

Responses to NASS Comments Received 10/9/2012

(Comments in *italics*, responses in **bold**)

October 17, 2012

I have reviewed the OMB docket for the 2010-2011 Farm to School Census and provided the following comments.

The Supporting Statements A and B offer a strong justification and plan for conducting this census. I did not see any grave errors that would cause concern from OMB. However, the timeline in question 16 in Part A is too vague. I would recommend that you include the time needed for editing, estimation, and writing. I would also recommend that the timeline for the nonresponse follow-up be included here, too.

We have added a more detailed timeline for data processing and preparation of data products, as well as time for non-response follow-up.

In Part B, you addressed my earlier question on whether the nonresponse follow-up brings the overall response rate to 80% and what the correct nonrespondent sample is. One question I did have after reviewing Part B is what the strata used for the nonrespondents are. Furthermore, I did not understand what was being used to stratify the sample and whether or not this is actually a post-stratification procedure that you are using.

We have clarified the strata to be used for sampling non-respondents, based on total enrollment of the school district as reported in the 2009 Common Core of Data public school district universe survey collected by the National Center for Education Statistics. These data will be merged to the list frame before the sample of non-respondents is drawn.

Finally, in Part A, question 8, what is your plan if no SFAs in a region provide data but the DOD Fresh program includes data for that or those SFAs? Also, in the same question, I did not see a response to the comment that SFAs may not be fully aware of the Farm to School activities outside of the school meals program made by Joshi et al. It is probably there but I did not see it.

DOD Fresh is a part of the USDA Foods program that donates foods to SFAs. Under DOD Fresh, SFAs may receive donated fresh produce from the Department of Defense procurement system, and may request locally produced items through the vendors serving DOD Fresh. These donations are separate from purchases of locally produced food by SFAs, so there may be many cases where SFAs receive USDA Foods donations of locally-produced food through DOD Fresh, but do not purchase locally produced foods. The Farm to School Census map will report SFA purchases of locally-produced foods and will not include donations through DOD

Fresh. Data are available for locally-produced foods donated through DOD Fresh at the State level, but not for the school district level.

We clarified the response to the comment by Joshi et al. that SFAs may not be fully aware of Farm to School activities outside of the district. The Farm to School Census is targeted to the district level and will provide only a partial picture of Farm to School activity.