

**APPENDIX U2.**

**60-DAY FEDERAL REGISTER NOTICE COMMENTS RECEIVED FRINZELL**



**CALIFORNIA DEPARTMENT  
OF EDUCATION**

**TOM TORLAKSON**  
STATE SUPERINTENDENT OF  
PUBLIC INSTRUCTION

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May 18, 2018

Ashley Chaifetz, Ph.D., Social Science Research Analyst  
U.S. Department of Agriculture  
Food and Nutrition Service  
Special Nutrition Evaluation Branch  
Office of Policy Support  
3101 Park Center Drive  
Alexandria, VA 22302

Dear Ms. Chaifetz:

Subject: Comments Regarding Farm to School Census and Comprehensive Review

The California Department of Education (CDE) Nutrition Services Division appreciates the opportunity to provide input on the Farm to School (F2S) Census and Comprehensive Review. The CDE supports the creation of a U.S. Department of Agriculture report which comprehensively examines F2S and its progress since the passage of the 2010 Child Nutrition Reauthorization.

The CDE has the following input on item c:

- c) Ways to enhance the quality, utility, and clarity of the information to be collected.

**Comment #1:** Given that federal regulations do not require Child Nutrition Programs (CNP) to collect data that identifies the amount of dollars spent on the procurement of local foods, and limitations on labeling and procurement documents, only those school food authorities (SFA) with a strong emphasis on serving local foods in their CNPs will be able to provide this assessment in the F2S Census. The dollars spent on local foods may be significantly underreported as many foods may unknowingly be procured from local sources by food distributors.

**Comment #2:** The F2S Census includes questions about school gardens. Given that the school food service director (FSD) is not usually the entity that creates and maintains school gardens, they may not be aware that school gardens exist on all campuses and therefore may underreport school garden activities within the district.

Ashley Chaifetz, Social Science Research Analyst  
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In addition, the F2S Census includes questions about F2S concepts incorporated into educational curriculum. Again, the FSD is not the entity that establishes educational curriculum in the classroom. Questions pertaining to educational activities in the cafeteria to promote F2S are appropriate to include in the F2S Census distributed to SFAs.

**Consider distributing a second survey which include questions about school gardens and educational curriculum in the classroom. The SFA could be asked to forward this second survey to the appropriate group within the district to complete rather than attempt to collect and report this information themselves.** This would increase the accuracy of data collected on school gardens and education curriculum in the classroom and minimize the burden of the collection of information on the SFA.

Thank you for inviting public comments on the process to develop a comprehensive F2S report. We appreciate the opportunity to provide input. If you have any questions regarding this subject, please feel free to contact me by phone at 916-322-8316 or by e-mail at [kfrinzell@cde.ca.gov](mailto:kfrinzell@cde.ca.gov).

Sincerely,



Kim Frinzell, Director  
Nutrition Services Division

KF:lp