

The 30% NYS Initiative:

Designing Opportunities for Access, Equity,
and Economic Impact in New York's
Farm to School Incentive Program



November 2023



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Title Page Image: Waterville Central School District

Credit: Josh Baldo

American Farmland Trust

American Farmland Trust (AFT) is the only national organization that takes a holistic approach to agriculture, focusing on the land itself, the agricultural practices used on that land, and the farmers and ranchers who do the work. AFT launched the conservation farming movement and continues to raise public awareness through the No Farms No Food® message. Since its founding in 1980, AFT has helped permanently protect more than 6.8 million acres of farmland, advanced environmentally sound farming practices on millions of additional acres, and supported thousands of farm families.

By combining on-the-ground projects with objective research and effective advocacy, AFT approaches its work comprehensively, advancing better agricultural policy within all tiers of government while continuing to conduct groundbreaking research that changes America's view of farming. AFT's work spans from the kitchen table to the halls of Congress.

AFT has a national office in Washington, D.C., and a network of field offices across the United States where farmland is under threat. The New York office was established in 1990, as the state is home to some of the most threatened farmland in the nation. This growing office coordinates programs, conducts research, and engages in advocacy to keep farmers on the land, keep land in farming, and help farmers adopt sound farming practices.

Learn more at [**farmland.org/newyork**](https://farmland.org/newyork).



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Farm to Institution New York State

Farm to Institution New York State (FINYS) is a collaborative initiative led by American Farmland Trust to dramatically expand the volume of food grown on New York farms that is served in institutions across New York including schools, universities, and hospitals. FINYS works to strengthen the economic security of farmers and the health of New Yorkers by empowering institutions to spend at least 25% of their food budget on fresh and minimally processed food grown in New York.

FINYS advances public policy campaigns, educates institutions about buying locally, and inspires commitment from institutions to expand local food purchasing. AFT staff also lead the New York Grown Food for New York Kids Coalition, a project of FINYS, and advocate for state-level programs and policies that help schools purchase and serve more New York-grown food to K-12 students.

Learn more, get engaged, and find other tools and resources at [**finys.org**](https://finys.org).



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National Farm to School Network

National Farm to School Network (NFSN) is the voice for the farm to school movement and the leading resource for information about national, state, and local policies that impact farm to school. NFSN played a pivotal role as the lead consulting organization, working closely in partnership with AFT on this project.

NFSN is an information, advocacy, and networking hub for communities working to bring local food sourcing, school gardens, and food and agriculture education into schools and early care education settings. NFSN provides vision, leadership, and support at the local, state, and national levels to connect and expand the farm to school movement, which has grown to reach approximately 67,300 schools in all 50 states as of 2019. The Network includes more than 20,000 farm to school supporters, a national staff, an advisory board, and partner organizations in all 50 states, Washington, D.C., and U.S. Territories. NFSN's work is deeply rooted in equity, guided by the organization's Call to Action that 100% of communities will hold power in a racially just food system.

Learn more and become a member of the Network at [***farmtoschool.org***](https://farmtoschool.org).



Hamburg Central School District
Credit: Nancy J. Parisi

Acknowledgements

This project has been significantly enriched by the generous support, collaborative efforts, and valuable insights from contributors across the nation. The authors extend their heartfelt gratitude to all members of AFT, with special recognition for the outstanding contributions of the following individuals and organizations, without whom this report would not have been possible:

The FINYS team at AFT: Stephanie Hsu, Farm to Institution New York Manager, Ashlea Raemer, Farm to Institution New York State Associate, Kiani Conley-Wilson, New York Regional Program Coordinator, Heidi Exline, NY Deputy Director, Olivia Fuller, New York Communications Manager, Linda Garrett, New York Regional Director

Staff from the National Farm to School Network: Ryan Betz, Policy Specialist, and Jiyeon Chon, Communications Manager

Members of the New York Grown Food for New York Kids Coalition, for direction and support of these recommendations

The New York Health Foundation, for support of this project and the Farm to Institution New York State initiative

Samantha Levy, AFT's Conservation and Climate Policy Manager (formerly AFT's New York Policy Manager), for your extensive guidance and groundwork in advocating for this policy

AFT's legislative champions, for your commitment to farm to school initiatives

Staff and members of the New York State Nutrition Association, particularly Julia Alotta and Julie Raway

Healthy School Meals for All New York Kids Coalition leaders: Jessica Pino-Goodspeed, Francesca DiGiorgio, and Abbie Watts of the Healthy School Meals for All NY Kids Coalition

Cornell Cooperative Extension Harvest NY staff, in particular Cheryl Bilinski and Becky O'Connor

Food service directors and child nutrition program representatives who participated in the 2023 survey, for your collective time and insight

The food service directors and food system professionals interviewed during this process, both within and outside of New York, for taking the time to discuss your experiences

Agency staff at New York State Department of Agriculture and Markets and New York State Department of Education, for your continued collaboration and dedication to the farm to school

Glossary of Abbreviations

Acronym / Term	Description
ADP	Average Daily Participation for school meals (typically referring to lunch meals unless otherwise specified)
AFT	American Farmland Trust
BIPOC	Black, Indigenous, and people of color
CCE	Cornell Cooperative Extension
CEP	Community Eligibility Provision
CNP	Child Nutrition Program
DoD Fresh / FFAVORS	The USDA Department of Defense (DoD) Fresh Fruit and Vegetable Program
ECE	Early Childcare Education
FINYS	Farm to Institution New York State
ISP	Identified Student Percentage
LFPI	Local Food Purchasing Incentive
NY Staple Products	Fluid milk, value-added dairy products, and apples
NFSN	National Farm to School Network
NSLP	National School Lunch Program
NYSED	New York State Education Department
NYSDAM	New York State Department of Agriculture and Markets
Pilot	The USDA Unprocessed Fruits and Vegetables Pilot Project
SFA	School Food Authority
SY	School Year
ROI	Return on Investment
Value-Added Dairy	Any non-fluid milk dairy, including yogurt, cheese, and sour cream

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Summary of Recommendations



Credit: Josh Baldo
Waterville Central School District

1. Expand to All School Meals

The 30% NYS Initiative (the Initiative) is the only local food purchasing incentive (LFPI) program in the nation with a lunch-exclusive design. This design causes substantial hardship for the more than 95% of SFAs that serve breakfast, as separating purchases adds administrative complexity and is time-consuming. For four years in a row, school food authorities (SFAs) have called upon policymakers to expand the program to include all school meals. Increasing the program to all school meals would undoubtedly increase participation, reduce administrative burden on both SFA program operators and state agency staff, and increase the amount of local food purchases required for most SFAs to qualify for the program.

Participation would increase: Two previous AFT reports illustrate that separating breakfast and lunch is a top barrier to participation. This remains true in 2023, where separating breakfast and lunch was the most selected option when FSD survey respondents were asked why they had not tried to qualify for the program (62%).

New York can unlock more local spending per participating SFA: If the local spending threshold were to expand to all school meals, SFAs that applied for the Initiative in 2023 would have to report spending 38% more on local foods to qualify for the program on average. Even with a 25-cent reimbursement rate (currently 19.1 cents), this expansion would increase the state's average return on investment among SFAs that applied to the Initiative in 2023 from 203% to 211%.

SFAs would purchase more local food: Currently, many SFAs reduce the amount of local food available at breakfast to make local food tracking easier, reducing both the availability of local food and the impact on the agricultural economy. Over 70% of 2023 FSD survey respondents would purchase more local foods if this program expanded beyond lunch.

2. Change the Legislative Language to Allow for the CEP State Subsidy

In 2023, New York made a historic commitment to increase meal access by creating the Community Eligibility Provision (CEP) State Subsidy. Unfortunately, this new program conflicts with the existing 30% NYS Initiative, resulting in specific CEP-participating schools receiving up to 58% less in Initiative reimbursement. This affects at least 70% of SFAs that were approved for additional Initiative reimbursement in 2023-24 that have a total student enrollment of over 60,000. Providing some SFAs less subsidy for meeting the same local food goals presents a critical equity concern, as CEP schools serve a large portion of students with limited economic resources. This conflict will only increase if New York adopts a universal meals policy. However, there is a simple policy solution; Changing the legislative language from a cap (current language is “not to exceed” 25 cents) to a flat-rate subsidy (proposed language is “an additional” 25 cents) would allow both programs to exist as complementary initiatives.

3. Change the Formula to Determine Qualification for Equity and Economic Impact

The perception that the 30% local goal is too high is a driver in low participation. However, reducing the 30% threshold to 25% is not the best policy solution to enhance accessibility for the program. Under a 25% threshold, many SFAs that already purchase NY fluid milk will surpass or easily reach the goal with little purchasing behavioral change, potentially decreasing demand for newly developed local foods. Even with a cap on specific local products, the goal would remain too high for those without access to local fluid milk or for SFAs that purchase NY fluid milk but do not serve it in large quantities. Changing the way the local food purchasing threshold is calculated may be the best avenue to increase access and sustain SFA demand for diverse NY products. **New York policymakers can require that SFAs source more than 75% of fluid milk locally to qualify for the program and borrow the formula used in Vermont's Local Foods Incentive Grant to calculate the threshold for qualification.** Under this formula, fluid milk purchases are subtracted from the overall food budget and **SFAs that spend at least 15% of their overall budgets on non-milk local items will receive additional reimbursement.** Additionally, New York can institute a "Special Hardship Clause" with a lowered rate of 12.5-15 cents for SFAs without access to NY fluid milk to participate in the program. SFAs in this category would receive support and a financial incentive to switch to a local vendor. Benefits to this design include:

- Maintaining a strong return on investment of state program dollars;
- Ensuring this program benefits NY dairy farmers;
- Ensuring SFAs are purchasing a diverse variety of local products;
- Allowing SFAs that purchase low levels of fluid milk to participate without a disadvantage; and
- Unlocking this program for SFAs without access to NY fluid milk.

4. Provide Financial Safety Nets to Increase Participation

Exclusively rewarding SFAs that meet a local benchmark is not conducive to fostering growth among those who stand to benefit from financial support for local purchasing. The 30% NYS Initiative is one of only two LFPI programs across the nation (NY and VT) that do not guarantee some form of reimbursement for participating SFAs when they purchase locally. This analysis observed a dozen SFAs that attempted to qualify for the 30% NYS Initiative but ultimately did not reach the 30% threshold. This is a driver of low participation as some SFAs cannot take a financial risk of buying large quantities of local foods and potentially missing the threshold.

FSD survey respondents agree they would be more likely to participate in a program with a tiered reimbursement model (63%) or if the program guaranteed reimbursement (84%). Two states with similar programs offer **a tiered reimbursement approach**, which provides increased levels of reimbursement for SFAs that purchase greater percentages of their budget on local foods. **Using the Vermont Formula to determine eligibility, a tiered approach would continue to yield a positive return on state investment while increasing program participation.**

General Recommendations

1: Continue Funding the Farm to School Grant Program and Regional Coordinator Positions

Farm to school coordinators play a pivotal role in bridging the gap between FSDs and local producers, and their expertise and connections are invaluable in maximizing the benefits of the program. Nearly half of survey respondents reported they worked with farm to school coordinators (45%). While the 2023 survey and interviews did not specifically inquire about the specific contributions of coordinators, numerous stakeholders explicitly recognized their indispensable role in facilitating the program's success. Additionally, the Farm to School Grant Program is crucial for addressing operational challenges in schools and enabling SFAs to fully benefit from local food procurement.

2: Fund Program Administration and Outsource Evaluation

All LFPIs of similar program sizes near or above \$10 million fund at least two program coordinators at the state agency level as well as non-profit partners to conduct regular program evaluation. Thus far, New York State has not allocated funding for state agency coordination of this program. With a <5% investment of the program's annual \$10 million budget for staffing, New York State Department of Agriculture and Markets (NYSDAM) can hire three full time staff (recommended: program lead, data analyst, and documentation coordinator/program support) to support smooth implementation of the program. Additionally, a similar investment of 1-1.5% for annual evaluation can lead to enhanced program accessibility and increase economic impact.

3: Streamline Tracking and Documentation

Originally, this analysis did not intend to investigate tracking and reporting requirements as this seemed more related to implementation than the policy itself. Yet, both surveys and interviews have underscored this as a significant obstacle that discourages program participation. NYSDAM can continue to streamline tracking and documentation by establishing a standard tracking method(s) that requires vendor-level purchasing information and allows SFAs to submit tracking information throughout the year.

4: Ask SFAs to Submit Notice if They Plan to Participate

Requiring SFAs to notify NYSDAM at the start of the school year is a simple step that can have several benefits:

- Better enable NYSDAM and partners to target support for interested SFAs in local purchasing and the Initiative's application process;
- Assist NYSDAM in adequately planning for application reviews and audits; and
- Allow advocacy partners to provide estimates for budgetary transparency.

5: Incorporate Annual Feedback Into Implementation

If New York seeks to codify the Initiative into law, it is crucial to have flexible language that allows NYSDAM to adapt the program effectively over time. Taking inspiration from California, one way for NYSDAM to incorporate annual feedback is by hosting annual comment periods and town halls. This can allow for a better understanding of the needs of SFAs for continued program success.

Remaining Concerns for a Performance-Based Approach

The 30% NYS Initiative Competes with the USDA Pilot Project for Unprocessed Fruits and Vegetables (Pilot)

Purchases of local foods using federal funds from programs like the USDA Pilot Project do not count toward an SFA's 30% local threshold. This creates competition between the Initiative and federal programs, ultimately disincentivizing SFAs that participate in the Initiative from purchasing local foods with federal funds. Transitioning to a grant-based model appears to be the most viable solution for addressing this conflict.

Current framing leaves SFAs to not view the program as worthwhile

Although the 2023 survey did not specifically ask FSDs about the current incentive rate (\$0.19 per lunch meal), FSDs shared extensive feedback in the open comment fields expressing doubts about the program's value. The current messaging of the program may lead to it being perceived as "not worthwhile," especially as food costs increase. This negative messaging may be because SFAs are provided a per-meal reimbursement, rather than receive based on actual food costs (such as in a grant model). Michigan's 10 Cents a Meal program recently transitioned from a per-meal reimbursement to reimbursing 50% of food costs. A "half-off" model has improved the overall perception of the program. The Initiative may benefit from framing the program as a means to offset local food expenses rather than fully reimbursing SFAs.

Additional Considerations, Future Research, and Conclusion

Additional Considerations

- **Transitioning to a Grant-based Incentive**, which is the most popular LFPI model across the nation, can increase the equity, accessibility, and interest in this program while maintaining a positive economic impact on local farmers.
- **Adopting a Regional Definition of Local** to better support SFAs in border communities in purchasing hyper-local ingredients.
- **Incorporating provisions to Support Values-Based Purchasing** to incentivize schools to make purchases based on specific product characteristics and/or producer characteristics and growing practices.
- **Adopting a Farmer-Focused LFPI Model** where the state directly contracts with local producers to sell to schools. This model can potentially ease FSD administrative burden and/or foster more purchasing from small farms.

Areas for Future Research

- **Expanding the Initiative to Summer Meals**
- **Research Farmers and Food Businesses Involved in The Initiative** to focus on the impacts and hurdles for farmers and vendors across sectors and scales.
- **Continued Assessment of the Economic Impact of This Program** to continue exploring impacts on SFAs of different sizes and geographies.

Conclusion: Embrace change; With the right policy adjustments, New York can pave the way for a more robust local food system that benefits everyone involved.



Introduction and Background

Buffalo Public Schools
Credit: Josh Baldo

Introduction

In 2018, New York State established the 30% NYS Initiative (“the Initiative”), which is a local food purchasing incentive program that encourages schools to purchase more food from New York farms. The Initiative increases the state per meal reimbursement from 5.9 cents up to 25 cents for School Food Authorities (SFAs) that spend 30% of their food budget for lunch on qualifying local products. At the time this program was established, the state reimbursement for lunch had not been increased in 40 years, and a quadrupled reimbursement rate promised to create a monumental incentive for SFAs to increase local food purchasing.

Over the last five years, participation appears to have stagnated; Less than ten percent of New York’s SFAs qualified for the Initiative since its establishment, and less than a third of the program’s \$10 million budget is disbursed each year. Additional investment in complementary efforts such as the Farm to School Grant program and regional farm to school coordinator positions have increased local food purchasing across the state, yet have not substantially yielded greater participation in the Initiative.

Though the reasons for low participation may be caused in part by the COVID-19 pandemic, additional feedback from stakeholders has led advocates at American Farmland Trust (AFT) to believe that **the design of the program itself is causing accessibility challenges**. As this report will show, Food Service Directors (FSDs) believe in the importance of both an incentive and supplemental farm to school programs, but the barriers to access are too great for many food service directors already spread thin.

This report intends to further a continuing conversation about the challenges of the Initiative and how changes to the program’s design could improve accessibility. AFT and National Farm to School Network (NFSN) partnered to conduct a policy analysis from July to October 2023 to determine what changes to the program could yield an increase in program participation. The team released a survey open to all FSDs and interviewed diverse farm to school stakeholders. The intention of this process was to gather feedback on the program’s design and collect additional purchasing data.

The following analysis is not meant to generalize all SFAs in the state. Rather, it intends to demonstrate how policy changes would affect a diverse variety of SFAs in a majority of counties in all major regions of New York. SFAs that informed this project are from public, private, public charter, and BOCES settings, have varying levels of access to local products, and range in size from less than a hundred students to the largest SFA in the state.

There is no doubt the Initiative is an impactful policy. It has influenced SFAs to purchase greater quantities and types of local foods. It has also directly led to local product development for institutions and increased sales for local food producers and vendors. That is why it is important to understand the barriers to participation and ensure the full potential of this program is unlocked to support more SFAs in creating a triple win for New York’s students, farmers, and communities.

[Click here to review the methods and learn more about the survey respondents.](#)

Background

About Local Food Purchasing Incentives

The 30% NYS Initiative is a **local food purchasing incentive** (LFPI). LFPIs provide additional funding to school districts to directly offset the cost of local foods. These programs are typically funded and operated at the state level and intend to increase the purchasing of local foods in school and early care and education (ECE) settings. When local foods are a more cost-effective option, food service directors (FSDs) are often more willing to begin purchasing, or purchase more, local food than they might otherwise without an LFPI.

The first state-level LFPI was established in Maine in 2001, with more states adopting LFPIs throughout the 2010's. By 2023, LFPIs were implemented in the District of Columbia and 16 states in all major regions of the United States. The designs of LFPIs, and the support structures around them, can impact program accessibility, capacity required for administration, and which kinds of child nutrition programs (CNPs) and local producers can benefit from the policies. This policy analysis delves into New York's LFPI internally, while also examining LFPIs in other states to identify pathways for improving program accessibility.

About the 30% NYS Initiative

In 2018, the State of New York established the Initiative as part of the No Student Goes Hungry Initiative. The program has an annual program budget of \$10 million and is funded through

the Aid to Localities bill in the state agriculture budget. At the time of its introduction, the Initiative was a nation-leading LFPI that encouraged schools to purchase more food from New York farms. According to New York State Department of Agriculture and Markets (NYSDAM), this program intends to provide healthy New York-sourced food products, such as farm fresh products, to children as part of their lunch meal in school.

How It Works

The Initiative quadruples the state per meal lunch reimbursement by providing an additional 19.1 cents (increasing from 5.9 cents up to 25 cents) for any SFA that spent at least 30% of their food budget for lunch on qualifying local products. Each school year from September to June, SFAs purchase qualifying local products. In August, SFAs apply to NYSDAM and their applications are reviewed. If the SFA's application is approved, they will receive the additional reimbursement for each lunch meal served starting in September of the following school year (SY).

What is a NY Food Product?

A food item that is grown,
harvested, or produced in NYS

OR

Is processed in or outside
NYS comprising over 51% raw
agricultural materials from NYS

At the time of its introduction, the Initiative was the eighth LFPI to be established in the United States. When compared to other LFPIs nationwide, the program's design is unique because it is limited to lunch, includes fluid milk, and only provides SFAs reimbursement if they reach a certain purchasing threshold.⁵

Unique Design Features of the 30% NYS Initiative:

1. **Limited to lunch**
(only program)
2. **Does not guarantee reimbursement if SFAs purchase local food** *(two programs)*
3. **Includes fluid milk**
(three active programs)

These unique features may be rare because they cause implementation challenges, and will be discussed in detail throughout this report. Policymakers have a powerful opportunity to draw on the national landscape of LFPIs, crafting a program finely attuned to the needs of SFAs and producers.

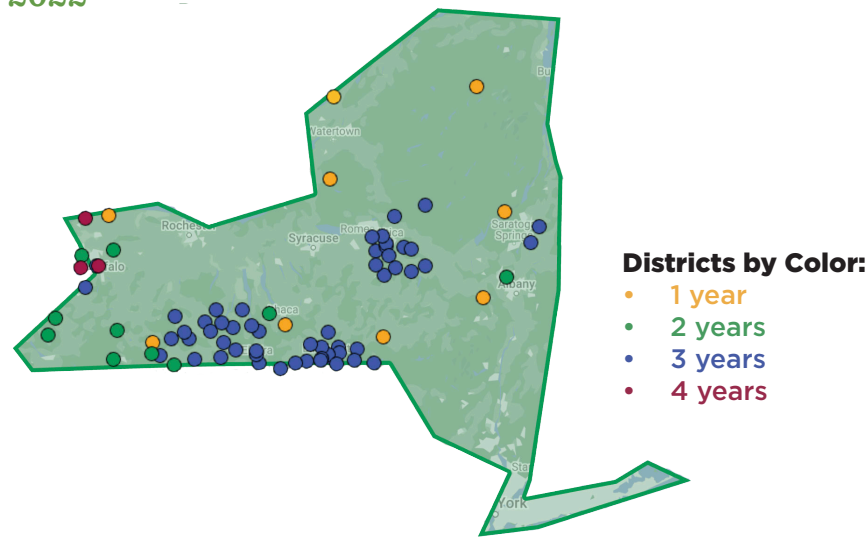
The Impetus for Analysis

This analysis comes after five years of implementation of the Initiative. Over the first four years, 64 unique SFAs participated in the program, representing roughly six percent of New York's roughly 1,030 SFAs.⁶ Seven SFAs qualified for the program in its

first year, spending \$2.9 million on local foods. This number increased to 57 SFAs the following year (19-20 SY) but dropped to 49 SFAs and 51 SFAs the two following years, respectively, likely due to the COVID-19 pandemic. Previous research from AFT estimated that by the 2022-23 SY, 75% of SFAs would be participating in this program. Yet, this estimate has not come to fruition; 61 SFAs applied as of August 2023 for the 22-23 SY and 59 were approved, further illustrating stagnated program growth. It is important to note that the COVID-19 pandemic created major disruptions in the food supply chain and school food service management beginning in March 2020. It is a testament to the interest in this program and support from partner nonprofits that as many SFAs continued to participate as did during this time.

The program's budget has continuously been underspent. The reimbursement awarded to SFAs has not exceeded \$2.7 million in a given year, which is only 27% of the annual \$10 million program budget line. The Initiative also appears to generally benefit the same SFAs each year and has not yet expanded substantially to benefit new stakeholders. Figure 1 is a map that illustrates that 66% of SFAs have qualified for the Initiative for three of the first four years of implementation. This map also showcases that no SFA in the Hudson Valley, New York City, or Long Island have qualified for the program to date. In 2023, a handful of SFAs from the Hudson Valley and Long Island were approved for the program.

Figure 1. Map of School Districts that Qualified for the 30% NYS Initiative Over Time: 2018-2022



This map was shared by Cheryl Bilinski of CCE Harvest NY who represented the 30% NYS Initiative during a national webinar on LFPIs hosted by NFSN.

Over the last five years, a new challenge arose, shedding light on the urgent need to change the bill language for this program. The specific way the 30% NYS Initiative was written has caused the program to conflict with the new Community Eligibility Provision (CEP) State Subsidy, which will be discussed in the next section. With greater attention to meal access sweeping across the nation, it is important to reduce these challenges to foster equitable access to high-quality, farm-fresh school meals.

These statistics are not intended to negate the incredible impacts the Initiative has had on local producers and school communities alike, as demonstrated by Cornell University and Cornell Cooperative Extension (CCE) Harvest New York. Examples include:

- **An economic analysis of Buffalo City School District showed a positive economic multiplier of 1.54, meaning that for every dollar spent in Initiative reimbursement, economic impacts to the state increase by \$1.54.⁷**
- **In 2023, NYSDAM approved 59 SFAs to receive additional reimbursement in the 2023-24 SY. On average, these approved SFAs spent 57 cents per lunch meal on local foods, which is three times what they receive in reimbursement.⁸**

Despite these clear successes, the Initiative is still inaccessible for many SFAs. The remaining \$6.3 million budget can be even more effective if it reaches the hands of local farmers. The last research AFT conducted on the Initiative was spearheaded in 2020. In addition to lessons learned during the COVID-19 pandemic, there is now a national discourse on LFPIs that can shape the understanding of the Initiative. There is no better time to reassess what design solutions can make this program more accessible to all SFAs.

Design Opportunities for Access, Equity, and Economic Impact



Hamburg Central School District
Credit: Nancy J. Parisi

1. Expand to All School Meals

Expanding this program to all school meals is the single greatest way to improve program accessibility. This expansion is in alignment with Governor Hochul's 2023 Executive Order 32, which encourages school districts to spend 30 percent of their *total purchases* on local foods within five years.

This recommendation is also in alignment with the general consensus among state LFPIs, as **New York is the only program in the nation that is limited to lunch**. Oregon originally limited its Farm to Child Nutrition Program grant to lunch but removed this regulation due to overwhelming feedback that it created cumbersome tracking requirements.⁹ A vast majority of state LFPIs (more than 80%) help subsidize local food purchases that are served for *all reimbursable school meals* (lunch, breakfast, after-school snack, supper/dinner), while several are limited to both lunch and breakfast.

Did you Know?

More than 95% of SFAs serve breakfast meals.

A third of SFAs serve reimbursable snacks.

AFT produced two previous reports that explore this topic further and recommended that the program expand beyond lunch.^{10,11} This is because FSDs do not typically separate food purchases for lunch from those for other school meals as part of their standard meal management practices. The additional step to separate lunch costs creates an administrative burden for nearly all SFAs,

and renders the program inaccessible for many schools that lack additional capacity. AFT's 2020 report found that separating lunch from overall meals was one of the top three barriers to qualifying for the program.¹² This remains true in 2023:

More than half (55%) of FSD survey respondents have not tried to qualify for the program in the past. The most selected option when asked why was “separating breakfast and lunch is too difficult” (62%).

What Food Service Directors are Saying:

“I think it should be based on total usage for both Breakfast and Lunch. There has to be an easier way to track things. It should be tracked as a whole program, not just what meal we serve it in.”

“I feel that breakfast, snack, and dinner program meals should all count towards NYS 30%. I feel more schools would participate if they did not have to track just lunch products i.e. less paperwork.”

What Food Service Directors are Saying:

“I think it’s silly not to allow NYS products for breakfast consumption (milk, cheese, granola, etc.). It’s a lot of paperwork to the already long list of things to do which is why a lot of fellow directors don’t participate.”

“I love this program and try to convince everyone to do it! However, breakfast NEEDS to be included - ideally with additional reimbursement, but if not that’s okay too.”

“Make it simple. Tracking everything separately between breakfast and lunch is just too much.”

“It would make the paperwork SO much easier and attainable for more districts...”

NY Can Unlock More Local Spending per Participating SFA

SFAs are purchasing local foods to serve in meals outside of lunch which currently go unreported. The best way for the state to capture this impact is to include all school meals in the program. On average, if the local spending threshold were to expand to all school meals but remain at 30%, SFAs that applied for the Initiative would have to report spending 38% more on local foods to qualify for additional reimbursement. For example, these SFAs would need to spend a total of \$11.2 million in local purchases, resulting in an additional \$4.3 million reported to NYSDAM.



Credit: Josh Baldo
Waterville Central School District

SFAs Would Purchase More Local Food

As emphasized in previous AFT reports and reiterated through the 2023 survey, in some instances, the lunch-exclusive stipulation inadvertently reduces both the availability of local food for students and the quantity purchased outside of lunch.¹³ The 2023 survey asked FSDs who qualified for the Initiative if they had engaged in “creative accounting” activities to make qualification for the program easier regarding the lunch-exclusive stipulation.

More than half of respondents indicated they participated in one or more of the following practices:

- **To make tracking easier**, they served most or all local products during lunch instead of breakfast (58%)
- **To increase our local food percentage**, they served most or all local products during lunch instead of breakfast (50%)
- **They decreased serving local products at breakfast** because they knew they would not count towards our local percentage goals (58%)

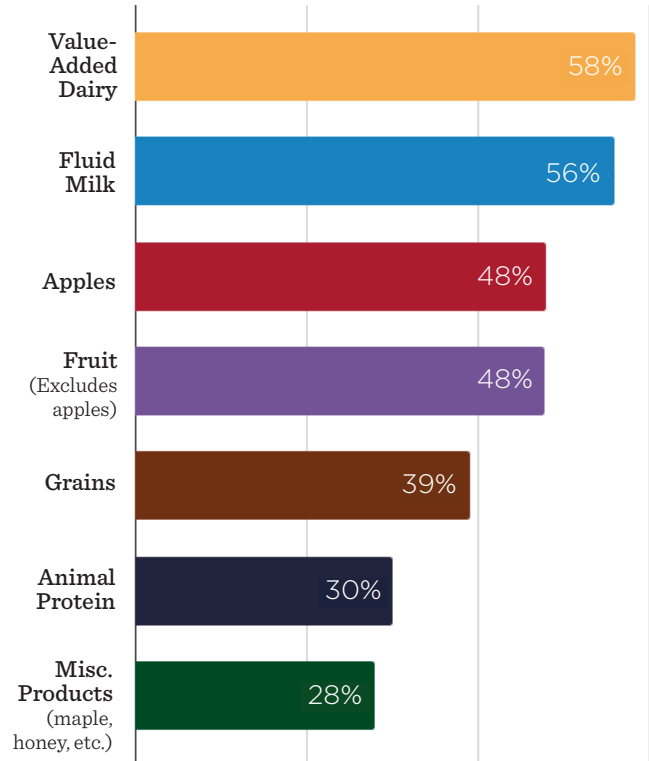
What Food Service Directors are Saying:

“Some schools are opting to serve only chocolate milk at lunch or only white milk at breakfast. That way, they know that anytime they see chocolate milk on an invoice, they know it’s for lunch.”

Over 70% of 2023 survey respondents shared they would purchase more local foods if this program expanded beyond lunch.

- **More than half of FSDs** report they would purchase **more NY fluid milk, apples, and value-added dairy products**.
- **Nearly half of FSDs** report they would purchase **more local fruits** (excluding apples) (48%).
- **More than a third of FSDs** report they would purchase **more local grains** (39%). Local grain products include a bagel, granola, and whole grain pasta.

Figure 2. Items FSDs Would Purchase More of if the 30% NYS Initiative Expanded Beyond Lunch (n=64)



Expanding the Program Can Increase NY's Average Return on Investment

Under the current lunch-exclusive model, the Initiative requires that SFAs spend on average three times as much on local food than they receive in reimbursement. Of the SFAs we observed that applied to the program in 2023, the average return on investment (ROI) was 203% (median 180%). Even if the program's reimbursement rate were to increase from 19.1 cents to 25 cents per lunch meal, in line with AFT's 2023 policy platform, the change would still result in an even greater ROI among this SFA sample (average 211%, median 194%).

What Food Service Directors are Saying:

"We limited overall purchasing across the board in order to meet the 30 percent threshold using dairy and a small amount of produce purchases solely."

"...I would be more likely to serve NYS products at breakfast instead of purposely limiting them."

"If the legislation were changed, I would spend a lot more on NYS apples and yogurt since I could count them at breakfast."

Will the expansion to breakfast negatively impact schools that do or do not serve breakfast?

Expanding this program to all school meals does not appear to negatively or positively impact SFAs that serve lower percentages of breakfast meals. Among the larger sample of 84 SFAs, there was a negligible correlation ($r=0.081$) between an SFA's current local purchasing percentage and their breakfast ADP as a percentage of total lunch, breakfast, and snack ADP.

Another concern is that this expansion may cause inequity for SFAs that serve large quantities of breakfast meals but are only reimbursed based on lunch participation. In the sample of SFAs in this study, the total reimbursement SFAs would receive if they qualified for the program represented as a percentage of their overall food budgets also shows very little connection ($r=0.02$) with how much breakfast they serve as a percentage of their overall ADP for breakfast, lunch, and snacks. In the future, it would be more equitable to provide SFAs with an additional reimbursement based on breakfast and lunch participation. **However, the unintended consequences of expanding to all school meals are far outweighed by the unintended consequences of a lunch-exclusive design.**

2. Change the Legislative Language to Allow for the CEP State Subsidy

Summary

The new 2023 Community Eligibility Provision (CEP) State Subsidy, which provides financial support to encourage more schools to participate in CEP, conflicts with the Initiative. Schools that participate in the CEP State Subsidy program will receive up to 58% less in the Initiative reimbursement than schools that do not benefit from this program. **This affects at least 70% of SFAs that applied for the Initiative in 2023 that have a collective enrollment of more than 60,000 students.** Using CEP data from NYSED as of October 6, 2023, these SFAs will receive collectively \$268,00 less in incentive reimbursement.

If New York were to shift to a full universal meals program, this unintended consequence would only heighten. However, if the legislative language for the Initiative changes from “State subsidy **shall not exceed twenty-five cents** per school lunch meal” to “**shall provide an additional**,” this program will continue to fully benefit New York’s schools, students, and farmers. By amending the legislation from a restrictive cap to a proactive provision, New York can pave the way for a future where every child has access to nutritious meals, and where communities flourish through robust support for local agriculture.

About the Community Eligibility Provision

The Healthy, Hunger-Free Kids Act of 2010 introduced CEP as a federal program to expand access to school meals. CEP essentially creates a “universal free school meals” program on a school or district level. To be eligible for CEP, a school within a district must have an Identified Student Percentage (ISP) of 25% or higher. Schools can also form groups to increase their ISP and maximize federal funding. Originally, CEP was available for schools that had 40% ISP, but this threshold was lowered to 25% in Fall 2023.¹⁴ This change is estimated to expand CEP to reach an additional 3,000 more school districts that would now be eligible for the program.¹⁵ **In New York, the CEP expansion has allowed over 400 schools to participate in CEP, with an additional 85 schools within two ISP percentage points to be eligible for CEP.**¹⁶

What are “Identified Students”?¹⁷

“Identified students” are students who are categorically eligible for free meals without the need for a household income application. For example, students are considered categorically eligible if they are enrolled in Head Start or Early Head Start, the Supplemental Nutrition Assistance Program (SNAP, formerly known as food stamps), and other similar federal assistance programs, or are homeless, migrant, runaway, or are in foster care. Additionally, the USDA began a pilot program in 14 states to directly certify students if they are enrolled in Medicaid.

As of October 2023, over 3,500 New York schools participate in CEP.¹⁸ Across the nation, one in three schools participated in CEP in the 2021-22 school year.¹⁹ This amounts to over 33,000 schools, which represent 16.2 million students, or nearly a quarter (22%) of all children under 18 in the US. Most schools that are eligible (74.3%) participate in CEP.

About the CEP State Subsidy

In 2023, the New York State government made a historic commitment to increasing school food access by establishing the CEP State Subsidy and budgeting \$134.6 million for the program.²⁰ Before the CEP State Subsidy, only schools with a high percentage of ISP students (>62.5%) would receive full reimbursement from the federal government for the meals they provided. Without this subsidy,

schools with ISP between 25-62.5% are not fully reimbursed by the federal government. This puts schools in a tough financial position because, even though they can serve free school meals to all students, they have no way of recouping the costs that are not covered by the federal government as they cannot charge students for meals. The CEP State Subsidy acts as a supplement to these costs, making it more appealing for schools to participate in CEP. Now, more New York schools can ensure all their students have access to free nutritious meals.

Using CEP data NYSED, the CEP State Subsidy would have benefitted over 200 SFAs under the former 40% ISP threshold and potentially support more than 400 SFAs under the new 25% threshold.²¹

30% NYS Initiative Bill Language:²²

"For additional funds to reimburse sponsors of school lunch programs that have purchased at least 30 percent of their total food products for their school lunch service program from New York State farmers, growers, producers, or processors, based upon the number of federally reimbursable lunches served to students under such program agreements entered into by the state education department and such sponsors, in accordance with the provisions of the "National School Lunch 37 Act," P.L. 79-396, as amended, to reimburse sponsors in excess of the federal and State rates of reimbursement, provided, that the total State subsidy shall not exceed twenty-five cents per school lunch meal, which shall include any annual state subsidy received by such sponsor under any other provision of State law, provided further that funds appropriated herein shall be made available on or after April 1, 2024 (55986)."

The Current Policy Challenge

The CEP State Subsidy inadvertently impacts the 30% NYS Initiative.

This is due to a technicality in how the Initiative was written. The bill language states that schools could get a maximum state reimbursement of 25 cents for each lunch served. In June 2023, NYSDAM released a memo explaining that schools that qualify for both the CEP State Subsidy and the Initiative will not receive the full reimbursement for lunches served in the “paid” meal category.²³ This is because the new CEP State Subsidy provides more than 25 cents for meals in the “paid” category. This change only affects CEP schools with an ISP between 25-62.5%. Schools with a greater than 62.5% ISP or schools that do not participate in CEP will not be affected by this change.

At least 70% of SFAs that applied for the Initiative in 2023 will receive less incentive reimbursement for the 23-24SY (43 SFAs, 73%) because of this issue, affecting more than 60,000 students enrolled in these schools.²⁴

Depending on the SFA’s ISP rate, their additional reimbursement from the Initiative can be as much as 58% less than the 19.1 cents originally intended in the legislation.²⁵

On average, SFAs affected by this conflict will receive 24% less in Initiative reimbursement than other schools not participating in the CEP State Subsidy in SY 23-24. Using CEP data from NYSED as of October 6, 2023, these SFAs will receive collectively \$268,000 less in incentive reimbursement. However, if more SFAs enroll in CEP because of the lowered 25% ISP CEP threshold, more than 80% of participating SFAs could be affected, and receive \$381,000 less in Initiative reimbursement.

This policy conflict poses a pressing equity issue, as schools participate in the CEP State Subsidy because they serve a large percentage of students with limited economic resources. It is inadvisable to provide some SFAs with less subsidy than others that reach the same local food purchasing goals. Not only can this legislative conflict decrease participation in the program, but it may also decrease overall spending on local foods, negatively impacting New York’s agricultural economy in its wake.

The 2023 survey asked FSDs about this issue. Nearly half (49%) of respondents shared they were impacted by the CEP State Subsidy. Among affected respondents, more than a third (36%) indicated they would be less likely to participate in the initiative without the full incentive reimbursement. This reduced Initiative reimbursement is dramatic enough for many SFAs to reconsider participating in the program. However, as a majority of the Initiative’s annual \$10 million budget continuously goes unspent, it does not seem as though providing these SFAs with the full reimbursement non-CEP SFAs receive would be financially burdensome for the State.

A Future with State-Supported Universal Meals

This legislative language conflict will become an even larger issue if New York adopts a state-level universal meals program. This is because, under a universal meals policy, the state government would provide schools an additional reimbursement to offset the cost of any lunch that is currently paid for by students. This additional state reimbursement to make these school meals free for all will exceed 25 cents for meals served to students whose financial status puts them in the “paid” or “reduced” price categories. As noted previously, the 30% NYS Initiative reimbursement allows SFAs to receive additional reimbursement **up to 25 cents**, which would drastically lower the Initiative reimbursement provided to schools that do not participate in CEP. Schools participating in CEP would still benefit from the program based on their ISP, with some SFAs still receiving a lower incentive reimbursement rate as explored above. **This policy conflict will ultimately result in SFAs not receiving the full 19.1 cents additional payment when they reach 30% local spending, rendering the Initiative essentially moot, and further lowering participation in the Initiative.**

What Food Service Directors are Saying:

“If the goal is to support the purchase of NYS products, then the incentive to participate in the program should not be discounted because the district is receiving CEP monies.”

“It still has to make financial sense. I will keep buying local food regardless because I believe it is the right thing to do, but I already have a hard time convincing other districts it’s worth the effort. If their 30% incentive is much lower because of higher state reimbursement from universal meals, I’m sure a lot of districts will choose not to bother with it at all.”

Policy Solution

This challenge can be easily solved with a tweak to the legislative language for the Initiative. Legislators can change the words “not to exceed” to “an additional” twenty-five cents to maintain equity and access among all schools. This design solution will in turn continue to support the program’s positive economic impact on New York’s agricultural economy.

“not to exceed” → ***“an additional”***

3. Change the Formula to Determine Qualification for Equity and Economic Impact

The perception that the 30% local goal is too high is a driver in low participation. However, reducing the 30% threshold to 25% is not the best policy solution to enhance accessibility for the program. Many SFAs with access to NY fluid milk will surpass or easily reach the goal with little purchasing behavioral change. Additionally, the goal would remain too high for (1) SFAs without access to NY fluid milk and (2) SFAs that currently purchase NY fluid milk, but do not serve it in large quantities. This remains true even if the threshold for qualification is kept at 30%.

Changing the way the local food purchasing threshold is calculated may be the best avenue to sustain demand for the numerous local products that have already been created for schools because of this program and increase access to the program. New York policymakers can require that SFAs purchase NY fluid milk to qualify for the program and change the formula to determine qualification in the Initiative. Our recommendation is to borrow the formula used in [Vermont's Local Foods Incentive Grant](#) to determine program eligibility. Under this formula, fluid milk purchases are subtracted from the overall food budget and SFAs that spend at least 15% of their overall budgets on local non-milk items will receive additional reimbursement.

Switching to another formula has many benefits, and would:

- Ensure that the Initiative **benefits NY dairy farmers**
- Maintain a **strong return on investment** of state program dollars
- Ensure SFAs **purchase a diverse variety of products** beyond NY fluid milk
- Allow **SFAs that purchase low levels of NY fluid milk to participate** without a disadvantage
- Allow **SFAs without access to NY fluid milk to participate in the program at a lower reimbursement rate** while providing them technical assistance and financial incentive they need to switch to NY fluid milk in the future.

Perceptions of the 30% Local Threshold

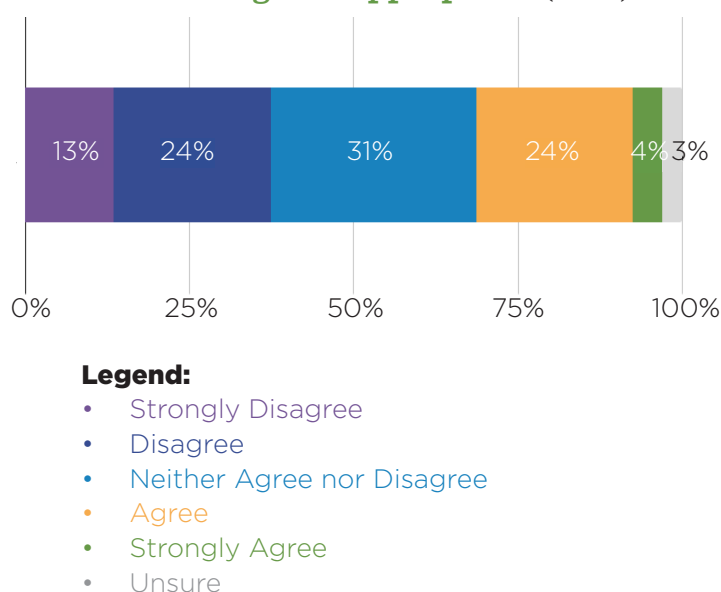
Perceptions that the 30% threshold is too high have been well documented in AFT's two previous reports:

- In AFT's January 2020 [Growing Opportunity](#) report, FSDs were asked about their main challenges related to the incentive program. **Well over half (62%) of FSDs responded that the "30% threshold was too high" was a definite barrier to participation.**²⁶

- In AFT's Fall 2020 *Growing Resilience* report, FSDs were asked to rate a list of program-specific barriers according to how detrimental each one was to their ability to reach 30%. **Collectively, survey respondents ranked that their highest barrier was that the 30% threshold was too high.**²⁷

In the 2023 survey, FSDs were asked to rate from 1-5 whether they believe the current 30% local NYS food procurement goal is an appropriate target to qualify for additional reimbursement. The responses to this question were mixed, with roughly a third of respondents each agreeing, disagreeing, or remaining neutral on the topic.

Figure 3. Percent of SFAs That Think the 30% Local Target Is Appropriate (n=67)



What Food Service Directors are Saying:

“30% is too high in my opinion...”

“I do find it very difficult to make the 30%. Extra funding in SCAF [Supply Chain Assistance Funds] definitely helped. Without this extra funding, meeting these targets in years to come will be difficult.”

“Lower the percentage needed to meet that goal is the most important. Also, to add Breakfast to the program.”

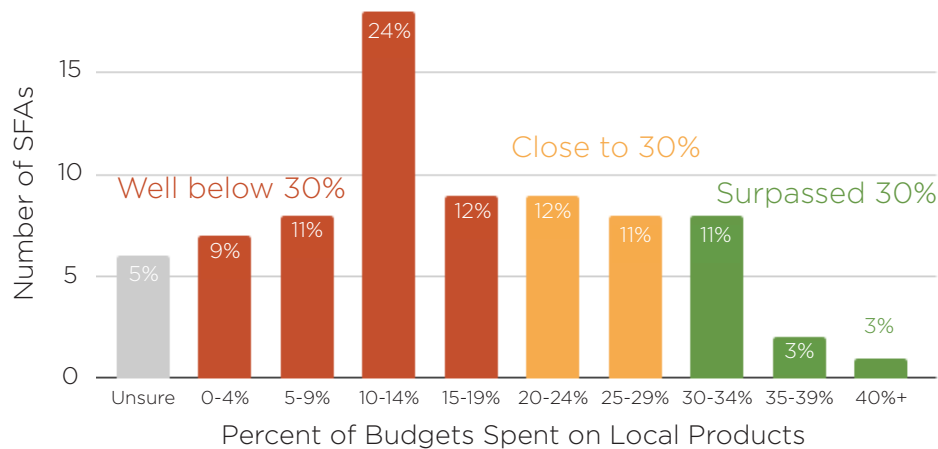
“I do think 30% may be too high. I think Directors need to see more meats available to them as that is still a huge piece. Some small farmers should be linked with some districts it can provide for, it can provide a cycle of growth for both sides.”

“I knew I wasn’t close to 30% prior to switch[ing] to a NY dairy”
This point about dairy is crucial to this recommendation and is explored below.

How Much Local Food SFAs are Already Spending

Figure 4 illustrates self-reported local purchasing data for SFA's overall food budgets. Of 2023 survey respondents, 15% reported they already serve above 30% local food for all school meals and an additional 23% of respondents believe they are less than 10% away from this goal.

Figure 4. Self-Reported SFA Local Food Purchasing for All School Meals (n=76)



School Food Authority Access to NY Staple Products

In the 2023 survey, FSDs were asked if they had access to three common products ("NY Staple Products"): fluid milk, value-added dairy, and apples. A vast majority (86%) of FSDs reported having access to NY fluid milk and three-quarters (74%) currently purchase NY fluid milk.

Figure 5. School Food Authority Access to New York Staple Products

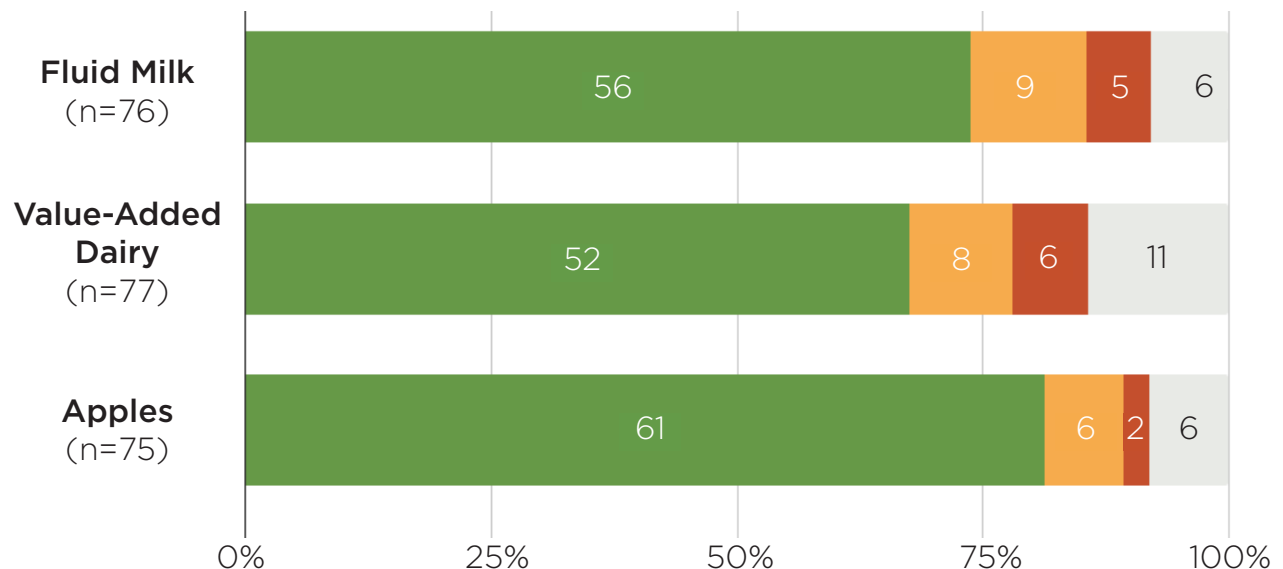


Figure 6. School Food Authority Local Food Purchasing Percentages for All School Meals Based on Shared Purchasing Information (n=84)

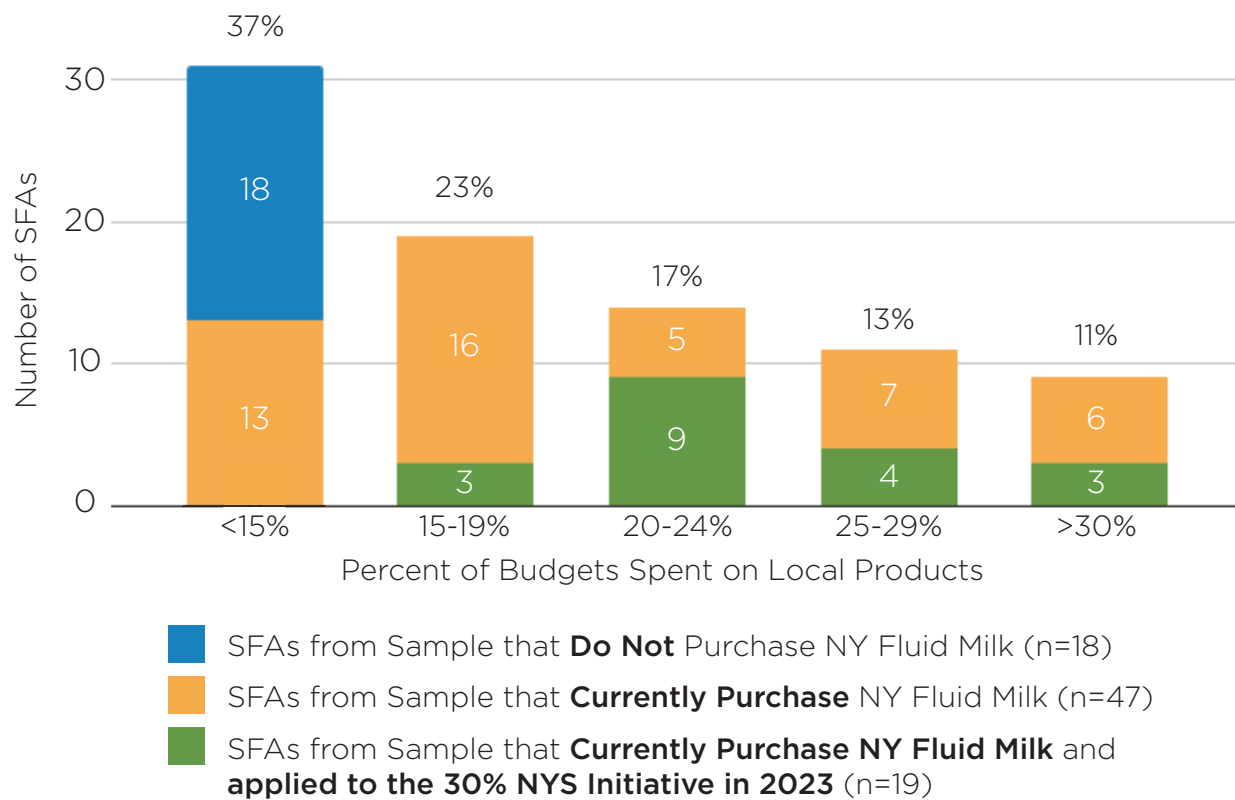


Figure 6 represents local spending patterns from SFAs that shared detailed purchasing information with the team. These results are slightly different than the self-reported estimates from FSDs. Highlights:

- More than 10% of these SFAs are already spending more than 30% of their budgets on local food (11%).
- More than a quarter of these SFAs are within 10 percentage points of the 30% local goal (28%).
- More than 10% of these SFAs are within five percentage points from the 30% goal, meaning they will likely reach the 30% goal if they were incentivized to purchase more local items at breakfast (13%).
- All SFAs in the sample that do not purchase local milk spend <15% of their budgets on local ingredients. More than a third of SFAs in the sample spend <15% of their budgets on local ingredients (39%).

More information on SFA spending patterns on NY Staple Products can be found in Appendix C.

Figure 7. Sample School Food Authority Local Food Spending Patterns for All School Meals by Category (n=84)

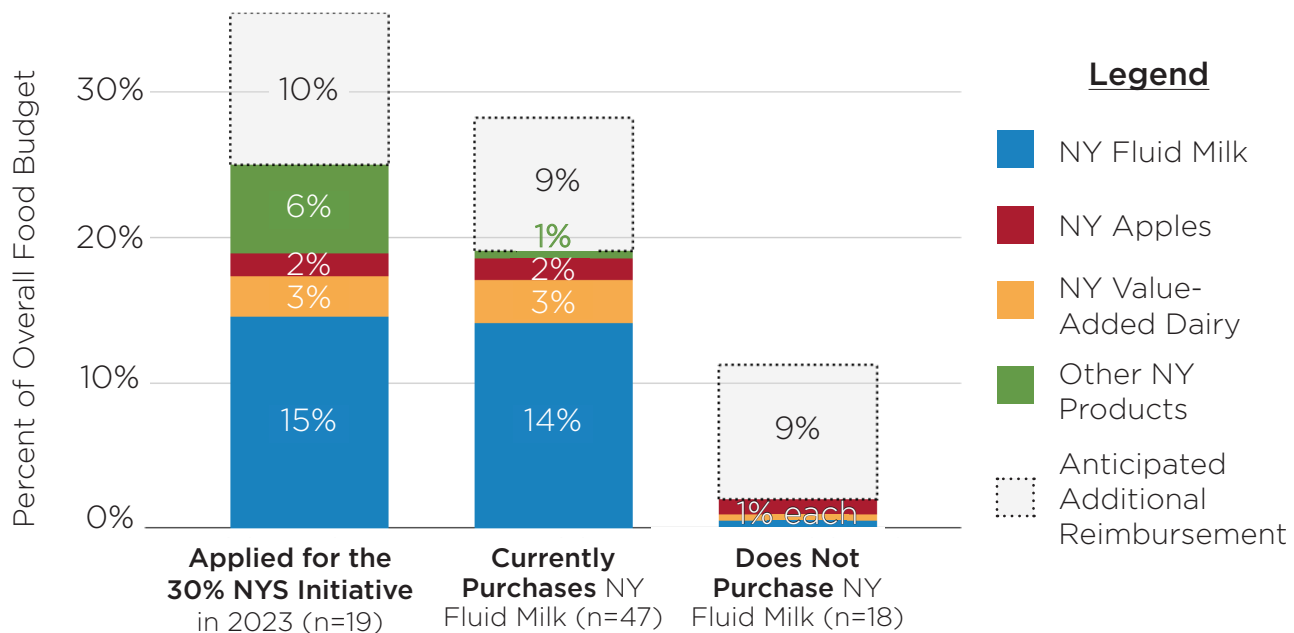


Figure 7 illustrates the “average SFA” from the sample for three main “NY Staple Foods:” fluid milk, value-added dairy, and apples, as well as all other NY products. The highlights from the average SFAs by category from this sample:

- **The average SFA that purchases NY fluid milk spends 14-15% of their overall budget on this product, 3% on value-added dairy products, and 2% on apples.** This totals approximately 19-20% of their overall budget on local foods, meaning the Initiative should still incentivize SFAs to shift 10-11% of purchasing to qualify for the program. This extra expenditure beyond NY Staple Foods seems to be almost entirely offset by the increased reimbursement (representing 9-10% of overall food budgets) that qualifying SFAs receive through the Initiative.
- SFAs that participated in the Initiative spent 5% of their budgets on all other NY products outside of the three main NY Staple Foods.

Calculating “Additional Reimbursement”

There is an additional spotted bar in Figures 7, 8, and 10 that indicates the overall reimbursement the SFA will receive if they reach the 30% threshold. This is calculated by multiplying the incentive rate (\$0.191) by the number of school days in a year (180) by the average daily lunch participation for the SFA from October 2022.²⁸ Average SFAs in this sample that reach the 30% threshold will be reimbursed an additional 9-10% of their lunch budgets. This figure is meant to demonstrate how much closer to 30% SFAs would be if they reinvested that back into their local food purchases. Another way of framing the “additional reimbursement” figure is to show how much the cost of local purchases can be offset by the additional reimbursement they are provided from NYSDAM if they qualify for the Initiative.

Reassessing the Role of Fluid Milk in Determining Qualification

- **Economic Impact:** Specific policy design can ensure SFAs will purchase more than NY fluid milk
- **Access:** SFAs cannot access NY fluid milk for reasons outside of their control
- **Equity:** Some SFAs that currently purchase NY fluid milk may still serve a low fluid milk percentage based on sociodemographic or health reasons

Ensuring SFAs Will Purchase More Than NY Dairy Products

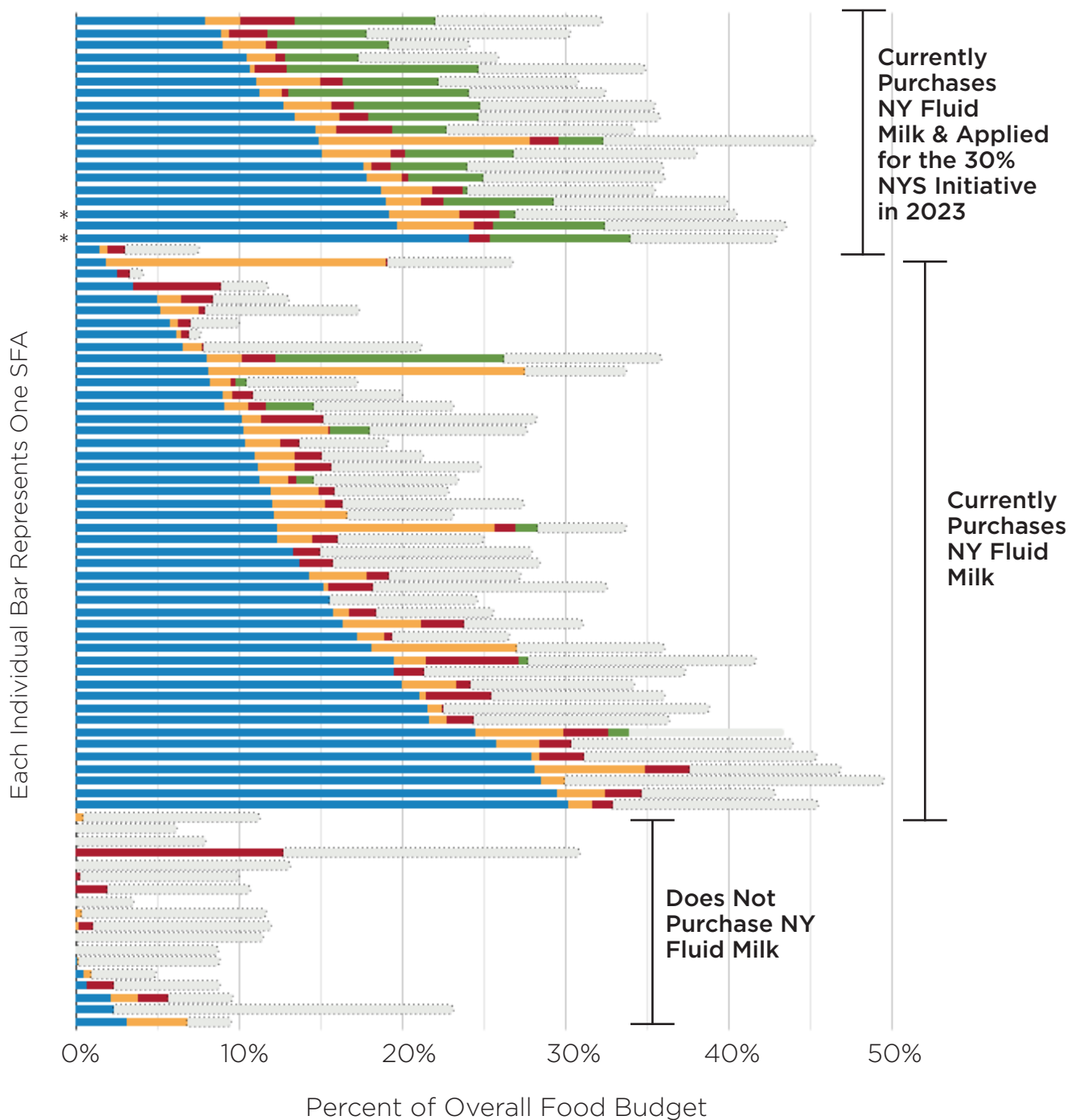
One of the main goals of this program is to improve market channels for local producers. A concern reiterated by several informants is that SFAs will not be further incentivized to purchase other products beyond existing purchases of dairy products without additional policy design measures in place. This is of great concern as more products have been developed to support schools in purchasing more local foods. Expanding the Initiative to all school meals may create an environment where many SFAs easily qualify based on NY fluid milk purchases, reducing the demand for other local products. If a goal for New York legislators is to provide market opportunities for multiple agricultural sectors, policy measures can be put in place to diversify the local products served in school meals.

Figure 8 represents these spending patterns on an SFA level. Each horizontal bar represents one SFA. The top section represents SFAs that applied for the Initiative for which we have full purchasing data, the middle section represents SFAs from our sample survey that purchase NY fluid milk, and the bottom section represents SFAs from our sample that do not purchase NY fluid milk. Though averages were shared in Figure 7, this figure is provided to demonstrate the diversity SFAs have in current local spending.

“[Headwater Food Hub] now has a line of frozen fruits and vegetables that are all New York State so that SFAs can reliably access local foods year-round. We also have done some product development of cooked black and kidney canned beans, based on school demand. We’re also working on crushed tomato sauce. So we’ve been doing some supply chain and product development as well. That’s been mostly driven by demand and sort of need from the 30% NYS Initiative.”

*- TC Washington,
Headwater Food Hub*

Figure 8. Breakdown of School Food Authority Local Food Spending Patterns for All School Meals (n=84)

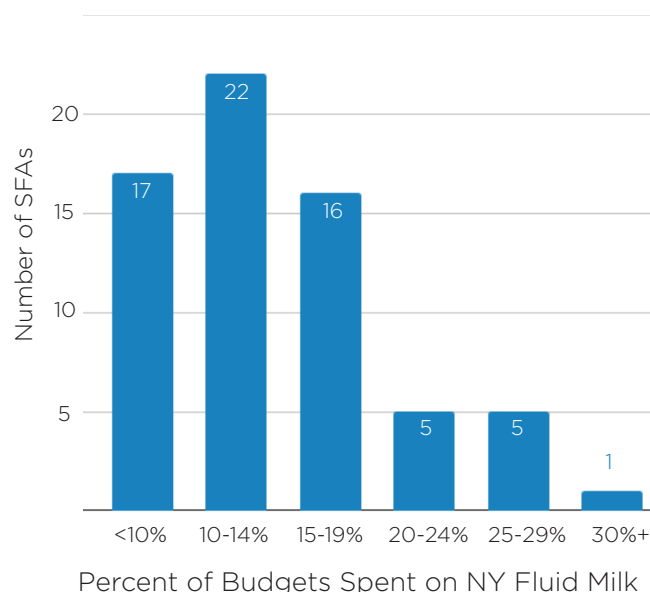


Spending on NY Fluid Milk vs. Anticipated Reimbursement

As demonstrated, the average SFA in this dataset that purchases NY fluid milk is only 14-15% away from reaching the 30% threshold based on fluid milk purchases alone. This means that many SFAs that purchase these staples must change their purchasing behavior to reach the 30% goal. However, some SFAs, depending on geography and situation, do not have to change spending patterns substantially to reach the threshold.

Figure 8 demonstrates that more than a quarter of SFAs that purchase NY fluid milk in this sample will receive at least a 100% return on all purchases beyond fluid milk that they need to purchase to reach 30%. At least one SFA purchases more than 30% of their budget on NY fluid milk alone, and 9% of this sample purchases more than 25% of their budget on NY fluid milk.

Figure 9. NY Fluid Milk Percentage of Overall Food Budgets Among SFAs That Purchase NY Fluid Milk (n=66)



Spending Patterns from SFAs that Applied to the 30% NYS Initiative

CCE Harvest New York's 2022 *Opportunities, Barriers, and Pathways to Success* report provides the most comprehensive analysis to date of what SFAs are purchasing to reach the 30% goal.²⁹ This report shares a similar phenomenon with some SFAs. Of the SFAs that qualified for the Initiative in SY 19-20:

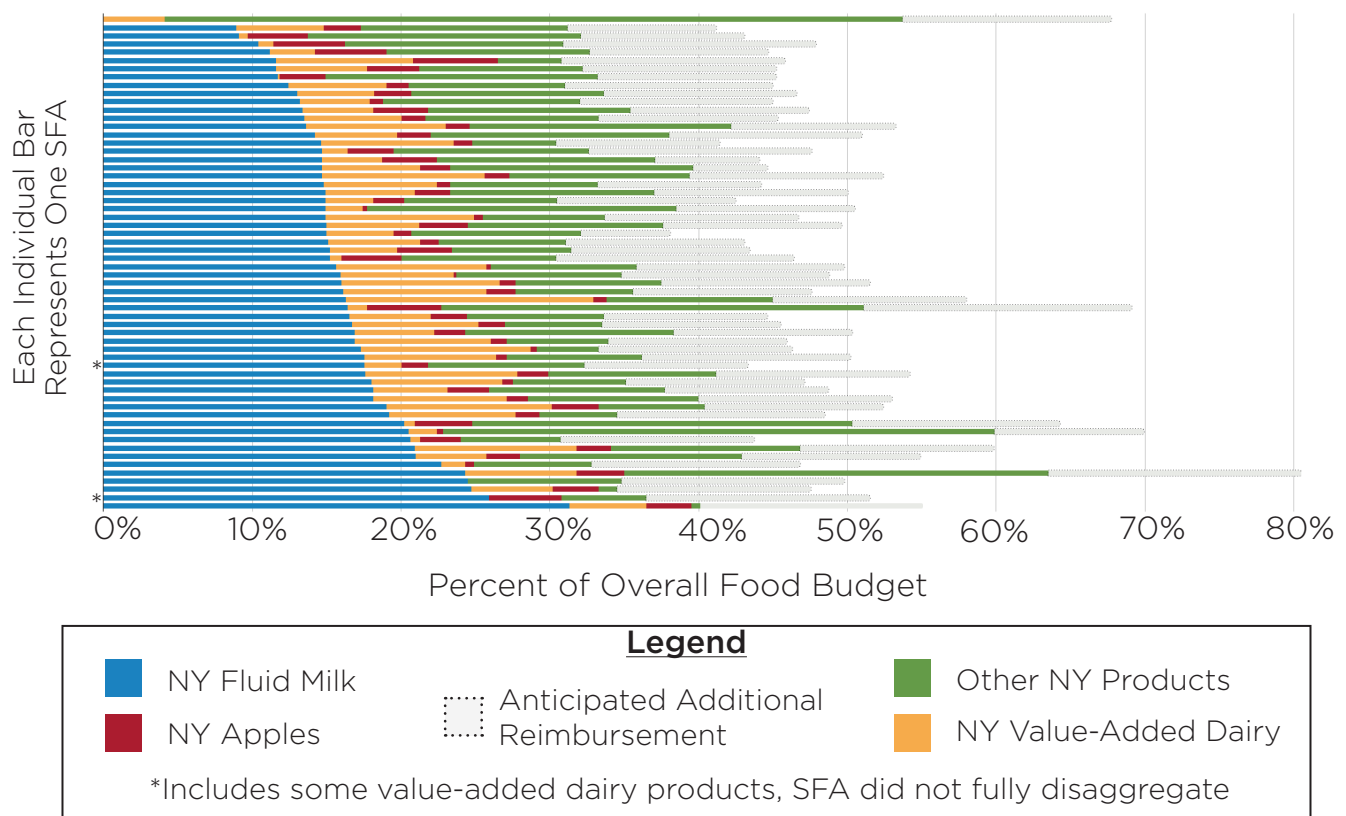
- **Two-thirds of local purchases were spent on local dairy and apples, two kinds of items 79% and 84% of the SFAs were already purchasing before the NYS Initiative was established, respectively.**
- **One-quarter of total lunch purchases were for all dairy products on average.**
- **Fluid milk represented one-fifth (20%) of total lunch purchases on average.** This means that the SFAs who qualified for the program only needed to shift an additional 10% of their total lunch expenditures outside of fluid milk.
- **Nearly a quarter of SFAs (12, 23%) qualified for the program solely on milk and value-added dairy purchases** (such as cheese, yogurt, sour cream, etc.), meaning dairy purchases represented more than 30% of their total lunch budgets.

In 2023, applications for the Initiative were less dairy-dependent yet had similar results: the average SFA that applied for the Initiative spent 16% of their lunch budgets on NY fluid milk, 6% on local value-added dairy products, 6% on local apples, and 13% on all other products. This means that the average SFA that applied for the program spent 28% of their lunch budget on “NY Staple products.” Only 10% of applicants reached the 30% threshold solely on milk and value-added dairy products. More than 60% of all reported local purchases from SFAs were spent on local dairy products. Figure 10 represents the spending patterns for the Initiative applicants in 2023.

Not all SFAs are this close to the threshold for additional reimbursement based on pre-existing purchases. Especially for cases like Buffalo City SD,

which reported 13% of its food budget spent on NY fluid milk for SY 22-23, SFAs have made substantial behavioral changes to participate in the program, resulting in positive economic impact.³⁰ In the case of multiple SFAs, achieving the Initiative is straightforward, as all expenses beyond local dairy are fully covered by the supplementary reimbursement. In many instances, the state is allocating funds to SFAs for the procurement of NY fluid milk, a product they are already buying, and providing a 100% reimbursement on all other local food purchases needed for SFAs to reach the 30% threshold. Based on this conclusion, it seems that developing language around NY fluid milk could lead to a more judicious allocation of state funding and inspire more behavioral change among SFAs.

Figure 10. Local Food Spending Patterns for Lunch among SFAs that Applied to the 30% NYS Initiative in 2023 (n=60)



SFAs Without Access to NY Fluid Milk Face Greater Challenges in Qualifying for the Initiative

Since offering fluid milk is a requirement for a reimbursable breakfast and lunch, purchasing NY fluid milk is a regular occurrence for all FSDs. This means that having access to NY fluid milk provides an easy boost in local food for most SFAs. Depending on the region, particularly in Western New York and the Southern Tier Region, NY fluid milk is the default for SFAs. FSDs in these areas do not have to spend considerably more on NY fluid milk, forge new relationships with local vendors, or spend more time processing and serving NY fluid milk. For the first four years of the Initiative, all SFAs that qualified had access to NY fluid milk. One SFA that applied for the 30% NYS Initiative in 2023 did not report any spending on NY fluid milk.

However, for the SFAs that do not have access to NY fluid milk, achieving the 30% local threshold is much more difficult without that substantial head start. The inclusion of dairy in the program has directly influenced many SFAs to switch to a local dairy vendor to qualify for the initiative. Independent

testimony from FSDs has shared that NY fluid milk can be more expensive than non-local fluid milk, and the additional incentive from the Initiative can financially support this transition. Known SFAs that have made the switch from non-local to local fluid milk include NYC Public Schools, several schools in the Hudson Valley, and roughly a dozen SFAs in Long Island.

Despite this clear boon for the dairy industry, many SFAs face challenges in accessing dairy for a variety of reasons:

- **Small districts:** Some schools are too small to meet the purchase minimums required for local milk distributors to deliver to these schools.
- **Districts in particular regions:** Until 2023, SFAs on Long Island had difficulty accessing NY fluid milk. Though considerable effort has been made to increase access to these products with some success, lack of access to local milk has caused entire regions including and beyond Long Island to not participate in the Initiative.

What Food Service Directors are Saying:

“One of the [SFAs] ... does not get New York milk because they are too far out in the middle of nowhere. The vendor that we work with, that other schools work with, isn’t willing to travel out there. Getting the 30% for [this SFA] is just not possible. It technically is possible, but they would have to spend so much money. Yes, there are really easy switches: ground beef, apples, and shredded cheese. There are already some really great New York products that are easy switches, but sometimes the price is double, if not triple, and the budget just isn’t there for that... Even with [additional reimbursement from] the 30%.”



Hamburg Central School District
Credit: Nancy J. Parisi

FSD Spotlight: Regan Kiembock, Southampton Central School District

Long Island's Southampton Central School District encountered several specific challenges in their endeavor to source locally produced milk for their school district. Initially, when they attended the retreat at AFT's Farm to School Institute in 2019, they discovered that Long Island was one of very few regions not receiving local milk. This revelation highlighted a significant regional disparity that needed to be addressed.

The main hurdle they faced was during the initial bidding process. Despite their efforts, they received no bids from potential local suppliers. This setback forced them to reassess their approach and refine their bidding requirements. One notable requirement they initially included was the request for milk refrigeration equipment, a standard provision offered by their previous distributor. To overcome this barrier, the requirement for refrigeration had to be removed. However, this became a point of contention, as some schools became reluctant to switch distributors for fear of their existing milk coolers being removed by their current milk suppliers.

In addition to these logistical challenges, there were financial considerations. Southampton is paying 34 cents per carton of NY fluid milk, whereas they paid 23-24 cents per carton for non-local milk. The NY fluid milk came with a minimum order requirement of six cases per school and a \$6 charge for each milk crate. While these costs were necessary to secure a local source of milk, they did pose a new financial burden to the school district.

Undeterred by initial challenges, Southampton CSD sought out invaluable contacts with farm to school coordinators and collaborated with a dedicated team of educators and nutrition directors across Long Island. Through their efforts, they established a cooperative network of 7-12 districts, which eventually led to the successful bid for local milk in January 2023. After four years, the district is now purchasing NY fluid milk. Their new milk distributor also carries other local products beyond fluid milk that the district now purchases and serves to students.

SFAs That Source NY Fluid Milk May Still Face Challenges in Meeting the 30% Threshold

SFAs that currently purchase NY fluid milk demonstrate a wide range of spending on this product. Figure 8 demonstrates that an SFA's local spending on NY fluid milk can range from <1% to greater than 30%. Figure 9 shares that more than a quarter of SFAs in this sample that source NY fluid milk spend <10% of their budgets on this product. This may be for a variety of reasons:

- Diverse schools and lactose intolerant students:** One FSD shared that they have lower milk participation because of their high percentage of BIPOC students, particularly of Hispanic/Latino and Asian descent. These students have higher rates of lactose intolerance and may consume more plant-based milk alternatives.³¹
- Low milk consumption due to schools not serving chocolate milk:** One FSD shared that their school does not serve chocolate milk due to a decision by the school to serve only low-sugar, nutritious options to students. Due to this decision, milk sales are only 2% of this SFA's overall spending, which is far lower than the sample average SFA fluid milk percentage of 14-15%.

This kind of volatility dramatically changes how much an SFA must change their local purchasing behavior to qualify for the Initiative. Some SFAs will have to serve more than 25% of local products beyond milk, whereas others may qualify mostly based on milk purchases. The inequity in labor required to participate in this program poses an accessibility issue.



Buffalo Public Schools
Credit: Josh Baldo

Possibilities for Formula Change to Ensure Diverse Local Spending

New York is one of three current LFPIs that subsidize fluid milk purchases.³² Most states do not include fluid milk in their programs because policymakers believe schools in their states are already regularly serving locally produced fluid milk. They deduced that including fluid milk purchases would likely not increase revenue for their agricultural sector, and rather, would subsidize purchases that were already being made. This is not an issue in Alabama, which includes fluid milk in its Farm to School Incentive Program, as there is very little production in the state. In its first year, Utah's Farm to Fork Enhanced State Reimbursement included fluid milk to make tracking easier for FSDs but excluded it from the program in year two to ensure SFAs were not reliant on existing fluid milk purchases to qualify for additional reimbursement.³³

The dairy industry is one of the main agricultural sectors in New York State. It also has one of the highest economic multiplier effects among food categories.³⁴ For these reasons, Initiative advocates find it imperative to boost NY fluid milk purchasing through the program. There are several design solutions that keep NY fluid milk in the Initiative while incentivizing SFAs to purchase more fresh, nutrient-dense local food beyond NY fluid milk.

Option 1: Place a Cap on NY Fluid Milk Purchases

A straightforward approach to prevent SFAs from depending solely on NY fluid milk purchases to meet the reimbursement criteria is to impose

a limit on the amount of NY fluid milk they can count towards the 30% target. The appropriate cap would be 15% overall food budgets, or half of all local purchases could be spent on NY fluid milk. This is aligned with the current purchasing patterns of Initiative applicants, where 82% of SFAs spent less than half of all local purchases on NY fluid milk. In the SFA sample, 68% of SFAs would be spending less than half of local purchases on NY fluid milk if they reached 30% local spending.

This design would ensure diverse spending on local products, should not add administrative burden on SFAs or NYSDAM, and should only affect SFAs that are hyper-reliant on NY fluid milk purchases to reach 30%. However, this design would still foster an environment where SFAs that do not purchase NY fluid milk or purchase it in low amounts are at a disadvantage.

Option 2: Reimagine the Formula for SFA Qualification

Changing the way the local food purchasing threshold is calculated may be the best avenue to increase the accessibility of the Initiative and sustain demand for the numerous local products that have already been created because of this program. New York policymakers can require that SFAs purchase more than 75% of fluid milk from local suppliers to qualify for the program and change the formula to determine qualification in the Initiative. Our recommendation is to borrow the formula used in Vermont's Local Foods Incentive Grant to determine program eligibility ("the Vermont Formula"). Under the Vermont Formula, fluid milk purchases are subtracted from the overall food budget and SFAs that spend at least 15% of their overall budgets on local non-milk items will receive additional reimbursement.

What is the “Vermont Formula?”

$$\text{Local \%} = \frac{\text{Non-Fluid Milk Local Food Purchases}}{(\text{Total Food Costs} - \text{Fluid Milk Costs})}$$

This change should not create complicated tracking and reporting requirements because SFAs can attain purchasing records (velocity reports) from their fluid milk vendor and subtract this from their total food cost amount. SFAs can additionally use object and function codes to track fluid milk, local, and non-local purchases, which the Vermont Agency of Education recommends to its SFAs.³⁵ As a rough estimate, SFAs would be required to spend 15% of their budgets on non-milk local products, though this will vary based on the SFA’s actual purchasing patterns. At the end of the year, NYSDAM can request that SFAs submit these velocity reports from fluid milk vendors, which will allow the state government to understand the full impact of the Initiative on the agricultural economy.

Additionally, this formula change should be accompanied by a “Special Hardship Category” for SFAs who do not have access to NY fluid milk. This category is explored in the following pages.

The Economics of the Vermont Formula

For SFAs that purchase NY fluid milk, the state’s ROI using this formula would be greater than the current ROI observed from the 60 SFAs that applied to the Initiative. With a reimbursement rate of 25 cents, this program would yield an average ROI of 269% using the Vermont Formula and with an average total local food spending percentage of 27%.

Would this change negatively impact SFAs currently participating in the Initiative?

Most SFAs (87%) that applied to the 30% NYS Initiative in 2023 should be able to reach this new goal with relative ease.

Without full access to all SFA purchasing patterns that applied to the 30% outside of lunch, we calculate that at least one-third of the SFAs that applied to the Initiative in 2023 would automatically qualify for the program under this new threshold. An additional 53% of these SFAs are within five percentage points from the 15% goal. These SFAs are likely to qualify for the program once fluid milk spending for school meals (not just lunch) is taken into account. Additionally, these SFAs will be incentivized to purchase more NY products for breakfast and snack meals, which will continue to increase these SFAs’ local food purchasing percentages.

Table 1. Return on Investment Using The Vermont Formula at a 15% Threshold with Overall Milk Purchases Included

n = 66	SFA Local %	\$0.20 Rate	\$0.25 Rate
Average	27%	362%	269%
Median	26%	251%	181%

Create a Special Hardship Category

A Special Hardship Category would undoubtedly increase access for SFAs that have been historically left out of this program. It will allow the Initiative to be more equitable, boost the local agricultural economy, and act as a smart investment of state dollars. This design will incentivize these SFAs to purchase more local foods while continuing to provide a financial incentive to switch to NY fluid milk. The idea for a Special Hardship Category was originally proposed in AFT's 2020 *Growing Resilience* report and is expanded further in this section.³⁶

Who is This Category For?

SFAs that want to participate in this program, but face difficulties reaching the current local threshold because they:

1. Do not have access to NY fluid milk.

SFAs can be asked to submit short testimony as to why they cannot access local milk and what attempts they have made to switch to local milk. Direct additional support in the form of technical assistance can help the remaining SFAs not currently purchasing NY fluid milk to eventually make the switch.

2. Source more than 75% of fluid milk locally, but spend <10% of their total budget on fluid milk.

These SFAs can elect to be included in the "Special Hardship Category" if New York does not adopt the recommended Vermont Formula and continues with the 30% threshold.

The Economics of a Special Hardship Category

Table 2 tests how different incentive rates (12.5 and 15 cents) would yield positive ROI using the Vermont Formula. The 12.5-cent reimbursement rate is high enough to incentivize SFAs to purchase more local foods, but provides half the reimbursement rate provided to SFAs with NY Fluid milk, which will provide a financial incentive for SFAs to switch to a local provider. Additionally, when an SFA switches to NY fluid milk, the doubling of their reimbursement should help offset any additional cost from purchasing NY fluid milk. The 15-cent reimbursement is the current rate Vermont offers its SFAs when they reach 15% local using the Vermont Formula, which does not require local fluid milk purchases. With a rate of 12.5 cents, the average ROI in the sample is 300% (median 200%).

Table 2. Special Hardship Category Return on Investment Using the Vermont Formula for SFAs that Do Not Purchase NY Fluid Milk

Results for a 15% Local Threshold			
n = 18	SFA Local %	ROI with \$0.125 Rate	ROI with \$0.15 Rate
Average	13%	299%	232%
Median	14%	201%	151%

4. Provide Financial Safety Nets to Increase Participation

The performance-based model inherently contributes to the accessibility challenges of the Initiative and is a reason why some SFAs do not participate. As incentives tend to work in districts that have existing resources (administrative capacity, available funds, etc.), the concept of providing an incentive program that awards schools for their successes rather than providing adequate funding to support school districts in buying local food also poses an equity issue.

Reimbursement is Not Guaranteed for SFAs

Nearly 90% of all LFPIs (except NY and VT) ***guarantee that participating SFAs receive some reimbursement for local food purchases***.³⁷ New York and Vermont's programs present even greater equity issues for schools that do not reach the incentive threshold because reimbursement is not guaranteed. For example, if an SFA in New York spends 29% of their lunch budget on local food but does not reach the 30% benchmark, they will not receive any reimbursement for local food purchases. Some SFAs, especially those in areas with limited financial resources, cannot take this risk to participate in the program.

LFPIs across the nation are typically administered in one of three ways:

Performance-based programs:

The 30% NYS Initiative was the first performance-based program to be developed. In this model, SFAs will receive additional reimbursement if they reach a specific local food purchasing threshold. Currently, three of the 17 LFPI programs have performance-based eligibility (New York, Vermont, and Utah).

Grant programs:

Grant programs are the most common among states with LFPIs, with at least ten LFPIs using this approach. Grant programs can be designed to reimburse schools for only food purchases or a combination of food and non-food purchases. Depending on how they are designed and the overall funding level, grant programs can be non-competitive or competitive.

At-will programs:

In this model, all SFAs are entitled to reimbursement for local food purchases as long as they properly submit a request for reimbursement. This system is different from a grant program because SFAs do not have to first apply for or accept an award in order to participate.

What Food Service Directors are Saying:

*“I have participated in the program since its inception. **This is the first year that we do not qualify and I am heartbroken about it.** I think it is a great program and I would love to see it continue and I would love to see it transformed to include purchases from all meals.”*

*“Doing the work, **spending the money and not qualifying is a fear.**”*

*“30% is too high in my opinion, and **if you miss the mark by a very small margin, you get nothing.**”*

*“We are a new SFA, we were under GST BOCES which is when we qualified for NY 30. **We were very close this year.**”*

“Having the assistance from our Cornell Farm to School coordinator was amazing! Even though we missed it by a few thousand dollars, she helped make the process easier. It is very daunting trying to figure out when, where and what when trying to feed children.”

“It’s very challenging to track the NYS items throughout the year since you don’t totally know where your food cost is going to be, especially post-COVID.”

In the 2023 survey, 12 FSD respondents shared that they previously attempted to qualify for the Initiative but were unsuccessful.

Reasons why SFAs were unsuccessful in qualifying for the 30% NYS Initiative include: almost reaching 30% but not applying, mistakenly thinking they met the 30% requirement but being disqualified during the audit, and becoming discouraged and stopping mid-way through the year.

In the past, several FSDs included local food products as part of their local food percentage that were later disqualified during the program audits. This can happen if the product is not local or if the SFA cannot provide sufficient documentation for a local product. If this happens to a large extent, the SFA's local purchasing percentage can be lowered below 30%, disqualifying them from the program and additional reimbursement. FSDs may also spend what they believe to be 30% of their budgets on local food, but since food costs change drastically from month to month, SFAs may become disqualified if they miscalculate what their 30% goal is and do not purchase enough local food.

The aim of achieving a 30% local purchasing target is commendable. However, exclusively rewarding SFAs that meet this benchmark may not be conducive to fostering growth for those who stand to gain the most from extra funding for local foods. One FSD who tried to qualify for the Initiative but did not reach 30% shared multiple times that they had “failed.”

The framing of winners and losers seems counterproductive to a healthy farm to school movement that adequately supports schools to purchase local food and celebrates the hard work of FSDs for supporting the local economy.

Lastly, another FSD shared the challenge of purchasing NY fruits because of extreme weather-related events, like late frosts and flooding. Similar challenges are also being experienced by FSDs in Vermont.³⁸ In a future impacted by climate-change weather-related events, fluctuations in the availability of fresh local foods will make it difficult for SFAs to reach a specific threshold without relying on processed shelf-stable or frozen local items to reach the local goal.

What Food Service Directors are Saying:

“I have no idea what this coming year is going to bring. We already can’t get New York apples because of the weather. We can’t get New York watermelons. The weather has not cooperated with us so far. I feel bad for the farmer because they’re losing the business, let alone we can’t even serve the product.”

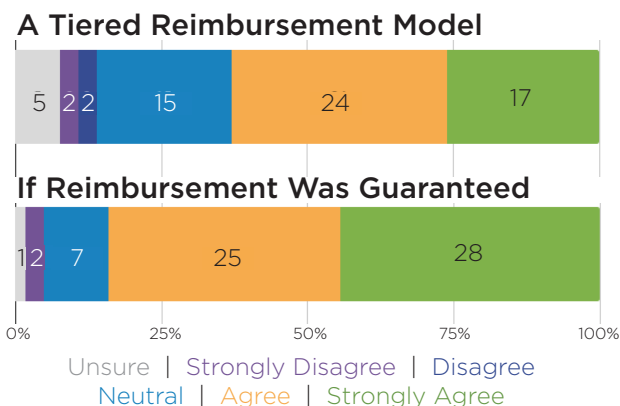
Increase Participation Through Financial Safety Nets

In addition to making the program more equitable, *financial safety nets* would also increase program participation. Financial safety nets can be incorporated in two ways:

- **Tiered Reimbursement Model:**
Both survey respondents and interview informants shared a positive response about this model. Nearly two-thirds of survey respondents agree or strongly agree they would be more likely to participate if the Initiative had tiered reimbursement.
- **Guaranteed Reimbursement:**
84% of survey respondents agree or strongly agree that they would be more likely to participate if reimbursement was guaranteed.

These responses show a desire to participate in the program but highlight the need for an onramp to foster increased local purchasing. Another benefit to higher participation is that NYSDAM can better understand and report the positive impacts of school food purchasing on the local agricultural economy.

Figure 11. Number of FSDs Who Would Be More Likely to Participate Under Different Models



“Without the tiers, I do not think I would necessarily be in favor of the performance-based model.”

*- Kate Wheeler,
Utah State Board of Education*

1. A Tiered Reimbursement Approach

A tiered reimbursement approach is a type of performance-based LFPI design in which qualifying SFAs are awarded a higher incentive reimbursement rate if they purchase a higher percentage of their budget on qualifying local food products. As mentioned above, there are three performance-based models in the nation: New York, Utah, and Vermont. Both Utah and Vermont offer tiered reimbursement.

LFPI program coordinators from Utah and Vermont were interviewed for this project. Both shared a preference for a tiered reimbursement approach rather than a singular threshold because of its ability to foster participation for less experienced SFAs while simultaneously encouraging SFAs to continuously increase their local purchasing percentages. Both coordinators also do not believe a tiered reimbursement approach increases the administrative burden on the state agency. However, if participation in the Initiative increases dramatically because of its expansion to all school meals and financial safety nets, more staff time may be required from NYSDAM to review applications and verify local purchasing.



Vermont's Local Foods Incentive Grant

Established 2021

Legislation: H.106 (Act 67)

How Local Percentage is Calculated

The percentage is based on the SFA's food expenditures for the entire previous school year. Fluid milk and non-reimbursable meal costs are removed from the total food expenditures formula. Vermont does not require SFAs purchase local fluid milk to participate in the program.

Reimbursement Calculation

The SFA will receive an additional subsidy multiplied by the number of lunches served during that year. The additional subsidy rate varies based on the SFA's local purchase percentage. This award is provided in one lump sum to the SFA if they qualify for additional reimbursement.

Table 3. Tiered Reimbursement Rates in Vermont

Local Purchase %	Additional Subsidy
<15%	None
15-19.9%	15 cents
20-24.9%	20 cents
>25%	25 cents

Additional Equity Provisions: The Baseline Year Grant

Vermont has a "Baseline Year" grant, where all SFAs that apply for the program are provided 15 cents per lunch they serve regardless of their local purchasing percentage. During this baseline year, SFAs are supposed to increase their local food spending and track all local purchases. After the baseline year, SFAs must spend at least 15% of their overall food budget on local food to qualify for additional reimbursement.

Considerations

Vermont has also had issues with SFAs trying to reach the local purchasing goal and missing the mark by a small margin. In SY 22-23, two SFAs were within two percentage points of reaching the 15% threshold to qualify for Vermont's incentive grant.³⁹ This indicates that a 10% tier would better create an on-ramp for SFAs just starting local food purchasing.

Why it is Important to Use the Vermont Formula with a Tiered Approach

As demonstrated in the previous section, NY fluid milk percentages fluctuate dramatically from 1%-30% of overall budgets, which makes it difficult to gauge what a proper reimbursement should be. Even if a tiered reimbursement approach was based on 25% of overall purchases including fluid milk as the lowest threshold, this design would still be relatively inaccessible for SFAs without access to local milk. Additionally, as demonstrated in the previous section, a lowered threshold would allow SFAs that already purchase NY staple products to qualify for additional reimbursement without much behavioral change.

Shifting the threshold calculation to the Vermont Formula presents a great opportunity to adopt a tiered approach because fluid milk purchases are removed from the program. A tiered approach under the Vermont Formula will increase equity, ensure SFAs are changing purchasing behavior, and can increase economic activity by providing an incentive for SFAs to continuously increase their local purchasing percentages.

The Economics of a Tiered Reimbursement Approach

Table 4 shares that the ROI from a tiered reimbursement approach generates relatively the same ROI in each local spending threshold. The state can also leverage an even higher ROI by providing a substantially lower incentive rate for any SFA that sources less than 15% locally, and would create a greater incentive to reach at least 15% local spending.

Table 4. Return on Investment for a Tiered Reimbursement Approach Using the Vermont Formula and Requiring SFAs to Purchase NY Fluid Milk

n = 66	10% Threshold		15% Threshold		20% Threshold		25% Threshold	
	SFA Local %	ROI \$0.15 Rate	SFA Local %	ROI \$0.25 Rate	SFA Local %	ROI \$0.30 Rate	SFA Local %	ROI \$0.35 Rate
Average	23%	402%	27%	268%	31%	265%	36%	262%
Median	262%	300%	26%	179%	30%	173%	35%	166%

2. A Guaranteed Reimbursement Approach

Guaranteed reimbursement can happen in a relatively uncomplicated manner through the two other LFPI designs: grant-based or at-will models. Exploring a grant-based model was outside the scope of this project, but grant programs can be designed to improve accessibility and equity while maintaining economic impact. This topic is revisited in the Additional Considerations section.

Utah's Farm to Fork Enhanced State Reimbursement is the only current example of a performance-based LFPI that guarantees reimbursement for local food purchases. See below for more details.

The Economics of Guaranteed Reimbursement

As demonstrated in Table 4, any incremental, proportionate change in both local spending percentage and reimbursement rate would return an average ROI of 260%. There is still much that remains uncertain about how a guaranteed reimbursement would increase programmatic costs to the state and how this would impact an SFA's overall incentive to purchase more local foods. However, such an approach can remain a positive investment for the state, make the Initiative an equitable program, and offer support for SFAs to purchase local foods regardless of their experience in local food purchasing.



Utah's Farm to Fork Enhanced State Reimbursement

Established 2021

Legislation: Board Rule R277-727

How Award is Calculated

There is no set local purchasing percentage SFAs must meet to participate in the program. Utah disburses its total program budget each year, dividing the funds proportionately to participating SFAs based on their local purchasing percentages above fluid milk. Participating SFAs, if they purchase even 1% of their budgets on local products, will receive some reimbursement.

Considerations

SFAs in Utah have expressed hesitation to participate in the program if they do not know what their increased reimbursement rate will be. It is best to include a reimbursement rate to allow SFAs to make an informed decision, but since Utah has a limited budget, they are unable to do this under their current design.

Remaining Concerns for a Performance-Based Approach

The 30% NYS Initiative Competes with the USDA Pilot Project for Unprocessed Fruits and Vegetables (Pilot)

The State of New York participates in the Pilot Project, which is an eight-state project of the USDA that was authorized in the 2015 Farm Bill. The program offers participating schools the flexibility to spend USDA funds on local products. A 2018 national evaluation of the program found that 65% of the funds that SFAs received under the Pilot program were spent on local produce.⁴⁰

Even though local products may be available through the Pilot or other federal programs, any purchases of local foods from entitlement funds do not technically count toward an SFA's 30% threshold. This is because these purchases are not typically reflected in program budgets as they are part of separate entitlement accounts provided to SFAs. In CCE's previous reporting, the authors found that **the most common strategy to navigate this policy conflict was to decrease spending on local products sourced from the Pilot and similar federal programs to ensure they could maximize their local food threshold for the Initiative**. CCE's findings are supported by the 2023 survey: six FSDs decreased spending on local products from federally subsidized programs because they do not count towards the 30% goal.⁴¹

While it is unclear how much of the local purchasing from the Pilot and other programs is reduced as a result of this conflict, it is evident that this practice does not effectively bolster the local agricultural economy. It would be advantageous if both programs were not in direct competition with one another. Moreover, it would be prudent for the New York's LFPI design to encourage SFAs to prioritize the purchase of local food within federal programs as much as possible.

It is uncertain at this time how both a performance-based LFPI and federal programs that provide local food to SFAs can coexist synergistically. Four other states with active LFPIs also participate in the Pilot program: California, Michigan, Oregon, and Washington. These four states all administered their LFPIs as grant programs. Grant LFPIs do not have a similar unintended consequence because SFAs are not trying to achieve a particular purchasing threshold and are thus not concerned about what counts towards this goal. In Michigan, the 10 Cents a Meal program requires grantees to provide a 1:1 match for purchases of eligible local foods. The Michigan Department of Education (MDE) incorporates the Pilot program by allowing purchases of local foods through the Pilot to count towards the grantee's match requirement.⁴² For Michigan, this match-style program circumvents the "double dipping" concern and still provides additional incentive for SFAs to purchase locally through federal channels.

Current Framing Leaves SFAs to Not View the Program as Worthwhile

The current messaging of the program may lead to it being perceived as “not worthwhile.” Even if the Initiative increases to a 25-cent incentive rate to accompany the legislative wording change, many food costs will continue to increase. Additionally, if New York includes the additional provisions mentioned in the previous pages, the program may still appear confusing and not worthwhile. One concern with a program that provides SFAs with a reimbursement per meal, rather than reimbursing food costs using invoices such as in a grant model, is that it makes the program vulnerable to negative marketing and messaging. Although the 2023 survey did not specifically ask FSDs about the incentive rate (currently 19.1 cents per lunch meal), FSDs shared extensive feedback in the open comment fields expressing doubts about the program’s value (seen on next page).

Wendy Crowley from MDE discussed the transition of the 10 Cents a Meal Program (Michigan’s LFPI) in 2022. Previously, the program provided reimbursement for each meal that featured local food. Now, it offers SFAs a 50% rebate on their local food purchases. Instead of individual meal reimbursements, the state determines a maximum award based on the previous year’s total meals multiplied by 10 cents per meal. This change has been well-received by FSDs in Michigan, who see a 50% reduction in their invoices up to their total grant award as much more appealing. However, MDE still faces resistance from some FSDs who see the words “10 Cents” and question if the effort is justified for only 10

cents. Continual efforts are made to help some FSDs view the program as worthwhile.

Most SFAs will have to spend far beyond what they receive in reimbursement just to qualify for the Initiative. It is important to consider how Initiative advocates can reframe the program as a tool to **offset** the cost of local food, rather than **fully reimburse** SFAs for local foods. This rebranding can allow the program to appear more worthwhile for SFAs.

Considerations for Transitioning the Initiative to a Grant-Based Model

Although the four main recommendations of this report will increase the accessibility of the Initiative, they will not inherently solve the two concerns raised above. At this time, it is uncertain how a performance-based LFPI model can be designed to incentivize SFAs to use federal funds for local foods and reduce negative messaging about the Initiative. Transitioning to a grant-based LFPI model can alleviate both of these concerns. This point is explored further in the Additional Considerations section.

What Food Service Directors are Saying:

“The cost of NYS products is far greater than the \$0.19 return.”

*“I have found it difficult to get documentation from local growers about the nutrition and equivalents of food. Also, the cost is much higher. Also finding the time to do all the additional paperwork. **All in all, it’s not really worth the \$0.19.**”*

“The program as currently structured is overly cumbersome on tracking and reporting. The extra costs associated with procurement and product usage are a wash at best with the reimbursement amount. The whole program seems to be more of a marketing ploy for the Districts and with a State that does not want to actually support and pay for students to have healthier local foods.”

“I would have to do a cost analysis on the cost of the NYS products versus the reimbursement received. We are not looking to make money off of the reimbursement, just break even with the added costs of the local products and additional labor & equipment needed.”

“Challenges: it costs \$0.19 per meal (maybe more) to receive \$0.19 per meal - additional food cost, and time - lots of time. But, it’s the right thing to do for our kids and families, NY Farmers and other Businesses...”



General Recommendations



Buffalo Public Schools
Credit: Josh Baldo

1: Continue Funding the Farm to School Grant Program and Regional Coordinator Positions

New York has an incredible track record of financially supporting farm to school initiatives. One example of this commitment is the recently developed [Regional School Food Infrastructure Grant Program](#), which will provide \$50 million over the next five years to facilitate the processing and preparation of local foods to be served in school meals. Alongside this remarkable grant program, it is critical that New York State continues to bolster farm to school through sustained investment in regional coordinator positions and the farm to school grant program.

Regional Farm to School Coordinators

There are many challenges for FSDs in purchasing local food, which is why farm to school coordinators are critical to this program's success. The 2023 survey asked SFAs to choose what challenges prevent them from purchasing more local products.

For more than a third of respondents:

- **Difficulties in expanding/ changing procurement strategies** (i.e. issuing a geographic preference bid, opening additional purchase orders with local farms, etc.) (35%)
- **Lack of staff time to find and purchase local NYS products** (34%)

For More than half of respondents:

- **Procurement is complicated** (56%)
- **Lack of time to collect documentation** (51%)

Regional coordinators led by [CCE Harvest New York](#) are especially instrumental in addressing these challenges. **Nearly half of survey respondents reported they worked with farm to school coordinators (45%).** Though the 2023 survey or interviews did not ask about the role of coordinators in supporting this program, many stakeholders expressed appreciation for their respective farm to school coordinators. This testimony (featured on the next page) underscores how coordinators are valued by diverse stakeholders.

Farm to School Grant Program

The [NYS Farm-to-School Program](#) grant also stands as an indispensable companion to the Initiative. By continuing to allocate resources towards this program, New York has the opportunity to directly address critical operational needs that often hinder schools from fully realizing the benefits of local food procurement. This grant has already provided essential financial support for staff time, the hiring of a dedicated farm to school coordinator, and the acquisition of necessary equipment and supplies. Moreover, it can facilitate invaluable culinary staff training, ensuring that school kitchens are equipped to incorporate locally sourced ingredients into their menus. These investments are pivotal in building the capacity of schools to effectively engage with local producers and integrate more scratch cooking in school meals. Without this targeted funding, schools may face even more barriers to participating in the Initiative.

What New York Stakeholders are Saying:

“We continue to be very happy that we’re funded with a farm to school coordinator. That’s essential because she can have conversations that the district can’t have with the marketplace. So that has been very beneficial to have her. We hope that that position continues to be funded. It’s really essential for us.”

“The Farm to School coordinators that CCE provides are an incredibly helpful resource.”

— TC Washington, Headwater Food Hub

“Having the assistance from our Cornell Farm to School coordinator was amazing! Even though we missed it by a few thousand dollars, she helped make the process easier. It is very daunting trying to figure out when, where and what when trying to feed children. There is only so much time in the day and having Katie and Cornell doing a lot of the legwork has moved us in the right direction!”

“...the process is very cumbersome, time-consuming, not user friendly, defeating, frustrating, CCE is a huge help but this requires A LOT of time.”

“Successes - The support from CCE is critical in helping me to understand the program and help me move toward using the program. If Kristy A. wasn’t always reaching out and trying to find ways to help our district connect with vendors, find bids, etc, I would have lost interest.”

“We have vendor connections, we now have distribution this year, a lot of progress has been made in the last 18 months thanks to CCE efforts...”

2: Fund Program Administration and Outsource Evaluation

Program Administration

LFPIs require extensive time and effort to administer, which requires marketing the program, providing training for interested SFAs through webinars and resource development, reviewing applications, and verifying documentation of local products. A [2023 report](#) from Pennsylvania State University and the Pennsylvania Department of Education underscores the importance of including funding for administration in LFPI legislation.⁴³ Oregon, California, Washington, and Michigan, which all have similar program budgets near or above \$10 million, all fund more than two positions at their respective departments to administer their programs.

Thus far, the Initiative has not provided any funding for state departments to administer the program. Based on staffing from the states mentioned above, New York can include <5% of the \$10 million budget to fund three positions at NYSDAM to facilitate smooth administration.

These positions can encompass:

1. **Program lead** - To support with SFA training and overall program communications
2. **Data analyst** - To process applications and analyze purchasing data
3. **Documentation coordinator/producer support**

When FSDs who have not tried to participate in the program were queried about their reasons, 51% cited the challenge of providing documentation for local products. CCE Harvest NY and other farm to school coordinators currently assist SFAs in locating required documentation and subsequently verify with the state, yet there remains an opportunity to further centralize documentation verification. Having a dedicated staff at NYSDAM for this purpose offers the following advantages:

- **Ease the administrative workload for FSDs**, who may not have expertise in the food supply chain or local agriculture.
- **Establish an official state agency channel for vendors** to contact regarding documentation collection. Small SFAs face challenges getting responses from producers when independently gathering documentation.
- **Assist local producers and vendors by providing resources to uplift their agribusinesses** during the verification process.
- **Assist SFAs if they want to verify local products prior to purchase**, preventing inadvertent purchases of non-local products for the Initiative.

This financial support for staffing would undoubtedly provide NYSDAM with more support to adequately scale up for increased participation in the NYS 30% Initiative.

Evaluation

Program evaluation is crucial for assessing the effectiveness and impact of a program, providing essential insights into what aspects are working well and where improvements may be needed. Currently, program evaluation of the Initiative has been conducted sporadically through a combination of private and public funds, when partners like CCE have the capacity to conduct research.

The legislation for Michigan's 10 Cents a Meal program, to date, provides partners 1% of the budget, for supportive services including evaluation, outreach, and training, which roughly amounted to \$100,000 in 2023.⁴⁴ For the 2021-2023 biennium, Oregon's Farm to Child Nutrition Program grant allocated \$200,000 for program evaluation, and \$1.2 million for nonprofit partners to provide technical assistance.⁴⁵ Examples of this assistance include a regional coordinator/hub program.

New York can similarly invest 1-1.5% of its \$10 million program budget to contract regular, dedicated evaluation of the Initiative.

Benefits:

- Investigating how SFAs are shifting spending patterns to reach the incentive goal, which can support other SFAs in understanding the steps they can take to participate in the Initiative.
- Uncovering the challenges within the program, which enables informed decision-making, ensuring that resources are allocated efficiently and interventions are tailored to meet the program's intended outcomes.
- Understand whether aspects of program design are causing challenges, in addition to external challenges like lack of staff time and supply chain infrastructure.

This investment for evaluation, in turn, will drive the Initiative towards greater success and effectiveness.

This quote refers to the content regarding tracking discussed on the next page:

“Not having us have to jump through all of these hoops to get this reimbursement. I don’t know. I’m such an optimist. Just trust the people and know that they’re trying their best and have the best intentions. Most people don’t want to cheat the system. Most people want to do the right thing. And so just trusting the SFAs, the cafeteria managers, the farmers, just trusting them that they will do the right thing and just give them the money. Just have that reimbursement always. And then you won’t have all this paperwork on both ends. But I get that there are checks and balances. But, of all things, to have a ton of paperwork for this does not seem really necessary.”

3: Streamline Tracking and Documentation

Originally, this analysis did not intend to investigate tracking and reporting requirements as this seemed more related to implementation than the policy itself. Yet, both surveys and interviews have underscored this as a significant obstacle that discourages program participation.

A key challenge arises from the need to track products served only at lunch, which places a substantial burden on FSDs. This concern has been discussed earlier in this report and in prior reports and would be eliminated if the program expands to include all school meals. Additionally, the prevalence of farm to school coordinators and potentially increased staffing within NYSDAM, can continue to assist in required documentation and reduce burdensome paperwork for FSDs. However, there are additional opportunities to streamline this process.

What Food Service Directors are Saying:

“I know one director that is doing [farm to school] but doesn’t want to bother tracking local purchases so they don’t even worry about it. They could be meeting the 30%, which would look nice for the state, but they don’t want to bother with the paperwork.”

“A simple spreadsheet to track monthly purchases would be extremely helpful.”

1. Establish a Standard Tracking Method

The current process involves an annual application for SFA qualification [[see attached for example](#)]. NYSDAM requests the type and overall purchase amount for each item throughout the year. While this approach offers FSDs the flexibility to manage local food purchases according to their needs, many SFAs may appreciate structure from NYSDAM, rather than creating spreadsheets of their own. A standardized tracking sheet would also create a more streamlined process for NYSDAM officials. Most states provide a required standardized monthly tracking tool for SFAs and states such as New Mexico, Colorado, and Michigan use online tools for FSDs to submit local food purchasing information. An aggregated folder of state LFPI tracking sheets is available [[link](#)].

Vermont Agency of Education provides two standardized tracking sheets, but also requests SFAs submit their own spreadsheets for approval if they prefer an internally developed method.⁴⁶ The Agency recommends alternative methods to track local purchasing, such as utilizing operation and function codes within existing child nutrition program software. If SFAs use codes to track local purchasing, they must submit velocity reports or detailed invoices from vendors to the Agency to verify local purchases.

What Food Service Directors Are Saying

“The way the system is structured currently is too complicated and it honestly steers people away. If we could look to streamline the qualifications a bit and the tracking, it would be more enticing to schools.”

“This is too hard to follow/save all of the paperwork. Between cost and paperwork, we are unable to participate like we would want to. NYS should go back to the unprocessed food grants”

“The program as currently structured is overly cumbersome on tracking and reporting.”

“Everything in the world of cafeterias needs to take less time. It’s impossible to find workers and the pay is awful. It is best to have NYS do all the paperwork. Directors are cooking and doing all paperwork and lots of other things they need no more paperwork.”

“Anything that can be done to simplify the tracking process would greatly be appreciated.”

“Make it less complicated and burdensome on already overwhelmed FSDs.”

“If I could dedicate the time to identify and track NYS items I would certainly apply for this program. I believe it is very important to support the growers of New York State.”

“As a FSD overseeing 6 kitchens and feeding 2,300 students a day, it is extremely difficult to complete the paperwork that is already required of us. I have not participated in the 30% initiative because we cannot handle even more paperwork, and the 30% initiative seems very cumbersome. With staffing shortages and coverage issues, it seems unlikely that we would participate in the foreseeable future.”

2. Require Vendor-level Purchasing Information

It is common for states with LFPIs to require vendor-level information, where SFAs share what products they purchased from different vendors and other information such as including purchase date, unit, unit cost, and even product origin/farm origin if available. Vendor-level information does not have to reach the farm-level, as it is difficult to attain from third party vendors and may be proprietary.

If NYSDAM switches to collect vendor-level information, they can allow SFAs to provide velocity reports from local food vendors with local products highlighted in lieu of this information disaggregated on individual invoices. These data can provide analysts with the information they need to support a more robust understanding of the impact of the Initiative.

Benefits to Vendor-Level Tracking

Enhanced farm and vendor impact insights.

While SFAs and their vendors possess data about farm impact, it is not readily accessible to state authorities or external partners. The [Farm to Institution Metrics Collaborative](#) offers comprehensive metrics covering business type, ownership, farm impact, farm identity, product type, and market channel. FSDs are not expected to conduct research on these metrics, but providing vendor-level information can enable agency staff and nonprofit partners to fill in these data fields on the back end.

Invoice-level data is crucial for gauging economic impact. Cornell University's economic report on the Initiative, based on invoice-level data from Buffalo City SD, illustrates how various business types and market channels have different backward linkage impacts on the economy.⁴⁷ If NYSDAM collects invoice-level data, similar economic analyses can be conducted more easily. Moreover, researchers can approach vendors serving qualifying schools to assess how their farm businesses have benefited from the program.

This information can be used to understand cost differences for local vs. non-local products in school food settings. Additionally, a 2023 evaluation of the 10 Cents a Meal program in Michigan shares how self-operated CNPs have dramatically different purchasing patterns than CNPs that contract with food service management companies.⁴⁸ This evaluation also shows that CNPs who have participated in the program for multiple years purchase from more local vendors than CNPs who have just started participating in the program.

Increased awareness of local vendors and products.

With vendor-level data, NYSDAM will have an immense amount of information on which businesses are selling local products to schools. This information about vendors and the local products they carry can further expand to the robust [30% NY Eligible Product Database](#) administered by CCE Harvest NY. This database can continue to support other SFAs and institutions like hospitals, colleges, senior care centers, and correctional facilities to more easily find local products in their area.

3. Allow SFAs to Submit Tracking Information Throughout the Year

Currently, SFAs make local purchases and track them throughout the year using their own system. At year-end, this information is compiled in NYSDAM's application template and sent to NYSDAM. This process can be streamlined by allowing SFAs to directly submit tracking information to NYSDAM on a regular basis. This practice is also adopted by other state LFPIs, and may offer several benefits:

Elimination of duplicative work.

SFAs will not need to track purchases internally and submit a year-end application. From an October 2023 report on LFPIs released from the Pennsylvania Department of Education and Penn State University, an FSD from New York shared that the process of gathering proper documentation can take several weeks to compile and submit for the annual application.⁴⁹

Reduced need for an annual audit.

NYSDAM auditors conduct a full audit for new SFAs that apply for the program. After that, SFAs are audited every three years.⁵⁰ If SFAs submit purchasing data on a monthly basis, NYSDAM administrators can approve these purchases throughout the year, requesting specific invoice documentation for flagged purchases. This minor adjustment can reduce the need for a concentrated end-of-summer audit process, saving time for both SFAs and program administrators.

Reduced uncertainty for SFAs.

SFAs that have purchases approved monthly by NYSDAM can officially track their progress toward their local food purchasing goal each month, avoiding misunderstandings or disqualification at the end of the year or during an audit.

What Food Service Directors are Saying:

“...It just needs to be made easier for FSDs to participate in. Too much paperwork - hard to get products, unsure if products qualify. We need a very easy list of how to do it. Step 1 ..., Step 2. Small districts have so much to do now we don't have time to start from scratch. It gets lost because we have so many other responsibilities.”

4: Ask SFAs to Submit Notice if They Plan to Participate

The Initiative is retroactive, which means that SFAs make purchases for an entire year before applying for the program. NYSDAM can request that SFAs provide notice to their department at the beginning of the year in order to participate in the program. This is a minor procedural adjustment that can yield several impactful benefits:

- **NYSDAM and nonprofit partners can better direct resources and technical assistance to these SFAs.** This additional support can reduce challenges related to local food purchasing and allow for a smoother application and audit process.
- **SFAs that receive appropriate support are less likely to become disqualified from the program,** either because they did not reach their threshold or because they could not provide proper documentation for local products.
- **NYSDAM can better plan to recruit staff and nonprofit partners to support the annual audit process** at the end of the school year.
- The Initiative operates as an entitlement program, which ensures that NYSDAM will offer supplementary reimbursement if the combined reimbursement to SFAs surpasses the allocated \$10 million budget. **Nevertheless, advocacy partners can utilize this prospective applicant list to furnish legislative partners with an approximation of the total budget required the following year.** This transparency will prevent surprises in the New York Legislature regarding budgetary needs.

5: Incorporate Annual Feedback Into Implementation

If New York intends to formalize the Initiative into law, the state government should assess which components should be flexible for the administering agency's discretion and which must be explicitly defined in legislative language. It is crucial to empower NYSDAM to adapt the program effectively to suit the needs of SFAs without being constrained by overly prescriptive legislation.

Taking a cue from the California Department of Food and Agriculture, one effective strategy in addition to evaluation is **to host a public comment period on the proposed program for the upcoming year.** This involves hosting webinars to present the program and any planned changes, followed by a several-week window for public feedback. The agency then addresses each stakeholder comment directly and incorporates changes based on this input. This approach nurtures trust between the agency, advocates, and food program managers, empowers program managers, and ensures that officials grasp the genuine needs of SFAs for success in the program.



Conclusion, Additional Considerations, and Areas for Future Research



Buffalo Public Schools
Credit: Josh Baldo

Additional Considerations for Accessibility

A Grant-Based Incentive Model:

As explored earlier in this report, there are equity issues inherent in a performance-based LFPI model. NFSN recommends a grant-based program, the most common LFPI model, for future consideration. New York is no stranger to a grant model; In 2023, The New York State Education Department (NYSED) is administering the [USDA Local Food for Schools](#) COVID-19 relief program as a non-competitive grant program. This program has more than double the current participation of the Initiative (159 SFAs). Through Local Food for Schools, SFAs will be fully reimbursed for purchases of fresh and minimally processed local foods up to their grant award. With a budget of \$11.9 million from the USDA, NYSED awarded a rate that essentially amounts to a 10-cent per lunch reimbursement to SFA grantees.⁵¹

Transitioning to a grant program can dramatically increase the equity, accessibility, and interest in this program while still creating a positive economic impact on local farmers and producers. To ensure a positive ROI, New York can consider adopting a similar 50% rebate grant model like Michigan's 10 Cents a Meal Program. This program can provide grant awards of 25 cents per lunch for SFAs to purchase NY fluid milk (with a reduced rate explored in the special hardship clause) and institute a 25% cap on reimbursement for NY fluid milk to ensure diverse spending on local products.

Under this scenario, the 84 SFAs observed in the sample that use their total grant award would spend 30% of their overall food budgets on local food (average and median). This sample would yield an average ROI of 223% (205% median) if they fully exhaust their grant awards. New York can look to [Oregon's Farm to CNP](#) grant and create a clause to reallocate unspent grant awards to champion SFAs to ensure the entire program budget is spent on local products. A grant program can be temporarily competitive until the program budget is increased to meet the overall demand. Though unlikely, if all SFAs in New York were to fully participate in the Initiative, whether it is operated as a performance-based or grant program, the overall program budget would need to increase to \$66 million.

States with Grant-based LFPIs:

- **Alaska** (defunct)
Nutritional Alaskan Foods in Schools
- **California**
Farm to School Incubator Grant
- **Colorado**
Local Food Purchasing Grant
- **Connecticut***
Local Food for Schools Incentive
- **Michigan***
10 Cents a Meal Grant Program
- **Oregon**
Farm to CNP Grant Program
- **Pennsylvania**
Farm to School Grant Program
- **Minnesota***
Farm to School Full Tray Grant Program
- **New Mexico**
NM Grown Grant Program
- **Washington**
Farm to School Purchasing Grant

* Indicates a rebate/matching grant program, which can yield greater economic impact

A Regional Definition of Local:

While not a prominent accessibility challenge, it is worth noting that SFAs in border communities are disincentivized to engage in purchasing relationships with local producers across state borders. This is because any non-NY (albeit still “local”) produce would not count toward the local purchasing threshold. Other states such as Connecticut ([SB 1](#)) and New Hampshire ([HB 1657](#)) have introduced legislation to adopt a regional definition of local.



Tioga Central School District
Credit: Josh Baldo

What Food Service Directors are Saying:

“We would be able to get a lot more of what I would consider as local produce. We currently have a lot [of local products] coming from Western New York, which is far from us. But we have schools that are 4 miles from a farm in Pennsylvania and we can’t get produce from that farmer... because it’s grown in Pennsylvania. He sells produce in New York to consumers, but we can’t use that. So my personal opinion is I’m a hundred percent on board with a regional definition. We have food coming farther away when we have a farm - not just his- other farms as well, sitting miles from schools and we can’t use the produce that grows there. Just because of a border. It’s just disappointing because he grows a lot of great produce.”

Values-Aligned Purchasing:

NFSN is a strong proponent of values-aligned purchasing and encourages New York policymakers to support values-aligned purchasing. As interest continues to rise in LFPIs, the conversations around them are expanding beyond prioritizing purchases based simply on whether they are "local" or not. Values-aligned purchasing can happen when schools make purchases based on specific product characteristics and/or the characteristics and growing practices of producing them. Values-aligned purchasing can provide immediate benefits to local communities and also offer a broader societal and environmental impact.

LFPIs in other states such as Washington, Oregon, California, and Minnesota have included language to encourage school purchasing from specific types of producers such as "emerging," "small and mid-size farmers and food producers," and "historically underrepresented farmers and ranchers." Purchasing from "socially disadvantaged" producers is also a key component of the USDA Local Food for Schools Cooperative Agreement Program currently administered by NYSED.

"The intention to benefit [socially disadvantaged] producers has been in every single communication that has gone out and every single webinar that was delivered [by NYSED] and the report that SFAs are required to submit for reimbursement. They have to say how they tried to support these producers. So while it's not a mandate... we have our schools asking how to find businesses that meet those qualifiers in a way that they haven't asked before. That's really encouraging."

- Interview Informant

Credit: Josh Baldo



A Farmer-Focused LFPI Model:

For the final survey question, FSDs were asked to share anything else about the Initiative that they would like us to consider or share how they would change the policy. A few responses hint towards changing the LFPI model altogether (seen below and right).

These responses signal a desire by some SFAs to have NY's LFPI modeled similarly to existing federally operated, well-used programs like the Pilot program or USDA commodities. This design is not unheard of: several states such as Rhode Island, Utah, Vermont, and Washington state have modeled their Local Food for Schools COVID-19 federal relief programs to contract directly with producers, cooperatives, and food hubs to get more local food into schools.⁵² This is different from existing LFPIs that provide funds directly to SFAs who are then charged with purchasing local foods. Having a "farmer-focused" model can reduce the administrative burden on the FSD to find qualifying vendors as well as streamline product documentation and tracking information provided to the state department. Further research is needed to assess the feasibility and effectiveness of adopting a farmer-focused program and to explore how it could potentially complement the Initiative.

"We should be able to receive NY State products in the same manner we receive USDA commodities, DoD and Pilot produce - make this easier and we can start purchasing tomorrow."

"Some small farmers should be linked with some districts it can provide for, it can provide a cycle of growth for both sides."

"...I like the idea of a rebate as an incentive, or maybe a "bank" or "entitlement" as an incentive, that we can use similar to how we use our USDA entitlement today. The \$0.19/meal could be used for the following school year, but you would be able to purchase without processing an invoice to a vendor or it could be tracked like we do with our Pilot program. The Pilot Program works, let's expand for other NY State Local products and then the incentive would increase our existing entitlement."

"...Take the school food operators out of this equation - we need to focus on hiring staff and feeding the kids, not reporting the past, dealing with procurement, so we can get \$0.19 per meal... Unfortunately the commodity system is set up to make it EASIER to purchase PROCESSED food (using USDA commodities) than to purchase fresh local or minimally processed food. YOU can change this and you have to know "we", school food operators, are interested and in need of assistance... Please make it easier to procure fresh local food so we can get it on the lunch and breakfast tray!!"

Areas for Future Research



Credit: Josh Baldo

Expanding to Summer Meals:

Seasonality has also been well-documented as a barrier for NY FSDs to purchase more fruits and vegetables. In the 2023 survey, 53% of FSDs cited that the short growing season remained a barrier to purchasing more local products. Expanding the program to include summer meals can incentivize SFAs to purchase fresh fruits and vegetables which may be unavailable during the school year. More than a third of survey respondents serve NY products in summer meals programs (40%). Roughly half of all current states with LFPIs include summer meals in their programs. Additional research can examine what the economic impact would be if this program were to expand to summer meals.

Focus on the Farmers:

This analysis adopts an SFA-centric perspective to assess policy implications for enhanced SFA accessibility. Limited access to vendor-level data hampers a comprehensive understanding of the program's impact on the number of local farms and the kinds of agricultural producers it supports. Moreover, it remains uncertain whether producers that sell to third-party vendors or manufacturers are aware that their products are being served in schools. Future research can focus on the impacts at the farm level and the hurdles faced by producers across various sectors and scales when engaging with the program.

Continued Assessment of the Economic Impact of This Program:

Cornell University's 2023 economic analysis of Buffalo City Public School District provides an excellent framework and process to evaluate this program.⁵³ This analysis can be replicated even if this program were to include all NSLP meals. Repeated analysis of the economic impacts from different SFAs of different sizes, regions, and affiliations (i.e. supported by a BOCES vs. self-operated) can help gain a more nuanced understanding of the benefits of this program.

Conclusion

LFPIs are indispensable in promoting local agriculture, fostering educational opportunities, and nurturing healthy eating habits among students. AFT and NFSN are grateful to provide these recommendations for the New York farm to school community. Much work has already gone into building this program over the last five years. These recommendations seek to build upon that extensive groundwork.

The current 30% NYS Initiative model has been a significant step forward in supporting local food purchasing. This program shows benefits for SFAs who qualify, and this thorough analysis has illuminated areas for improvement toward more widespread benefit. It is imperative that New York move towards a more accessible and equitable model to ensure that the benefits of this program reach all stakeholders involved.

It is common for LFPIs to adapt their models over time to better meet the needs of child nutrition program operators and local producers. The evolution of an LFPI is a testament to the state's commitment to growth and adaptability in the face of changing needs. We call upon New York advocates, policymakers, and program coordinators to not only embrace this change but to continue the dialogue, fostering an environment of sustained improvement.

“I think a lot of people don’t realize how much New York can feed New York.”

*- TC Washington
Headwater Food Hub*

LFPIs are a political experiment, a dynamic endeavor that requires ongoing refinement. With the right policy adjustments, New York can pave the way for a more sustainable, inclusive, and robust local food system that benefits everyone involved. With this bold vision, New York can continue its status as a national leader in farm to school initiatives and inspire other states to embark on a similar transformative journey. Together, New York can forge a brighter, healthier future for our communities, our farmers, and our children.

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Tioga Central School District
Credit: Josh Baldo



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