Methods and Limitations

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
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Methods

This analysis was conducted between July to October 2023. This report uses a mixed-method approach to identify policy challenges and analyze how potential changes to the 30% NYS Initiative (the Initiative) would increase program accessibility for School Food Authorities (SFAs), increase local food purchasing, and increase program participation. The team collected data through a state-wide survey of Food Service Directors (FSDs), a series of interviews with NY stakeholders and Local Food Purchasing Incentive (LFPI) program coordinators across the nation, and quantitative datasets shared from government sources.

Data Collection Strategy

Survey

The team developed a survey specifically for representatives of School Food Authorities.[1] The 2023 survey was divided into two parts. The first half asked for information about SFA spending patterns on key local foods like NY fluid milk, value-added dairy, apples, as well as other local products. The second half of the 2023 survey asked FSDs about their attitudes toward the Initiative, how they felt about potential changes to the policy, and their interest in an LFPI if the state were to adopt a statewide universal free meals policy. This section held space for open comments and responses to questions. These responses are elevated frequently in the report. Unless otherwise specified, all quotes used in this report are derived from this survey and interviews (mentioned in the next section).

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1 While some survey respondents may not technically have the title of FSD, they are hereby called FSDs for simplicity.

This survey was reviewed by members of the New York American Farmland Trust (AFT) team, Cornell Cooperative Extension (CCE) Harvest New York, Community Food Advocates, Hunger Solutions New York, and the Food and Health Network of South Central New York. The survey was sent to FSDs representing all of the state's 1,026 SFAs in early August with a final deadline of September 6, 2023. AFT partnered with the New York School Nutrition Association and the partners mentioned above for survey dissemination. AFT sent the 2023 survey directly to each FSD and provided $40 in Visa gift cards to survey respondents who completed the survey in its entirety. Survey questions can be found in Appendix A.

The 2023 survey had 77 complete responses and 197 incomplete responses. This study's qualitative analysis is derived from only complete responses. The 197 figure highlights strong FSD interest in policy feedback. They may have been deterred by detailed purchasing data questions preceding general attitude questions.
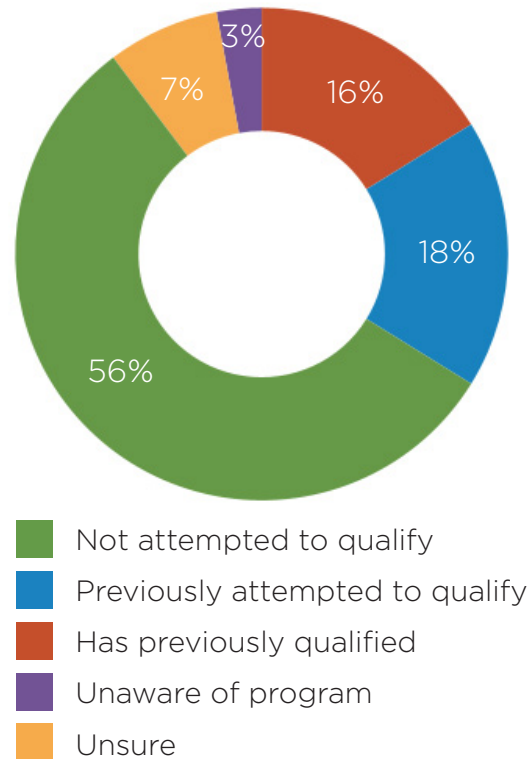
More than 84% of survey responses were from FSDs that have never qualified for the Initiative. This analysis seeks to dive deep into the challenges for SFAs accessing the program, and thus the high percentage of non-program participants is valuable. An overview of survey respondents' relationship to the Initiative is visualized in Figure 1.

Purchasing Data

Purchasing data from a total of 84 SFAs was used for the purchasing analysis. FSDs were asked to share purchasing data for a "typical year" or for the 2022-23 SY. Of the 84 SFAs, 12 SFAs provided purchasing data but did not complete the second half of the 2023 survey. Their information is still used to inform the analysis. After the 2023 survey results were finalized, more than a dozen FSDs were contacted for clarification or additional information.
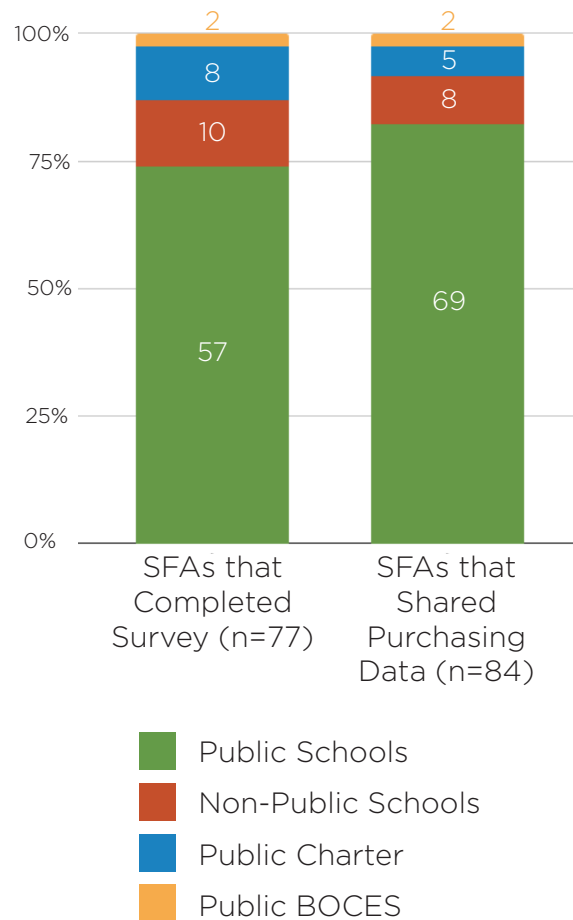
All FSDs that submitted applications for the Initiative in 2023 were contacted by email for additional information about their purchases of fluid milk, value-added dairy products (such as sour cream, cheese, yogurt, etc.), and apples served in all school meals, as the applications provided purchasing data for lunch only. This analysis observes overall spending patterns for 19 SFAs had applied for the 30% NYS Initiative in 2023.

Figure 1. Survey Respondents' Relationship to The 30% NYS Initiative (n=68)

- Not attempted to qualify
- Previously attempted to qualify
- Has previously qualified
- Unaware of program
- Unsure

Around three-quarters of FSDs represent public schools, as demonstrated in Figure 2. In total, SFAs for which purchasing data were analyzed serve 639,000 students who eat school lunch, representing 44% of all students who eat lunch in New York. This high proportion is because a representative from New York City Public Schools (NYC Chancellor's Office) completed the 2023 survey. This district alone serves 533,000 students lunch each day. Just over a third of SFAs had a lunch ADP of less than 500 (34%) and nearly two-thirds (54, 64%) had a lunch ADP of 1,000 or less. The median ADP of this sample skews slightly higher than the state as a whole (663 vs. 480 students). In total, the purchasing data from 84 SFAs through the 2023 survey reported over $238 million on school food annually, with the largest purchaser being NYC Public Schools with an annual $185 million food budget. SFAs were from a majority of 56% of NY counties (35) from all ten Economic Development regions of NYS.

Figure 2. School Food Authorities by Type

Legend:
- Public Schools
- Non-Public Schools
- Public Charter
- Public BOCES

Semi-structured Interviews

The team conducted semi-structured interviews with 14 informants over Zoom to gain deeper insight into how policy changes would affect program accessibility. The interviews took place between August 28 and October 3, 2023, and lasted between 30-60 minutes. Informants fall into three main categories:

- **Food Service Directors or SFA Representatives (5):**
  Five FSDs representing a diversity of SFA sizes, geographies, locales, and relationships to the 30% NYS Initiative.

- **30% NYS Initiative Supporters and Stakeholders (3):**
  - Two individuals from CCE who provide technical assistance to FSDs and food producers.
  - A staff member at a regional food hub.

- **LFPI Program Coordinators from Other States (6):**
  Six statewide LFPI program coordinators representing five states (California, Colorado, Michigan, Utah, and Vermont) with universal meals programs (4) or in states that have tiered reimbursement approaches (2) to their LFPIs.

Informants were given the option to be anonymous in any outward-facing materials. A full list of informants and the unique perspective they brought to this project can be found in Appendix B.

Public Sources

Several public sources were used for this analysis including:

- **SFA applications for the 30% NYS Initiative submitted during summer 2023**, which provided detailed purchasing information from SY22-23. This information was received from NYSDAM through a Freedom of Information Law (FOIL) request to the department (R000553-081823). NYSDAM provided information for 61 SFAs, but one application was only a cover sheet and did not contain purchasing information. The team deduced this missing SFA was Keene Central School District. The SFA applicants had a collective annual food budget of $36 million, spent $7.6 million on local food, and served an average of ADP of 139,000 students for the 22-23SY.

The applications received from this FOIL request vary slightly from the spreadsheet of approved applications posted on the 30% Initiative page on NYSDAM's website. Two SFAs, Candor Central School District and Spencer-Van Etten Central School District, had applied to the Initiative in 2023 but were ultimately not approved. However, purchasing data from these two districts are included in the analyses of 2023 Initiative applicants. The report uses language to distinguish the data from "applicant" SFAs as opposed to "approved" SFAs.

- **A list of SFAs and their average daily participation (ADP)** for lunch, breakfast, and snacks from October 2022 was used from <u>New York State Education Department's (NYSED) aChild Nutrition Reports Listing</u>.[1]

- **A list of SFAs participating in the Community Eligibility Provision** (CEP) was used from an <u>October 6, 2023 memo from NYSED</u>.[2]

- **A contact list for FSDs** and corresponding school information available from <u>NYSED's Child Nutrition Reports Listing</u>.[3]

- **School enrollment information** from <u>NYSED's data portal</u>.[4]

- **USDA Local Food for Schools Cooperative Agreement** grant program award data shared by NYSED staff.

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Data Analysis Strategy

Descriptive statistics were mainly used to analyze quantitative and qualitative data alongside statistical tools to determine correlation within the sample. Equations used for any additional modeling can be found where results are discussed in the report.

Anticipated Reimbursement:
The term "anticipated reimbursement" is used throughout this report. This term represents how much an SFA would receive in reimbursement if they qualified for the Initiative. The anticipated reimbursement is calculated as follows:

Anticipated Reimbursement =

Average Daily Participation (ADP)
(from October 2022)

x
180
(days in a school year)

x
$0.191
(the Initiative's reimbursement rate)

Anticipated reimbursement may also use a $0.25 per lunch rate depending on the situation, and this will be noted in the report.

Return on Investment (ROI):
This report looks at "return on investment" (ROI) to compare different models. The calculation for ROI is as follows:

Return on Investment =

$$\frac{(\text{total required spending on local foods} - \text{anticipated reimbursement})}{\text{anticipated reimbursement}} \times 100$$

Limitations

Survey Responses and SFA Purchasing Data

This analysis does not intend to be representative of all SFAs or FSDs in the state. There is likely self-selection bias in the results based on the SFAs who chose to take the survey. Terms like "average SFA," used in this report mean the average among the *available dataset* and are not meant to be generalizable among all SFAs in the state. The testimony from FSDs and the diversity of SFA spending patterns remain compelling despite these limitations.

Additionally, the 2023 survey is open to bias during the 2023 survey development process given that SFAs were often limited to choosing multiple-choice questions. The survey provided ample open-text space for SFAs to share more about their attitudes toward the program.

SFA purchasing data were self-reported by FSDs who responded to the 2023 survey. Obvious outliers were removed or data were clarified through follow-up questions. Additionally, this analysis observes SFA applications for the Initiative in 2023. As mentioned above, one SFA that applied for the Initiative was not included in the dataset and two SFAs that applied for the Initiative were ultimately not approved for additional reimbursement.

Producer Perspectives

As the main goal of this analysis is to understand the challenges for SFAs to qualify for the program, this analysis is limited in its focus on agricultural producers. It was difficult to understand what kinds of producers were benefiting from this program because of the lack of itemized purchasing data available from SFAs. By increasing participation in the program, economic opportunities may also increase for agricultural producers. A food hub representative was interviewed to understand how potential changes to this program would impact local producers and gather more insights on producer challenges to participation.

Changing School Food Landscape - Community Eligibility Program (CEP) Expansion

This analysis was conducted at a time just before New York State began a historic expansion of school food access through the CEP State Subsidy, which took effect in SY 23-24. Participation in school lunch and school food budgets may fluctuate dramatically for schools participating in this program in future years. Additionally, the number of SFAs that participate in CEP are expected to increase dramatically due to the CEP State Subsidy and the new lowered CEP threshold explored in depth in the report.