



August 18, 2015

Colleen Rathke  
Director, Office of Head Start Policy and Planning Division  
1250 Maryland Avenue SW  
Washington, DC 20024

Docket No. ACF-2015-0008-0001  
Submitted electronically via <http://www.regulations.gov/>

## Re: Proposed Rule on Head Start Performance Standards

Dear Ms. Rathke:

On behalf of the National Farm to School Network, we are writing to comment on the proposed Head Start Performance Standards and to share information on an innovative approach to support these enhanced standards. Farm to preschool – which encompasses farm to Head Start and farm to early care – offers diverse educational opportunities that meet multiple components of the Head Start Early Learning Outcomes Framework and that promote healthy lifestyles for children while offering additional benefits to families and communities. In addition to the significant opportunity to utilize farm to preschool to meet performance standards, we strongly recommend maintaining the educational requirement to involve children in food related activities and incorporating language to encourage local procurement. Integration of farm to preschool activities can further Head Start's primary objective of providing children with high quality early learning opportunities that best prepare them for success in school and in life.

### Introduction to the National Farm to School Network and Farm to Preschool

The National Farm to School Network (NFSN) is an information, advocacy and networking hub for communities working to bring local food sourcing and food and agriculture education into schools (grades K-12) and preschools (to include Head Start and early care centers serving children from ages 0-5). NFSN provides important leadership in the farm to school movement to promote and support the development and expansion of farm to school and farm to preschool at the state, regional and national levels ([www.farmtoschool.org](http://www.farmtoschool.org)).

Farm to school – inclusive of farm to preschool – enriches the connection communities have with fresh, healthy food and local food producers by changing food purchasing and education practices at schools and preschools. Farm to school implementation differs by location but always includes one or more of the following:

- (1) Procurement: Local foods are purchased, promoted and served in meals, as a snack or taste-test;
- (2) Education: Students participate in education activities related to agriculture, food, health or nutrition; and
- (3) School gardens: Students engage in hands-on learning through gardening.

Farm to school empowers children and their families to make informed food choices while strengthening the local economy and contributing to vibrant communities. As a grassroots movement, implementation of farm to preschool develops independently to best



meet the needs and resources of the individual site. Thus, farm to preschool (including farm to Head Start and farm to early care) is applicable and beneficial to center-based, family child care and home-based Early Head Start and Head Start programs.

### Head Start Performance Standards Recommendations

We ask that you take into consideration the following recommendations for incorporating farm to preschool components into the Head Start Performance Standards:

- In addition to healthy kids and families, farm to preschool has the potential to promote food secure communities. Incorporating access to healthy, local food options as an element in the community assessment would contribute to an understanding of the overall food landscape, particularly food access challenges. **We recommend adding, “Availability of adequate, healthy, culturally appropriate food choices, including locally sourced food options,” to the components of the community assessment in §1302.11 (b).**
- We acknowledge the importance of increased flexibility for individual programs and reduction of overly prescriptive education requirements; however, **we urge *against* removing the requirement to involve children in food related activities (formerly §1304.23 (c) (7))**. Food related activities such as cooking, gardening and taste tests offer vital learning opportunities and health benefits. Farm to preschool’s diverse assortment of activities can provide the education and nutrition related benefits of food activities with the flexibility of adapting selected activities to the specific needs and resources of the program. Thus, instead of removing the requirement, **we recommend adding the following language to §1302.31 (e) (2): “A program must provide, as developmentally appropriate, opportunities for involvement of children in food related activities, such as cooking, tasting and growing of food.”**
- Incorporating local procurement within nutrition services programs offers the hallmark “triple win” of farm to school by increasing access to high quality, fresh foods to children, supporting local farmers and promoting thriving communities. To encourage a focus on local foods, **we recommend the following addition to the nutrition services requirements in §1302.44 (a) (2): “Promote, to the extent practicable, the use of locally sourced foods.”**
- Once the need for increased access to healthy, local food is identified, promoting community relationships with local farmers and other food system partners would be a promising step in addressing this issue. Farm to preschool activities – such as farm fieldtrips and using local foods in meals and snacks – naturally facilitate relationships with growers and local food sources. By establishing collaborative partnerships with farmers and local food purveyors, children and families benefit from increased access to healthy, local food while farmers increase marketing opportunities and diversify sales outlets. To encourage this collaboration, **we advise inserting the following language in §1302.53 (b) (2) as an additional potential community partnership: “Providers of locally sourced food.”** Such partnerships encourage community economic development and support healthy families and thriving communities.

### Additional Opportunities for Farm to Preschool (and Head Start or Early Care) to Support Performance Standards

In addition to specific regulatory language, we would like to emphasize the opportunity for farm to preschool (and Head Start / early care) activities to meet multiple components of the Head Start Performance Standards:



- Farm to preschool (and Head Start / early care) activities strongly contribute to the central elements noted in the program standards as vital to furthering high quality early education and to promoting cognitive, social and emotional development (§1302.31). Farm to preschool practices enhance the learning environment by promoting all eating occasions and food related experiences as educational opportunities that can be utilized to enhance social abilities, cultural knowledge and key skill development.
- NFSN has identified multiple research-based farm to preschool curricula focused on developing age appropriate skills and active engagement appropriate for Head Start programs (§1302.32). (More information: [Farm to Preschool Resources](#).) These curricula incorporate nutrition, gardening and agriculture lessons that support key areas of skill development including language and literacy, mathematics and social, emotional and physical development.
- Farm to preschool (and Head Start / early care) activities offer unique opportunities to encourage parental involvement and provide benefits that extend beyond the child to parents and communities (§1302.34, §1302.50). Children bring their daily experiences home with them: if a child taste-tests berries at school, that child will be more willing to eat berries at home. Introducing new, healthy foods to children and families in the Head Start setting can strongly influence the foods parents serve at home and eat themselves. Activities such as farm to table family events and Community Supported Agriculture (CSA) memberships for families ensure the health and education benefits of farm to preschool are continued into the home while promoting increased access to healthy food options.
- Importantly, farm to preschool (and Head Start / early care) has the potential to strongly influence the short- and long-term nutritional status of young children (§1302.40). Farm to preschool activities like taste-tests, integration of seasonal foods and gardening encourage repeated exposure to healthy foods, like fruits, vegetables and whole grains. Research indicates that participation in farm to school activities promotes increased fruit and vegetable consumption. (More information: [Benefits of Farm to School](#).) Additionally, repeated exposure promotes continued acceptance of such foods and contributes to preference development and lifelong healthy eating habits. The more often children try healthy foods, the more likely they are to enjoy them and choose them in the future, thus achieving Head Start Early Learning Outcomes Framework Nutrition Standards Indicators.
- Finally, farm to preschool (and Head Start / early care) activities create the opportunity for children, parents, and teachers of varying cultural, ethnic, and linguistic backgrounds to connect with farmers and community members of a variety of backgrounds (§1302.50). These connections not only facilitate and support cultural communities, but also promote development of cultural competency and understanding.

The farm to preschool (and Head Start / early care) movement is increasingly recognized as an important approach to promoting positive learning and health outcomes for children, families and communities. We believe that integration of farm to preschool practices into Head Start programming will bolster the position of Head Start as the leader in early education. Please do not hesitate to contact us for more information on how farm to preschool can enhance Head Start Program Performance Standards and strengthen the impact of Head Start services.

Thank you for your time and attention to this important matter.

Respectfully submitted,



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