



December 9, 2015

Oregon Board of Education  
255 Capitol Street NE  
Salem, OR 97301

Re: Farm-to-School Grant Program

Thank you for the opportunity to comment on the Proposed Administrative Rules for the Farm-to-School and School Garden Education grant program administered by the Oregon Department of Education (ODE). By way of background, Oregon Farm Bureau (OFB) is a voluntary, grassroots, nonprofit organization representing Oregon's farmers and ranchers in the public and policymaking arenas. As Oregon's largest general farm organization, OFB's primary goal is to promote educational improvement, economic opportunity, and social advancement for its members and the farming, ranching, and natural resources industry as a whole. Today, OFB represents over 7,000 member families professionally engaged in the industry and 60,000 members statewide.

OFB is a strong supporter of the Farm-to-School program and the important agricultural education that the program provides. During the 2015 Session, the Legislature made a historic investment in the Farm-to-School program, and OFB appreciates the opportunity for commodity commissions and nonprofit organizations to participate in the promotion of ag education through grants administered by ODE. As such, we submit the following comments.

ORS 336.431 revised by SB 501 in 2015 specifies the following criteria:

(c) when awarding grants under this subsection, preference shall be given to entities that propose educational activities that:

- (A) are well designed;
- (B) promote healthy food activities;
- (C) have clear educational objectives;
- (D) involve parents or the community;
- (E) are connected to a school district's Farm-to-School procurement activities; and
- (F) are culturally relevant to the students being served by the grant moneys.

OFB participated in ODE's stakeholder group on the Farm-to-School administrative rules and believes that certain provisions in the draft administrative rules may be outside of scope of the legislation. Specifically, we are concerned that the draft language would reduce the flexibility of the grant program administered by ODE and, consequently, reduce producer participation. For example, county farm bureaus regularly partner with local schools to promote agriculture education and teach students about farming. Ag education is a core function for state and county farm bureaus. However, county farm bureaus also operate on a volunteer basis and may not have the staff support necessary to meet onerous application requirements. We ask ODE to put

forward a grant program that allows nonprofit groups with all levels of administrative support to compete on equal footing.

Additionally, we urge ODE to remove the language mandating compliance with all grant criteria (A-F) under the draft under OAR 581-017-0441(5) and revert back to the statutory requirement of "preference shall be given" to the criteria (A-F). We believe this was the legislative intent.

We also are concerned with the added requirement that applications are mapped to state education objections. Farm-to-School educational grants should meet clear educational goals and teach children about agricultural production. However, we think it is unnecessary that grant applications be mapped to state standards and doubt that all applicants would have the expertise to meet this requirement.

We appreciate your time and attention and look forward to the opportunity to engage with ODE through the Farm-to-School and School Garden Education grant program. Please do not hesitate to contact Oregon Farm Bureau with any questions or concerns.

For questions or comments, please contact Jennifer Dresler, Director of State Public Policy at the Oregon Farm Bureau at [jenny@oregonfb.org](mailto:jenny@oregonfb.org) or 503-399-1701.

cc: Cindy Hunt

