



GROWING STRONGER TOGETHER

April 25, 2025

Rachelle Ragland-Greene
Departmental Information Collection Clearance Officer
U.S. Department of Agriculture
Mail Stop 7602
Washington, DC 20250-76021320

ELECTRONIC SUBMISSION

Dear Ms. Ragland-Greene:

These comments are submitted on behalf of National Farm to School Network and our Partner organizations 50 states, D.C. Tribal Sovereign Nations, and U.S. Territories in response to the U.S. Department of Agriculture's Food and Nutrition Service (FNS) request for OMB review regarding the Agency Information Collection Activities: 2027 Farm to School Census, OMB Control Number: 0584-0646. This information collection is currently under review and was published in the Federal Register on March 26, 2025.

National Farm to School Network represents multi-sectoral national partners, organizations in all 50 states, Washington, D.C., the U.S. Territories, and Native nations, and tens of thousands of farm to school and early care and education (ECE) supporters. Our members work daily with the child nutrition programs, producers, and farm to school activities that are improving the ways kids eat, grow, and learn about food in schools and early care and education settings. These initiatives provide hands-on learning experiences, teaching students about the origins of their food and promoting the consumption of a diverse range of fresh, local options in schools.

Farm to school programs play a vital role in the Administration's initiatives to enhance the health of America's children while also supporting farmers, ranchers, and producers across the country. The Farm to School Census provides the only nationally representative data available on farm to school participation and activities in the United States. It provides detailed information on how states and school food authorities (SFAs) engage with farm to school efforts from local food purchasing, to gardening to food education. The Census illustrates the scale and reach of the farm to school movement, showing how child nutrition programs are effectively supporting American farmers, ranchers, and food producers to gain new market avenues.

By conducting and publishing the Census, USDA provides farmers, ranchers and fishermen with important insight into schools that are interested in local purchasing, and what they may want to buy. The 2023 Farm to School Census found that "farm to school SFAs estimated that they spent about \$1.8 billion on local food during the 2022-2023 school year, about 16% of their total

food spending.”¹ It also collects product-specific information to understand the sector impact of purchasing on dairy, livestock, and horticulture. For instance, it found that the percent of SFAs that purchased local protein increased by nearly 8% since 2019, the biggest increase of any product category.² Without the Census, we have no real way of understanding the macro-level economic impact of federal programs on sectors of the agricultural economy. It also provides a granular level of data that allows for tailored economic and business analysis.³ This kind of local market information is a useful resource to help producers reach appropriately scaled market opportunities.

Making this data available helps state and federal policymakers understand the type, reach, and scale of innovative farm to school programs taking place, and how policies can best support this work. Given that Secretary Rollins’ has expressed a vision of USDA’s role to “encourage states to choose policy options that protect both participants and the taxpayer,” the data that the Census provides allows states to understand the impact of their own state-level policies to local procurement.^{4,5} SFAs have an opportunity to share what specifically would help them buy more local food.⁶ This information given by the actual buyers is key for state and local policymakers to shape programs that can make a real impact. No other source provides the level of robust data for decision-makers.

Moreover, child nutrition programs have the opportunity to maximize the impact of government funds by including farm to school activities, and this data helps understand how child nutrition program operators are doing so. Secretary Rollins’ goal of creating new opportunities to connect America’s farmers to nutrition assistance programs is directly facilitated by collecting information from child nutrition program operators about their farm to school activities.

¹ Machata, Nicole, Leah Jennings, Heather Morrison, and Maria Boyle (2024). 2023 Farm to School Census Report. Report submitted to the Food and Nutrition Service, U.S. Department of Agriculture. Houston, TX: Decision Information Resources, October 2024. p. 7 (https://fns-prod.azureedge.us/sites/default/files/resource-files/2023FarmToSchoolCensusReport_v3.pdf)

² Machata, Nicole, Leah Jennings, Heather Morrison, and Maria Boyle (2024). 2023 Farm to School Census Report. Report submitted to the Food and Nutrition Service, U.S. Department of Agriculture. Houston, TX: Decision Information Resources, October 2024. p. 8 (https://fns-prod.azureedge.us/sites/default/files/resource-files/2023FarmToSchoolCensusReport_v3.pdf)

³ Duval, D., Bickel, A. K., & Frisvold, G. B. (2019). Farm-to-school programs’ local foods activity in Southern Arizona: Local foods toolkit applications and lessons. *Journal of Agriculture, Food Systems, and Community Development*, 8(Suppl. 3), 53–72. <https://doi.org/10.5304/jafscd.2019.08C.001>

⁴ Wen, C. and C. Connolly (2022). “Aiding farm to school implementation: An assessment of facilitation mechanisms.” *Agricultural and Resource Economics Review* 51, 311–342.

<https://doi.org/10.1017/age.2022.3> AND <https://www.sciencedirect.com/science/article/abs/pii/S0306919223001689>

⁵ Pratyosh Kashyap, Becca B.R. Jablonski, Allison Bauman, Exploring the relationships among stocks of community wealth, state farm to school policies, and the intensity of farm to school activities, *Food Policy*, Volume 122, 2024, 102570, ISSN 0306-9192, <https://doi.org/10.1016/j.foodpol.2023.102570>.

⁶ Machata, Nicole, Leah Jennings, Heather Morrison, and Maria Boyle (2024). 2023 Farm to School Census Report. Report submitted to the Food and Nutrition Service, U.S. Department of Agriculture. Houston, TX: Decision Information Resources, October 2024. p. 17 (https://fns-prod.azureedge.us/sites/default/files/resource-files/2023FarmToSchoolCensusReport_v3.pdf)

While it is good for agencies to be mindful of the burden that data collection puts on SFAs, this information is being sought from those that already participate in federally reimbursed child nutrition programs (CNPs) such as the National School Lunch Program (NSLP). The Census directly helps understand how CNP operations can best meet federal child nutrition program goals of child health and support for American producers. To maximize the effectiveness of this information collection, child nutrition program operators need advance notification of the 2027 Census to be able to gather the data and respond thoroughly. USDA should also note and implement the further feedback provided from state agencies and school nutrition directors on how to maximize participation and thorough responses from the surveyed groups.

On behalf of the National Farm to School Network, we appreciate the opportunity to emphasize the vital importance of the Farm to School Census as the agency plans for the 2027 Census. We look forward to working with the USDA Food and Nutrition Service in ensuring the efficacy of this information collection.

Sincerely,

A handwritten signature in black ink, appearing to read 'Karen Spangler', with a stylized, cursive script.

Karen Spangler
Policy Director, National Farm to School Network