



2021 Transition Recommendations for USDA

The transition to a new Presidential administration comes with a change in leadership at important federal agencies, including the U.S. Department of Agriculture (USDA). This moment can be an inflection point, where farm to school and farm to early care and education (ECE) advocates can call for new leadership in how policies and programs are administered. While the federal Farm to School Grant Program has escaped major regulatory attacks over the last four years, it relies on and supports other programs within USDA that have suffered from agency actions. A new administration, in addition to undoing harm, has the opportunity to elevate farm to school and ECE as a proven strategy aligned with USDA's multi-faceted mission of nourishing children and families and providing economic opportunities for farmers and communities. Additionally, the following recommendations are steps to advance the strategic goal of the National Farm to School Network (NFSN): By 2025, 100% of communities will hold power in a racially just food system.

Actions for the new administration specific to farm to school and ECE:

- Withdraw the proposed rule on Broad Based Categorical Eligibility, and revisit USDA rules that may negatively impact participation in school meals. Any attempts to restrict school meal or CACFP participation should be corrected.
- Develop more formal guidance for school food authorities (SFAs) on using a [values-aligned procurement](#) framework (in addition to strictly geographically local preference) for RFPs and the bidding process.
- Initiate agency legal research into statutory barriers to further [values-aligned purchasing](#).
- Research USDA authority to issue waivers for greater cash in lieu of USDA commodity foods, if SFAs applied with proposals to increase their local and/or [values-aligned purchasing](#).
- Initiate research on increasing transparency within the USDA Foods supply chain, and assess what would be needed to apply more stringent conservation compliance and fair labor standards within that supply network.
- Research barriers that prevent producers from participating as a vendor in DoD Fresh procurement. Recommend policy changes if necessary to reduce barriers for small local and regional producers, to increase the ability of SFAs to procure locally through DoD Fresh.
- Continue and expand the AMS and FNS administered successful Pilot Project for the Procurement of Unprocessed Fruit and Vegetables, an alternative to USDA Foods and DoD Fresh for USDA purchases, authorized in the 2014 Farm Bill.



- Conduct research on administrative and overhead savings provided by pursuing a universal approach to school meal and child nutrition programs. Additionally, assess the potential economic impact of local and values-based procurement for the farm economy as part of such an approach.
- Identify regulatory and other barriers related to developing farm to school programs, including direct and indirect compliance costs of production and marketing to schools and early care and education programs, barriers to local and regional market access for small-scale production, barriers to funding projects which might otherwise be eligible for a federal Farm to School Grant, barriers to funding Tribal projects under farm to school programs, and barriers to local and regional market access for Tribal farmers and ranchers.

Actions for the new administration for a just food system:

- Resume the farm labor prevailing wage survey, and ensure that H2-A agricultural workers receive the very modest protections the program currently has.
- Take immediate action to protect food and farm workers at risk from the COVID-19 pandemic, and enforce occupational safety and health rules in our food system.
- Restore the antitrust and competitive practices protections in the livestock and poultry industry, which are rife with unfair practices that exploit producers and lead to more consolidation in our food system.
- Rebuild the personnel capacity of USDA's Economic Research Service and the National Institute of Food and Agriculture to collect, analyze, and release important data.
- Work with small producers to understand and reduce the regulatory barriers of compliance with the Food Safety Modernization Act.
- Scrutinize programs that have been authorized, but not funded, to include in the President's budget request. Programs such as the Beginning Farmer and Rancher Individual Development Account, which would provide matching savings for beginning producers, require no additional authorizing authority and could get funds directly into the hands of producers who need it most.

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