Research Summary

Statewide Farm to School Procurement Incentives:

Design Thinking & Analysis of the National Policy Landscape

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Research Summary

(full report here)

Farm to School programs have been expanding over the last three decades, with an estimated annual $1.26 billion in local food sales and 60,000 schools participating in Farm to School activities in 2019 (Bobronnikov et al., 2021). Each of these programs are unique by design, yet are united by the shared mission to strengthen the local food system by leveraging institutional power. While there is no one particular formula or method for implementing a Farm to School program, according to the National Farm to School Network, they incorporate at least one of three core elements: (1) procurement, in which schools source and serve local food in the cafeteria, (2) education related to food, agriculture, and nutrition, and (3) school gardens (National Farm to School Network, 2020). Due to such a large collective purchasing power, local food procurement has potentially significant implications for both the local agricultural sector and students who are served by participating schools. Thus, institutional purchasing is viewed as a gateway to impacting social and ecological change by supporting alternative food models (Bagdonis et al., 2008; Bisceglia, et al., 2020; Long et al., 2021; Rains et al, 2019).

Despite the possible benefits of Farm to School programs on student health, economic development, and the environment, the implementation of local food procurement is not a simple feat for School Food Authorities (SFAs), nonprofit entities that operate school cafeterias. The prohibitive cost of local foods is a particularly ubiquitous challenge for SFAs (Bobronnikov et al., 2021; Colasanti et al., 2012; Levy & Ruiz-Ramón, 2020).

In response to appeals for more institutional support, state governments have made considerable efforts to promote Farm to School through policy intervention. These policies are steadily featuring provisions that aim to promote local food procurement. Researchers found that between 2002 and 2020, there were 546 bills and resolutions that supported Farm to School activities, and of those, 240 bills had passed (NFSN, 2021, p. 15). Between 2019 and 2020, 73% of proposed Farm to School bills and resolutions related to procurement (NFSN, 2021). Moreover, more than half of these local procurement bills and resolutions that passed were backed with public funding.

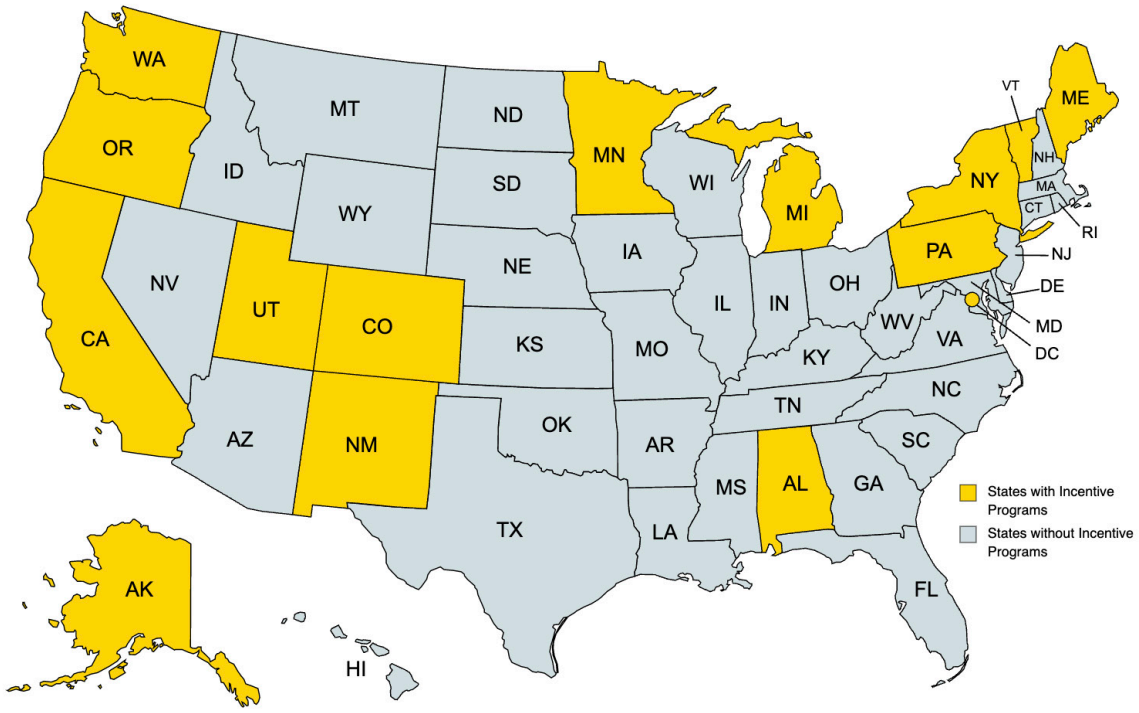
One type of state policy that is gaining momentum is ***monetary local food incentive programs,*** in which state governments[1] provide SFAs[2] a specific amount of additional funds to partially or completely offset the cost of local ingredients with the intention to increase local food procurement.

To date, there are at least 15 states that have established incentive-based programs. The first state to establish an incentive program was Maine in 2001, with their Local Foods Fund (formerly Local Produce Fund). However, the Local Foods Fund

1 and the District of Columbia, which this report is referencing as a 'state' for simplicity

2 Depending on the state policy, other Child Nutrition Programs that are not explicitly operated by SFAs (such as Early Childhood Education and Child and Adult Care Food Program) can be eligible to participate in incentive programs discussed in this report. Some state policies are specific to districts, rather than SFAs. However, for simplicity, in this paper, I will use SFA as a general term to describe all child nutrition programs and applicants eligible for participation in the state programs.

Figure 1. Map of States with Incentive Programs



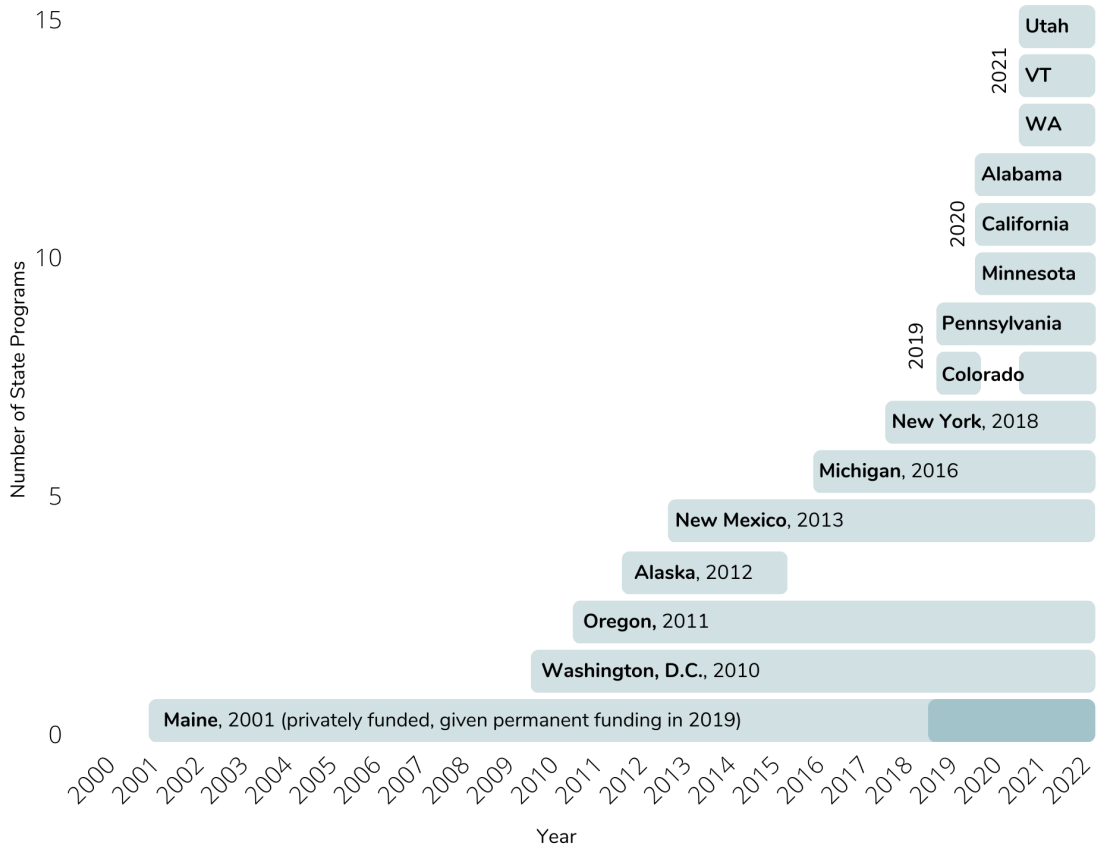
Source: Figure created by author using MapChart software in July 2022. Data sources listed in Appendix C.

was not given permanent or substantial funding until 2019, where previously it was funded inconsistently. Washington, D.C. was the second, established nine years later through the Healthy Schools Act of 2010. The only state to establish a program and become inactive is Alaska, whose program lasted from 2012 to 2015. Though the majority of states have not yet adopted incentive policies, these programs are being adopted with more frequency. More than half (9) of all incentive-based policies have been established since 2018.

States have tremendous flexibility in designing these policies, but little guidance on the range of models in which they can use to develop an incentive program. There are considerable variations in both the design, intentions, and implementation contexts of incentive programs. Research on existing incentive programs has shown evidence of both successes and challenges associated with how the programs were designed (Levy & Ruiz-Ramón, 2020; Matts et al., 2020; Giombi et al., 2020).

While several publications discuss several incentive programs simultaneously (NFSN, 2021; Massachusetts Farm to School, 2019), to date, these policies have been examined in relative isolation. This is due, in part, to the great variations among the programs and the different evaluation methods used from state to state. Yet, there is much to learn from other regional approaches. Giombi et al. (2020) suggest future research that compares policy models and impacts across states. This report seeks to respond to this call.

Figure 2. Statewide Farm to School Incentive Program Adoption Timeline



Source: Figure created by author in July 2022. Data sources listed in Appendix C.

My guiding research question is:

How do statewide Farm to School incentive programs vary with respect to (a) program design (b) context (c) and alignment to existing Farm to School policy goals?

This report describes and characterizes the variation in 15 incentive-based Farm to School policy designs. It aggregates insights and common themes from implementation and analyzes how statewide programs are in alignment with five policy goals often attributed to Farm to School (economic development, education, environment, equity and community engagement, and public health).

To do this, I used a grounded theory design to classify the programs and synthesize emerging and diverging themes among the programs. My data collection process included identifying the state programs, reviewing secondary sources, and interviews with key stakeholders. In total, I interviewed 19 informants from 14 states.

These interviews lasted 45-90 minutes. Most informants were coordinators at the state level and the rest were nonprofit partners.

This report adds to the Farm to School incentive discourse by observing variations within a united national Farm to School movement, rather than viewing the state programs as individual phenomena. There are several intended audiences for this research: (1) policymakers and practitioners who wish to implement Farm to School local food incentive programs, (2) current practitioners of Farm to School incentive programs who are looking to build a community of practice, and (3) Farm to School researchers and nonprofit partners.

The classification schemes presented in the report will give advocates and statewide policymakers who wish to implement Farm to School procurement incentive programs a way to identify the program elements that are aligned with their specific vision, capacity, and regional context. It will also provide an aggregated collection of experiences and list of stakeholders for interested parties to contact during the process of researching and designing (or redesigning) their programs.

The value of this research exists in the detailed experiential evidence and knowledge that may help policymakers think through programmatic scenarios, circumvent future challenges, and avoid reducing policy designs to one dimension. This research summary does not provide the level of detail that is included in the full report, or share any of the quotes that were gathered from informants during the interview process. These can be found in the full report.

Supplemental products of this study are a Farm to School Incentive Program Compendium, which provides in-depth 3-4 page overviews of the incentive programs in each state, as well as links to each program's websites and supplemental sources, and (2) a Farm to School Incentive Program Toolkit with compiled practitioner documents such as Requests for Applications (RFAs), tracking spreadsheets, and evaluations.

Summary of Findings

Key findings are as follows:

1. No two incentive programs are identical, and there is a great diversity in program designs.

There are seven main categories that describe program designs:

1. Eligibility determination
2. Reimbursement determination
3. Program funding
4. Incentivized purchases
5. Incentivized meal types
6. Incentivized child nutrition programs
7. Program size

1. Eligibility Determination:

Eligibility describes how interested SFAs can participate in their state's incentive program. There are three main ways that SFAs can become eligible for an incentive:

Figure 3. Overview of Program Design Components

State	Eligibility				Reimbursement Determination					Funded	
	Competitive Grant	Universal Eligibility	Performance-based	Comment	Lump-sum (per-meal formula)	Lump-sum (NOT per-meal formula)	Per-meal Reimbursement	Matching	Other	General Fund / Appropriations	Other
Alabama		✓					$0.20		Per component, not meal	✓	
Alaska		✓				✓			Based on ADP and a "cost factor," about $0.14 per meal	✓	
California	✓				$10				Based on per student enrolled, not meal count	✓	
Colorado	✓				$0.05				Based on lunches served in a specific previous year	✓	
District of Columbia		✓					$0.05		Per day, if either lunch or breakfast feature a local component	✓	Previously funded with bag tax
Maine		✓						1:3	Capped at $5,000 per SFA ($5,500 with training)	✓	
Michigan	✓				$0.10		$0.10	1:1	Reimbursed up to $0.10 per meal but must provide a match, up to the cap of their grant award	✓	Combination with school aid
Minnesota	✓				$0.10			1:1	Based on previous breakfast and lunch meals served in set month	✓	Part of AGRI (general funds)
New Mexico	✓					✓			Reimbursed for purchases up to this amount	✓	
New York			✓				$0.19		Must reach 30% local procurement	✓	
Oregon	✓*	✓		* Competitive grant once CNPs spend original funds	$0.08					✓	
Pennsylvania	✓					✓			Grant awards are up to $15,000 per applicant	✓	Part of PA Farm Bill
Utah			✓		N/A				Depending on their local %, SFAs are reimbursed for each lunch meal served during the previous SY		Liquor tax
Vermont		✓*	✓	* Baseline grant only	$0.15-$0.25				Depending on their local %, SFAs are reimbursed for each lunch meal served during the previous SY	✓	
Washington	✓				$0.12*				* Applicants can request $20,000 if formula is under this amount		COVID-19 Relief funds

Source: Figure created by author in July 2022. Sources listed in Appendix C.

1. *Competitive grant application:* SFAs must first submit an application demonstrating their intent to participate in the program to be considered for funding. This is typically accompanied by a proposal or other narrative. Incentive programs may also be housed in one or two tracks of a larger multi-track grant program.

2. *Universal eligibility:* All SFAs will receive funding as long as they follow the program's structure for reimbursement.

3. *Performance-based:* SFAs are only eligible for reimbursement once they reach a certain local food procurement threshold.

Most (47%) states have competitive grant applications, 33% employ universal eligibility, and the least number of states (20%) are performance-based. Grant applications provide the most structure for states to prioritize particular priority goals and embed them into scoring criteria, such as giving additional points to applicants with higher free and reduced lunch rates. Programs with universal eligibility appear to be the most equitable design because they are noncompetitive and reduce barriers for participation. Performance-based programs raise equity concerns, as applicants must purchase local products without a guarantee of additional reimbursement.

Several states have included variations to the three main designs. Oregon has both a competitive and non-competitive program. Vermont has a universal eligibility program for a baseline year, after which, SFAs are eligible for an additional subsidy based on their performance. Utah and Vermont both have sliding-scale performance-based programs, in which the reimbursement rate increases when SFAs purchase a higher percentage of local products.

2. Reimbursement Determination:

Reimbursement determination describes how qualifying SFAs are reimbursed for program-related expenditures. There are four main ways in which states do this:

1. *Lump-sum based on a per-meal formula:* In this model, SFAs are notified that they are entitled to a maximum award amount. This occurs before SFAs make local food purchases with the intention of getting any additional reimbursement. This award is calculated by multiplying a predetermined number (e.g., meals SFAs served in a designated time frame, average daily participation in school lunch (or breakfast), or student enrollment, etc.) by a specific dollar amount set by the regulating authority (e.g., 12 cents, $10 per student, etc.). Most often, SFAs purchase eligible local products throughout the year and submit invoices periodically for reimbursement.

   More than half of state programs use this model of reimbursement determination. The benefit of providing lump-sum awards based on a per-meal formula is that this method can be easily calculated by SFAs and state coordinators. It is also scalable, increasing with the enrollment or average daily participation of the SFA. However, this model can disincentivize small SFAs from participating if their incentive is not large enough to be worthwhile to participate.

2. *Lump-sum not based on a per-meal formula:* In this model, awards to SFAs are not made with a participation-based formula. They may be made based on multiple criteria, such as enrollment size, whether the applicant

has participated in the past, and if they have participated, their track record for utilizing their award. The benefit of providing lump-sum awards without a per-meal formula is that they do not constrain SFAs who may have visions for larger, more transformative projects, even if they are small in size.

3. *Per-meal reimbursement:* In this model, SFAs are reimbursed based on the number of meals they serve that feature qualifying local ingredients. Unlike the "lump-sum based on a per-meal formula" model, which has a predetermined maximum amount that is established before SFAs begin procuring local food, the "per-meal" model reimburses SFAs for each meal after they purchase ingredients. A per-meal reimbursement structure encourages applicants to serve more qualifying meals to receive additional reimbursement.

   One variation to a per-meal model is a per-component model, in which SFAs are reimbursed if they serve a meal that featured a full local food component, rather than reimbursed per-meal. This ensures SFAs are featuring local food on their lunch tray, rather than including it as a garnish.

4. *Matching:* These awards are typically viewed as rebates, where an SFA will be reimbursed a percentage of what they spend on local food. Matching reimbursement models were the least prevalent among states. Matching percentages range from 33-50%.

Other variations: There are many nuanced variations in how states determine reimbursement for SFAs. Often, states employ slight variations to these categories or employ multiple strategies. These variations are denoted in the "other" column in Figure 3.

3. Funding Avenues:

General appropriations or "other"

More than 70% of incentive programs are funded through general budget appropriations from the state legislature. Unique avenues used to fund these programs include a liquor tax, a bag tax, COVID-19 relief funds, and by piggybacking on larger agricultural development efforts in the state. In multiple cases, the temporal and episodic nature of incentive program funding has created hesitance among interested SFAs and producers.

4. Incentivized Purchases:

Primary Categories:

Fresh fruits and vegetables, proteins, grains, minimally processed items, processed items, fluid milk, and value-added dairy

Secondary Categories:

School garden produce, non-food items, and government programs

A major difference between programs can be found in what they do or do not incentivize with taxpayer dollars. Figure 4 displays a breakdown of which items were incentivized in the 15 state incentives. **Minimally processed fruits and vegetables** and fresh, **unprocessed fruits and vegetables** are incentivized by all programs. **Grains** are another largely popular incentivized food among the programs, with all but one state incentivizing grain. All but two states (87%) incentivize **value-added dairy** (including items such as yogurt, cheese, and sour cream) and local **proteins**. The items least likely to be incentivized by these programs were **processed items** (8 states, 53%) and **fluid milk** (5 states, 33%).

Figure 4: Overview of Incentivized Purchases

State	Incentivized Purchases										
	Primary Categories							Secondary Categories			Comment
	Fresh Fruits & Vegetables	Proteins	Grains	Minimally Processed Items	Processed Items	Fluid Milk	Value-added Dairy	School garden produce	Non-food items	DoD / FFVP / PILOT	
Alabama	✓	✓	✓	✓	✓	✓	✓	✓			Processed items must consist of 51% local products.
Alaska	✓	✓	✓	✓	✓	✓	✓	N/A	✓		Minimally processed items may be processed out of state. Transportation vendors are allowed costs.
California	✓	✓	✓	✓	✓*		✓	✓	✓		*Only whole grain products that are 100% grown, milled, processed, and manufactured in CA are allowed. Awards can be used for education, labor, infrastructure, equipment, etc.
Colorado	✓	✓	✓	✓	✓		✓	✓	✓		Processed items qualify if they are Colorado Grown or meet the designation. Delivery / transportation costs are also allowed.
District of Columbia	✓	✓	✓	✓			✓	✓			Takes a regional approach to local. *Bread is eligible for reimbursement if assembled in local zone.
Maine	✓	✓	✓	✓			✓	✓			
Michigan	✓			✓				✓		✓	Includes dried beans. Local items purchased through federal programs count as match.
Minnesota	✓	✓	✓	✓			✓		✓		Can request up to $25,000 for equipment, but must provide match for purchases.
New Mexico	✓		✓	✓				✓			
New York	✓	✓	✓	✓	✓	✓	✓	✓	*		Processed items be 51% local products. *Performance-based: incentive reward can be spent on any SFA expense.
Oregon	✓	✓	✓	✓	✓		✓	✓	✓		Up to 25% of funds can be used on non-food items. There is no local ingredient threshold requirement for processed foods.
Pennsylvania	✓	✓	✓	✓	N/A*	✓	✓	✓	✓		* The Dept. has not yet placed any limitation on how foods can be used.
Utah	✓	✓	✓	✓		✓	✓	✓	*		*Performance-based: incentive reward can be spent on any SFA expense.
Vermont	✓	✓	✓	✓	✓		✓		*		Uses state established definition of local. *Performance-based: incentive reward can be spent on any SFA expense.
Washington	✓	✓	✓	✓	✓		✓	✓	✓		Processed items must consist of 51% local products by weight or volume. Up to 25% of funds can be non-food costs.

✓ Color denotes products that have a nuanced local definition or do not have a required local ingredient threshold.

Defining Local: All states, with the exception of Washington, D.C., used a "state border" definition for local fresh and minimally processed products. Sometimes, this limited scope of "local" has disincentivized existing local purchases and relationships between farms and SFAs in border communities that have historically purchased from nearby farms that are technically across state lines. Many states voiced an interest in adopting a regional definition for local but recognized the potential political and administrative hurdles that come with a regional definition.

Some states used existing definitions from other programs or state departments to determine how to define "local." This includes a "Colorado Proud" definition in Colorado or a definition of local that was adopted by the state legislature in Vermont.

Most states that allowed processed products used a 51% or greater definition for processed products, while several others did not have a minimum local ingredient threshold or have more nuanced regulations.

The decision on what foods to allow is perceived by stakeholders to impact the implementation of their incentive programs. Several topics that relate to which products to incentivize include, but are not limited to:

- **Prioritizing connotations of healthy eating vs. prioritizing the local economy.** (i.e. prioritizing fresh fruits and vegetables vs. allowing local products)
- **Prioritizing small and mid-size producers vs. larger agribusinesses**, such as global food manufacturers and distributors.
- **Subsidizing existing local food purchases vs. inspiring new ones.** This consideration was important for states in their decision to incentivize fluid milk, which is often already served in school meals.
- **Prioritizing ease of SFAs.** This decision can determine the ease in which SFAs understand incentive regulations and can procure local products. For example, unprocessed or minimally processed items can be more easily trackable and verifiably local. SFAs can be confused at which processed items qualify as "local" depending on how processed items are regulated by the state. However, processed items, value-added dairy, and fluid milk may be more easily procured by SFAs than fresh fruits and vegetables, especially in northern climates.

Secondary Categories: Most programs allow SFAs to purchase items that go above and beyond the primary foods that are typically purchased through distributors. For example, a vast majority of states (12 of 14 for which there are data) allow school garden produce to be purchased for their programs. Only one state, Michigan, allows local foods "purchased" through federally funded programs as part of their matching requirement. A third of programs allow non-food items as allowable costs such as equipment, staff time, transportation, and labor, to be purchased as part of their programs. These kinds of purchases can help build SFA capacity for scratch cooking and foster more educational activities.

5. Types of Incentivized Meals

Lunch, breakfast, after-school snack, supper/dinner, a la carte, adult meals

This category defines "where" local food is incentivized, or which kinds of meals qualify for reimbursement. This detail is important, as it determines who will most benefit from the program. This category may also be a variable in how labor-intensive the reporting requirements are for participating SFAs. A vast majority of programs (79%) help subsidize local food purchases that are served in all NSLP reimbursable meals (lunch, breakfast, after school snack, supper/dinner). Four states allow their funds to be used for a la carte or adult (staff) meals. Most states did not restrict their funding to a particular meal, even though their award calculations may have been based on lunch participation. For example, in a lump-sum model, an award might be based on $.08 per lunch meal served in a given year, but the award granted to SFAs can be used to purchase local food that is used in any reimbursable NSLP meal.

6. Types of Child Nutrition Programs Participating:

NSLP, CACFP, SFSP, SSO, and ECE / non-school partners

The decision of which type of child nutrition programs can participate in an incentive will dictate **when** local food can be purchased (only during the school year vs. summer), and **who** in the community can participate in the program (K-12 students, pre-K children, and/or adults). All 15 states incentivize reimbursable **lunch meals** served through NSLP. Child nutrition programs such as Child and Adult Care Food Program (71%), Seamless Summer Operation (71%), and Summer Food Service Program were less likely to be included in these incentive programs. Pennsylvania's grant program is an outlier; While the program will reimburse food purchases made through NSLP, the grant is specific to food purchased for K-5 grade levels.

There is a growing effort from states to expand their incentive programs into other spaces outside of school to reach a larger and more diverse subset of the population. Thus far, seven states have incentive programs that reach **ECE and non-school partners**. States expanding into ECE and non-school partners have experienced implementation challenges working with these populations.

7. Program Size

The size of each program budget varies dramatically, as do the size of incentives that states provide to participating SFAs (hereby referred to as incentive rates). Informants believe that these design traits factor into how accessible and desirable these programs are for SFAs.

Incentive Rates

States provide 5-25 cents per meal (or per component) to participating SFAs. More than two-thirds of states (7 of the 10 observed in this category) provide $0.14 or less per meal as their incentive. Half of the states (5 of the 10 observed in this category) give $0.10 or less per meal. Other states do not use a per-meal formula.

When asked whether SFAs perceived their program as worthwhile to participate, multiple informants listed the incentive rate as a factor. High incentive rates are considered as a large motivational factor for SFAs to become involved. On the other end of the spectrum, smaller incentives are effective at altering purchasing behavior, but may not promote transformational change that allow for SFAs to serve more

than one local meal component at a time. For example, the informant from Washington, D.C. noted that SFAs were not purchasing local proteins because local proteins tended to cost far more than five additional cents per serving, making the incentive not financially feasible for SFAs to expand into local proteins.

Other factors that can affect whether SFAs view their program as worthwhile revolve around Farm to School culture within a state as well as other programs and services available to support SFAs.

Minimum awards for SFAs: Several states have created artificial minimums for applicants. For example, small-sized applicants in Washington can request up to $20,000 in funding per grant cycle regardless of their per-meal formula, which is typically 12 cents per-meal multiplied by 9 months. This helps make the program more worthwhile for smaller-sized sites.

Maximum caps on programs: As mentioned above, many states implement a maximum grant award based on the enrollment or average meal participation of an SFA. States that base their awards on a per-meal formula may also institute an **award cap**. States do this so that they have enough funds for multiple applicants. While award caps may have their merits, they can also disincentivized larger, more urban school districts from purchasing local foods.

Program Budget Size

The overall program budgets for state incentive programs ranged from $220,000 (Alabama) to $10,000,000 (New York) per year or biennium, depending on the state legislative cycle. Many new programs have been introduced as pilot programs and have not been given permanent funding. States with more established programs have seen their program budget fluctuate greatly over time. The amount of program funding per enrolled public school student in each state ranged from $0.30 (Alabama) to $22.73 (Alaska). All but three states (Alaska, Oregon, and Vermont) allocated less than $5 per enrolled public school student for their incentive program, with the median amount at just above $1.50 allocated per student.

2. While there is great diversity in the context of these programs, many states shared similar implementation challenges. States have integrated unique additional support structures into their programs to contend with these challenges.

Farm to School incentive policies cross political and geographic lines. While most incentive-based programs (8 of 15, 53%) have been established and implemented under Democratic governors, 27% (Alaska, Alabama, Utah, and Vermont) began under Republican governors. Three states, Michigan, Maine, and New Mexico, have had programs operate under both Republican and Democratic governors. Farm to School incentives were found in all geographic regions of the US and from the second least populous state (Vermont, 650,000) to the most populous state (California, 39.2 million). The density of the states ranged from the least dense state (1.3 in Alaska) to the densest state (11,280 in the District of Columbia).

More than a third of the states had at least one or multiple Full Time Equivalents (FTEs) to run their programs. A majority (53%)

of programs are administered by their Departments of Education. Of the 15 states with incentives, eight are administered through the Department of Education, six through the Department of Agriculture, and one through the Department of Commerce, Community, and Economic Development (Alaska, now defunct). Only one state program (New York) has switched administration from the Department of Education to the Department of Agriculture. More than half of the programs were initiated by Farm to School advocacy groups that partnered with state legislators. Many of these advocacy groups and legislators were also responsible for designing these programs, though a handful were designed in-house.

One unifying characteristic among states was the presence of strong partnerships with businesses, nonprofits, institutions, or agencies for the establishment and promotion of their incentive-based programs. Most commonly, intrastate agency partnerships were mainly between Departments of Agriculture and departments of Education, but these partnerships also included the Department of Health. Some incentive programs were influenced by their state's food system policy advisory councils or working groups. In addition to these governmental partnerships, all states also relied on nonprofit partners to varying degrees. Every state has at least one additional program or policy that helps bolster incentive-based programs. These are illustrated in Figure 5.

Common implementation challenges were shared among three main actors within incentive programs: state agencies, SFAs, and producers.

Common challenges for state agencies include:

- navigating strict or flawed legislation
- developing administrative systems from scratch
- staff turnover
- connecting SFAs with producers
- reviewing grant applications
- tracking expenditures
- collecting data and evaluation
- conducting ongoing training for SFAs

Common challenges for SFAs include:

- verification and documentation of local products
- finding local producers
- not understanding program rules
- restricted budgets
- staff turnover and labor shortage
- restrictive bill language
- restricting participants from certain groups
- disruptions caused by the COVID-19 pandemic

Common challenges for producers include:

- lack of local food supply and the number of producers
- lack of preparedness of the local food supply chain to handle additional demand for local products
- food safety training and knowledge
- complications in understanding and labeling local products such that they comply with program regulations

Figure 5: Kinds of Assistance from Partners & Supportive Programs

Description of Assistance
Network Building
Held quarterly networking sessions for SFAs
Creation of a food hub network
Building a statewide network for Farm to School
Advocacy, Outreach, & Financial Support
Wrote bill language and/or advocated for the adoption of a coordinator position or incentive program
Developing statewide Farm to School strategic plans, which established long term food system goals
Philanthropic organizations and government agencies provided additional grant funding for activities
Developed promotional campaigns to promote the incentive program
Evaluation & Research
Conducted research or evaluations about program
Help score grant applications
Technical Assistance & Education
Developed promotional campaigns to promote Farm to School
Provided supplemental nutrition or school garden education assistance (includes extension offices, Ag in the Classroom, and Foodcorps)
Pre-reviewed grants for SFAs prior to submission
Provided technical assistance for SFAs to navigate program
Created Farm to School recipes
Provided culinary training for SFAs
Connected food producers with SFAs
Working with producers to develop specific Farm to School food products
Description of Supportive Program or Policy
Statewide coordinator roles
Local food branding membership campaigns
Local producer map or database for SFAs
Increased small purchase threshold
Mini grant programs
Statewide geographic preference policy
Farm to School grants (not specific to procurement) to districts
Trainings or Institutes on scratch cooking for SFAs
Harvest of the Month or promotional programs (Days, Weeks, etc).
Buyer Grower Meetings
Federal assistance with USDA grant to support statewide Farm to School adoption

Some states have found unique ways to contend with implementation challenges by including additional design elements.

These additional supporting program elements, which do not fall into the seven "design elements," have tremendous value and potential to aid in implementation.

Some states have incorporated flexibility, such as:

- reallocating expenses to allow for full utilization of funds
- creating flexible Farm to School incentive legislation
- embedding participatory decision-making

States have utilized program funding for purposes outside procurement including:

- outsourcing evaluations
- contracting technical assistance
- providing additional funding for SFAs that participate in training
- including one (or multiple) coordinator positions
- earmarking funds for specific target populations
- creating alternative pathways to enter their program with low or no risk by including seed grants

States have improved structural elements in their programs such as:

- providing or requiring an approved vendor/product list
- embedding programmatic systems within typical SFA routines
- creating standard tracking tools for SFAs
- creating opportunities to provide wrap-around services to SFAs and producers
- supporting producers throughout the data input and verification process

3. Explicit programmatic goals did not always translate into program designs (and vice versa).

I analyzed how five Farm to School goals were both mentioned explicitly and incorporated into the design of the 15 incentive programs. More than two-thirds of states with incentive programs do not have explicit goals listed directly on their program's website or in the bills that established the incentive. The legislation and websites seldom listed goals that went above surface statements such as *"to help offset the cost of schools buying [local] products to serve in their meal system"* and did not expand further to discuss the motivations behind encouraging local food procurement. Explicit goals were more often mentioned in programmatic materials such as RFAs, posters, and recorded webinars. A list of design structures that promote the five policy goals can be found in Figure 6.

Economic Development was the most prevalent theme among explicit goals mentioned in programmatic materials and by coordinators during interviews. Many state coordinators want their incentive programs to not simply offset the purchases of local foods, but hope that these programs create new market opportunities for farmers and encourage SFAs to spend beyond the value of their state subsidy. Following closely behind economic development, **public health** was the second most commonly mentioned goal. Phrases such as "nutritious," "high quality," "freshly harvested," "improve eating habits," and "improve daily nutrition" were found in the documents about these programs or mentioned by informants during interviews. However, in practice, few policies found ways to explicitly prioritize

Figure 6. Design Structures in Alignment with Five Farm to School Goals

Goal		Element	Alignment *("+" = positive alignment, "-" = negative alignment)*
Economic Development	+	*Allowable Costs / Eligibility*	Tracking new purchases or requiring baseline information on local purchases in order to participate
		Reimbursement	Matching reimbursement structure
		Supports	Reallocating expenses to allow for full utilization of funds
		Eligibility	Encouraging more local purchases through a sliding scale performance-based eligibility
		Allowable Costs	Incentivizing all or most local food types in the program
		Allowable Costs	Allowing a la carte and adult meals as incentivised meals in the program
Education	+	*Allowable Costs*	Incentivizing the purchase of school garden produce
		Allowable Costs	Making education an eligible (or mandatory) expense
		Eligibility	Grant scoring criteria can prioritize effective in-school partnerships and educational activities
	__	*Allowable Costs*	Not allowing educational supplies as allowable expenses without a similar program to fulfill this need
Environment	+	*Eligibility*	Grant scoring criteria can prioritize sustainable agricultural practices
	__	*Allowable Costs*	Allowing processed products, meat-based protein, and dairy as incentivized purchases.
Equity & Community Engagement	+	*Eligibility*	Eligibility through universal qualification
		Eligibility	Grant scoring criteria can prioritize high need communities, cultural foods, high need farmers, and applicants that are engaged in their communities
		Eligibility	Sliding scale reimbursement structure can create pathways for SFAs to enter a program with low or no risk
		Allowable Costs	Allowing non-food items such as staff time and equipment as eligible expenses
		Supports	Earmark funds for tribal communities or adopt separate program timelines
		Supports	Seed grants can create pathways for SFAs to enter a program with low or no risk
	__	*Eligibility*	Performance-based eligibility without sliding scale or other equity measures
		Eligibility	Grant application eligibility without additional equity measures
Public Health	+	*Eligibility*	Grant scoring criteria can prioritize applicants that include nutritional activities and promotion
		Eligibility	Grant scoring criteria can prioritize the purchase of unprocessed and minimally processed foods
	__	*Allowable Costs*	Restrict allowable items to unprocessed and minimally processed foods
		Allowable Costs	Allowing processed products as incentivized purchases

nutrition and public health through their designs.

Community engagement and equity were infrequently mentioned among the explicit goals of incentive programs, but were commonly incorporated through design elements. They were also often mentioned as indicators of success. Most states incorporated this goal through grant scoring criteria and program supports.

Education was not often listed as an explicit goal. However, many states often bolstered education through other synergistic programs and policies. Some states also prioritized educational activities in grant scoring criteria.

The promotion of **environmental sustainability** was the least prevalent among all programs in both explicit goals, design elements, and indicators of success. Only one state incorporated environment into its explicit goals and program design.

Successes

I looked to see how states were describing the "success" of their programs. Surprisingly, when describing success, informants went beyond listing the kinds of metrics that are typically observed in program evaluations or legislative summaries. For example, informants did not discuss the success of their program based on dollars spent or pounds purchased, but rather on whether their program reached diverse audiences, cultivated relationships, built trust, and engaged the community. Informants saw success when their programs were being fully utilized and expanded over time, promoted culturally relevant foods, improved school meal quality, and built the capacity for partnerships and interagency participation.

Some of the indicators mentioned below have been observed, recorded, and reported by states. Others are harder to measure and have not yet been operationalized. Descriptions of "success" were mostly aligned with principles of community engagement and equity, followed by economic development. These collective indicators can be found in Figure 7, and can help state program coordinators and nonprofit partners develop a way to view and evaluate the implementation of their incentive programs.

4. There is interest among state officials to create a community of practice.

My research into the literature and conversations with state-level Farm to School professionals called attention to the fact that many coordinators did not know which states were operating similar programs. Many had heard of the longer-standing programs such as Oregon and Michigan, but even officials in those states were unaware that many of their contemporaries had adopted similar incentive programs. Part of this lack of awareness may be because more than a third of the programs were established relatively recently, since 2020. This may also be due to the nature of the work of coordinators and department officials, whose demanding work can create silos within a state's borders.

There is a burgeoning effort, including work by the Michigan State University Center for Regional Food Systems, to intentionally strengthen these relationships through listservs, webinar training, and coordinated meetings between states. There are also nationally-focused organizations and projects, such as the National Farm to

Figure 7. Descriptions and Indicators of Incentive Program Success (shared by informants)

Policy Goal	Success Statement	Indicators
Economic Development	*The program supports local producers and promotes economic development.*	• The program directly connected producers with SFAs • Department officials were able to connect local producers with other school districts when inputting SFA invoice data • SFAs purchased from a wide variety of producers (big tent approach) • SFAs purchased from small, direct farms • Districts spent more on local food than their incentive award • There was a diversity of types (direct farm, distributor, coop, food hub), geographic regions, and sectors represented by producers participating in the program • The program addresses needs for producers with wrap around services such as food safety training or grant funding • The department or their partners connected producers with food hubs and institutional partners • There were new products developed by producers for the program • Food distributors are now including farm-level or state-level data for all their clients • More anchor institutions and retail buyers are purchasing local food
	The program expanded use and uptake among SFAs in their state.	• The program's budget has expanded over time • All of the funds were being utilized • The number of participants (SFAs or CNPs) expanded over time • Ability to foster the growth of an SFA's Farm to School program over time
Equity & Community Engagement	*The program has uptake among diverse stakeholders in their state.*	• Ability to connect with SFAs new to Farm to School • Ability to serve SFAs with more diverse or lower socioeconomic students • The program had diversity in the types of stakeholders that participate in the program (tribal communities, expanding into community partner and ECE sites) • The program identified SFAs and fostered program success in underserved geographic regions
	The program cultivates a positive relationship with participating SFAs.	• There were repeat participant SFAs over time • There was positive feedback from and ease of use by SFAs • SFAs are public advocates of the program • Program participants saw the program as worthwhile
	The program cultivates community, builds trust & builds culture around the program.	• There was trust between buyers and growers • Experienced SFAs are mentoring new SFAs or ECE/community partners • State agencies were able to quickly adapt to better serve SFAs in light of an implementation challenges
	The program engages the community at large.	• The program has garnered bipartisan support • The program can engage the community through storytelling
Public Health & Education	*The program fosters agricultural education and improves school meals.*	• The department or collaborative agencies developed resources and conducted promotional activities for districts to better participate in the program. This can be through items such as a recipe book, local food days, or local food training for cafeteria staff • The nutritional quality of school foods was perceived to increase • SFAs engaged classrooms and clubs in building their Farm to School programs. • The program worked to diversify the types of new foods that are served in meals • The program allowed foods that were more attuned to community foodways of that area
Other	*The program allows the department to build its capacity for partnerships and interagency participation.*	• The program expanded to ECE and community partner facilities • Stakeholders and departments were sharing resources and creating efficiencies • The department collaborates with other agencies and organizations to improve the program • The department has been able to maintain or increase staff dedicated to the program, either at the agency or among their partners • There are new partnerships with tribal communities beyond the incentive program.

Source: Figure created by author in July 2022. Data sources listed in Appendix C.

School Network, the National Farm to Institution Metrics Collaborative, and a project team at Colorado State University, Ohio State University, and USDA – Agriculture and Marketing Service who are working to understand the impacts of statewide incentives on procurement.

There was a desire from officials to collaborate with others or learn more about: drafting bill language, creating tracking sheets, developing RFAs, conducting evaluations, expanding into ECE sites, working with tribal partners, developing price points for school garden produce, and creating a pool of professionals familiar with Farm to School to review grant applications. To kick-start this process, I attempted to glean tracking sheets, evaluations, and RFAs from each state to establish a repository for interested parties who wanted to observe how other states are implementing their programs. These resources are available in a Farm to School Incentive Toolkit.

Recommendations

Recommendations for Researchers & Nonprofit Partners:

1. Create a community of practice.

2. Create a searchable database for incentive program materials. Each state had less robust evaluation material than I originally anticipated at the beginning of this study. To combat this lack of data, I was able to contact a coordinator or nonprofit partner from every state with an active incentive policy. Each informant was very gracious with their time, either providing resources or speaking with me for an interview.

Resources, such as this report, should be viewed as snapshots of these dynamic programs and will not be accurate over time. A searchable database that incorporates evaluations from each state, in which state stakeholders upload relevant materials, would be helpful for individuals that are trying to access similar information in the future. It must be updated regularly to reflect the constant iterations and expansions of incentive programs in order to stay relevant to the evolving and growing trend of Farm to School.

3. Conduct an Analysis of Incentive Program Legislation Language & History. A content analysis of Farm to School incentive bills and interviews with advocacy partners could illuminate a richer story of what kind of language can be more influential for states that are looking for support during their legislative process.

4. Include Food Service Director and SFA-level input. Researchers may wish to dive deeper into understanding how the statewide programs were perceived by food service directors in each state, or how the incentives were impactful on an SFA level.

5. Operationalize this classification scheme to compare state programs directly. This report seeks to tease out possible attributes of different programs and identify trends in experiences, rather than compare incentive-based programs directly with each other. Comparative analyses may be able to further investigate the nuance of varying program designs (observed in this report) and how program attributes affect implementation on the ground.

6. Study the causes and effects. Future research can take a longitudinal and more in-depth approach and may be able to describe the impacts of different incentive programs and the extent to which specific design elements are likely to yield different outcomes while taking into account dcontextual factors. This research could begin with cohesive measurement criteria that states use to evaluate their programs, which could be used to compare outcomes between states with less variability. For example: Do states with limited food categories lead to more nutritional outcomes? Do states with match structures promote economic development more than programs with universal eligibility?

Recommendations for Incentive Program Designers, Policymakers, and Coordinators

The Design Process

Conduct extensive research before starting the program. It is important to understand how an incentive program can complement current Farm to School activities in a specific state. Conducting research such as a needs assessment will establish a baseline local procurement threshold and help designers understand what SFAs are already purchasing. Designers should also research incentive-based programs from other states to understand the range of available models.

Incorporate as many stakeholders into the design process as possible. Stakeholders should be from a variety of disciplines and especially include food service directors.

Start small with a pilot program to work through implementation challenges before expanding.

Develop clear goals and bake them into the program. Understanding what success looks like in your community can give state administrators a guiding star on which to base implementation and evaluation.

Use intentionally flexible language in legislation that encourages incentive programs to be nimble, iterative, and attuned to the evolving needs of stakeholders. Not all unintended consequences and implementation challenges can be foreseen, and feeling beholden to strict bill language was noted by several informants. It is critical that programs are designed to adapt such that they can avoid issues in the future.

Program Supports

Provide technical assistance to stakeholders, either through the authorizing department or by working with partners. Providing funding to program partners to provide technical assistance is a bonus.

Embed a funded coordinator position (or several) to implement the incentive program.

Require (and finance) evaluation in the program. If this is not possible for the authorizing agency, evaluation can be outsourced to a supporting nonprofit firm.

Collaborate with partner agencies, nonprofits, and producers in the design, advocacy, implementation, and evaluation of the program.

Design Attributes

Make the program simple and user-friendly for participating SFAs. Making a program welcoming and accommodating for SFAs is key to genuine, meaningful, and abundant participation. Authorizing agencies can make a program more user-friendly by (but not limited to):

- assisting SFAs with finding vendors, such as with an approved supplier list;
- working through the process of how SFAs become eligible for reimbursement and making it as simple as possible;
- and designing their incentive reimbursement to align with existing SFA reimbursement processes as to not overwhelm food service directors. For example, this can be done by incorporating incentive reimbursement into the monthly claims process.

Reflect on key programmatic considerations in the design process:

- How does re-allocation work? What happens if there are unspent funds?
- Should there be a cap on the size of funds disbursed to sponsors? What should it be?
- Who defines local?
- Who will be responsible for vetting suppliers or their products?
- How will purchases be reviewed and tracked by the authorizing agency?

Incorporate other local food promotion programs (if applicable) into your incentive design. This is in reference to local food branding programs, capacity-building grants, and educational programs taught by supporting stakeholders.

Programs that are funded for multiple years (or indefinitely) may be more likely to have greater buy-in from stakeholders, who may be apprehensive to be involved in a new program if it isn't permanent.

Embed professional development. Find ways to mandate or incentivize ways that promote scratch cooking and menu development.

Consider accessibility and bake equity into programs, with the intention of supporting SFAs, producers, and students in under-resourced communities.

Consider transformational change. The freedom in which SFAs are able to spend their reimbursement, the incentive rate per SFA, and the program budget can be viewed as indicators of how impactful program funding may be. To what extent will these relationships continue if the incentive program stops? To what extent is the program going to change how students are engaged with local food, and how producers and SFAs interact with one another? What are ways that your infusion of government dollars can not only encourage local food procurement, but change the status quo of school food?

While all of these recommendations may not be feasible for each state's context, results from this report provide valuable insight into the current landscape of Farm to School incentive programs in the U.S. and support their diffusion. We can benefit tremendously from reflection, collaboration, and learning from one another's lived experiences. Nuanced differences in each policy can drastically alter how the program is accessed and perceived by Farm to School stakeholders. The decisions one makes in the design and implementation of these programs have the ability to greatly impact the livelihoods of children, farmers, and communities - hopefully - for the better.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