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**Subject:** [External Email] Farm to School Census Feedback from the Kansas State Department of Education  
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- Thank you for the opportunity to provide feedback on the Farm to School Census. Please find comments from the Kansas State Department of Education:
- a. Whether the proposed collection of information is necessary for the proper performance of the functions of the agency, including whether the information shall have practical utility;  
Currently due to the time lag from when the survey is completed and when the State Agency receives the data, there is not really much practical utility for the data other than to use to submit grant applications. The collection of this data is not necessary for the proper performance of KSDE. We do use the data to reach out to Sponsors to find out best practices and also to reach out and provide technical assistance. We do not feel the procurement data is accurate because vouchers are not coded as local vs not- so this data can only be a guess. We are interested in what local foods they are using- that is not asked though.
  - b. the accuracy of the agency's estimate of the burden of the proposed collection of information, including the validity of the methodology and assumptions that were used;  
It needs to be clarified that the Farm to School team needs to be a part of the completion of the census- not just one person- if you want valid data. In Kansas the School Food Authority Director may be a Board Clerk or Superintendent and they may not have complete information. The Food Service Director if in the kitchen, often does not pay the bills or submit the claims- that is often a Board Clerk. The Superintendent is at times the Authorized Representative who signs the Program Agreement yet leaves administration up to the Board Clerk and the Food Service Director is a Cook and may not be asked for input- in fact OFTEN is not asked for input. These Superintendent Authorized Representatives are very busy and just do not prioritize surveys.  
Since data is not kept for purchases as to whether local or not, there is great burden to try to figure out what dollar amount of purchases are local- most Sponsors that do not complete the census stop because they have no way to figure this out.
  - c. ways to enhance the quality, utility, and clarity of the information to be collected; and  
Too much emphasis on fruits and vegetables. In Kansas we do not have a growing season to support inclusion of fruits and vegetables in school meals during the fall and winter but we can encourage local beef, grains, pork, eggs, milk, etc.

Data should be provided for CACFP and SFSP as well as SNP. In Kansas, the CACFP and SFSP sponsors are able to utilize local products more because they can get adequate supply for their smaller sponsors- the current census does not capture this farm to plate activity at all.

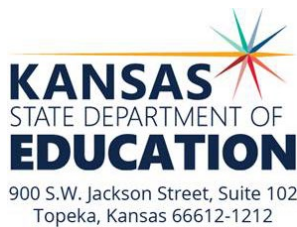
There are not adequate quantities of product available at this point for middle to large Kansas SNP Sponsors other than milk. Smaller SNP Sponsors can often find and utilize local products.

We know the data from the current census is not reflective of the gains we have made in Farm to Plate in Kansas and so having the data released right now that does not show a true picture is not helpful. In some ways it is harmful in that it appears we are not making progress and would make administrators think that few in Kansas are implementing so why would they want to do it.

- d. ways to minimize the burden of the collection of information on those who are to respond, including use of appropriate automated, electronic, mechanical, or other technological collection techniques or other forms of information technology.

Using an electronic collection tool such as Qualtrics allows us to see the data immediately and act upon it- no lag. With the current Census, the data is from before COVID and so not a true picture for our state.

The Census needs to be shorter- length is a burden. Asking for dollar amounts of purchases on local products is a barrier to participation since this is not information that is not readily available if available at all as indicated above.



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