

Appendices

The 30% NYS Initiative:
Designing Opportunities for Access, Equity,
and Economic Impact in New York's
Farm to School Incentive Program



November 2023



NATIONAL
FARM to SCHOOL
NETWORK



American Farmland Trust
SAVING THE LAND THAT SUSTAINS US



FINYS
FARM TO INSTITUTION
NEW YORK STATE

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Appendix A. Survey Questions

Contact Information

1. What is your first name? [Short response]

2. What is your last name? [Short response]

3. What is your email address? [Short response]

4. Which School Food Authority (SFA) do you represent?

If you supervise more than one SFA, please enter only the name of one SFA right now. We will ask you to share procurement information for each SFA you represent. However, you only need to respond to the general attitude questions once.

[Short response]

5. As a Thank-You for your time, we are offering Visa Gift Cards to the first 75 respondents. **If you would like to receive a gift card, please provide your physical mailing address.**

- Name [Short response]
- Company [Short response]
- Street Address 1 [Short response]
- Street Address 2 [Short response]
- City/Town [Short response]
- State/Province [Short response]
- Zip Code [Short response]

Procurement Information

We appreciate you pulling your actual data for these questions, as clear purchasing information will help us better understand the issues. If you need to make estimates, please do your best to be as accurate as possible.

1. What were your total annual food costs for the entire SY 22-23?

Enter the total nonprofit food service account food costs for the school year (not including the value of USDA foods/entitlement).

[Short response]

2. Total Annual Sales SY 22-23:

Please enter the amount received from sales of reduced and paid meals, and non-program food (e.g. a la carte, vending, catering, adult meals, etc.). For CEP schools, please enter your sales from non-program food.

[Short response]

3. How much of your overall school food budget do you estimate your School Food Authority currently spends on local NYS products?

Please enter the amount for *all reimbursable meals* (NSLP, SPB, etc.) served during the school year (not summer). Please include all local products such as fluid milk, value-

added dairy products, vegetables, fruits, plant and animal protein, grains, and other products.

Definition of local: For the purposes of this survey, a “local” or “NYS” product is defined as a food item that is grown, harvested, produced, or processed in NYS. A processed item, including raw ingredients from both within and outside of NYS, may be deemed a local NYS food product when at least 51% of the raw ingredients were grown, harvested, or produced in NYS. An item is not considered local if it is only distributed or sold in NYS.

Single-choice response options:

- 0-4%
- 5-9%
- 10-14%
- 15-19%
- 20-24%
- 25-29%
- 30-34%
- 35-39%
- 40% +
- I do not know

Fluid Milk

4. **Fluid Milk:** How much does your School Food Authority spend on fluid milk each school year?

- Please include the dollar amount you spend on milk *regardless of whether or not* it is sourced from local NYS farms.
- Please include this number for *all reimbursable meals* (NSLP, SBP, etc.) served in the regular school year (not summer).
- Fluid milk includes *all flavors* of milk, in both gallons and cartons.
- You can also provide us an estimate of this product purchased per week or month, and we will do the math for you.

[Short response]

5. **OPTIONAL SUMMER QUESTION:** How much does your School Food Authority spend on fluid milk during the summer?

- Please include the dollar amount you spend on milk *regardless of whether or not* it is sourced from local NYS farms.
- Please include this number for all SSO and/or SFSP meals served during the summer.
- Fluid milk includes *all flavors* of milk, in both gallons and cartons.
- You can also provide us an estimate of this product purchased per week or month, and we will do the math for you.

[Short response]

6. **Fluid Milk:** Does your School Food Authority have access to fluid milk produced in

NYS?

Single-choice response options:

- Yes, we have access AND currently purchase this local product
- Yes we have access, but DO NOT purchase it
- No, we do not have access to this product
- I am not sure

7. **Fluid Milk: What percentage of the fluid milk you purchase is produced in NYS?**

- Please put 0% if you do not have access to or do not purchase any of this local NYS product.
- Please leave this blank if you are unsure if you purchase local products.
- It's ok to use a best guess here. If you purchase all these products from NYS, put 100%. If you purchase roughly 25% of this product from NYS and 75% from out-of-state, put 25%.
- Examples of local NYS fluid milk companies include Upstate Niagara Dairy Cooperative, Mountainside Farms, Byrne Dairy, Hudson Valley Fresh, Revelry Group, etc.

Single-choice sliding scale:

0-100%

Value-Added Dairy

8. **Value-Added Dairy Products: How much does your School Food Authority spend on all value-added dairy products each school year?**

- Please include the dollar amount you spend on these products *regardless of whether or not* the products are sourced from local NYS farms.
- Please include this number for *all reimbursable meals* (NSLP, SBP, etc.) served in the regular school year (not summer).
- Examples of value-added dairy products include yogurt, cheese, cheese sticks, cream cheese, cottage cheese, sour cream, etc. It does not include any kinds of fluid milk.
- You can also provide us an estimate of products purchased per week or month, and we will do the math for you.

[Short response]

9. **OPTIONAL SUMMER QUESTION: How much does your School Food Authority spend on all value-added dairy products each summer?**

- Please include the dollar amount you spend on these products *regardless of whether or not* the products are sourced from local NYS farms.
- Please include this number for all SSO and/or SFSP meals served during the summer.
- Examples of value-added dairy products include yogurt, cheese, cheese sticks, cream cheese, cottage cheese, sour cream, etc. It does not include any kinds of fluid milk.
- You can also provide us an estimate of products purchased per week or month, and we will do the math for you.

[Short response]

10. Value-Added Dairy Products: Does your School Food Authority have access to value-added dairy products produced in NYS?

- Examples of companies that produce these local NYS products include Upstate Niagara Dairy Cooperative, North Country Creamery, Hudson Valley Fresh, Chobani, Great Lakes Cheese Co., Cabot, The Indian Milk & Honey Co., etc.
- Examples of value-added dairy products include yogurt, cheese, cheese sticks, cream cheese, cottage cheese, sour cream, etc.
- Definition of local: For the purposes of this survey, a “local” or “NYS” product is defined as a food item that is grown, harvested, produced, or processed in NYS. A processed item, including raw ingredients from both within and outside of NYS, may be deemed a local NYS food product when at least 51% of the raw ingredients were grown, harvested, or produced in NYS. An item is not considered local if it is only distributed or sold in NYS.

Single-choice response options:

- Yes, we have access AND currently purchase this local product
- Yes we have access, but DO NOT purchase it
- No, we do not have access to this product
- I am not sure

11. Value-Added Dairy Products: What percentage of the value-added dairy products you purchase are produced in NYS?

- Please put 0% if you do not have access to or do not purchase any of this local NYS product.
- Please leave this blank if you are unsure if you purchase local products.
- It’s ok to use a best guess here. If you purchase all these products from NYS, put 100%. If you purchase roughly 25% of this product from NYS and 75% from out-of-state, put 25%.
- Examples of companies that sell these local NYS products include Upstate Niagara Dairy Cooperative, North Country Creamery, Hudson Valley Fresh, Chobani, Great Lakes Cheese Co., Cabot, The Indian Milk & Honey Co., etc.

Single-choice sliding scale:

0-100%

Whole and Sliced Apples

12. Apples: How much does your School Food Authority spend on all whole and/or sliced apples each school year?

- Please include the dollar amount you spend on these products *regardless of whether or not* the products are sourced from local NYS farms.
- Please include this number for all reimbursable meals (NSLP, SBP, etc.) served in the regular school year (not summer).
- You can also provide us an estimate of products purchased per week or month, and we will do the math for you.

[Short response]

13. OPTIONAL SUMMER QUESTION: How much does your School Food Authority spend on all whole and/or sliced apples each summer?

- Please include the dollar amount you spend on these products *regardless of whether or not* the products are sourced from local NYS farms.
- Please include this number for all SSO and/or SFSP meals served during the summer.
- You can also provide us an estimate of products purchased per week or month, and we will do the math for you.

[Short response]

14. Apples: Does your School Food Authority have access to whole and/or sliced apples grown in NYS?

Definition of local: For the purposes of this survey, a “local” or “NYS” product is defined as a food item that is grown, harvested, produced, or processed in NYS. A processed item, including raw ingredients from both within and outside of NYS, may be deemed a local NYS food product when at least 51% of the raw ingredients were grown, harvested, or produced in NYS. An item is not considered local if it is only distributed or sold in NYS.

Single-choice response options:

- Yes, we have access AND currently purchase this local product
- Yes we have access, but DO NOT purchase it
- No, we do not have access to this product
- I am not sure

15. Apples: What percentage of the whole and/or sliced apples you purchase are grown in NYS?

- Please put 0% if you do not have access to or do not purchase any of this local NYS product.
- Please leave this blank if you are unsure if you purchase local products.
- It’s ok to use a best guess here. If you purchase all this product from NYS, put 100%. If you purchase roughly 25% of this product from NYS and 75% from out-of-state, put 25%.

Single-choice sliding scale:

0-100%

Other Products

Your responses to this question will give us a better understanding of what products SFAs are purchasing outside of staple local NYS foods like dairy products and apples.

16. OPTIONAL: Please share any additional annual tracking spreadsheets or the required spreadsheet for the NYS 30% Application [here](#). All tracking data you provide will help this analysis.

[Upload file]

Does your School Food Authority currently purchase other local products grown, raised, or harvested in NYS during the school year for reimbursable meals that are served for any child nutrition program? If so, please list them here.

- You can categorize these items however specific or general you'd like.
- You can bypass the categories below and use the "other" category to share amounts for specific products if that is easier.
- You can also provide us an estimate of products purchased per week or month, and we can do the math for you.
- If you uploaded a tracking spreadsheet above, you can skip this question or add other items that may not be included in the attached files. For example, if you uploaded a tracking spreadsheet you use for lunch purchases only, you can add other local NYS items you may have purchased for non-lunch meals.

Definition of local: For the purposes of this survey, a "local" or "NYS" product is defined as a food item that is grown, harvested, produced, or processed in NYS. A processed item including raw ingredients from both within and outside of NYS may be deemed a local NYS food product when at least 51% of the raw ingredients were grown, harvested, or produced in NYS. An item is not local if it is simply distributed or sold in NYS.

17. NY Meat and Animal Proteins (beef pork, chicken, eggs) [Short response]

18. NYS Fruit (juice and applesauce included in this category) [Short response]

19. NYS Vegetables (including frozen) [Short response]

20. NYS Plant-based Protein (dried beans, tofu) [Short response]

21. NYS Grains (oats, flour, pasta, granola, etc.) [Short response]

22. Misc. NYS Products (maple, honey, sauces, etc.) [Short response]

23. Anything else? [Short response]

24. [OPTIONAL SUMMER QUESTION] Does your School Food Authority currently purchase other local NYS products grown, raised, or harvested in NYS during the summer for reimbursable meals that are served under SSO or SFSP? If so, please list them below.

Definition of local: For the purposes of this survey, a "local" or "NYS" product is defined as a food item that is grown, harvested, produced, or processed in NYS. A processed item including raw ingredients from both within and outside of NYS may be deemed a local NYS food product when at least 51% of the raw ingredients were grown, harvested, or produced in NYS. An item is not local if it is simply distributed or sold in NYS.

[Short response]

General Attitude Questions

1. Do you supervise more than one School Food Authority?

- Yes

[If yes] 2. Have you already answered the general attitude question portion of this survey?

- Yes

[If yes, skip to end of the survey]

- No

- No

3. Have you ever tried to qualify for the 30% NYS Initiative?

Single-choice response options:

- Yes, and we have qualified in the past.
- I represent more than one SFA, and some of them have qualified in the past, but others haven't.
- No, but we HAVE tried to qualify in the past.
- No, we HAVE NOT tried to qualify.
- I am unaware of the incentive program.
- Unsure.

SKIP LOGIC: The following questions only apply to FSDs that selected:

- *Yes, and we have qualified in the past.*
- *I represent more than one SFA, and some of them have qualified in the past, but others haven't.*
- *No, but we HAVE tried to qualify in the past.*

1. Since the 30% NYS Initiative includes only purchases for lunch, some School Food Authorities shifted purchasing and serving practices to make qualification for the program easier. Did you engage in any of the following practices? Please check all that apply.

Multi-selection response options:

- To make tracking easier, we served most or all local products during lunch instead of breakfast.
- To increase our local food percentage, we served most or all local products during lunch instead of breakfast.
- We decreased serving local products at breakfast because we knew they would not count towards our local percentage goals.
- We decreased spending on local products from PILOT/DoD programs because they do not count towards the 30% goal.
- None of the above.
- Other (please specify) [Short response]

2. Select all NYS items you already purchased prior to the 30% NYS Initiative being established in 2018. Click “Other” to add additional products not listed.

Multi-selection response options:

- Fluid milk
- Value-added dairy products
- Apples
- Other fruits (excluding apples)
- Vegetables
- Meat-based protein
- Plant-based protein
- Grains
- Misc. products (maple, honey, sauces, etc.)
- I am not sure
- Other (please specify) [Short response]

3. Did the 30% NYS Initiative influence you to purchase more NYS products? Select all that apply. Click “Other” to add additional products not listed.

Multi-selection response options:

- Fluid milk
- Value-added dairy products
- Apples
- Other fruits (excluding apples)
- Vegetables
- Meat-based protein
- Plant-based protein
- Grains
- Misc. products (maple, honey, sauces, etc.)
- I am not sure
- Other (please specify) [Short response]

4. What are some successes you’ve experienced from participating in the incentive program?

- [Long response]

SKIP LOGIC: The following question only applies to FSDs that selected:

- *I represent more than one SFA, and some of them have qualified in the past, but others haven't.*

Why did some School Food Authorities not qualify?

Single-choice response options:

- We thought we reached 30% NYS purchases, but during the audit process we were disqualified
- We came close to reaching 30% but did not quite make it and did not apply
- We became discouraged and stopped trying to reach 30% mid-way during the school year
- Some SFAs did not try to qualify, whereas others did attempt to qualify

- for the program
- Other (please specify) [Short response]

SKIP LOGIC: The following question only applies to FSDs that selected:

- *No, but we HAVE tried to qualify in the past.*

Why did your School Food Authority not qualify?

Multi-selection response options:

- We thought we reached 30% NYS purchases, but during the audit process we were disqualified
- We came close to reaching 30% but did not quite make it and did not apply
- We became discouraged and stopped trying to reach 30% mid-way during the school year
- Other (please specify) [Short response]

SKIP LOGIC: The following question applies to FSDs that selected:

- *No, we HAVE NOT tried to qualify.*

Is there a reason that you have not tried to qualify? Check all that apply.

Multi-selection response options:

- We did not know about the program until recently
- We need more support to participate in the program
- NYS products are not available in our area
- NYS products are too expensive
- We do not need the additional reimbursement
- Tracking local products takes too much time
- Providing documentation for local products is too complicated
- Separating lunch and breakfast costs is too time consuming
- We do not have the upfront cash-on-hand to buy local food without the guarantee of reimbursement from the state
- I am not interested in purchasing more local foods
- Unsure
- Other (please specify) [Short response]

SKIP LOGIC: Resume all FSDs responding to the remaining questions.

1. What challenges prevent you from purchasing more local NYS products?

Check all that apply.

Multi-selection response options:

- Cost of local NYS products is too high
- Short growing season
- We do not know where to purchase local NYS products
- Our current vendors sell little/no local NYS products
- Farmers can't deliver
- Procurement is complicated
- Lack of staff time to find and purchase local NYS products

- Lack of time to collect documentation
- Lack of staff time to prepare food from scratch or work with fresh/raw ingredients
- Staff are not trained to prepare food from scratch or work with fresh/raw ingredients
- We do not have enough staff to prepare food from scratch or work with fresh/raw ingredients
- We do not have the right equipment to prepare food from scratch or work with fresh/raw ingredients
- Difficulties in expanding/changing procurement strategies (i.e. issue a geographic preference bid, open additional purchase orders with local farms, etc.)
- Other (please specify) [Short response]

2. Do you believe your School Food Authority will qualify for the 30% NYS Initiative in the future?

Single-choice response options:

- Yes, in 1-3 years
- Yes, in 3-5 years
- No
- Unsure
- Other (please specify) [Short response]

3. Did you receive support from a farm to school coordinator in the last year?

Single-choice response options:

- Yes
- No
- Unsure

4. Did the presence of the 30% NYS Initiative influence you to make any other changes to your food service program? Please check all that apply.

Multi-selection response options:

- Increasing staff hours
- Increasing staff pay
- Investing in culinary training
- Intentionally purchasing from small farms and farms operated by women and/or Black, Indigenous, and other Farmers of Color
- Intentionally purchasing nutritionally dense local NYS foods
- Buying more naturally grown, organic, or grass fed local NYS foods
- Investing in more kitchen supplies or equipment
- Hosting food and garden educational activities
- Applying for grants to help fund this work
- Other (please specify) [Short response]

Changing the Program Structure

We are interested in your thoughts on whether you would participate in the 30% NYS Initiative if the policy was slightly changed. Your candid feedback will help guide future advocacy efforts.

1. If purchases for breakfast or any meal other than lunch counted toward the 30% NYS initiative would you purchase more of these items?

Select all that apply. Click “Other” to add additional products not listed.

Multi-selection response options:

- Fluid Milk
- Value-added dairy products
- Apples
- Other fruits (excluding apples)
- Vegetables
- Meat-based protein
- Plant-based protein
- Grains
- Misc. products (maple, honey, sauces, etc.)
- Unsure
- Other (please specify) [Short response]

2. Currently, School Food Authorities can only qualify for the program and receive the 19 cent per meal additional reimbursement if they spend 30% of food costs for lunch on local NYS ingredients. Please respond to this grid with your thoughts about each statement regarding changes the program.

[The following questions were accompanied by a 5-point Likert scale: Strongly Disagree, Disagree, Neither Agree nor Disagree, Agree, Strongly Agree, and Unsure]

- I think the current 30% local NYS food procurement goal is an appropriate target to qualify for additional reimbursement. [Likert scale]
- We would be more likely to participate if the local NYS food procurement goal. [Likert scale]
- We would be more likely to participate if the program included breakfast costs AND was lowered to 25% local procurement. [Likert scale]
- We would only want to include breakfasts costs in the program if we also received an additional reimbursement for breakfast meals. [Likert scale]
- Tiered Model: We would be more likely to participate if there was a tiered model for reimbursement, such as if we received:
 - 25 cents if 35% of our all our purchases are local;
 - 19 cents if 30% of all our purchases are local; AND
 - 13 cents if 25% of all our purchases are local. [Likert scale]

- Guaranteed reimbursement: We would be more likely to purchase and track local NYS products if we were guaranteed to receive an incentive for all local purchases. For example, if your SFA was fully reimbursed (100% rebate) or partially reimbursed (20-50% rebate) for local purchases at the time of purchase. [Likert scale]
- Other (please specify) [Short response]

Community Eligibility Provision and Universal Meals

1. Recently the NYS Department of Ag and Markets sent a memo about the interplay between the new state reimbursement for CEP meals (also referred to as the “CEP State Subsidy”) and the 30% NYS Initiative program. This memo shared that any SFA that receives the new “CEP State Subsidy” and qualifies for the 30% NYS Initiative cannot receive a full additional 19.1 cents per lunch for any meal designated in the “paid” category under CEP.

This does not affect schools with Identified Student Populations above 62.5% or schools that do not operate CEP. Only CEP schools with meals claimed in the “paid” category will be impacted.

Please check all that apply regarding your perspective on this situation:

Multi-selection response options:

- This doesn’t apply to me because we’re not a CEP school OR are CEP but not affected by this change.
- We are affected by this change - We still plan on purchasing the same amount of local foods, regardless of receiving the full incentive reimbursement from the 30% NYS Initiative.
- We are affected by this change - We would most likely not buy as much local product if we aren’t guaranteed the full additional reimbursement for local food that other SFAs receive.
- We are affected by this change - But this doesn’t apply to us because we’re not interested in the 30% NYS Initiative.
- Other (please specify) [Short response]

2. Imagine a world where NYS has a statewide universal meals policy. Please share your thoughts below regarding the following statements.

[The following questions were accompanied by a 5-point Likert scale: Strongly Disagree, Disagree, Neither Agree nor Disagree, Agree, Strongly Agree, and Unsure]

- I think a local food purchasing incentive program is **important**, even if we had universal meals. [Likert scale]
- We would still be interested in the 30% NYS Initiative **the way the policy**

is designed now with universal meals. [Likert scale]

- We would only be interested in a local food purchasing incentive policy **only IF it was designed differently.** [Likert scale]

3. Do you think a local food purchasing incentive is beneficial, even if NYS has a universal meals policy? Please elaborate on your thoughts.

[Long response]

Final Thoughts

1. Please share anything else about the NYS 30% Initiative that you'd like to consider:

- How would you change the policy?
- Are there other successes or challenges you've experienced that we did not ask you about?

[Long response]

Appendix B. Interview Informants

Table 1. Interview Informants

Perspective	Name	Affiliation	Title
District-Level School Food Service Representative	Regan Kiembock	Southampton Central School District	Child Nutrition Program Director
	Julie Raway	Broome-Tioga BOCES	Registered Dietitian
	Lisa Ostrowski	Shaker Central School District	Food Service Director
	Maryssa Schlough	Sidney Central School District	Farm to School Coordinator
	Stephen O'Brien	NYC Department of Education Office of School Food	Director of Strategic Partnerships and Policy
Food Hub	TC Washington	Headwater Food Hub	Director of Community Programs
Nonprofit Partner	Cheryl Bilinski	Cornell Cooperative Extension Harvest New York	Local Food Systems Specialist, Farm to School Lead
	SJ Whalen	Cornell Cooperative Extension Harvest New York	Farm to School Coordinator, New York City
Local Food Purchasing Incentive Program Representatives Outside New York	Wendy Crowley	Michigan Department of Education	Farm to Program Consultant
	Conor Floyd	Vermont Agency of Education	Grants Program Manager, Child Nutrition Programs
	Amy Garfinkel	California Department of Food and Agriculture	Farm to School Network Lead
	Kate Wheeler	Utah State Board of Education	Farm to Fork Specialist
	Jessica Wright	Nourish Colorado	Director of Healthy Food in Institutions
	Anonymous	California State Agency	N/A

Appendix C. School Food Authority Spending Patterns

Table 2. School Food Authority Total Food Budget Spent on Local NY Staple Products

% Local	All NY Staple Products			NY Fluid Milk Only			Fluid Milk and Apples			All NY Dairy Products		
	# SFAs	% SFAs that purchase NY Milk	% Total Sample	# SFAs	% SFAs that purchase NY Milk	% Total Sample	# SFAs	% SFAs that purchase NY Milk	% Total Sample	# SFAs	% SFAs that purchase NY Milk	% Total Sample
n = 84 SFAs												
20%+	25	38%	30%	11	17%	13%	18	27%	21%	22	33%	26%
25%+	16	24%	19%	6	9%	7%	10	15%	12%	11	17%	13
30%+	6	9%	7%	1	2%	1%	4	6%	5%	3	5%	4%

SFAs purchasing NY Milk = 66, of these, 19 applied for the 30% Initiative in 2023

Table 3. Total Lunch Budget Spent on Local Foods from 2023 Applicants of the 30% NYS Initiative

% Local	All NY Staple Products		NY Fluid Milk Only		Fluid Milk and Apples		All NY Dairy Products	
	#	%	#	%	#	%	#	%
n = 60 SFAs								
20%+	51	85%	11	18%	20	33%	38	63%
25%+	23	38%	2	3%	16	27%	20	33%
30%+	7	12%	2	3%	4	7%	7	12%

Table 4. School Food Authority Purchasing Patterns of Apples, Milk, and Value-Added Dairy Products (Local AND Non-Local) for All School Meals

% Local	All NY Staple Products		NY Fluid Milk Only		Fluid Milk and Apples		All NY Dairy Products	
	#	%	#	%	#	%	#	%
n = 84 SFAs								
20%+	38	45%	16	19%	24	29%	31	37%
25%+	23	27%	10	12%	13	15%	20	24%
30%+	11	13%	3	4%	7	8%	7	8%

Notes for Table 4:

This information is not included in the analysis of the main report, but we did ask SFAs in our survey to share their purchasing patterns on milk, value-added dairy, and apples regardless of whether they bought them locally. Results are shown in Table 4. This table shows what the local percentage would be for these SFAs if ALL their purchases for these products were transitioned to be purchased locally.

Notes for Tables 2-4:

- These results are from the SFA sample and are not predictive of all SFAs.
- While the local purchasing percentage for all NY Staple Products was lower than the team predicted, this may be because of the specific SFAs observed in this analysis. For example, SFAs that contract with GST BOCES were not included in the analysis of overall budget spending patterns. Through data shared by the New York State Department of Agriculture and Markets for the 30% NYS Initiative, SFAs that contract with GST BOCES appear to have a high local purchasing percentage from NY Staples for their lunch budgets. These SFAs may also have a high percentage of NY Staples for their overall budgets, though this prediction cannot be backed by data at this time.
- Some may assume that by including breakfast in the program, an SFA's local purchasing percentage would increase based on NY Staples because these are higher-cost items on the breakfast tray. However, several FSDs shared that fluid milk actually is not chosen in large quantities at breakfast. This may be if the SFA only serves non-flavored milk at breakfast, which has lower participation than flavored fluid milk options.
- These results are not predictive of how SFA purchasing patterns would change if all NSLP meals were included in the Initiative. For example, SFAs would most likely purchase more NY Staples at breakfast if the Initiative expanded to include all school meals. Thus, overall local percentages on NY Staples would increase under this policy change.

Proposed Policy Solution:

As mentioned on page 40 of the main report, a straightforward approach to prevent SFAs from depending solely on NY fluid milk purchases to meet the reimbursement criteria is to impose a limit on the amount of NY fluid milk they can count towards the 30% target. **The appropriate cap would be 15% of overall food budgets, or half of all local purchases could be spent on NY fluid milk.** This is aligned with the current purchasing patterns of Initiative applicants, where 82% of SFAs spent less than half of all local purchases on NY fluid milk. In the SFA sample, 68% of SFAs would be spending less than half of local purchases on NY fluid milk if they reached 30% local spending.

This design would ensure diverse spending on local products, should not add administrative burden on SFAs or NYSDAM, and should only affect SFAs that are hyper-reliant on NY fluid milk purchases to reach 30%. However, this design would still foster an environment where SFAs that do not purchase NY fluid milk or purchase it in low amounts are at a disadvantage, which is why the Vermont Formula is preferred.

Additional Notes on a Cap:

- If advocates wanted to impose a cap on **NY Staple Products**, the appropriate cap would be **67% (or 2/3)** of their overall local spending.
- If advocates wanted to impose a cap on **NY dairy products**, the appropriate cap would be **60%** of their overall local spending.

Current Recommendation:

An expansion of this program to all NSLP meals is immediately necessary to increase accessibility. It would also be wise to implement a cap or formula change on the program immediately, while other changes to the program are being made. However, NY advocates can also advocate for a cap on specific products or formula change in the future. Additionally, if a cap is not placed at this time, more data from future evaluations may be able to show the need for such a cap, which can further support advocacy for a program design change.