APPENDIX W

NASS COMMENTS

**Farm to School Census and Comprehensive Review Part A and B**

August 22, 2018

**General Comment:**

The paper addresses and explains very clearly the purpose, expectation, process, cost and statistical methods used for the study of SFA procurement practices. All topics are well defined and supported by tables, examples and the pertinent information such as OMB control number, expiration date etc. The statistical methods used for the study are well detailed and - for the most part – justified.

**Supporting Statement Part A**

1. No comment.
2. Distributor Interview: If the purpose of the distributor interview is to obtain the perspectives of *large-scale* food distributors on the processes and challenges to *local*food purchasing and procurement, it is somewhat unclear how conclusions can be drawn without knowing more information about the entire universe of food distributors. From the description it is not clear how the sample of 25 distributors was chosen and if this sample is representative of large food distributors as a whole. Additionally, if the food distributors which are purposely sampled are large, using these responses to draw conclusions about local food purchasing and procurement may only give insight into the challenges of larger distributors, and ignore challenges faced by smaller distributors.

The study also identifies the goal of identifying and describing the economic contribution of farm to school across various geographies. From the study’s description it is unclear if the 25 distributors are spread across multiple geographic regions or geographically concentrated. To accurately describe the economic contribution of various geographies it is important to ensure that multiple geographies are appropriately represented.

1. At the end of this section an FNS estimate of 227,965 responses for this collection is mentioned. It is unclear what this number of responses is referencing, as this number has not been noted prior to this point. I would suggest removing this sentence or providing further clarification.
2. No comment.
3. No comment.
4. No comment.
5. No comment.
6. No comment.
7. No comment.
8. No comment.
9. No comment.
10. No comment.
11. No comment.
12. No comment.
13. No comment.
14. No comment.
15. No comment.
16. No comment.

**Supporting Statement Part B**

Please see comment above about distributor interview. Glad to see that a nonresponse telephone follow up is already built into the data collection plan.

**Reviewer:**

Mingshan Zheng, Mathematical Statistician

Summary, Estimation, and Disclosure Methodology Branch

National Agricultural Statistics Service

United States Department of Agriculture

T: (202) 720 0830

Email: mingshan.zheng@nass.usda.gov