

Program Development Considerations and Team Planning Guide

This document is part of a resource series on Local Food Purchasing Incentives (LFPIs), produced through collaboration between the Michigan State University Center for Regional Food Systems (CRFS) and the National Farm to School Network. This project aims to contribute to the growing body of knowledge on LFPIs and provide more information for farm to school advocates and practitioners nationwide.

Local Food Purchasing Incentives (LFPIs) are programs that provide additional funding to child nutrition program (CNP) operators to directly offset or incentivize local food purchases. Typically funded and operated at the state level, these programs intend to increase purchasing of local foods in school and early care and education (ECE) settings.

LFPIs across the nation differ in type, size, and complexity, tailored to the specific cultural, political, and socioeconomic contexts of each state.

The purpose of this resource is to provide LFPI program designers and stakeholders with essential questions to create programs, or modify elements of existing programs. Our goal is to empower advocates to design stronger and more effective LFPIs while also avoiding common difficulties in implementation. Taking inspiration and lessons learned from existing LFPIs, the series of questions listed below are intended to guide policymakers, program officials, and advocates in considering five key aspects of LFPI programs before they are implemented or during program redevelopment:

- **ESTABLISHMENT AND FUNDING (P. 2)**
- **ADMINISTRATION (P. 5)**
- **DESIGN (P. 6)**
- **DEFINING LOCAL AND QUALIFYING LOCAL PRODUCTS (P. 11)**
- **INTEGRITY AND EVALUATION (P. 14)**

This document is designed as a team planning guide.

We intend for stakeholders to consider and address the questions below, take notes about their vision for an LFPI in the margins, and discuss their perspectives in groups to reach a consensus on LFPI design.

Although numerous questions are outlined for stakeholders to consider and address, this list should not be considered exhaustive. Some questions have straightforward answers, while others may require further research and thought partnership.

Program designers are encouraged to think innovatively and critically about their programs and connect with professionals from other states to learn valuable insights from the growing national community of incentive practitioners. Program designers may find it helpful to first research existing LFPis and review the [Farm to School Incentives Toolkit](#), which includes a report of the national landscape of LFPI designs, a compendium of all statewide programs, and folders that include tracking sheets used by states and existing state program evaluations.

PROGRAM ESTABLISHMENT AND FUNDING

What legislation is required to establish the program?

- Will the LFPI need to be part of a general budget bill, a ballot measure, be standalone legislation, or part of another program? Other programs may include universal meals policies, education and health policies, or a state-level farm bill.
- Who will be responsible for advocating for the program's establishment and/or continued funding?

If applicable, what language should the legislation contain about the program?

Once the appropriate legislative vehicle is determined, the language should be written to include what is absolutely necessary for transparency and accountability, without being so prescriptive that an agency can not respond to program needs.

- What is the minimum information needed in LFPI legislation to allow flexibility for customization and adaptation to changing needs?
- Conversely, what components should be included in legislation to ensure accountability and transparency from the administering agency? Engagement with state agency personnel during the beginning of this process can help advocates understand the right level of specificity.
- How easy is it to amend LFPI legislation if needed during implementation?

How will the program be funded?

- Given the political environment and funding outlook, can the state first establish a **permanent** or **temporary** program? Consider the feasibility of introducing legislation for either type of program.
- Will the state fund the LFPI through general appropriations?
- Are there existing tax programs or other revenue sources that can directly fund this program?

Is it more politically feasible to start with a pilot program before introducing a permanent and/or large-scale program?

If yes, consider the following questions:

- What size should the pilot program be? Meaning, how many students should it impact, and at what funding level?
 - If you have a small startup fund for the program, will you limit the size of districts so that a larger number of districts can participate? Or is including large districts important for your pilot?
- Should participants be strategically placed throughout the state or focused in specific regions for the pilot?
- What data will be most beneficial to gather from the pilot to advocate for a statewide program?
- Who will be responsible for aggregating and using the data for storytelling and advocacy?
 - How will this group or organization be funded?
 - Can the pilot program include funding to support these efforts?
- Are there other supports that a pilot program can fund, such as technical assistance, staff training, small equipment, etc.?
- How long would a program run before it is ideally funded at a permanent and/or larger-scale? We suggest 2-3 years as a minimal length of a pilot program.

What should be the overall program budget?

- Do you have an idea of a feasible program budget?

If not, consider the following:

- First, gather data on eligible CNPs in your state, their enrollment, and average daily participation (ADP).
- Then, test budget scenarios based on specific incentive rates multiplied by CNP size or tiers of sizes. Size can be measured by student enrollment, number of lunches served, or ADP multiplied by the number of days. For example, \$0.15 x lunches served in the previous school year or \$10 x total student enrollment. For more information on incentive rates, see pages 9-10.
- Alternatively, if you want to give all CNPs an equal amount of funding or provide a range of funding regardless of CNP size, multiply the anticipated funding (or an average of the range) by the number of eligible participants.

- If the total budget yielded by these calculations seems unrealistic, consider (1) adjusting award amounts or incentive rates, or (2) reducing the number of participants by making program participation competitive through an application and review process. If the application process is competitive, consider the administrative workload required for reviewing grant applications and plan your budget around this need.
- Additional staff members (including fringe benefit estimates) and/or contracts needed to support successful program implementation should also be included in the total budget. Services provided by these staff members or contractors may include data collection/tracking, evaluation, storytelling, marketing and promotion of the program, culinary skills training, procurement support, and identifying interested farmers/food suppliers and/or matchmaking.

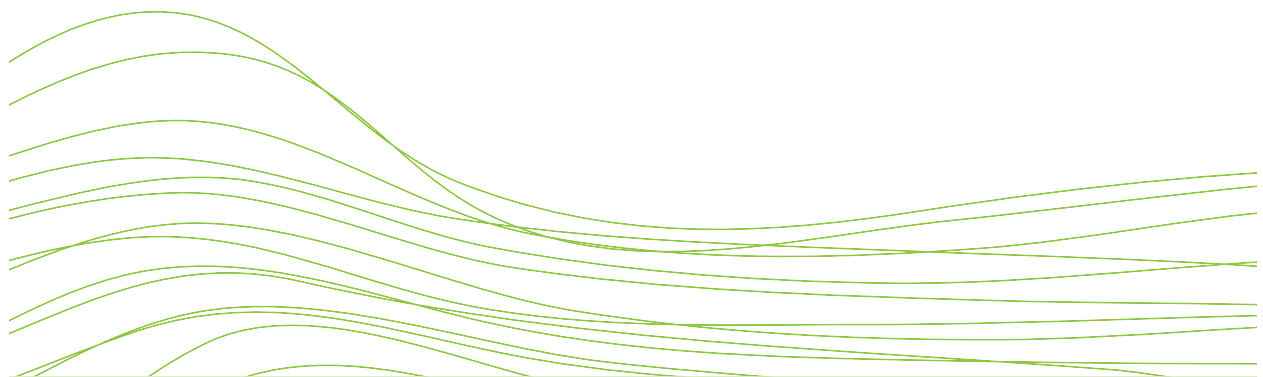


TIPS

- **Consider proposing different budget scenarios** to stakeholders for discussion.
- **Start small.** A successful LFPI can build momentum for an increased budget and target a greater student population over time.

What happens if some of the LFPI budget goes unspent?

- How can program administrators ensure participating CNPs spend their awarded funds? Are there ways to check in with them throughout the year and provide direct assistance if and as needed? Should this protocol be written into legislation or program guidelines?
- Can the administering agency reallocate funds to other participants after a specific period?
 - If yes, how and when will CNPs be notified about potential fund reduction?
 - Should this process be codified into legislation or program guidelines?
- Can the funds roll over to the following school year or be allocated for other purposes like the state's required match to support school meals programs, funding nonprofit partners, or providing grants for broader farm to school activities?
- If underspending is likely or unavoidable, how can advocacy partners talk about it? Will this negatively impact the program's chances for funding, or permanent funding, in future years?



PROGRAM ADMINISTRATION

Which state agency or department will administer the program?

- What expertise or resources do they bring?
- What are their existing relationships with CNPs? Farmers and local food suppliers? Other state departments and external organizations that could support program implementation?

Does the state agency or department have the capacity to administer the program?

- How many staff hours are needed for administering the program and supporting participants?
- Are there available staff members at the agency with time to administer the program? Or will funding be required for additional employees or contracts with external partner organizations?

How can the program leverage existing partnerships and programs?

- Which (1) nonprofit partners or (2) state agencies already support farm to school or local food systems efforts? Ask these questions for both sets of partner groups:
 - How do they support farm to school initiatives?
 - Does or how can the LFPI align with their efforts?
 - What role can they play in the LFPI (e.g., technical assistance, training, producer-buyer connections, and program evaluation)?
 - Do they have the capacity, in terms of funding, staff time, and expertise, to play a particular role in supporting the program?
 - Can the LFPI financially support these partners in their work as well?
- What state-level programs already support farm to school or local food system efforts?
 - Are there existing programs that support producers who want to sell to institutions?
 - How can the LFPI complement or fill gaps in these programs to catalyze broader farm to school efforts in the state?



For more information, please refer to our resource on [program administration](#).

PROGRAM DESIGN

Establishing clearly defined goals helps with program delivery but also guides program participants and supports evaluation. As you think through these questions, think about how your responses are in alignment with different policy goals.

What goals do you hope to achieve through this program and policy?

- Are there existing policies in the state that outline specific goals, such as those related to local procurement, producers, values-based procurement, health outcomes, or climate? How does this policy align with existing goals or declarations from the state government?
- How will the program further community engagement, equity, economic development, education, environment, and/or public health?
 - Consider different kinds of stakeholders concerning these goals.
- If values-based purchasing is supported in your state, what are the specific values, and how will they be integrated? Examples include economic and environmental justice, health, racial equity, workers rights, and animal welfare.
 - Refer to our resource on [integrating values-based purchasing in incentives](#) for more information.**
- How will you communicate these goals and values in legislation and programmatic materials?

How will you include community voices in designing and engaging with the program?

- How will stakeholders such as CNP staff, school administrators, students, parents, farmers/producers, distributors, and food hubs be involved in the early stages of program design?
- How and when will you share your proposed incentive design with different stakeholders to gather their input?
- How will community voices be involved in the program's implementation?
 - Colorado's [H.B. 22-1414](#) requires CNPs that participate in its LFPI to establish a local multi-stakeholder advisory board. CNPs can use up to 12% of their allotment to support the student-parent advisory councils.
 - California Department of Food and Agriculture hosts town halls and public comment periods to gather stakeholder input about their proposed Farm to School Incubator grant before the new request for applications is released.¹

¹ The Department hosted its last town hall from November 29 – December 14, 2023. Learn more about California Department of Food and Agriculture's public comment period on the Farm to School Incubator grant's website, which shares press releases for the comment period, the public information session slide deck, recordings of the public information session, and a summary of public comments and responses from the department: <https://www.cdffa.ca.gov/caf2sgrant/>

Should the program be a traditional or expanded LFPI?

- **Traditional incentives** provide a specific reimbursement rate for CNPs if they qualify for the incentive program.
- **Expanded incentives** are typically grant programs that fund farm to school activities (such as CNP staff time for administration, staff training, equipment, and expenses for educational activities) in addition to local food purchases.



Refer to our resource on [expanded incentives](#) for more information.

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- Are there other programs in the state that already support CNPs in other areas of farm to school development?
 - Is an expanded LFPI politically or administratively feasible?
 - Should there be a cap on the amount of grant awards that can be spent on nonfood costs? Or, should the program allow CNPs to use the funding according to their needs?

Who will be eligible to participate in the program?

- Will only public schools be eligible, or any school that operates the National School Lunch Program (NSLP)? Will other non-school sponsors of CNPs like early care and education (ECE) sites be included? Consider the expertise and capacity to offer technical assistance to these different groups.
- How will tribal communities be engaged and ensured to benefit from the program?
- Will specific funding be allocated for specific kinds of stakeholders (i.e. ECE sites, tribal communities) to ensure equitable distribution of funds?

How will the LFPI be administered? There are typically three ways:

1

GRANT PROGRAMS

Grant programs can be noncompetitive or competitive depending on how they are designed and the overall funding level for the program. In a noncompetitive grant, either all CNPs are notified of their award without an application process, or all CNPs who apply for the grant are awarded funds. Some LFPIs are housed in larger grant programs with multiple tracks that target various audiences. For example, California and Oregon have multiple tracks to support local producers and nonprofit partners in addition to tracks that provide funding to CNPs.

2

PERFORMANCE-BASED PROGRAMS

CNPs make purchases of local food products for an entire school year. At the end of the year, if the CNP has reached a certain percentage of local food purchasing (such as 30% of their lunch budgets in New York, or 15-25% of all NSLP budgets minus milk purchases in Vermont), the CNP will receive additional reimbursement at that time.

3 AT-WILL REIMBURSEMENT PROGRAMS

The administering agency issues reimbursement to any CNP throughout the year as long as the CNP properly submits a request for reimbursement. This system of program administration is different from a grant program because CNPs do not have to first apply to participate in the program and are not required to submit additional materials (testimonials, photos, etc.) regarding their participation in the program.

How will qualification for program participation be determined?

- If the program aims to reach all eligible CNPs, is there sufficient funding for all of them to participate? If no, the program may need to be made competitive.
- If the program is competitive:
 - How will the competitive **application** process be equitable for participants with less capacity to fill out a complicated application?
 - How will the competitive **selection** process ensure the program reaches diverse economic, racial, and geographic populations?

TIP

Even in a non-competitive program, it may be helpful to have CNPs apply to be part of the program before they begin to participate. This way, the administering agency can ensure that CNPs are aware of all program rules and requirements and be able to provide initial training and/or technical assistance throughout the year.

- Will CNPs need to first **apply** to be considered eligible for the LFPI?

If yes, will other materials be required in the application? Other materials may include:

- A local food purchasing plan,
- Baseline local procurement figures such as dollar amounts or percentages,
- A plan for integrating local food and garden-based learning or other farm to school education,
- Suggestions of services the administering department could offer to ensure successful implementation,
- An outline for tracking and documenting local food purchases throughout the year (if there is not already a template available from or required by the state),
- Letters of support from community partners, and/or
- An affidavit that food program professionals will comply with all program rules and regulations.

After CNPs qualify to participate in the program, how will they receive reimbursement?

- Will they be reimbursed either partially (such as a 33% or 50% rebate) or fully (100% of expenses, like a true grant program) for the cost of qualifying food and/or other allowable expenses?
- Will they be reimbursed per-meal or per-meal-component that features a local ingredient?
- Are there other ways to reimburse CNPs?
- How, and how often will they receive reimbursement (funds provided up front, or monthly, quarterly, annual reimbursements)?

Which meals will qualify for LFPI funds?

- Do foods purchased with LFPI program funds need to be used in specific meals, such as breakfast or lunch, or can ingredients be used in any meal that is reimbursable through NSLP?
 - If LFPI funds must be used as part of any meal, how will the accurate separation of meal costs be ensured? Will this decision add a significant administrative burden on SFAs to properly track expenditures?
- Can funds be used for à la carte purchases, and if not, how will this be advised and monitored?
- Is it possible to include summer meals in the LFPI?
 - Consider the availability of local produce and the associated advantages and disadvantages of including summer meals.

How much funding should the LFPI provide to CNPs? In other words, what should the incentive rate be?

Program designers will want an incentive to be substantial enough to be worthwhile for CNPs to participate, and for producers and distributors to invest the time in shifting their behavior. However, in order to get the maximum amount of benefit per dollar of the state budget, the incentive rate should not be disproportionately large relative to the amount of effort involved.

DETERMINING FUNDING

States commonly use a formula that multiplies an incentive rate by a number of meals served, ADP, enrollment, or another metric. This formula determines the total funding entitlement for LFPI reimbursement for CNPs. If an LFPI is administered as a grant program, these formulas represent the maximum award a CNP can apply for, and allow the CNP to apply for a grant amount under their maximum threshold. For example, Washington State's Farm to School Purchasing Grant allows for a tiered formula to determine maximum funding entitlement based on ranges of lunch counts.²

CNPs often receive LFPI reimbursement either in one lump sum provided to the CNP at the beginning of the year (such as in Colorado's LFPI), or through requests for reimbursement (shown with proper

² For example, small schools serve less than 5,000 meals in one month, whereas large schools serve more than 30,000 meals in one month.

documentation provided to the administering agency) submitted at regular intervals, or by reaching a specific local food threshold. As of 2022, incentive rates for states using a per-meal or per-meal-component formula have ranged from \$0.05 to \$0.25 (Bull 2022).

Alternatively, some states do not use a formula to determine total funding entitlement. Instead, they provide a set threshold for all CNPs or offer a funding range and allow CNPs to request a specific amount of funds within that range.³



CONSIDERATIONS FOR INCENTIVE SIZE

If program administrators will use a formula to determine the maximum incentive subsidy:

- Will the CNP be able to request an incentive award size they are comfortable with, up to a specific maximum amount? This tactic can allow administering departments to not overestimate CNP spending on local foods and reallocate excess program funds earlier on.
- How would the overall award appear for CNPs that have smaller enrollments, meal counts and/or ADPs? Could the award be too small to incentivize CNP participation in the program?
 - If yes, should a minimum award amount be established for all CNPs, regardless of size? What would be an appropriate minimum subsidy?
- How would the incentive rate appear to large-sized CNPs that have larger enrollments, meal counts, and/or ADPs? Could the incentive be too large and consume a significant portion of the overall program budget?
 - If so, should a maximum award amount be established for all CNPs, regardless of size? What would be an appropriate maximum subsidy?

Program designers should carefully consider what incentive rates would work best for their specific context, rather than solely mirroring rates from other state programs.

Consider the following based on your local context and conditions.

- Are there incentive rates that may appear too insignificant to CNPs, potentially discouraging them from applying for additional funding or purchasing more expensive items like local protein or unique fruits and vegetables?
- Are there incentive rates that may be too large, limiting the participation of only a small number of CNPs?
- Is there any research available on the current per-meal cost of school food in your region?
- Are there price estimates for the cost difference between various local foods and non-local ingredients per meal? Can this research be conducted as part of your design and planning process?

³ For example, Maine's Local Foods Fund provides all CNPs with up to \$5,500 in reimbursement per school year.

How will program administrators increase capacity through the program?

- ❑ Can the state incorporate capacity-building support for food program professionals and local producers into the program design?
- ❑ Can the LFPI offer multiple funding tracks or other forms of support for additional staff time, staff professional development, equipment purchases, supplies, and other needs that aid participants in procuring, processing, and serving local foods?
- ❑ Can the LFPI incentivize training programs by increasing reimbursement rates or providing stipends to food program staff?
- ❑ Can administering agencies or partners:
 - Offer training programs for participating food program staff or food producers?
 - Facilitate networking or matchmaking opportunities for food program staff to connect with each other and with local producers?
 - Provide open office hours or regular check-ins for food program staff?
 - Supply marketing and communications materials to participating CNPs?



RETHINKING LFPI DESIGN: FARMER-FOCUSED LFPIs

In addition to the existing LFPI models, state governments can also directly subsidize local farmers, food hubs, and other producers to increase their sales to CNPs. Learn more about this innovative model and its potential benefits and challenges in our complementary resource [Farmer-Focused Local Food Purchasing Incentives](#).



Photo Credit: Sarah Rypma

DEFINING LOCAL AND QUALIFYING LOCAL PRODUCTS

What is the existing local food procurement activity in the state?

- How much local food are CNPs currently purchasing?
- What types of foods are CNPs currently purchasing for ingredients?
- What data sources do you use to gather this information? Are they reliable and up to date?
- Can you establish a baseline of local food purchasing among the target CNPs pre-program implementation for evaluation purposes?
- Are CNPs currently purchasing local foods through federal government programs, such as USDA Foods or DoD?
 - Will LFPI incorporate CNPs' purchases through these federal government programs? If so, how can you do this without "double dipping"?
 - Will this work against or in alignment with current local purchasing through those programs?

How will you define local?

- Are there any established definitions of local being used by the legislature, state agencies/ departments, or external partners (such as universities or statewide organizations) that can be used for the LFPI?
 - Is this definition too broad or too restrictive?
 - Think about equity. Does this definition have requirements that may be too cumbersome for beginning or historically marginalized farmers?

If entities in the state do not already have an existing definition of local you want to use:

- How will you define local for the LFPI?
 - Will the definition include specific **products** or qualify certain farmers and vendors as local producers?
 - Will the definition be limited to within state borders or the broader region? Is a regional definition politically feasible or preferable?
 - How will the definition of local affect or be used by CNPs near the state's border?
 - How will this definition of local impact administrative responsibilities? How will the authorizing agency or its partners verify and enforce whether processed products fit the definition of local?

 See [Program Integrity](#) section on page 15.

What types of local foods will the LFPI incentivize?

Examples of types of local foods to consider incentivizing:

- Fresh and minimally processed fruits, vegetables, and legumes
- Grains
- Proteins (e.g. animal and plant-based products)
- Value-added dairy products (e.g. yogurt, sour cream, cheese)
- Fluid milk
- Processed products (e.g. tomato sauce, flour, juice)



Photo Credit: Sarah Rypma

Consider your specific goals for the LFPI when determining which foods to incentivize. For example,

- If prioritizing healthy eating or strengthening connections between small producers and schools, consider limiting or excluding specific kinds of processed products.
- If prioritizing economic development, include more food categories.

Also consider the local food and agricultural landscape of the state or region when determining which types of foods to incentivize.

- What types of farms and other local food businesses are in your state/region?
- Are CNPs already purchasing and using foods from these farms and/or businesses?
- Should the LFPI support these farms and/or businesses?
- Should the LFPI exclude certain food products that are already highly available in food programs that serve children?
- Are there sufficient fresh and minimally processed fruits and vegetables available to institutional buyers?
- Would expanding the types of local foods incentivized make program participation easier for CNPs?
- How feasible is it for these farms and/or food businesses to provide the necessary documentation required to verify the local products?

> See [Program Integrity](#) section on page 15.

If processed local food products are included in the LFPI, how will they be defined?

- Will there be a minimum local ingredient percentage threshold, such as 51% grown, raised, or harvested by weight or volume?
 - Will the main ingredient by weight of a processed product need to be entirely grown or harvested in the state?⁴
 - Will any product processed or manufactured in the state qualify as local?⁵
 - Will only some processed or manufactured products qualify as local?⁶
 - Based on this definition, are there large corporate food manufacturers/processors in the state/region that CNPs may purchase from? Think strategically about how to word your definition to disqualify purchases from large corporations if you do not want your incentive dollars to benefit these companies.
 - Will there be an exemption for products that are headquartered and manufactured/processed in the state but difficult to grow locally?⁷
 - Is it feasible for processors/manufacturers to track and market their products as local?
 - Is it feasible for the administering department to verify if processed products meet the proposed definition?

 See [Program Integrity](#) section on the next page.

4 Washington State's Farm to School Purchasing Grant Program formerly used a 51% local ingredient definition but now requires that the main ingredient of processed products by weight be entirely grown in Washington to qualify for the program. Learn more here: <https://agr.wa.gov/departments/business-and-marketing-support/farm-to-school-toolkit/grants>

5 Oregon Department of Education's Farm to CNP Noncompetitive Reimbursement Grant includes any processed items that could be grown, caught or raised out of state, but processed into a usable product in Oregon. Learn more here: <https://www.oregon.gov/ode/students-and-family/childnutrition/F2S/Pages/reimbursement.aspx>

6 Both Washington DC and California allow only specific processed products qualify for their LFPIs. Washington DC's Local5 program allows bread where the dough assembled, proofed and baked at a bakery in either the District of Columbia, Maryland, Virginia, West Virginia, North Carolina, Pennsylvania, Delaware and New Jersey. California allows only minimally processed dairy products (yogurt and cheese) with no artificial preservatives or sweeteners and limited sugar, as well as breads that are made with whole grain-rich flours and other whole grain-rich products that are 100% grown, milled, processed, and manufactured in the state.

Learn more about Washington DC's Local5 program: <https://osse.dc.gov/page/local5>

Learn more about California's Farm to School Incubator grant: <https://www.cdffa.ca.gov/caf2sgrant/>

7 For example, Vermont's Act 129 codified a statewide definition of local. Vermont uses three different definitions for in categories to define local: Raw Agricultural Products, Processed Food, or Unique Food Products. Read more about Act 129 here: <https://agriculture.vermont.gov/development/act-129-local-definition>

PROGRAM INTEGRITY

When considering the questions in this section, it is important to strike a balance between program integrity, administrative capacity, and the capacity of participating CNPs. Overly strict program requirements may limit the participation of producers and CNPs, while requirements that are not strict enough may compromise program integrity. We stress that program designers consider where the administrative workload falls (on producers, CNPs, state agencies, program partners) when making these key decisions. Adequately resourced program partners can provide valuable support in data collection, documentation, verification, and evaluation.

Consider evaluation in relation to documentation requirements.

- What do you want to learn about the program?
 - How can the collected data demonstrate if the program is working to meet its goals, or program effectiveness?
 - How can you design tracking methods to gather this information?
 - How will the administering agency collect purchasing data from participating CNPs?
 - Are CNPs already tracking local food purchases, and if so, how?
 - If not, how will program administrators ask participating CNPs to track local purchases?
 - Will program administrators use a spreadsheet or online software for tracking?
 - Will there be a standard tracking system and/or will participants be allowed to develop their own?
 - Will you ask CNPs to track local purchases through business administration purchasing codes or another method that program managers are already using?
 - What metrics or qualities will participants track for farms/food businesses and local products purchased?
 - Is this information standardized? And if not, would it be useful or practical to standardize this?
 - Do participants need to submit tracking information and/or invoices for reimbursement?
 - How frequently will program administrators request tracking information?
 - Should the tracking coincide with regular CNP routines, such as a monthly claims process, or be submitted annually?
 - If you want to track all local procurement from participating CNPs, is there a way to incentivize or encourage them to submit data for purchases beyond their maximum award?
- > For more insight on what state programs are currently measuring, the complementary resource [Benefits of Local Food Purchasing Incentives](#) provides a comprehensive overview of existing evaluations and legislative reports.**

- What other information will the administering agency collect about the program?
 - What other interests do legislators and/or program stakeholders have in the program that might not be demonstrated by purchasing data from CNPs?
 - Will program participants be asked to share stories, recipes, photos, or answer qualitative questions to supplement purchasing data?
 - Should this information be stipulated in legislation or left to the discretion of the state agency?
 - If so, what questions would you like to ask and how often?

What purchasing documentation will program administrators require before issuing reimbursement?

How will participating CNPs prove their purchases of local products? Possible options include:

- Asking vendors to include the state's name next to each product that is grown or processed in the state, per the local definition
- Requesting vendors to provide a separate attestation on each invoice or velocity report, indicating which products are grown or sourced locally
- Matching specific products on CNP invoices to a local product database available from food vendors

How will program administrators ensure farmers/producers also comply with documentation requirements?

- Will CNP staff be responsible for verifying compliance?
- Will program administrators require farm-level data or farm of origin if sales are not made directly from local farms?
- Do other types of food vendors such as distributors or food hubs need to provide a list of their local products?
- Will program administrators require any other information from vendors, such as demographics or farming practices?
- Will producers of processed products need to disclose farm sources and/or recipes to meet the local definition?
- Will these data be publicly available or kept secure due to proprietary concerns?
- Can program administrators provide any training or guidance to farmers and food vendors to know how to sell products to participating CNPs if they choose?

How will program administrators aggregate and share data?

- If program administrators require additional information from vendors, will each CNP aggregate these data or will a centralized or administrative staff collect it on their behalf?
- Will the administering agency or its partners share public lists of farmers and vendors and/or products, along with necessary documentation, to support CNPs in purchasing local foods?

If you are interested in creating a database of participating producers:

- How will producers apply or opt in to be part of it?
- What are the deadlines and frequency of application?
- Will the application process be equitable and include new, beginning, and historically marginalized farmers and food entrepreneurs?
- What documentation is required from producers to be part of the database?
- Will program administrators collect and/or share publicly any certifications or characteristics of these producers and/or their products?
- Will producers on the list receive additional support, such as food safety training or certifications?
- How will producers on the list be connected with participating CNPs?
- Consider how the administering agency can limit concerns about liability and/or endorsements for managing this list. How will this be communicated to ensure it supports documentation without verifying other aspects of operations such as food or worker safety and production practices?
- How and how often will this list be maintained and updated?

How will program administrators audit or verify local products?**For CNPs:**

- Will all invoices be reviewed during reimbursement requests, or only a random subset?
- If data is collected annually, should all invoices be submitted at that time, or will audits be conducted for a partial subset of all participants?

**TIP**

Make auditing/verification plans clear to CNPs before participation.

For Producers & Distributors:

- Should program administrators periodically audit specific producers or distributors to ensure they sell local products?
- How often will program administrators conduct these audits and what form will they take (interviews, affidavits, site visits)?
- How will program administrators ensure producers and distributors are willing to be audited for the program?
- What happens to CNPs if the products or producers turn out to not be local?

How will the program and its impact be documented and evaluated?

- Will the state legislature mandate an annual legislative report and/or full program evaluation? If it does not, would you like to plan for either regardless?
- If evaluation is required, how frequently will evaluation activities and/or reports occur? What is the timeline?
- Should reporting and/or evaluation requirements be outlined in the legislation?
- Can the state allocate funding for evaluation in the LFPI legislation and budget?
- Does the authorizing state department have the capacity to evaluate the program?
- Who within the administering agency/department will be responsible for program evaluation? Do they have experience as evaluators?
- Or, is there available funding and political willingness to outsource evaluation to a consultant or community partner? Ideally, evaluation should be done by an outside contractor separate from the administering agency. We recommend evaluation partners are brought into the process from the beginning to ensure program implementation and data collection supports overall evaluation needs.
- Would community partners be able to evaluate the program if they are not compensated directly by the LFPI?

How will advocates or policymakers use participant experiences to inform program changes and improvements once it is implemented?

- When and how will program administrators or partners solicit feedback from participating CNPs and other program stakeholders?
- If so, through which formats? Public or one-on-one meetings, focus groups, or surveys?

CONCLUSION

This resource serves as a valuable guide for teams of stakeholders involved in designing or adapting LFPIs, although its relevance may vary depending on specific contexts. By addressing essential questions across the five critical aspects of LFPI program development—program administration, establishment and funding, defining local, program design, and program integrity—we provide teams of stakeholders with the necessary tools to establish a common understanding, circumvent implementation challenges, and create impactful LFPI programs. Policymakers must invest ample time in thoughtful consideration of each step of LFPI implementation to identify additional programmatic questions. We acknowledge that each LFPI program is unique, and encourage stakeholders to think innovatively when developing an LFPI. The insights and guidance offered in this resource aim to pave the way towards stronger, more equitable, and effective LFPIs that empower child nutrition staff, support local communities, and drive positive change for our children and local and regional food systems.

References

Bull, C. (2022) *Statewide Farm to School Procurement Incentives: Design Thinking & Analysis of the National Policy Landscape* [Master's thesis, Tufts University]. <https://bit.ly/LFPIToolkit>

Matts, C, Fink Shapiro, L, Hoey, L. (2022) Local food incentive programs for K-12 school and ECE Settings: Stakeholder needs and values. Michigan State University Center for Regional Food Systems. <https://foodsystems.msu.edu/resources/local-food-incentive-survey-2022>

LEARN MORE

- Review the [Farm to School Incentives Toolkit](#), which includes a report of the national landscape of LFPI designs, a compendium of all statewide programs, and folders that include tracking sheets used by states and existing state program evaluations.
- Read [Local food incentive programs for K-12 school and ECE Settings: Stakeholder needs and values](#), a 2022 report by Michigan State University Center for Regional Food Systems. <https://foodsystems.msu.edu/resources/local-food-incentive-survey-2022>



See [National Farm to School Network's Webpage on Local Food Purchasing Incentives](#) for an up-to-date list of state programs.

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To find more resources on LFPIs, go to foodsystems.msu.edu/local-food-purchasing-incentives and farmtoschool.org/resources. Contact Cassandra Bull at cassandra@farmtoschool.org or Colleen Matts at matts@msu.edu for more information.

AUTHORS

Cassandra Bull

Policy Specialist
National Farm to School Network

Colleen Matts

Director, Farm to Institution Programs
Center for Regional Food Systems,
Michigan State University

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