributor, the biggest way to encourage supporting independent farms (rather than large scale broker or packer purchasing) is for buyers to seek traceability and transparency. Source identification is available from any buyers that purchase directly from farms and is a clear market signal that understanding the impact of purchasing from farms and telling the story of the farm matters. Farm names would either have to be kept fully confidential or at least decoupled from their aggregator to protect the aggregator relationships. Need to define purchasing source. Is the purchasing source only the distributor, which gives very little information? Asking for the source that the distributor purchased from and encouraging farm name and/or direct purchasing that includes farm name is the easiest way to support small farms and transparency in the supply chain that encourages distributors to buy from small farms rather than just from brokers, and schools in turn to buy from those distributors.	Regarding the identification of farm names and clarification of purchasing source, under "Reporting" for Track 1 we have added a line below the "Submit monthly invoices..." bullet point that reads: "Regarding the purchasing source, identifying the farm or producer name in the invoice is recommended whenever possible." Additionally, under "Grant Application" for Track 1, we have added a line to the "California Procurement Baseline" bullet point that reads: "Additional information such as the specific product items purchased and the specific purchasing sources (e.g., farm name, or distributor name and farm name) is encouraged but not required for the baseline report."
	Are the requirements for local procurement reporting the same in all iterations as they are described in the baseline assessment on page 5? This is the only place where this is described in the RFA: (California Procurement Baseline: Includes CA-Produced food items purchased in 18-19 school year, type of item, quantity of item, total weight purchased, purchasing source, purchasing method (direct/indirect))	Regarding procurement reporting requirements, under "Grant Application" for Track 1, we have updated the description of "California Procurement Baseline" to reflect the information we will be requesting from applicants. Under "Reporting" for Track 1, we have updated the description of the monthly invoices to reflect the information we will be requesting from grant recipients.

	<p>It isn't clear how the reimbursement is applied. It is described as per meal but is then measured based on procurement invoices. Is the reimbursement total based on a proportion of the grant based on overall new CA grown purchasing + other categories reported on (i.e. education & procurement time budgeted)?</p>	<p>Regarding reimbursement, we have updated the language for the first bullet point under "Reporting" for Track 1 to say, "Submit monthly invoices to CDFA detailing California food procurement to be reimbursed for actual allowable costs incurred, as well as all other allowable costs to be reimbursed (e.g. labor, kitchen infrastructure, educational integration, etc.). Please note that CDFA will provide grant recipients with a template invoice to complete and submit each month."</p>
	<p>Add a requirement for both tracks that recipients will be required to work with Farm to School evaluation team members.</p>	<p>Under "Reporting," we have added a paragraph that says, "All grant recipients will be required to participate in evaluation activities for the California Farm to School Incubator Grant Program as needed. A CDFA representative or external designee will work with grant recipients to address questions and gather necessary evaluation data. Program evaluation will demonstrate the impact of the grant program and will support efforts to develop future Farm to School Grant Programs."</p>
<p>Allowable and Unallowable Costs</p>	<p>Allowing only 10% of program costs for "labor associated with processing and procuring new local food products" is likely to discourage smaller school districts from applying.</p>	<p>Regarding allowable costs for Track 1, we have added an option for applicants to request to use a greater percentage of funding (up to 20%) for these labor costs associated with processing and procuring new local food products. If applicants so choose, they can provide a detailed and justified reasoning in the budget section of the application, explaining what percentage of the award they hope to use for these costs and why.</p>
	<p>The primary comments I have are about allowable costs. For track 1, not allowing travel costs and limiting costs to 10% for labor associated with processing and procuring new local food products, 10% for kitchen infrastructure, and 10% for indirect is far too restrictive for these programs. Below are some specific comments:</p> <ol style="list-style-type: none"> 1. I suggest allowing travel costs. School staff need to be able to visit farms to build relationships with farmers and educate staff on where the food comes from. 2. Limiting costs to 10% for labor associated with processing and procuring new local food products, 10% for kitchen infrastructure, and 10% for indirect leaves 70% for few other line items. It seems that the desire is to have the grantees spend the majority of the funds on the local food products themselves. This creates a subsidy that is difficult to sustain after the grant. Allowing more, like up to 30% for labor for processing and procuring new local food products and 40% for kitchen infrastructure, would allow LEAs to build programs that are sustainable after the grant period. 3. Please clarify in the RFA the 10% limit on labor associated with processing and procuring new local food products. Will the LEA be allowed to include other labor for managing the project, coordinating and participating in professional development trainings, tending to grantee requirements like reporting and site visits, etc.? 	<ol style="list-style-type: none"> 1. Under "Allowable costs" for Track 1, we have added "Travel costs for farm and food producer visits, as well as for project collaboration." Travel costs are no longer an unallowable cost for Track 1. 2. Under "Allowable costs" for Track 1, we have added an opportunity for applicants to request to use more than 10% of the total award (up to 20%) for labor costs associated with processing and procuring new California grown or produced food products, and added an opportunity for applicants to request to use more than 10% of the total award (up to 20%) for kitchen infrastructure to support utilization of California grown or produced food products in school nutrition programs. We have specified that if applicants would like to make these requests, they can include a detailed and justified reasoning in the budget section of the application, explaining what percentage of the award they hope to use for these costs and why. However, the 10% cap on indirect costs is a departmental requirement that we have to maintain. 3. Under "Allowable costs" for Track 1, we have added a line that says "Staff time associated with managing and implementing the project" is an allowable expense.
	<p>No milk/bread - but what if they are local? We are trying to get set up w/Cal Poly milk and are getting cheese from them, assistance in this area would be extremely helpful. Maybe a way for legitimate exceptions (more fluid milk I would agree with, but appropriate exceptions?)</p> <p>Same with local bread - we have a bakery in our town that makes compliant school products - not sure why this has to be excluded. I'm interested in getting a local bagel company to make 51%WG bagels - this would fit here for me. I'd like more clarification on bread vs specialty bread (just no wheat sliced?)</p>	<p>Regarding the parameters of the grant for specialty bread products, this is something we discussed extensively. In the updated RFA, we ended up deciding to exclude both sliced bread and specialty bread products and designate bread products as unallowable costs. Based on our research, we determined that bread is a moderately processed, multi-ingredient product that does not align with the goal of this grant program to promote "whole or minimally processed" California grown or produced products. Additionally, if we included specialty bread products as an allowable cost, it would be important to the integrity of the grant to require that the specialty bread products were not only manufactured in California, but also manufactured using California produced ingredients, which may be a challenge to procure and to track. However, we did specify that California produced flour and California grown wheat and other grains are allowable expenses. Additionally, regarding the parameters of the grant for dairy products, we did decide to</p>

		<p>maintain that minimally processed California produced and manufactured dairy products like yogurt are an allowable cost, because this may be easier to procure and to track, and better aligns with the goal of this grant program to promote "whole or minimally processed" California grown or produced products.</p>
	<p>Isn't clear what the CA ingredient threshold is for added value/multi-ingredient products to count, i.e. bread and yogurt - how much of the product has to come from California? Center for Good Food Purchasing and Real Food Challenge have standards on this.</p>	<p>Regarding bread and yogurt, we have updated the "Unallowable costs" section of the RFA under Track 1. We have clarified what types of dairy products are allowable (i.e., "minimally processed, California produced and manufactured dairy products like yogurt"), and clarified how dairy products like yogurt fit into our grant parameters regarding the procurement of products that are whole or minimally processed. We have also clarified that California produced bread is an unallowable cost, because the grant seeks to expand the amount of whole or minimally processed California products utilized in school nutrition, and California produced bread does not quite fit into the "minimally processed" parameters, nor is it necessarily made from California grown ingredients, even if it is made in California. However, we further clarified that California produced flour and California grown wheat and other grains are allowable expenses.</p>
	<p>Recommendation: Knowing the importance of beverage choices as part of the school meal program, we are recommending amending Page 4 of 7 under Unallowable Costs: after the word milk to add, and milk substitutes. Recommend sentence reads:</p> <p>Because the grant seeks to expand the amount of new local products utilized in school nutrition, CA produced milk, including milk substitutes, and bread will not be reimbursed. However, dairy products like yogurt and specialty bread products like rolls or buns are allowable expenses.</p> <p>Childhood is a key opportunity to establish healthy dietary patterns, which are important for supporting optimal growth and development as well as preventing diet-related chronic diseases. Research shows that what children drink can have a big impact on their health since beverages contribute significantly to total dietary intake during this critical period. Given the importance of beverage consumption in early childhood and the need for comprehensive and consistent evidence-based recommendations, in September 2019, Healthy Eating Research, a group under the Robert Wood Johnson Foundation, released a consensus statement recommending the best beverages for children ages 0–5; this statement was developed in collaboration with key national health and wellness organizations, including the Academy of Nutrition and Dietetics, the American Academy of Pediatrics, the American Academy of Pediatric Dentistry and the American Heart Association. Although the report, Healthy Beverage Consumption in Early Childhood: Recommendations from Key National Health and Nutrition Organizations, provides comprehensive recommendations for beverage consumption consistent with a healthy diet for children from birth to age 5, research for older children has the same findings.</p> <p>Without including all milks/milk substitutes there is a possibility to supplant cow's milk with milk substitutes which will impact the nutritional quality of meals students consume.</p>	<p>Regarding the "Unallowable costs" for Track 1, we have updated the language to read, "California produced fluid milk, including fluid milk substitutes, will not be reimbursed as part of this grant program. Although they are important components of a healthy diet for California's school children and for our local economy, these products are already procured from within the state. While fluid milk and fluid milk substitutes will not be reimbursed, minimally processed, California produced and manufactured dairy products like yogurt are allowable expenses."</p>

	<p>Can you expand on the allowable and unallowable costs?</p> <p>Track 2: Unallowable costs --Travel. This is effectively saying that no meetings are allowed, or that an organization would have to eat the cost of mileage for farmer and partner meetings. This will be a burden for nonprofits and RCDs who are likely to apply.</p> <p>Why aren't travel costs allowed in the regional grants? Travel funds are common in grants like this to help school district staff, nonprofit staff, farmers, etc. travel to meetings, trainings and other opportunities to collaborate together in person, which is critical to relationship building.</p> <p>Is it clear that the 2nd track budget can include infrastructure like farm equipment/coolers?</p>	<p>In the RFA under "Allowable and Unallowable Costs," we expanded on the allowable and unallowable costs for each track in an effort to make this more clear.</p> <p>Regarding Track 2, under "Allowable and Unallowable Costs," we have added the following as an allowable cost: "Travel costs that are directly related to the project." This is now no longer an unallowable cost for Track 2.</p> <p>Regarding a clarification that funds in Track 2 can be used for infrastructure like farm equipment/coolers, we have updated the "Allowable costs" for Track 2 to include, "Infrastructure (e.g., farm equipment, coolers, warehousing, etc.)."</p>
<p>Grant Application</p>	<p>Length: Are there any limits on section/page length or number of attachments?</p>	<p>Under "Grant Application" in the RFA, we have updated the application instructions to describe the process for applying electronically via an online submission portal. Several answer fields for the application questions in the online submission portal will have word limits, and some will allow attachments. Once applicants create a user account for the online submission portal, they will be able to see the word limits and attachment options for the application.</p>
	<p>Budget: Will you provide a template? Do you have a preferred format?</p>	<p>We will not be providing a budget template, but in the Budget section of the online application for each track, we specify which items we request applicants to include in their budget. Applicants can have the flexibility to describe and submit their budget in whatever format they prefer.</p>
	<p>Given the likely availability of evaluators who can provide thorough and overarching assessments of each grantee's project assessments of each grantee's project, plus the desire to make this grant application process as accessible and equitable as possible, consider asking for a brief evaluation plan or specific metrics the applicant would use to measure impacts of the grant.</p>	<p>Under "Grant Application" for both grant tracks, we have asked applicants to provide an evaluation plan as part of their Project Narrative.</p>
	<p>Offer an option for applicants to receive technical assistance in developing their evaluation plans or choosing metrics upon request. Add in the requirements that applicants shall include contact information for who on their team will be the point of contact for the evaluation team.</p> <p>Track One – Add in the requirement that applicants provide a list of the producers from whom they intend to source for the purposes of this grant. This will be important for evaluators to be able to follow up with those producers to gather baseline and ongoing data directly from the producer side. As the grant continues in future years, the data could allow tracking of the F2S Grant's impacts on growth in producers' operations, changes to production practices, growth of farming acreage, establishment of more cooperation/aggregation between producers, development of more farmer/rancher cooperatives or food hubs hiring, ability to attract capital, and other important metrics. Add a statement that "if you need help identifying producers that meet these descriptions, please contact [provide a point of contact for technical assistance]".</p>	<p>Thank you for the recommendations regarding the inclusion of various evaluation information and guidance in this RFA. Because we have not yet solidified the evaluation procedure and evaluation goals for this grant program, we decided that the sentence we added under "Reporting," that "All grant recipients will be required to participate in evaluation activities for the California Farm to School Incubator Grant Program as needed," would be a way to indicate that participation in evaluation will be a required part of the grant program, but that we won't gather more specific baseline data and ongoing data from applicants until they have received a grant award.</p>

	<p>Clarify Procurement Baseline: Since milk will not be reimbursed, it would be helpful to make this clearer in procurement baseline instructions, "California Procurement Baseline: Includes CA-Produced food items purchased (excluding milk) in 18-19 school year, type of item, quantity of item, total weight purchased, purchasing source, purchasing method (direct/indirect)"</p> <p>Question: Will districts be able to use their USDA F2S census and/or other regional reporting to provide their procurement baseline? That will help alleviate administrative burden if the metrics line up with what the CDFA would like to see reported.</p>	<p>In the online submission portal for this grant program, one section of the Track 1 application will include a California Procurement Baseline form for applicants to complete and submit. This form will contain clear instructions and specify exactly which items we would like applicants to include and not include in their responses. The California Procurement Baseline form will include general types of CA grown or produced food items purchased in the 2018-19 school year, the dollar amount spent on each type of item, general purchasing methods, and general types of purchasing sources. We have updated the language in the RFA under "Grant Application" for Track 1 to reflect this.</p> <p>The California Procurement Baseline is designed to gather fairly general information and pose a limited administrative burden for applicants. If applicants do not have exact metrics handy to answer the questions in the CA Procurement Baseline form, we offer an option to provide their best estimate.</p>
<p>Review Criteria</p>	<p>Really only one logic line to forward with respect to "applicant preference or priority given". I'd forward that the consequences faced by populations subject to repetitive major disaster are on equal or possibly even worse footing than those cohorts you've singled out in the RFA. Traumatic consequences from serial disasters here in the North Valley, as example, manifest in socio-economic comparatives equal to any of the State's most disadvantaged populations. Homelessness, severe food insecurity, unemployment, and familial dysfunction are at all-time highs statistically here locally. These conditions are predicted to pervade the region for the foreseeable future unless mitigation actions are proactively taken. And here I'd further that this responsibility extends to our State agency partners to follow alongside with this local and regional mandate—to take proactive steps to specifically address and alter the future trajectory of this cohort of disaster victims. I'd love to start to see inclusion in grant authorization language in California that gives priority to applications from entities and organizations within the influence areas of the Camp Fire, the North Complex Fire, etc.</p>	<p>In the Review Criteria for both grant tracks, we have updated the Scorecard to reflect this feedback. Under the Scoring Category, "Identified Community Need," we have included a Scoring Description that reads, "Serves a community impacted by recent natural disasters (e.g., wildfires)."</p>
	<p>I love that CDFA encourages working with a variety of types of partners - are we able to use scoring criteria/points to place a value on working with these types of groups or is that unallowable as a procurement practice? I'm interested in figuring out how to be more intentional in this area.</p>	<p>CDFA can run specific questions about procurement practices through our sister agency at CDE and our partners at USDA, and can follow up to provide technical assistance regarding this question.</p>
	<p>Great that it will serve highest need communities and culturally relevant foods, although not totally clear how that will be measured or how culturally relevant foods will be inquired about in the proposal process.</p>	<p>Regarding culturally relevant foods, under "Grant Application" and below "Project Narrative" for Tracks 1 and 2, we added the following line: "In the project description, applicants are encouraged to include a strategy for incorporating culturally relevant foods in their project." Additionally, under "Review Criteria" in the Scorecard for Tracks 1 and 2, we included a Scoring Description within the "Comprehensive Plan" Scoring Category that reads, "[applicant] utilizes or plans to utilize culturally relevant foods, including foods that are native to the area, in procurement and educational programs." Regarding highest need communities, under "Review Criteria" in the Scorecard for Tracks 1 and 2, we have included an "Identified Community Need" Scoring Category that includes economic factors, community diversity, and other factors. Some of this information will be collected in the "LEA Data" section of the Grant Application for both grant tracks. There will also be an application question in both grant tracks that will offer applicants an opportunity to further make the case for why this funding will help meet the needs of their community.</p>

<p>When assessing grant opportunities, RFA should specify what qualifies as a “high-quality student experience” versus students simply being “engaged” in farm-to-school activities? Will “high quality” be measured by student outcomes?</p>	<p>Regarding the "high-quality student experience" language, we decided not to include a specific measurement of this in the review criteria, but rather to emphasize under the "Comprehensive Plan" Scoring Category that integrating farm to school education and student engagement activities with the procurement program (for Track 1) and improving student engagement (for Track 2) are priorities.</p>
<p>Keep review criteria which prioritize values-based procurement. It is beneficial to include values-based purchasing criteria (small and medium farms, socially disadvantaged farmers, and climate-smart practices) as part of the evaluation for this grant program. This provides school districts and regional partners with the opportunity to demonstrate in their applications where they can leverage their purchasing power for good, while respecting the administrative burden that detailed reporting on each of these purchases would entail.</p>	<p>While we are unable to make this part of our review criteria, we have made our encouragement of values-based procurement more prominent by moving it up to the “Purpose” section.</p>
<p>[We are] generally supportive of the review criteria priorities as they are laid out, especially the encouragement of purchasing from farmers that use climate-smart agricultural practices, including organic or transition farmers, as well as small and mid-sized farmers, especially farmers of color and other socially disadvantaged producers. Emphasizing these preferences in the review criteria is an excellent step towards supporting healthy kids and a healthy planet.</p>	
<p>The RFA lists a series of practices as criteria that are not noted in any of the State approved on-farm management practices. These include: “organic or transition to organic,” “regenerative agriculture,” “certified 100% grass-fed,” and “reduced or no use of synthetic pesticides or fertilizers.” None of these practices have been included in state or federal climate smart agricultural climate smart agricultural programs and therefore, are inappropriate to be included under such a heading. Moreover, several terms, including “regenerative agriculture,” have not been officially defined or recognized by the department. Including unverified practices and undefined terms as “climate smart,” in this context is inadvisable and contrary to the science-based procedure the Department has followed in all other climate policy actions. We encourage the Department to remove these problematic additions. If an interest to reference “climate smart” throughout this RFA persist, we respectfully request the Office of Farm to Fork consult with the Office of Environmental Farming and Innovation (OEFI) and only reference those practices that the State accurately acknowledges as scientifically related. Beyond the vague nature of the criteria, if it remains in the final RFA, the scoring of grant applicants and subsequent project implement will suffer from several challenges. First, it is unclear how these climate related criteria will be used to evaluate grant applications in a competitive process. Though we recognize that the preface of this excerpt states that the Department “encourages” partnership with producers that use these techniques, the RFA does not provide a scoring rubric or additional narrative explaining if and how additional points or preference may be offered to such applicants. As you know, transparency and fairness in the grant administration process is of the utmost importance. Second, the RFA fails to distinguish what types of reporting or verification mechanisms the Department will impose on awardees to ensure their producer partners are carrying out the climate smart practices proposed in the applications. This does not comport with the robust processes required for grant recipients of all other OEFI Programs or Department-administered grant programs. Finally, should the Department implement a verification process of on-farm practices, we strongly encourage the Department to consider the resource needs</p>	<p>Although we have maintained the component of the RFA that encourages applicants to partner with producers that have demonstrated and documented climate smart practices, we have moved this excerpt up to the “Purpose” section of the RFA, and removed it from the “Review Criteria” section. We have maintained our careful selection of the word "encourages" to emphasize that it is neither something we require nor something that will exclude applicants who partner with other producers. We have also revised the language to reflect the Climate Smart Agricultural management practices that are recognized by the CDFA Office of Environmental Farming and Innovation, and by the USDA-NRCS Conservation Practice Standards. We have also used the phrase “other regenerative strategies” in place of the phrase “regenerative agriculture.”</p>

	<p>that would be associated with that activity. Given the precedent for other climate smart agricultural programs, it is unlikely such costs could be covered with existing administrative funds and may further constrain funding available for LEAs to make demonstrable progress on their farm to school efforts. California was clearly struggling with child hunger long before COVID-19. According to the California Association of Food Banks, one in four children may go to bed hungry at night and over 20 million children live in a household that struggles to put food on the table. It is without doubt that the current pandemic, in the wake of record unemployment and widespread economic hardships, this problem has been made exponentially worse. School meal programs are a powerful way to support struggling families and support local agricultural economies. We encourage the Department to use this finite funding source to help those communities address their current needs with a model that's accessible and scalable for all.</p>	
	<p>We recommend modifying the following review criteria language to reflect that school districts can use funds for initiating a new farm to school program: "Have a history of farm to school success and/or a thorough, viable plan in place and evidence of strong, effective partnerships or a clear strategy for developing new partnerships." Districts who lack experience or staff capacity for building farm to school relationships or programming will be at a disadvantage for winning these funds. For this grant cycle, or in a future grant cycle, we suggest that the CDFA (or designated regional leads) offer technical assistance to understaffed districts so that they can more effectively compete for these funds. We also suggest putting aside some of the existing resources in track #1 for school districts that do not already have established farm to school programs. We have observed that community resilience, especially during COVID-19, is often linked to the strength of their relationships and we recommend that these funds are made available to school districts that are still in need of developing farm-to-school partnerships and relationships.</p>	<p>For the "History of Farm to School Success and/or Evidence of Strong, Effective Partnerships with Key Stakeholders" Scoring Category, we have added language in the Scoring Description that says: "Established or committed partnerships within LEA between educators, school nutrition teams, counselors, administration, or other departments. These will be made evident in letters of commitment and letters of support." We hope that by stating "established or committed," we have clarified that partnerships can be in the early stages and not yet firmly established, as long as parties are strongly committed to working together moving forward. We also hope that by stating "partnerships within LEA," we have clarified that we don't necessarily expect external partnerships to be established yet.</p> <p>Thank you for the suggestion regarding future grant cycles.</p>
	<p>We recommend adding a preference for proposals that integrate educational and student engagement activities with local and regional food procurement, since we know that student engagement activities are key for increasing participation rates and increasing student consumption. The objectives include LEA's that "coordinate educational opportunities between cafeterias, classrooms, and communities" but a clear link to meet this objective isn't included in the review criteria.</p>	<p>We have added a "Comprehensive Plan" Scoring Category, which includes the following Scoring Description, "Plans to increase procurement of new and whole or minimally processed California grown or produced foods and integrate farm to school education and student engagement activities with the procurement program."</p>