

APPENDIX U6.

60-DAY FEDERAL REGISTER NOTICE COMMENTS RECEIVED RAGALIE-CARR



May 15, 2018

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

Re: Docket FNS-2018-0006, Agency Information Collection Activities: Proposed Collection; Comment Request – Farm to School Census and Comprehensive Review

Dear Dr. Chaifetz:

These comments respond to the Food and Nutrition Service’s (FNS) request for comments on new information collected “to study farm to school efforts being conducted for the Farm to School Census and Comprehensive Review.”

The National Dairy Council (NDC), a non-profit organization founded by U.S. dairy farmers, is committed to nutrition research and education about dairy’s role in diet and health and wellness. NDC provides science-based dairy nutrition, food safety and product development information to, and in collaboration with, a variety of stakeholders committed to fostering a healthier nation, including health professionals, educators, school nutrition directors, academia and industry. Established in 1915, NDC comprises a staff of registered dietitians, school nutrition specialists, and experts in nutrition research, product development, food safety and communications across the country. NDC is committed to helping improve children’s health and wellness through programs such as Fuel Up to Play 60 (FUTP 60), which encourages youth to consume nutrient-rich foods and achieve at least 60 minutes of physical activity each day.

FNS seeks comments on, among other things, whether collecting information on farm to school efforts is necessary and whether the information collected will have “practical utility.” We would note that interest in farm to school initiatives has expanded substantially; as explained further below, some 8,000 schools implemented a farm to school play through Fuel Up to Play 60 (FUTP 60), and this is likely only a subset of schools that have adopted one form or another of farm to school programs. From the

standpoint of using resources efficiently and maximizing benefits for student nutrition, surveying both distributors and school nutrition directors will contribute to a body of knowledge that enables schools to make more informed choices and to recognize which programs are likely to be most beneficial in their own situation.

Although the study’s design will capture important and pertinent information from distributors and schools, additional insights would likely be gained by also surveying non-profit organizations that have been directly involved in designing, funding and/or implementing farm to school programs. NDC and its state and regional dairy councils would welcome the opportunity to provide information to FNS as a part of the Farm to School Census and Comprehensive Review. We assume that other USDA-regulated research and promotion programs, as well as trade associations or other non-profits, would likewise be willing to share data and insights.

In order to illustrate the type of information that would be available to FNS, we provide below a few facts and statistics from three initiatives in which dairy producers have been involved.

Fuel Up to Play 60 Farm to School – Know Your Food Play

One of the “plays” that FUTP 60 offers to schools – activities that can be implemented by students under adult sponsorship and that aim to improve nutrition, physical activity or both – deals directly with the connection between schools and local farmers. A full description can be found at <https://www.fueluptoplay60.com/playbooks/current-seasons-playbook/farm-to-school>

FUTP 60 grants have been awarded to some schools for several years, as detailed in the table below.

For Funded Plays:

School Year	# of Schools Awarded Funding for Farm to School Play	Total Amount of Funding Approved for Farm to School Play
2015-2016	112	\$ 269,809
2016-2017	152	\$ 347,621
2017-2018	115	\$ 248,916
TOTAL	379	\$ 866,346

In addition, FUTP 60 has conducted surveys that are representative of all participating schools, whether funded or not. The 2016-17 utilization survey found that --

- 44% of all FUTP 60 schools implemented a Healthy Eating Play. Of these schools, 24% implemented the Farm to School Play. This equates to 11% of all enrolled schools, which translates to approximately 8,000 schools implementing the farm to school play (in 2016-17, which is the last year for which these data are available).

Farm to school themes have also been part of our annual Student Ambassador summits:

- 2016 Student Ambassador Summit Farm to Table Grant Challenge
- 2016 and 2017 Summit Interactive Farm to Table Meals
- 2017 Summit Excursions: Answer Plot, Dairy Farm Tour and Land O' Lakes R&D Center
- 2017 Summit Student/Program Advisor Requirement to engage a local dairy farmer during the 2017-2018 school year as part of their Activation Plans

Discovery Education – Discover Undeniably Dairy

Another example of farm to school engagement is a partnership with Discovery Education.

- In 2017, NDC partnered with Discovery Education to build content and resources targeted to 5th to 8th grade classrooms across the U.S. to share information about dairy farming, including cow care, nutrition and sustainability.
- On October 19, 2017, a [Virtual Field Trip](#) launched, taking classrooms on a journey to a dairy farm in Colorado to experience how dairy farmers care for their cows and communities.
 - A four-part series discussed cow care, cow nutrition and diet, dairy's journey from farm-to-table and the sustainable practices and technologies used in dairy farming.
 - Nearly 135,000 students tuned in to the Virtual Field Trip from almost every state.
- Following the virtual trip, the content along with educator resources and guides were housed on a custom website: www.DiscoverUndeniablyDairy.com
- In late January 2018, two more resources were launched – a [360-video](#) and a [360-hotspot image](#) that provided classrooms with an opportunity to visit a farm in Virginia and explore the farm via 360-viewing technology.
 - The two-minute 360 video showcases the technology on the dairy farm, highlighting automated milking and feeding systems while reinforcing dairy farmer's commitment to cow care and to developing nutritious and safe foods for communities.
 - The 360 hotspot image provides the opportunity for students to click on areas of the farm and to learn more about key subjects including nutritious facts about dairy foods, sustainability and more.
 - Classroom guides accompanied the 360 assets and also helped students explore a variety of job opportunities in dairy and agriculture overall.
- Since February, the content has nearly 750,000 students and resources will be marketed and made available through June 2018.

AdVenture Capital

A final example is the work of AdVenture Capital, a program of the GENYOUth. AdVenture Capital empowers students ages 13-17 to help improve health and wellness in their schools and communities with funding, mentor support, and access to exclusive experiences. As part of its health and wellness initiatives, AdVenture Capital also funds and supports projects that utilize farm to school solutions to a nutritional eating challenge in school. Examples of past Adcap Farm to School Projects are below.

- *Food & You:* A farmer engagement program to help students learn more about their food and the farmers who produce it, and to implement a dairy farm-to-table breakfast smoothie program to increase access to nutritional food in the morning.
- *Let's Talk About Food:* Collaboration with local farmers during a summer enrichment program to provide education and resources to students to create their own healthy snacks.
- *Growing Knowledge:* Opportunity to learn about farming and sustainability by utilizing vertical gardens in the school's science program.
- *Dare to Pear Dairy Fair:* A school fair engaging local dairy and orchard farmers in a field trip and school visit program and utilizing dairy/fruit in breakfast smoothies.
- *Farm to Funds:* A student-built website to link local farmers markets to school campuses.
- *Brentwood Bloom Room:* A greenhouse space where high school classes can participate in the design, implementation, and sustainability of a school garden.

As these examples illustrate, a wide range of farm to school programs currently exists and thousands of schools are involved. Gathering information about the design, major features, accomplishments and challenges for these programs, including those sponsored by non-profit groups in the private sector, would add information and insights to FNS's existing work.

Sincerely,



Jean Ragalie-Carr, RDN, LDN, FAND

President

National Dairy Council