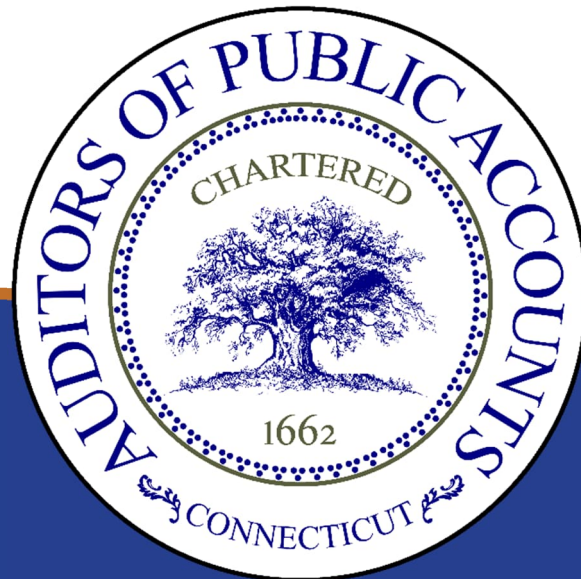


# AUDITORS' REPORT

---

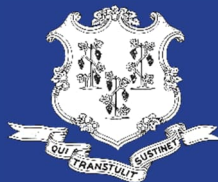
## PERFORMANCE AUDIT COMPLIANCE REPORT

Farm to School Program  
(Follow-Up Report)  
February 4, 2026



STATE OF CONNECTICUT  
Auditors of Public Accounts

JOHN C. GERAGOSIAN  
State Auditor



CRAIG A. MINER  
State Auditor

# CONTENTS

---

INTRODUCTION .....	3
Background.....	3
Follow Up .....	3
Highlighted Agency Accomplishments.....	3
AGENCY UPDATES .....	4

# INTRODUCTION

## Background

Our office published the [Farm-to-School Program](#) performance audit on October 4, 2023. The objectives for this performance audit were to analyze the efficiency and effectiveness of the Department of Agriculture (DoAg) and the State Department of Education (SDE) in meeting their statutory obligations related to the program; to determine whether sufficient internal controls were in place to ensure the program's objectives were being met; and to examine how Connecticut's Farm to School policies that encourage the sale of local farm products to school districts compared to policies in other states.

The Farm-to-School Program is intended to enrich the connection students, schools, farmers and producers, families, and communities have with their local food systems. Farm-to-school includes one or more of the following core elements: procurement of local food for school meals, snacks, or taste tests; student participation in educational activities related to agriculture, food, and health; and student engagement in hands-on learning through school gardening. The Farm-to-School Program was not a typical program. It did not have a centralized funding source, staffing, or organizational home. Rather, it was a cluster of activities performed by the agencies, with some activities performed in collaboration or under contract with one or more community partners.

## Follow Up

On March 19, 2025, we requested an update from the State Department of Education and the Department of Agriculture on how they addressed the report's 23 recommendations.

The report's recommendations focused on the development of strategic and operational plans, data measures, and policies and procedures for the program; practices to improve collaboration with UConn Extension; and consideration of best practices to improve the program.

## Highlighted Agency Accomplishments

Since the release of the audit, the State Department of Education (SDE) and the Department of Agriculture (DoAg) have taken steps to improve the Farm-to-School Program:

- SDE realigned its approach from Farm-to-School as a standalone program to being a core practice within school nutrition programs. SDE is developing a strategic workplan and processes to collect data. It also enhanced procurement training for school food authorities and worked with DoAg to implement the Connecticut Local Food for Schools Incentive Program.
- DoAg drafted a strategic plan with measurable goals, entered a memorandum of understanding with UConn Extension, and worked with SDE to implement the Connecticut Local Food for Schools Incentive Program (CT LFSIP). It is also developing a data collection strategy.

The State Department of Education and the Department of Agriculture appear to have partially or fully implemented 82% of our audit recommendations. This information is solely based upon the departments' responses to our update request and may be verified during our next departmental audits.

# AGENCY UPDATES

## Finding Area 1

The State Department of Education and Department of Agriculture have not developed farm-to-school strategic or operational plans to guide their priorities and actions.

### Recommendation 1

The State Department of Education and the Department of Agriculture should develop strategic and operational plans that indicate priorities and measurable goals for the Farm-to-School Program that connect or are consistent with the Farm-to-School Collaborative's broader system goals.

### Status

PARTIALLY IMPLEMENTED

SDE and DoAg each developed draft plans with priorities and measurable goals for the Farm-to-School Program. The SDE draft plan details a three-year implementation process with priorities for program development and long-term goals. The DoAg draft plan contains Farm-to-School Program goals and measurable objectives. SDE and DoAg have not fully implemented this recommendation because these plans are still in draft form.

### SDE Update

"The Connecticut State Department of Education (SDE) disagrees with this finding. While the SDE remains an active leader within the Farm to School Collaborative, it is important to note that the Collaborative has evolved its focus towards broader system priorities. Incorporating this newer shift in direction, the SDE has adopted a tactical approach that integrates Farm to School not as a standalone program, but as a core practice embedded within school nutrition program operations. This approach reflects a deliberate paradigm shift—one that positions Farm to School as an essential element of how school food authorities (SFAs) procure, prepare, and serve meals, with the goals of increasing access to locally sourced foods, enhancing student satisfaction, and supporting the local agricultural economy.

To support this shift, the SDE is in the process of finalizing a three-year Farm to School workplan aligned with the *Connecticut State Board of Education's Five-Year Comprehensive Plan for Education*

*2023-28: Every Student Prepared for Learning, Life, and Work Beyond School.* Once finalized, the SDE will develop associated action steps, assign responsibilities, and institute mechanisms for monitoring progress accordingly. This process is designed to remain flexible and responsive to evolving resources, changes in federal and state guidance, regulations and requirements, partner priorities, and other shifts within the Connecticut and federal Farm to School landscape.”

#### DoAg Update

“ARPA and state funding have been applied to the farm to school program which gives the department structure, goals, and the ability to go beyond just resource sharing. The CT Grown for CT Kids (CTG4CTK) grant program assists with the State Department of Education’s (SDE) implementation of the federal local food for schools plans and CT’s Local Food for Schools Program (LFSIP) which are accomplished through cooperation with SDE.

DoAg has taken the initiative to draft a strategic plan for consideration. The next steps for finalizing the strategic plan include:

- a. Sharing and discussing with SDE, identifying specific roles and responsibilities
- b. Opening a public feedback and/or comment period for the public specifically targeting schools/school systems, boards of education, parents, and various parent teacher associations to provide feedback
- c. Meeting the goal for a finalized agency strategic plan by June 30, 2026”

## Finding Area 2

The State Department of Education and Department of Agriculture do not sufficiently monitor and evaluate Farm-to-School Program activities.

#### Recommendation 2

The Department of Agriculture and the State Department of Education should identify the key data points required to understand and report on their Farm-to-School Program activities and develop sustainable methods to collect, analyze, maintain, and utilize the data. The departments should work with their farm-to-school collaborators to establish formal agreements that ensure they collect and report agreed upon important data.

SDE and DoAg identified key data points required to understand and report on their Farm-to-School program activities. Both agencies are developing sustainable methods to collect, analyze, maintain, and utilize data. This recommendation is partially implemented since neither agency fully developed sustainable methods to collect and report data.

#### SDE Update

"The SDE disagrees with this finding. In addition to the USDA Farm to School Census, the SDE remains committed to evaluating and strengthening the effectiveness of Farm to School efforts in Connecticut. The SDE has successfully leveraged federal funding to support data-driven program development and is actively pursuing additional resources to further these efforts. The SDE has entered into a Memorandum of Agreement (MOA) with the UConn Rudd Center for Food Policy and Health (UConn Rudd) to develop a comprehensive Connecticut Farm to School Assessment. The development of this assessment has been guided by an advisory committee composed of national, state, and local partners - ensuring that the tool is both meaningful, evaluative and actionable for stakeholders across the state. This assessment will be completed by all National School Lunch Program (NSLP) sponsors during the 2025-26 school year (SY) and will be administered periodically thereafter. The assessment is designed to capture data across the three foundational pillars of Farm to School: Cafeteria, Classroom, and Community, with an added focus on Coordination. The resulting data will not only establish a statewide baseline of Farm to School activities in each NSLP participating SFA but will also inform regional action planning and continuous improvement efforts led by newly established Regional Farm to School Coordinators. Moreover, the assessment results will support sponsors in measuring the long-term impact of trainings, resources, and other supports provided by the SDE. As resources allow, the SDE plans to facilitate reassessments every three years to evaluate progress, identify gaps, and refine strategies for achieving sustained impact.

#### Use of Data from the Connecticut Farm to School Assessment:

The data gathered through the Connecticut Farm to School Assessment will serve as a critical tool for both evaluation and continuous improvement across multiple levels of Farm to School initiatives. The information collected will be utilized in the following key ways:

1. Establishing a Baseline for Farm to School Activities: The initial assessment will provide a comprehensive snapshot of current Farm to School activities across Connecticut. By gathering data from all NSLP sponsors, the SDE will establish a baseline understanding of where Farm to School efforts stand in terms of implementation, engagement, and impact. This baseline will be crucial for identifying trends,

areas of growth, and areas that may need further attention or resources.

2. **Informing Action Plans and Strategy Development:** The data will inform action plans developed by the Regional Farm to School Coordinators. With insights from the assessment, these coordinators will be able to tailor support and intervention strategies for each region, ensuring that efforts are focused on where they will have the most impact. The data will allow the coordinators to identify schools and districts that may benefit from additional training, resources, or guidance on best practices.
3. **Guiding Effort Improvements:** The assessment will enable the SDE to measure the effectiveness of existing initiatives, trainings, and supports. By comparing data over time, the department will be able to assess which strategies and resources are yielding the greatest outcomes, and which areas require refinement. For instance, if certain regions or schools are reporting low participation in the cafeteria or classroom components, the SDE can adjust its strategies to address those challenges.
4. **Supporting Stakeholder Engagement and Accountability:** With clear, data-driven insights, the SDE will be able to engage stakeholders—including local school districts, farmers, and community organizations—in meaningful conversations about the success and challenges of the initiatives. Data transparency will also help hold stakeholders accountable for their roles in implementing Farm to School efforts, encouraging a collaborative, goal-oriented approach to development.
5. **Enhancing Federal and State Reporting:** The data will be essential for meeting reporting requirements and ensuring that the most effective Farm to School efforts and alignment with broader educational and health goal are aligned. The comprehensive data collected through the assessment will position the SDE to secure continued federal support and potentially attract new funding opportunities to further strengthen these activities.
6. **Long-Term Evaluation and Impact Measurement:** The SDE will track progress and measure the long-term impact of Farm to School efforts through triennial reassessments (as resources permit). This long-term evaluation will provide valuable insights into how Farm to School work evolves over time and its sustained impact on students' dietary habits, academic performance, and community engagement. By tracking this data, the SDE will refine strategies and ensure their relevance and effectiveness in the future.
7. **Improving Community and School Partnerships:** As the data from the Farm to School assessment will include feedback from school administrators, cafeteria staff, teachers, students, and community partners, the results will identify areas where collaboration between schools, local farmers, and community groups can be strengthened.

#### Use of Farm to School Assessment Data by Regional Farm to School Coordinators:

The SDE's Regional Farm to School Coordinators, subcontracted through UConn Extension, are assigned to support all National School Lunch Program (NSLP) sponsors across Connecticut. The Regional Farm to School Coordinators play a vital role in tracking and supporting the incorporation of Farm to School practices and activities at the local level. These coordinators provide targeted technical assistance (TA) to NSLP sponsors, ensuring that their efforts align with statewide goals and best practices. The data collected by the coordinators will guide continuous improvements in the initiative. Key data points tracked by the Regional Farm to School Coordinators include:

1. Technical Assistance (TA) Provided: The coordinators track the specific TA offered to each NSLP sponsor, documenting the type of support given (e.g., local procurement, educational resources, guidance on Farm to School integration in the cafeteria or classroom, etc.) and the areas where support was most needed. This data will identify the areas of the initiative that require more focused attention and identify common challenges faced by sponsors.
2. Pre- and Post-Surveys: To assess the impact of the TA provided, the coordinators administer pre- and post-surveys to NSLP sponsors. The pre-surveys capture baseline information about the sponsor's understanding of Farm to School practices and the current state of their efforts. After receiving TA, the post-surveys will provide valuable feedback on how the support impacted the sponsor's ability to implement Farm to School activities and integrate them into their operations. By comparing pre- and post-survey responses, the SDE can measure the effectiveness of the TA, identify areas for improvement and resource development, and adjust future support strategies accordingly.
3. Tracking Progress and Identifying Trends: The coordinators use this data to track the progress of each NSLP sponsor over time. By monitoring improvements in the areas where technical assistance was provided, the coordinators can identify trends, measure the success of particular strategies, and make data-informed decisions about future support and resource allocation.
4. Developing District/School-Specific Action Plans: Based on the data collected from the Connecticut Farm to School Assessments, the Regional Farm to School Coordinators will work with individual districts and schools to develop targeted, school-specific action plans. These action plans will be informed by the assessment results, ensuring that each district or school has a clear roadmap for incorporating more Farm to School practices that align with their unique needs, resources, and goals."

#### DoAg Update

"DoAg has worked to make data more readily available for the LFSIP and the CTG4CTK Program. DoAg and SDE have formalized



implementation of this cooperation through an MOU between the two agencies. On a quarterly basis, schools participating in LFSIP provide:

- a. What product they purchased
- b. How much of the produce was purchased
- c. Who they purchased the product from
- d. What town the product(s) was purchased from
- e. How the products as a whole were used

DoAg has collected a wide range of data from operating the CTG4CTK Grant Program from 2021 through 2025. DoAg entered into an MOU with University of Connecticut Extension to provide technical assistance to grant participants, specifically schools. To date, DoAg has not been able to analyze the data for either program. The agency plans to reach out to OPM and enter into an MOU to conduct an analysis to analyze data for both programs for future program consideration and implementation by June 30, 2026."

### Finding Area 3

The State Department of Education and Department of Agriculture do not collect or have access to data that describe certain key aspects of the farm-to-school landscape in Connecticut.

#### Recommendation 3

The State Department of Education and the Department of Agriculture should identify the highest priority farm-to-school data to better understand the program's landscape and establish processes to systematically and sustainably collect data to assist in decision making. The agencies should begin their focus on a limited set of key data points and build out data collection and analysis capacity over time as they obtain more resources.

#### Status

**PARTIALLY IMPLEMENTED**

SDE and DoAg identified priority Farm-to-School data to better understand the program's landscape. Both agencies are developing methods to systematically and sustainably collect data to assist in decision making. This recommendation is partially implemented since neither fully established processes to collect and use data.

## SDE Update

"The SDE disagrees with this finding. The Farm to School Assessment described above in finding area #2 includes collecting data from key points aligned with the initiative's core areas (Cafeteria, Classroom, Community, and Coordination) and capturing meaningful information such as the percentage of cafeterias purchasing locally grown food, the extent of classroom integration, access to local food experiences, and collaboration across district departments like food service, curriculum, and family engagement."

## DoAg Update

"As part of the LFSIP and the CTG4CTK Grant Program, DoAg is collecting specific data points across grantees. The highest priority data points are targeted to analyze if there has been an increase in institutional procurement of CT Grown products by 25% over the next five (5) years, while enhancing farm viability, and fostering community-based food systems. Strategies to advance data collection and program evaluation will be done through:

- a. Establishing baseline metrics for institutional local food procurement, experiential learning activities, and grantee performance using data gathered from grant reporting forms, site visits, and program documentation.
- b. Standardizing reporting expectations across all CTG4CTK grant tracks to ensure consistent tracking of outputs and outcomes (e.g., meals served with local products, student engagement hours, vendor relationships).
- c. Publishing annual summary reports highlighting grantee activities, statewide trends, and implementation insights. These will support accountability, encourage replication, and inform future program design.
- d. Using evaluation data to guide program refinement, particularly in updating grant guidance, technical assistance priorities, and promotional strategies.
- e. Collaborating with academic and agency partners (e.g., UConn Extension, SDE, CT Department of Public Health) to align evaluation tools and share data where appropriate.

The agency plans to work with OPM and their data analysis team to analyze the data for future program implementation and consideration. Additional information regarding farm to school data and metrics can be found in our draft strategic plan."

## Finding Area 4

The State Department of Education and Department of Agriculture lack adequate contracting procedures and management practices.

### Recommendation 4a

The State Department of Education should revise its agreements to specify what the University of Connecticut Extension should accomplish and document completed tasks. The department should verify that required documentation has been submitted prior to payment.

### Status

IMPLEMENTED

SDE revised its memorandum of agreement with UConn Extension to include specific performance measures. SDE updated its process to ensure UConn Extension submits its required documentation prior to payment.

### SDE Update

"The SDE Bureau of Child Nutrition Programs has implemented an updated process to incorporate the recommendations outlined in the Farm to School Program Audit. The SDE utilizes an agency approved contracting vehicle known as a Memorandum of Agreement (MOA) or Personal Services Agreement (PSA), which outlines the: Purpose of the agreement; Definitions of terms; Duties and responsibilities of the Contractor; Duties and responsibilities of the CSBE/SDE; Term; Budget; Payment; Statutory Authority; Cancellation; Unspent funds; Amendments; Choice of law; Contract assignment; Protection of confidential information; Dispute resolution; Nondiscrimination; Liaisons and notices; Severability; Entire agreement; Compliance with consumer data privacy and online monitoring; and, Acceptances and approvals.

SDE is focused on deliverables and payment gates once deliverables have been reviewed and accepted. SDE begins the payment process by having the lead reviewer, the Education Consultant with specific program area expertise, review the invoice to ensure the work matches duties performed by the Contractor. Once the Education Consultant has approved of the work and signed an approval, the Grants and Contracts Specialist reviews invoicing against deliverables outlined in the MOA or PSA. When the terms of the MOA/PSA are satisfied with the correct deliverables in place and with the correct accompanying invoice, the Grants and Contracts Specialist makes documentation and signs an approval. The invoice is sent to the Child Nutrition Program Bureau Chief for

review and approval before it is transmitted to the fiscal office. Following this step, the SDE Fiscal team reviews and makes their approval followed by payment.”

#### Recommendation 4b

The Department of Agriculture should determine whether it is appropriate for the University of Connecticut Extension to perform certain statutory duties on its behalf. If so, the department should enter into a formal agreement that specifies those duties and how they should be delivered, monitored, and paid.

#### Status

IMPLEMENTED

DoAg entered a memorandum of understanding with UConn Extension that specifies UConn Extension’s duties, service delivery, monitoring, and payment.

#### DoAg Update

“DoAg and UConn Extension entered into an MOU on July 10, 2024, to formalize the farm to school relationship.”

### Finding Area 5

The State Department of Education did not consistently develop and hold events for potential purchasers and farmers to interact.

#### Recommendation 5

The State Department of Education should comply with Section 22-38d(b)(4) of the General Statutes by collaborating with the Department of Agriculture to increase the number of events that bring together potential educational purchasers and farmers and should document a plan to achieve this statutory requirement.

#### Status

NOT IMPLEMENTED

SDE did not report collaboration with DoAg to increase the number of events that bring together potential purchasers and farmers, nor document a plan to achieve this statutory requirement. The memorandum of agreement with UConn Extension and hiring of regional Farm to School coordinators does not appear to address this recommendation.

#### SDE Update

“The SDE is in compliance with this recommendation. To collaborate with the Department of Agriculture, the SDE developed a

Memorandum of Agreement (MOA) with UConn Extension to assist and support the SDE's Farm to School efforts and hire six Regional Farm to School Coordinators to provide technical support and resources to every school food authority participating in NSLP in the state."

## Finding Area 6

# The State Department of Education did not arrange events to promote farmer and student interaction.

### Recommendation 6

The State Department of Education should comply with Section 22-38d(b)(5) of the General Statutes by arranging farmer and student interactions subject to public health conditions.

### Status

IMPLEMENTED

The General Assembly modified Section 22-38d(b)(5) of the General Statutes to require SDE to provide technical assistance and support to schools instead of requiring it to directly arrange farmer and student interactions. SDE did not implement the audit report's recommendation but is now in compliance with state statute.

### SDE Update

"The SDE disagrees with this finding. However, the state statute has been amended with the underlined language below:

(b) The Department of Education, in consultation with the Department of Agriculture, school food service directors and interested farming organizations, shall (1) establish a week-long promotional event, to be known as Connecticut-Grown for Connecticut Kids Week, in late September or early October each year, that will promote Connecticut agriculture and foods to children through school meal and classroom programs, at farms, farmers' markets and other locations in the community, (2) encourage and solicit school districts, individual schools and other educational institutions under its jurisdiction to purchase Connecticut-grown farm products, (3) provide outreach, guidance and training to districts, parent and teacher organizations, schools and school food service directors concerning the value of and procedure for purchasing and incorporating into their regular menus Connecticut-grown farm products, (4) in consultation with the Department of Agriculture, arrange for local, regional and state-wide events where potential purchasers and farmers can interact, and (5) provide technical assistance and support for schools to arrange for interaction between students and farmers, including field trips to farms and in-school presentations by farmers. (P.A. 06-135, S. 21; P.A. 18-73, S. 1; P.A. 24-78, S. 11.) History: P.A. 06-135 effective July

1, 2006; P.A. 18-73 amended Subsection (a)(3) by adding provision re person selling farm product as Connecticut-grown to school district, school or educational institution offer proof that product was produced in Connecticut; P.A. 24-78 amended Subsection (b)(5) by adding "provide technical assistance and support for schools to", effective July 1, 2024.

C.G.S. Section 22-38d(b)(5) was amended effective July 1, 2024, to clarify that the SDE is to provide technical assistance and support to schools to arrange interactions between students and farmers, including field trips and in-school presentations by farmers."

## Finding Area 7

The State Department of Education has not amended statutory breakfast and lunch nutrition standards to facilitate purchases from local farmers.

### Recommendation 7

The State Department of Education should amend regulations consistent with Section 10-215d(b)(2) to facilitate local and regional boards of education purchases from local farmers.

### Status

NOT IMPLEMENTED

SDE did not implement this finding because it does not believe it is necessary and lacks the required capacity.

### SDE Update

"The SDE disagrees with this finding. This proposal recommends the SDE invest scarce resources and substantial time into a process that federal law has rendered unnecessary. Although the SDE will take this recommendation under consideration, without dedicated state funding to hire a full-time staff person to oversee this, the SDE does not have the capacity to implement such a proposal."

## Finding Area 8

The food service management company contracting process is undermined by a lack of specificity, which hindered the ability to support the statutory intent of Section 10-215j of the General Statutes.

### Recommendation 8a

The State Department of Education should consider adding language to the food service management company bid template that would require the companies to quantify their capacity for supplying Connecticut grown products, provide additional detail in their proposals, and establish contractual farm-to-school obligations.

### Status

IMPLEMENTED

SDE modified the Food Service Management Company (FSMC) template to include requirements for school food authorities to specify produce the FSMC must purchase from Connecticut farms and the percentage of total produce purchases. This establishes contractual Farm-to-School obligations. The FSMC template does not require the FSMC to quantify its capacity for supplying Connecticut grown products but would require it to have sufficient capacity to fulfill its contractual requirement.

### SDE Update

"The SDE is in compliance with this recommendation. The Food Service Management Company (FSMC) template has been modified to include requirements for School Food Authorities (SFAs) to enter specific produce the FSMC must purchase from Connecticut farms. This also includes a requirement of the SFA to enter a percentage, for each item, of the FSMC's total produce purchases."

### Recommendation 8b

The State Department of Education should provide additional training on how the food service management company bid template could be used by school food authorities to increase a food service management company's contractual commitment to the Connecticut Farm-to-School Program, including the development of optional or suggested language.

Status

IMPLEMENTED

SDE updated the template but did not appear to provide additional training on how school food authorities could use the FSMC bid template to increase the FSMC's contractual commitment to the Connecticut Farm-to-School Program.

SDE Update

"The SDE is in compliance with this recommendation. The food service management company contract (FSMC) template has been modified to ensure Farm to School has its own criteria and scoring section. The template has also been expanded to ensure the FSMC is required to provide additional details about Farm to School in their proposal."

Recommendation 8c

The State Department of Education should develop training to help school food authorities provide additional specificity in their farm-to-school scoring rubrics.

Status

IMPLEMENTED

SDE provided training on Farm-to-School geographic preference.

SDE Update

"The SDE is in compliance with this recommendation. The SDE provides training on Procurement 101, FSMC RFP Process, and FSMC RFP Scoring annually. Each of these trainings include discussions regarding geographic preference. This discussion includes the Connecticut Farm to School requirement."

Recommendation 8d

The State Department of Education should provide additional training in the use of the food service management company template to maximize the purchase of Connecticut-grown products.

Status

IMPLEMENTED

SDE appears to have provided training in the use of the food service management company template to maximize the purchase of Connecticut grown products.

SDE Update

"The SDE is in compliance with this recommendation. During SDE's annual FSMC RFP Process training, there is detailed information provided to SFAs to assist with the completion of the Schedule B - Procurement Schedule."



#### Recommendation 8e

The State Department of Education should incorporate specific consideration of the Connecticut Farm-to-School Program into the food service management company monitoring reviews, including whether school food authorities are appropriately evaluating and awarding points for support for the Connecticut Farm-to-School Program, and providing sufficient oversight of compliance with contractual obligations to procure Connecticut-grown food or provide other Connecticut Farm-to-School Program supports.

#### Status

IMPLEMENTED

SDE updated its Procurement Review Organizational Tool to require school food authorities to include documentation of their Farm-to-School activities. This allows oversight of compliance with contractual obligations.

#### SDE Update

"The SDE is in compliance with this recommendation. SDE added a requirement to the Procurement Review Organizational Tool (PROT) which includes requiring the SFA to include all Farm to School activities and how they monitor the FSMC for purchasing compliance."

### Finding Area 9

The Department of Agriculture's database containing information about farmers interested in selling products to local schools is inadequate.

#### Recommendation 9

The Department of Agriculture should ensure that it improves its statutorily mandated database and website currently provided by University of Connecticut Extension. The database and website should provide information about the amount of produce available within specific periods, and identify and link to farms that allow online ordering.

#### Status

PARTIALLY IMPLEMENTED

The DoAg memorandum of understanding with UConn Extension requires DoAg to possess the information in the Connecticut Farm to School Directory and the ability to add and remove contacts. This is a beginning step toward maintaining the database with information about available produce and contacts for farms that allow online ordering.

## DoAg Update

"As part of the agreement with UConn Extension, UConn will continue to work on the database and DoAg has the ability to assume responsibility for management of the database initially established by UConn Extension. DoAg also supports several food hubs implementing databases and tracking systems that support farm to school purchasing, along with other markets. They include:

- a. Brass City Harvest, Waterbury
- b. Northwest Community Food Hub, Torrington
- c. CliCK Inc., Willimantic
- d. Healthy PlanEat
- e. Keney Park Sustainability Project"

## Finding Area 10

The Department of Agriculture lacks written, documented Farm-to-School Program policies and procedures.

### Recommendation 10

The Department of Agriculture should develop and maintain comprehensive written Farm-to-School Program policies and procedures.

### Status

**NOT IMPLEMENTED**

The DoAg draft strategic plan has an outcome to develop policies and procedures. While it shows intent, it is insufficient to consider this recommendation partially implemented.

## DoAg Update

"This is an outcome identified in the strategic plan."

## Finding Area 11

There is a lack of verification that agricultural products sold to school districts are Connecticut or locally grown.

### Recommendation 11a

The State Department of Education should advise school food authorities of the importance of ascertaining the validity of any Connecticut-grown claims and check that the SFAs have a process

to ensure that food distributors claiming to sell Connecticut- or locally-grown products can prove their Connecticut origin in accordance with the definition in Section 22-38 of the General Statutes.

## Status

### PARTIALLY IMPLEMENTED

The SDE response shows efforts towards implementing this recommendation, but those efforts are insufficient to achieve full implementation. SDE advises school food authorities (SFAs) of the importance of ascertaining the validity of claims through training. SDE did not report evidence that SDE verifies if SFAs have processes to verify those claims. The Local Food for Schools Incentive Program verification requirements only fulfill the recommendation for the participating schools. Furthermore, these verification requirements do not ensure SFAs have their own claim verification processes.

## SDE Update

"The SDE is in compliance with this recommendation. Regarding proof of origin, the SDE administers the federal Local Food for Schools Incentive Program (LFSIP). A requirement of the LFSIP is that the participating SFAs maintain documentation verifying vendor name, address, and the products provided for all items purchased using LFSIP funds and in accordance with federal record retention requirements. Furthermore, as of May 2024, Connecticut launched its own state funded LFSIP (CT LFSIP) administered by the Department of Agriculture (DoAg), which mirrors the origin documentation and verification requirements set forth by the federal government and SDE in the LFSIP. To further support SFAs, the SDE directs SFAs to the CT Farm to School Directory, which includes verified information on local farmers and food hubs. This directory serves as a resource to help SFAs validate product origins and support local procurement efforts. Training on the use of this directory has been a focal point of SDE's Farm to School training initiatives.

Additionally, the mandatory Procurement 101 annual training for all SFAs has been updated to include guidance encouraging the purchase of Connecticut-Grown products and verifying claims. This training now incorporates the statutory definition of Connecticut-Grown outlined in Section 22-38a of the Connecticut General Statutes and emphasizes the importance of requiring proof of origin from food distributors making Connecticut-Grown or local product claims. Through these actions, the SDE is committed to improving transparency and compliance with statutory requirements related to local food procurement in Farm to School Operations."

## Recommendation 11b

The Department of Agriculture should collaborate with the State Department of Education to educate school districts about the importance of checking the veracity of claims made about

Connecticut- and locally-grown products and follow up on any alleged fraudulent claims reported by school food authorities.

Status

PARTIALLY IMPLEMENTED

DoAg collaborates with SDE to verify the claims through the federal Local Food for Schools Incentive Program (LFSIP) and educate school food directors at training events about what to look for when purchasing Connecticut Grown products. These efforts may not reach all school districts. DoAg follows up on erroneous claims through LFSIP and has not identified any fraudulent claims.

DoAg Update

"To ensure schools are purchasing CT Grown farm products, a reporting requirement of the LFSIP is to maintain detailed invoices which itemize the product purchased and where it was purchased from. This information must be available upon request. In addition, the farms referenced in applications are cross-referenced for an online presence and physical locality within Connecticut. All information provided is cross referenced and verified by DoAg staff prior to the school being eligible for reimbursement. DoAg staff have attended School Lunch Tray events, SNACT Hot Topics, and other school food service director educational events to educate and promote the purchase of CT Grown farm product, and what to expect and look for when buying CT Grown farm products for incorporation into school meals. Any erroneous claims through LFSIP have been reviewed, and no fraudulent claims have been identified regarding the location of the farms where items have been purchased."

Recommendation 11c

The Department of Agriculture should update the embedded farm-to-school document on its website to reflect the 2018 amendment to Section 22-38d(a)(3) of the General Statutes.

Status

IMPLEMENTED

DoAg updated links to the most recent statute on its Farm-to-School Overview and CT Grown for CT Kids webpages.

DoAg Update

"This is completed and updated to the 2021 statute and can be found here: <https://portal.ct.gov/doag/adarc/programs/farm-to-school-overview> and here: <https://portal.ct.gov/doag/adarc/adarc/grants/ct-grown-for-ct-kids-grant/regulations>"

## Finding Area 12

Strengthening Connecticut's promising farm-to-school policies and practices in key stakeholder areas would efficiently leverage the state's strategic assets to fully realize the statutory intent of the program.

### Recommendation 12a

The State Department of Education should provide specific information and training to school food directors on how to create and integrate values-based procurement procedures, including the development of goals and commitments to increase local purchases.

### Status

**PARTIALLY IMPLEMENTED**

SDE provided specific information and training to school food directors to increase local purchases, which partially implements the recommendation. SDE reports it has taken steps towards providing specific information on developing goals and commitments to increase local purchases. SDE developed, but has not yet implemented, a strategy to help school food authorities develop goals to increase local purchasing and is developing an enhanced Connecticut Farm to School guide.

### SDE Update

"The SDE is in compliance with this recommendation. The SDE has provided specific information and training to school food service directors to increase local purchases. As the SDE builds on its Farm to School initiatives year-over-year, the Farm to School Regional Coordinators will work with the SFAs in their region to take the Farm to School assessment results for their LEA and develop goals for increasing local purchasing. The Regional Coordinators will provide training and individualized technical assistance to move these plans forward. Additionally, the enhanced Connecticut Farm to School guide will have specific strategies related to values-based and local procurement.

In the meantime, the SDE calculated and dedicated specific monetary allocations for each eligible SFA to enroll and participate in both the USDA federal Local Food for Schools Incentive Program (LFSIP) and the Connecticut LFSIP, administered by the Connecticut Department of Agriculture (DoAg). Both of these funding opportunities set individualized local and regional purchasing goals for each SFA by determining each SFAs allocation allotment and the SDE's Regional Coordinators are actively working with each SFA to

increase commitments to local purchases. As of April 25, 2025, 138 of the state’s 170 School Food Authorities (SFAs) are participating in the federal LFSIP, while 83 SFAs are enrolled in the state-level Connecticut LFSIP.

The Federal LFSIP was launched in two phases. SDE designed Phase 2 specifically for SFAs that commit to purchasing from socially disadvantaged producers or vendors that meet the criteria for small businesses. A total of 75 sponsors have enrolled in Phase 2. Through the first quarter of 2025, participating school districts have sourced products from 139 local and regional producers. Of these:

- 119 are located in Connecticut;
- 129 qualify as small businesses;
- 19 are classified as socially disadvantaged producers.

The SDE continues to provide guidance, training, and resources to food service directors (FSDs) to help increase procurement from local vendors that qualify as small businesses. Key initiatives include:

Providing Regional Support for districts:

- Supporting SFAs in enrolling in both the Federal and Connecticut LFSIP programs;
- Developing values-based procurement procedures to meet the LEA’s Farm to School values-based procurement goals;
- Facilitating purchases from local farms using program funds;
- Conducting individualized meetings with district FSDs to:
  - o Identify barriers to local purchasing;
  - o Set actionable goals;
  - o Connect districts with Connecticut farms or food hubs based on geographic and product needs.”

Recommendation 12b

The State Department of Education should review educational and school gardening best practices and identify barriers to expanding school gardens in Connecticut. The department should propose methods to address those barriers to the legislative committees that have cognizance over agriculture and education.

Status

NOT IMPLEMENTED

SDE did not review education and school gardening best practices and identify barriers to expanding school gardens.

SDE Update

“The SDE disagrees with this finding. Regional Coordinators will use the data obtained in the Connecticut Farm to School Assessment to determine key strategies to address barriers to expanding school gardens in Connecticut, should that be a finding in the assessment. The SDE recognizes that school gardens can serve as an educational tool for students. The SDE is open to engaging with legislative committees on the topic of school gardens should legislators request such information from the SDE. It’s important to note that

the relevant statutes are silent on school gardens and the focus on such activities will be weighed against other priorities identified by the assessment.”

#### Recommendation 12c

The Department of Agriculture, in consultation with the State Department of Education, should research and assess various incentive programs to better understand how to sustain and encourage farm-to-school participation and support Connecticut producers. The department should report its findings and recommendations to the legislative committees that have cognizance over agriculture and education. The assessment should include an analysis of the benefits to farmers and local school districts and the costs of different approaches.

#### Status

### PARTIALLY IMPLEMENTED

SDE and DoAg reported research on incentive programs through implementation of the federal and state Local Food for Schools Incentive Programs. This is a step toward researching and assessing various incentive programs. However, SDE and DoAg did not conduct comprehensive research on incentive programs nor report findings and recommendations to the legislative committees of cognizance.

#### SDE Update

“In addition to the federal LFSIP work described in 12a., the SDE collaborates closely with DoAg to support the implementation and operation of the CT LFSIP. To date, some of SDE’s contributions include:

- Co-hosting a statewide informational webinar with the DoAg to launch the CT LFSIP.
- Promoting and encouraging participation in CT LFSIP throughout the SDE’s School Lunch Tray, Table Talk, the School Nutrition Association of Connecticut (SNACT) conferences and Food Shows, and other forums.
- Leveraging the expertise of Farm to School Regional Coordinators to promote program participation, and assist school districts in enrolling, connecting with local farmers, identifying appropriate products, and navigating the reimbursement process.
  - Since the introduction of the Regional Coordinators in mid-January 2025, 32 additional districts have enrolled in the CT LFSIP.
- Administering the processing of CT LFSIP reimbursement claims and disbursing funds to participating School Food Authorities (SFAs).

As noted in Section 12a, SDE is successfully operating the federal LFSIP in Connecticut, utilizing Regional Farm to School Coordinators to support school districts in purchasing from local producers using

federal funds. This collaborative model has proven effective in expanding local procurement across the state.”

#### DoAg Update

“This research is conducted in preparation and continuation of the CT LFSIP. Through the MOU with SDE, SDE drafts the annual report on the program's efficacy. In addition, DoAg is a contributor to the annual Commission on Women, Children, Seniors, Equity and Opportunity Food Insecurity Report which develops many recommendations, of which one discusses the importance of school meals and farm to school. The report can be found at: <https://wp.cga.ct.gov/cwcseo/wp-content/uploads/2025/01/Food-Insecurity-in-Connecticut-Report-2024.pdf>. DoAg also participates in the Food Insecurity Planning Committee which organized a daylong event focused on food insecurity. One area topic of the Committee was schools and school systems. The Bureau Director for AG Development and Resources Conservation served on a panel with the SDE Bureau Chief of Child Nutrition Programs (among others) to highlight farm to school and school meals. From a regional perspective, DoAg participates as a Supporting Partner in the New England Feeding New England Partnership which is a regional network that unites the food system community to mobilize state networks to impact local and regional food supply chains and strengthen and grow the New England regional food system.”

### Finding Area 13

Connecticut-grown food markets, processing, and distribution are insufficient for some school food authorities to fulfill their local product needs.

#### Recommendation 13a

The Department of Agriculture should, in collaboration with its Food Policy Council, research and assess how to implement a food system policy to increase key food production and infrastructural capabilities like processing and aggregation capacity for Farm-to-School Program needs. The department should report the results of its findings and recommendations to the legislative committees that have cognizance over agriculture and education.

#### Status

IMPLEMENTED

DoAg contributed to the annual Commission on Woman, Children, Seniors, Equity, and Opportunity's Food Insecurity report, which provided findings and recommendations to increase processing and aggregation. This report does not focus on processing and aggregation capacity specific to schools but does include schools in



its analyses. DoAg did not complete this report in collaboration with its Food Policy Council because this council is not responsible for establishing food policy.

#### DoAg Update

"The Food Policy Council is administered by DoAg. While they have the statutory ability to discuss and recommend policy, they are not responsible for establishing food system policy. The Office of the Governor identifies the Commission on Women, Children, Seniors, Equity and Opportunity as the primary entity in Connecticut responsible for recommendations related to food system policy and the report including policy recommendations can be found at: <https://wp.cga.ct.gov/cwcseo/wp-content/uploads/2025/01/Food-Insecurity-in-Connecticut-Report-2024.pdf>."

#### Recommendation 13b

The Department of Agriculture should develop and implement a plan to facilitate relationships between schools and food hubs so school districts can overcome the challenges of finding local product, processing, and transportation.

#### Status

**PARTIALLY IMPLEMENTED**

DoAg, through the Aggregator Group it coordinates, is developing a plan to work with school markets as the primary outlet for food hubs. This recommendation is partially implemented because the plan is still under development.

#### DoAg Update

"DoAg coordinates the Aggregator Group, which has representation from all of the food hubs in CT as well as Healthy PlanEat and Keney Park Sustainability Project, Inc. where they are working on creating a plan to work with school markets as a primary outlet. The aggregator group organizes field trips for the SDE/UConn Farm to School Coordinators to connect with food hubs including visitation of two of the food hubs. DoAg has recommended an award for the USDA's Resilient Food System Infrastructure Grant specifically to support a cooperative digital food hub for all food hubs in CT which we hope to continue into the future."