

# Bringing the Good Food Purchasing Program to New York City

*Barriers and Facilitators for Select Institutions*

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## Executive Summary

The Good Food Purchasing Program (GFPP) is a comprehensive effort to harness the power of municipal institutional food procurement to achieve social, environmental, and economic goals through the promotion of better food purchasing practices. Specifically, the program provides a metric-based, flexible framework that prioritizes five core values: local economies, environmental sustainability, valued workforce, animal welfare, and nutrition. With more than 100 national, state, and local food system experts providing recommendations and feedback on the policy, the GFPP is the first procurement model to support these five values in equal measure.

In 2012, Los Angeles became the first city to join the GFPP and subsequently other cities including San Francisco, Oakland, Boston, Chicago, Washington D.C., Cincinnati, and Austin approved the GFPP, as did several school systems, counties and regions. In New York City, several organizations including the Food Chain Workers Alliance, Community Food Advocates and the City University of New York (CUNY) Urban Food Policy Institute, and the national Center for Good Food Purchasing have joined forces to create the NYC Good Food Purchasing Campaign and to begin to build a coalition of local supporters.

In 2018, the Center for Good Food Purchasing initiated baseline assessments for the Department of Education (DOE) – the New York City’s largest institutional food purchaser, and NYC Health and Hospitals – the largest municipal hospital system in the country. The research presented in this summary complements these ongoing assessments by providing in-depth information about the processes of food procurement at two additional government agencies, the New York City Human Resources Administration (HRA) and the New York City Agency for Children’s Services (ACS). These two agencies were selected because of their reach among vulnerable populations and their complex relationships with hundreds of community-based organizations.

The report also explores how the GFPP might influence food procurement programs in the emergency food programs HRA funds and in the early care and education centers ACS supports and examines how adoption of the GFPP might affect those procurement processes. Researchers used a two-pronged data collection strategy combining qualitative case study data with quantitative data from procurement contracts and a survey of vendors. A case study research design was employed to develop an in-depth and comprehensive overview of institutional food procurement at select institutions in the City and to shed light on the barriers and facilitators to institutional commitment to the GFPP. Analysis of current NYC food procurement contracts at HRA and ACS – ascertained via FOIL requests and the NYC OpenData Portal – as well as a survey with the top

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twenty vendors supplying city agencies, based on the contract data previously explored, allowed for a preliminary assessment of the degree to which those vendors' practices aligned with GFPP values.

Our case studies were based on interviews with 14 staff directly involved in food procurement through the two agencies and 5 staff members at other organizations who were not directly involved with either agency but were able to provide insight into certain aspects of procurement, including relevant policies and procedures. Overall, our case study research revealed divergent as well as overlapping barriers and facilitators to GFPP adoption at HRA and ACS. For the HRA and the emergency food programs they support, higher cost, the influence of federal regulations, and policy restrictions from state-level anti-hunger and nutrition programs were perceived as the main constraints to institutionalizing a holistic, value-based approach to food purchasing as represented by the GFPP. For the ACS and the early care and education centers it supports, the lack of infrastructure, the modest volume of purchases, and the limited information on the food procurement practices of similar institutions, were among the key barriers noted.

Of note, both early care centers and emergency food providers identified alignments between their existing procurement practices and the values GFPP promotes, an alignment that can support and expedite GFPP implementation after it is adopted. Additionally, both types of institutions noted that attaining greater economies of scale – either through the development of a collective purchasing model or by using the services of group purchasing organizations – can help reconcile financial viability with requirements for higher nutritional, environmental, and human and animal rights standards. Tools or resources that can help institutions to more easily identify GFPP-aligned vendors were another key facilitator for the GFPP implementation identified by case study participants.

As expected, the contract data analysis revealed the strategic importance of the NYC Department of Education in the NYC's institutional procurement landscape – both for the scale of its purchases as well as its ability to simultaneously affect the well-being of future generations of New Yorkers and the resiliency of farmers and farmland in the region and elsewhere.

Equally important was the finding that more than half of the top 22 vendors, ranked by dollar amount, who contract with the City, supply agencies other than the DOE, including the HRA, ACS, and DOC. When DOE contracts are excluded, these City contracts total more than \$62 million. This shows the potential for the municipal government to leverage its market power to improve food quality, lower costs, and promote agri-food systems that work in the public interest.

Survey data from the top 22 vendors revealed additional key findings including a significant alignment with the GFPP's local economies value category. Of the fourteen vendors who took the

survey, more than two thirds stated that they sourced products from local producers or manufacturers (i.e., within 250 miles for produce and 500 miles for meat). In most cases, this response was largely due to local food sourcing already playing an important part of the company's policy or mission. Additionally, the majority of vendors who participated in the survey stated that they follow a social responsibility policy. However, only one agency used the Fairtrade certification as a criterion for sourcing food.

In a forthcoming report, Institute researchers will explore in further detail these and other findings to support the activities of the coalition campaigning for adoption of the GFPP in New York City. This coalition, led by the Food Chain Workers Alliance, Community Food Advocates, and the CUNY Urban Food Policy Institute, working together with many other organizations, is engaged in a robust set of advocacy efforts to see the GFPP implemented citywide. For that reason, we present the following recommendations outlined below.

*For the NYC Good Food Purchasing Policy Coalition*

- 1. Advocate for citywide adoption of the GFPP to make full use of NYC's food purchasing power.*
- 2. Identify ways that GrowNYC's future food hub in the Borough of Bronx might address many of the logistical concerns described as barriers to GFPP adoption. Additionally, explore opportunities for the new hub to help meet the scale of NYC's institutional food procurement.*
- 3. Work with City institutions to identify specific strategies for better aligning current policies (i.e., for HRA emergency food provision HPNAP and EFAP) with GFPP goals and for reducing any conflicts. Similarly, explore potential for policies like HPNAP to allow for additional vendors.*
- 4. Given the NYC Department of Education's scale of procurement, and the fact that it has already taken steps to include specific language in their bids as well as identify GFPP-related goals for their operations, continue to advocate for that agency to lead the way toward citywide GFPP adoption.*
- 5. Advocate for the city to test and adopt collective purchasing models that can influence the development of more affordable contracts and help establish a tailored support system to aid in transitioning to GFPP procurement approach.*

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- 6. Continue to ensure that the campaign for GFPP adoption makes the expansion and development of public awareness and support a priority.*

### *For NYC Institutions and Agencies*

- 7. Explore the ability of group purchasing models to support institutions in finding vendors that better align with the GFPP values, such as Food and Supply Source.*
- 8. Develop a tracking system to monitor procurement in order to continually assess alignment with values-based purchasing models. As proposed by the NYS Department of Agriculture and Markets, explore the possibility of a centralized institutional procurement system.*
- 9. With support from the Center for Good Food Purchasing and the NYC Coalition for adoption of the GFPP, consider adding local, fresh options under the Emergency Food Assistance Program (EFAP).*
- 10. Create structures and processes that allow for effective community input and increased transparency, including through making the outcomes of GFPP baseline assessments publicly accessible.*

### *For Future Research*

- 11. Carry out research to support the development of tools or resources that can help institutions and their programs more easily identify GFPP-aligned vendors.*
- 12. Conduct an in-depth case study on NYC Department of Correction (DOC) to deepen understanding of innovations in current food procurement practices as well as identify opportunities for their normalization through adoption of the GFPP.*

Together, the lessons and recommendations from the case studies, contractual data, and vendor survey point to key areas for future scholarship on institutional food procurement as well as next steps for the GFPP Campaign currently underway in New York and other cities across the US. A better understanding of how public institutions procure food can aid the adoption of policies that could lead to the procurement of healthier, more sustainable foods being served in the public sector.

## Acknowledgements

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## About the CUNY Urban Food Policy Institute

The CUNY Urban Food Policy Institute is an academic research and action center at the CUNY Graduate School of Public Health and Health Policy located in Harlem, NYC. The Institute provides evidence to inform municipal policies that promote equitable access to healthy, affordable food.



## 1. Introduction

Cities across the United States and abroad are in agreement: current food systems often fail to serve the public interest. Due to the ubiquity of cheap food, rates of chronic diet-related diseases have steadily risen over the past few decades. In that same time, we have seen the depletion of natural habitats and the denial of human and animal rights. The new urban foodscape is thus one of caloric abundance at the expense of fair, ecologically sound, and nutritious meals.

Public food procurement – or the share of a city’s food supply funded by government and government-sponsored institutions – can be an effective tool that municipalities use to instigate a radical transformation of the current urban food system. One approach being used by cities is the [Good Food Purchasing Program](#) (GFPP), a metric based, flexible framework that encourages large institutions to direct their buying power toward supporting five core values: local economies, environmental sustainability, valued workforce, animal welfare, and nutrition.

Public and publicly-funded institutions such as schools, hospitals, correction facilities, senior centers, early care and education centers, emergency food relief organizations, and related programs, make large-scale, centralized decisions about procuring food. With support from city, state, and federal government, these organizations can lead the shift toward better food procurement at the regional and national levels.

What makes these institutions compelling sites for food system reform is the sheer volume of purchases they make every day—for example, New York City’s school food procurement budget is second only to that of the US military’s food expenditures—and their ability to transform the business practices of food distributors and producers through the power of the public purse.<sup>1-3</sup> At the individual level, there is only so much that slogans such as "vote with your fork" can do. At the institutional level, however, a mayor voting with her or his fork can substantively influence the practices of vendors looking to do business with the city. Municipal agency-level decisions can indeed be critical to transforming the food system to behave more in line with the public interest, thus encouraging changes in procurement practices nationwide.

As adoption of the GFPP expands across the US and a campaign to bring the program to New York City gains momentum, three key questions are: What obstacles should GFPP advocates, city agencies, and government-supported institutions expect when embarking on more ambitious food procurement goals? What strategies could city leaders employ to effectively surmount these obstacles? And, how the ample knowledge of the NYC GFPP Coalition – which brings together

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experts in the five value categories – can be leveraged to mobilize citywide adoption and implementation of the GFPP?

Yet, to date, no systematic analysis of the barriers and opportunities to GFPP development and implementation in New York City at key institutions such as the childcare centers and hunger relief organizations, supported by the city's Administration for Children's Services (ACS) and Human Resources Administration (HRA), has been carried out. Addressing this missed opportunity can provide evidence to support the expansion of the GFPP and inform the direction of future GFPP campaigns. To address this gap, and to inform ongoing GFPP efforts in New York City, the CUNY Urban Food Policy Institute, in coordination with the Center for Good Food Purchasing and the NYC GFPP Coalition, and with support from the Food Chain Workers Alliance and the NoVo Foundation designed a mixed-methods study on the process of food procurement at government agencies and institutions supported through government funding, specifically early care centers and emergency food programs in New York City. The report also asks how adoption of the GFPP might affect that process. This analysis builds and expands on a previous exploratory study, supported by the American Society for the Prevention of Cruelty to Animals (ASPCA), focusing on the barriers and opportunities encountered by the cities that have already adopted the GFPP across the US and key institutional procurement stakeholders in New York City. The core aims for the phase of research documented in this report are to:

*Aim 1: Build a deeper understanding of how food is procured at two selected NYC institutions: The Administration for Children's Services (ACS) and the Human Resources Administration (HRA). These two agencies were selected because of their reach among vulnerable populations and their complex relationships with hundreds of community-based organizations.*

*Aim 2: Explore facilitators and barriers to adoption of the Good Food Purchasing Program in New York City.*

*Aim 3: Through an evaluation of current institutional procurement contracts, determine the Top 22 NYC Food Vendors, the largest suppliers of food to city programs.*

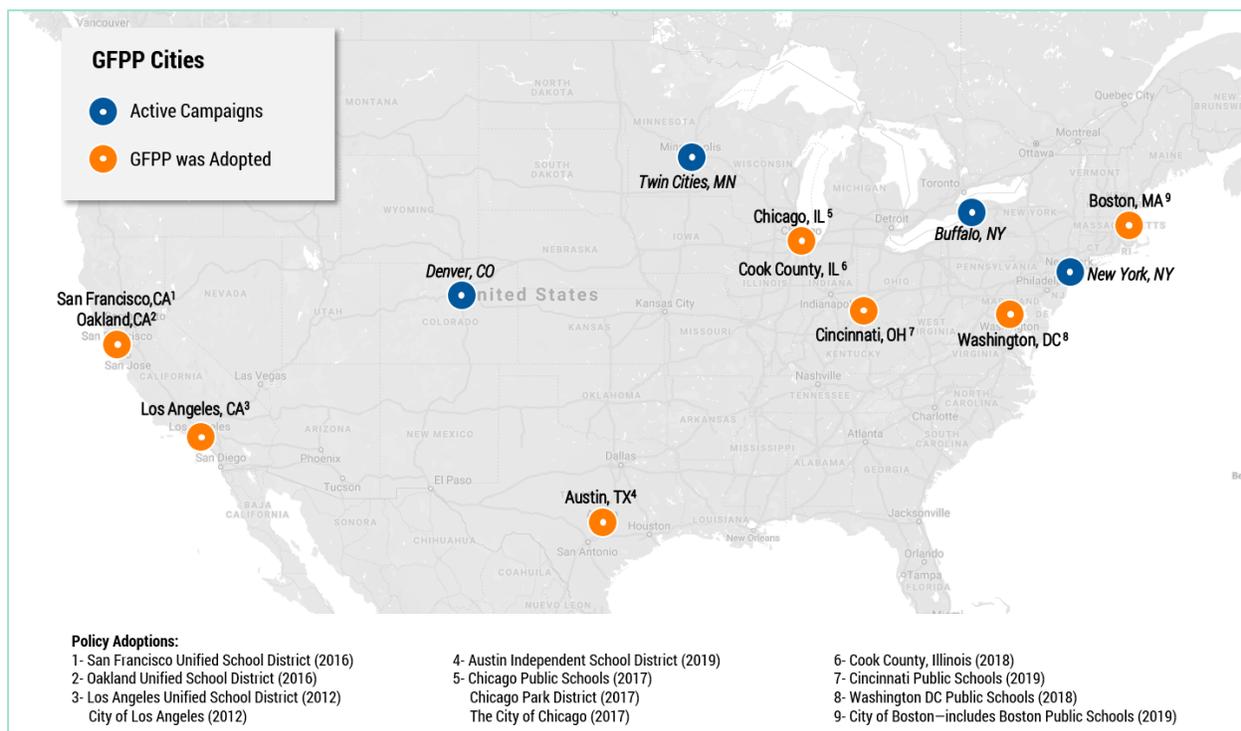
*Aim 4: Conduct preliminary analyses of Top 22 NYC Food Vendors and their company values in order to assess alignment with the GFPP.*

The lessons from this research can inform future scholarship on institutional food procurement as well as the GFPP Campaign currently underway in New York and other cities across the US.

Moving forward, it will be key to expand existing efforts to create a learning infrastructure that enables GFPP advocates to effectively learn from barriers and facilitators to the adoption and implementation of GFPP policies across multiple city agencies. This will involve documenting and developing strategies for overcoming barriers, which include fragmented or incomplete access to government procurement contracts data, difficulties with engaging city contracted vendors in interviews and surveys, and the challenge of understanding the unique political, civil society, and institutional contexts where the GFPP has been adopted.

The remainder of this report is organized as follows: Sections 1, 2 and 3 provide an overview of the GFPP and its approach to transforming institutional food procurement and the importance of leveraging the purchasing power of public institutions to attain social, environmental, public health, and economic goals. Section 4 provides the rationale for adopting a GFPP policy in New York City and synthesizes key advancements made toward each of the five GFPP goals – local economies, nutrition, valued workforce, environmental sustainability, and animal welfare. In Section 5 we explain the study’s research design and clarify how data were collected and analyzed. In Section 6 we present the key findings from the research. In the concluding sections, we summarize the implications of our findings for future research and highlight key recommendations for the GFPP Coalition to support successful campaigning and implementation of the GFPP in New York City.

## 2. The Good Food Purchasing Program (GFPP)



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The Good Food Purchasing Program (GFPP) is one of the most comprehensive efforts to harness the power of institutional food procurement to achieve social, environmental, and economic goals. Specifically, the program provides a metric-based, flexible framework that enables municipal agencies to advance five core values-- local economies, environmental sustainability, valued workforce, animal welfare, and nutrition. Designed to do for the food system what LEED Certification<sup>1</sup> did to shift government dollars to more efficient, environmentally sound buildings, the GFPP operates under the notion that if institutions shift spending, the billions of dollars spent on food purchases can influence supply chains and contribute to transforming our food system into one that is more equitable and sustainable.<sup>4</sup>

In 2012, the Los Angeles Food Policy Council developed the Good Food Purchasing Guidelines for Food Service Institutions. The model, itself, was developed by a diverse working group with expertise in labor, nutrition, environmental sustainability, animal welfare, agriculture, processing, distribution, and institutional food procurement. Reflecting this range of expertise, the guidelines evolved to encompass the five values shown in Table 1. With more than 100 national, state, and local food system experts providing recommendations and feedback on the policy, the GFPP became the first procurement model to support these five values in equal measure. See **Table 1** for specific visions for each value.

After the model was developed, the Good Food Purchasing Policy was adopted by the City of Los Angeles and the Los Angeles Unified School District in 2012. In 2015, the Center for Good Food Purchasing was created in response to nationwide interest in replicating the program in other cities. In 2016, the San Francisco Unified School District and Oakland Unified School District formally adopted the GFPP. Chicago followed when, in 2017, Chicago Public Schools, the City of Chicago, and the Chicago Parks Department adopted the program. Notably, Cook County of Illinois was the first to adopt countywide in 2018.<sup>5</sup> The GFPP came to the East Coast when D.C.'s Public Schools adopted the policy in December 2018. Since then, the GFPP has been adopted in Cincinnati,<sup>6</sup> Austin,<sup>7</sup> and Boston,<sup>8</sup> with active campaigns in the Twin Cities: St. Paul and Minneapolis, Buffalo, and Denver. In New York City, the Food Chain Workers Alliance, Community Food Advocates, and the CUNY Urban Food Policy Institute are gathering evidence to inform the GFPP campaign for adoption and robust implementation.

While some cities have adopted the GFPP citywide (Chicago, Boston, Los Angeles), most have achieved adoption through commitments made by public school systems (Washington D.C., Cincinnati, Austin, etc.).

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<sup>1</sup> LEED Is a green building rating system that encourages the design, construction, operations and maintenance of resource-efficient, high-performing, healthy, cost-effective buildings.

Table 1. The GFPP Values, Vision, and Standards<sup>4</sup>

Value	Vision	Standards Definition
<b>Local Economies</b>	Support small, diverse, family and cooperatively owned, and mid-sized agricultural and food processing operations within the local area or region.	The Local Economies definition is based on a combination of farm size (by acreage) and farm distance from purchasing institution (based on driving distance). Farm sizes refer to USDA definitions.
<b>Nutrition</b>	<p>Promote health and well-being by offering generous portions of vegetables, fruit, whole grains and minimally processed foods, while reducing salt, added sugars, saturated fats, and red meat consumption, and eliminating artificial additives.</p> <p>Improving equity, affordability, accessibility, and consumption of high quality culturally relevant Good Food in all communities is central to our focus on advancing Good Food purchasing practices.</p>	25 item checklist that includes both procurement-oriented targets (such as purchasing seasonally, purchasing whole rather than processed ingredients, and purchasing leaner meats) as well as food service environment targets (such as eliminating the use of deep frying, highlighting local food with signage, or replacing unhealthy items with healthy items near checkout points and registers). The checklist items were developed in partnership with the Los Angeles County Department of Public Health, and are aligned with the standards in the Healthy, Hunger-Free Kids Act and the GSA Health and Sustainability Guidelines for Federal Concessions.
<b>Valued Workforce</b>	Provide safe and healthy working conditions and fair compensation for all food chain workers and producers from production to consumption.	<p>The baseline for compliance in the Valued Workforce category is compliance with basic labor laws by institution, vendor(s) and all suppliers for the institution and increasing fair food purchases. Examples of certifications and claims in the Good Food Purchasing Standards include:</p> <ul style="list-style-type: none"> <li>• Equitable Food Initiative</li> <li>• Food Justice Certified</li> <li>• Fair for Life/Fair Trade Certified by IMO</li> <li>• United States Federation of Worker Cooperatives</li> </ul>
<b>Environmental Sustainability</b>	Source from producers that employ sustainable production systems that reduce or eliminate synthetic pesticides and fertilizers; avoid the use of hormones, routine antibiotics and genetic engineering; conserve and regenerate soil and water; protect and enhance wildlife habitats and biodiversity; and reduce on-farm energy and water consumption, food waste and greenhouse gas emissions; and increase menu options that have lower carbon and water footprints.	<p>Examples of certifications and claims in the Good Food Purchasing Standards include:</p> <ul style="list-style-type: none"> <li>• American Grassfed</li> <li>• Animal Welfare Approved</li> <li>• Seafood Watch</li> <li>• USDA Organic</li> <li>• Demeter Certified Biodynamic</li> <li>• Food Alliance Certified Producer</li> <li>• Non-GMO Project Verified</li> <li>• School Food Focus Certified</li> <li>• Responsible Antibiotic Use</li> </ul>

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<b>Animal Welfare*</b>	Provide humane care for farm animals by improving overall wellbeing through better rearing practices and/or reducing total numbers raised.	Examples of certifications and claims in the Good Food Purchasing Standards include: <ul style="list-style-type: none"><li>• Animal Welfare Approved</li><li>• Global Animal Partnership</li><li>• USDA Organic</li><li>• School Food Focus Certified</li><li>• Responsible Antibiotic Use</li><li>• Certified Humane Raised and Handled</li></ul>
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\* Note: The wording of the Vision summary for the Animal Welfare category was modified from the original version to reflect input from experts in the animal welfare workgroup of the NYC GFPP Coalition. Specifically, the reference to "healthy care" was omitted since claims about the animals' physical health have been historically used by the industry to invalidate concerns about the animals' overall wellbeing, which includes but is not limited to physical health.

Regardless of the scale of adoption, the adoption and implementation process follows the same trajectory. Once an institution commits to adopt the GFPP, the Center for Good Food Purchasing works with the city, often but not always in tandem with the city's lead partner organizations, to conduct a baseline assessment of institutional procurement, working to set goals and measure progress. Institutions that adopt the policy must then incorporate the Good Food Purchasing Standards and reporting requirements into new RFPs and food supply contracts and with support from the Center, establish supply chain transparency to the farms of origin. GFPP commitment and compliance is then tracked and verified over time. A Good Food Provider verification seal is issued to participating institutions once the baseline is met for all 5 value categories.

### 3. Greening Food Procurement Here: Overview and Accomplishments in New York City and State

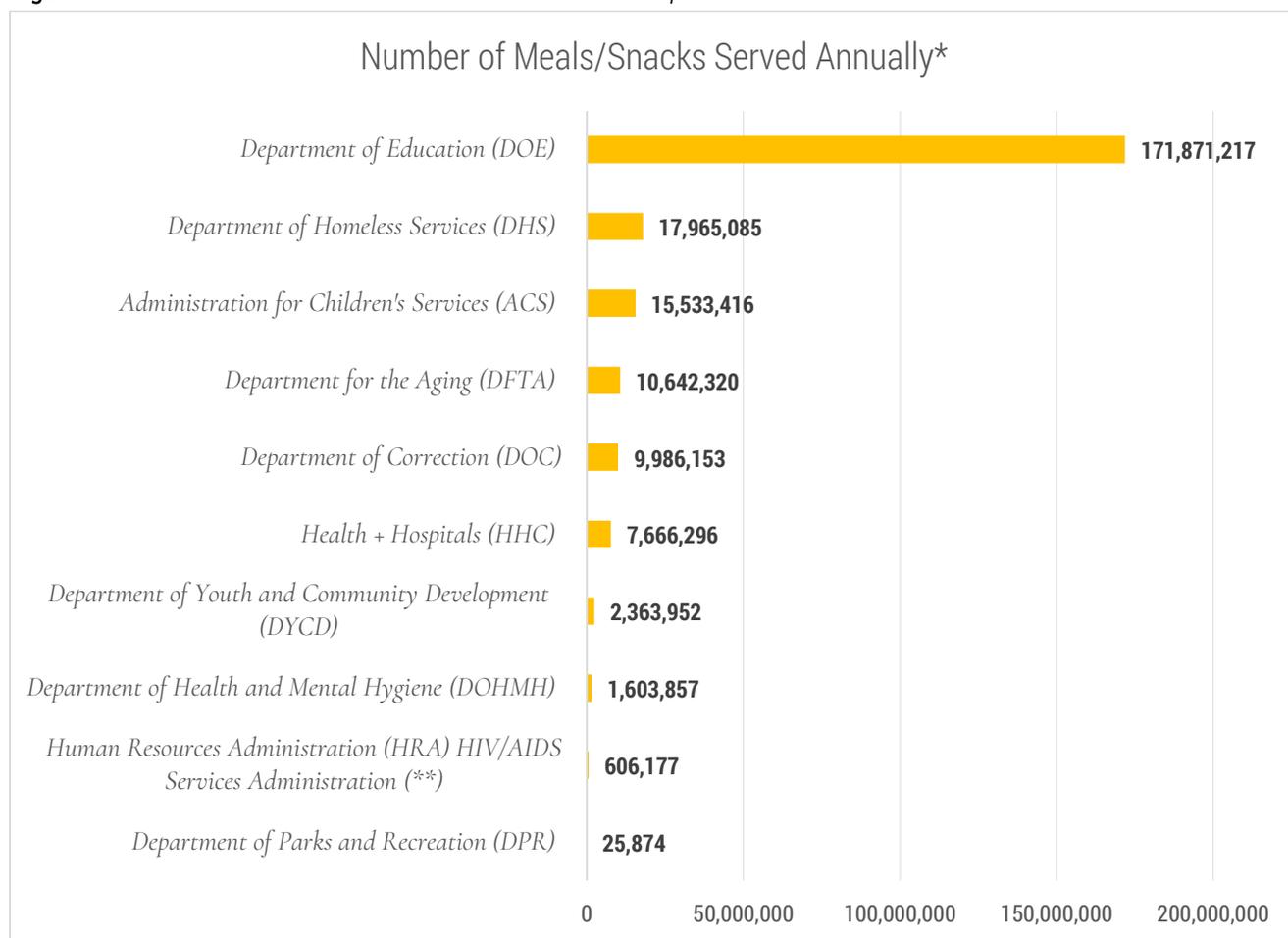
#### *NYC's Public Plate*

Given the national momentum around GFPP adoption, advocates in New York City are focusing on institutional procurement as a way to improve the city's food environment. In 2014, the New York City Food Policy Center at Hunter College<sup>2</sup> published their report: *The Public Plate in New York City: A Guide to Institutional Meals*. The report explored the impact of institutional meals and revealed that city agencies spend more than a quarter of a billion dollars annually on food served on the public plate.<sup>1</sup>

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<sup>2</sup> The [New York City Food Policy Center](#) at Hunter College was co-founded in 2012 by CUNY Urban Food Policy Institute Director Nicholas Freudenberg and Janet Poppendieck. In 2016, they created the CUNY Urban Food Policy Institute at the CUNY Graduate School of Public Health and Health Policy.

Figure 1. NYC Institutional Meal Data. Source: Food Metrics Report 2018



\* The chart does not include separate data for the New York City's Department of Citywide Administrative Services (DCAS) – a city agency which purchases food for multiple other city institutions and takes part in the implementation of the NYC Food Standards – since these food purchases are already reflected in the figures reported by the other food-purchasing agencies (included in Figure 1 above and in Appendix H of the annual Food Metrics Report).

\*\* HRA's data is reflective only of the HIV/AIDS Services Administration number of meals. The number of meals metrics does not include the Emergency Food Assistance Program. The Food Metrics Report notes that in Fiscal Year 2018 EFAP programs reported serving more than 14.7 million people but that this statistics is self-reported and duplicated and hence is to be interpreted with caution.

Coined by urban food systems scholar, Kevin Morgan, the term **public plate** describes “institutional meals,” or “meals and snacks prepared and served by city agencies, and meals and snacks partially or wholly financed by city funds (or by federal or state funds administered by a city agency), but prepared and served by private entities.”<sup>1</sup> According to the 2018 Food Metrics Report, published annually by the NYC Office of the Director of Food Policy, these agencies served more than 238 million meals and snacks annually.<sup>9</sup> This food is served in schools and directly or through nonprofit partners in homeless shelters, childcare centers, correctional facilities, and public hospitals (See Figure 1). The magnitude of this reach means that policies, like the GFPP, have the potential to

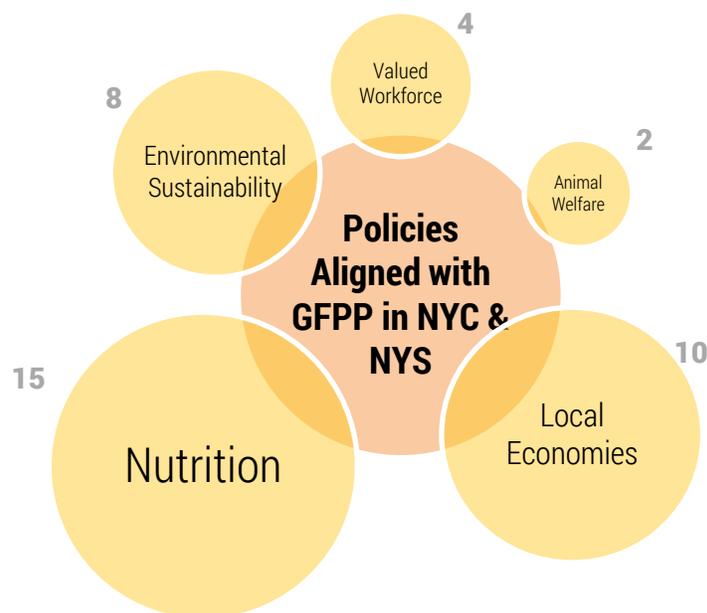
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dramatically shift the quality of the food consumed annually by millions of New Yorkers who are overwhelmingly the most economically marginalized and struggling with income and food insecurity. Additionally, besides the sphere of food, NYC has already embraced several strategies for using procurement guidelines to achieve broader social, environmental, and economic goals. These include procurement requirements for minority and women-owned enterprises (M/WBEs) (e.g., setting a goal of 30 percent of city contracting dollars for M/WBEs by 2021<sup>10</sup>), energy efficiency (e.g., *Energy Standards for Public Buildings*<sup>11</sup>), and recycled products (e.g., *Environmental Preferable Purchasing Standards*<sup>12</sup>).

### Accomplishments in New York City and State

While not yet citywide policy, New York City's actions around food (see Table 2) make New York well-positioned to lead GFPP efforts in the Northeast and to explore opportunities for scaling up and institutionalizing good food purchasing policies at the municipal and state levels. Several city agencies, including those examined in this report, either have or are currently undergoing baseline assessments with the Center for Good Food Purchasing – a key step in the process of GFPP adoption – and the largest food procurement agency in New York City, the Department of Education, has already taken steps to include specific language in their bids as well as identify GFPP-related goals. Additionally, the City's recently released long-term sustainability plan OneNYC 2050 included a specific recommendation calling for the adoption of a good food purchasing policy. Below we summarize some of the actions taken so far in each of the five areas and explain how these lay the groundwork for leadership in implementing the GFPP.

Figure 2. Policies Aligned with GFPP in New York City and State



### *Local Economies*

Local food systems are a vital component of New York City and State's local economies. Over the past few years, elected officials at different levels of government have proposed policies and programs to protect and strengthen the local food system. In fact, the initiatives put forward in New York City, as well as the recommendations formulated by coalition members, show that food system governance is now increasingly seen as part of the responsibility of local jurisdictions. One noteworthy effort aimed at reshaping the landscape of public food procurement in New York City is Local Law 50 of 2011. The law required the City to develop new food procurement guidelines and allowed city agencies to give price preference for NYS products as long as the cost does not exceed 10 percent of the lowest bid for nonlocal alternatives. Additionally, since 2015, as part of a nationwide Urban School Food Alliance initiative, the New York City Department of Education (DOE) established "New York Thursdays" – a program which allows schools to use mostly NYS-grown products for Thursday lunch menus.

Other prominent recent changes in New York City institutional food procurement practices include a new contract for local eggs by Riker's Island (the City's main jail facility) awarded to The Common Market, a nonprofit regional food distributor, and an award to West Side Campaign Against Hunger, a supermarket-style food pantry in New York City, to develop a collective purchasing model which will grant emergency food assistance centers greater autonomy in selecting local food options. State-level initiatives that strengthen the local food economy and related infrastructure include New York State's \$15 million investment in the development of the Greenmarket Regional Food Hub (2016), the New York State Grown & Certified program (2016), which certifies that the farming practices of producers enrolled in the program conserve natural resources and adhere to farm-safe food handling protocols, and the "No Student Goes Hungry" initiative (2018), which quadruples state reimbursement for school meals (\$0.25/meal) for K-12 schools that purchase 30 percent of their lunch ingredients from New York farms.

### *Nutrition*

By far, one of the GFPP value areas where New York City has been most active is nutrition. Over the past twelve years, the City effectively adopted new calorie labeling rules for chain restaurants (2006), banned trans-fats from restaurant foods (2007), devised food standards for City agency meals (2008), joined nationwide salt reduction initiatives (2009), and mandated sodium warning labels in chain restaurants (2015). The Good Choice initiative, which the City launched in 2014, streamlined the process of finding food products that meet the New York City food standards by working with food distributors to make it easier for institutional buyers to more quickly identify healthier products. Programs developed specifically at hospitals like the Fruit and Vegetable Prescriptions (2013, 2016) and the recently launched Plant-Based Lifestyle Medicine Pilot (2017) are

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additional examples of the proactive approach New York City's agencies and allies, including NYC Health + Hospitals, have taken to improve the nutritional quality of the food city agencies serve.

### *Valued Workforce*

Good food systems hinge on good food jobs, or the food sector jobs that offer a living wage with benefits, provide safe working conditions, and produce, distribute, or sell healthy, affordable food made more available to low-income communities. Provisions that address the well-being of food chain workers in local food programs and policies have, overall, been few and far between.

New York City and State have recently made some efforts to change this. In 2015, New York State legislators adopted a law which set a minimum wage of \$15/hour for all employees working at fast food establishments starting on December 31, 2018 in New York City and in the middle of 2021 for the rest of the state. At the city level, Local Law 11 of 2016 offered protection to employees of large grocery stores from immediately losing their jobs after an ownership transition. Furthermore, under the 2017 Fair Workweek Law, fast food employees have the right to good faith estimates of their work schedule before their first day on the job and notice of upcoming work schedules two weeks in advance. Additionally, existing workers get priority access to newly available shifts as well as protection against back-to-back closing and opening shifts unless the worker consents in writing. While these initiatives mark the beginning of efforts to establish positive workforce values in municipal and state food-related policies, these sorts of features have yet to become major requirements for institutional food vendors who do business with the city.

### *Environmental Sustainability*

Environmental and food systems sustainability are tightly intertwined and, thus, warrant an integrated, cross-scale approach to policy design and implementation. While cities in the US are infrequently the jurisdictions that drive regional planning and farmland conservation initiatives, this has not been the case in New York City.

Since the 1990s, the City has spearheaded and provided funding for a Watershed Agricultural Program which emphasized the role of farmland preservation and best farm-management practices in protecting soil and water quality. The program was significantly expanded in 2012 and again in 2016 to ensure that the New York City's regional foodshed withstands urbanization pressures and, at the same time, keeps drinking water safe. More recently, the New York State Grown & Certified program (2016) included environmental sustainability requirements for participating farmers as part of the certification process. To be eligible, a farm needs to meet a certain threshold (tier 2 or higher) for environmental stewardship practices as defined by the State criteria for Agricultural Environmental Management (AEM).

Thus, when city agencies or city-funded institutions in New York City give preference to New York State certified produce, both local economy and environmental sustainability objectives are pursued. That is not to say that produce grown out-of-state that meets more stringent environmental requirements does not exist or is not desirable, but to acknowledge that local efforts to advance ecologically-sound food systems are already underway. Moreover, other municipal efforts to support environmental sustainability within the food system include the Mayor's Office commitment to the goal of zero waste to landfills by 2030 as described in OneNYC, New York City's blueprint for building a stronger, sustainable, resilient, and equitable city. This commitment is most evident in the expansion of commercial and residential compost pick up since 2013.<sup>13,14</sup>

Another initiative promoting environmental sustainability values through New York City's "public plate" include the Department of Education's (DOE) recently-launched Meatless Mondays pilot program (2018). As part of the pilot, every Monday, all-vegetarian breakfast and lunch were served in 15 public schools in Brooklyn, NY. More recently, New York City Mayor Bill de Blasio announced all New York City public schools will have "Meatless Mondays" beginning in the 2019-2020 school year. Meals higher in plant-based foods, like those served as part of the Meatless Monday Initiative, are associated with lesser environmental impact.<sup>15</sup>

Since 2005, the NYC Mayor's Office of Contract Services (MOCS) has adopted standards for Environmentally Preferable Purchasing (EEP) (Local Laws 118-121 of 2005) requiring city agencies to meet minimum thresholds for waste production, energy and water use, and greenhouse gas emissions, among other factors. Yet, none specifically focus on food procurement. Nevertheless, some progress has been made toward waste reduction with the development of Packaging Reduction Guidelines following the adoption of Local Law 51 of 2011. More recently, Local Law 77 of 2013 mandated the development of an organic waste pilot collection program, Local Law 146 of 2013, followed by the business organics rules of 2018, that requires chain food restaurants to separate organic waste.<sup>16</sup> Joining the Good Food Purchasing Program would, therefore, help the City pursue a more holistic approach to the integration of environmental sustainability values in its food purchasing practices.

### *Animal Welfare*

Animal welfare – or the ability of animals to express normal behavior and be free from hunger, thirst, pain, fear, and distress<sup>17</sup> – is tightly intertwined with the broader objectives of environmental and human health and well-being. Transitioning to a less meat-centric diet, for instance, not only significantly reduces global greenhouse gas emissions, but also improves one's health by reducing the risk for heart disease, hypertension, and type two diabetes, among other conditions.<sup>18</sup> As New York City Council Member Helen Rosenthal recently put it: "*A plant-based diet not only provides enormous health benefits, it's also good for animal welfare and the environment—using fewer resources and*

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*creating less pollution than diets centered around animal products.*<sup>19</sup> Bringing animal welfare goals front and center in institutional food procurement policies calls attention to the intrinsic rights of animals and the ethical value of humanely caring for them.

Many of the New York City initiatives and policies that have bearing on the attainment of animal welfare goals have, therefore, already been mentioned earlier in this section under the rubric of nutrition and environmental sustainability. However, in order to explicitly acknowledge the connection between these City initiatives and animal welfare values, it is worth highlighting some of them here as well (see also Table 2).

Poultry is one of the product categories where cities in the US have been most active in challenging conventional procurement practices. Since 2015, as part of the Urban School Food Alliance, New York City's DOE has participated in actively promoting the procurement of humanely-raised, antibiotic-free poultry raised on an entirely vegetarian diet. In April 2018, the NYC Division of Contracts and Purchasing issued a bid request for chicken products for about 1,250 school kitchens that comply with these animal welfare standards. The bid was issued on behalf of DOE and the Office of School Food.<sup>20</sup>

Reducing meat consumption through public food procurement is another strategy aligned with animal welfare objectives which schools, colleges, hospitals, and other publicly-funded institutions have been pursuing in recent years. In New York City, a Meatless Mondays pilot program was launched in 2018 allowing the integration of all-vegetarian lunch menus at 15 public schools in Brooklyn and was followed by a decision to implement the initiative in all New York City schools in the 2019-2020 school year. In addition, since January 2013, Public School 244 in Flushing has been serving an all-vegetarian menu year-round, with three other public schools engaged in a similar process.<sup>21</sup>

In 2017, 1,200 schools in New York City's public schools district committed to one vegan meal option one day per week, an accomplishment achieved through longstanding advocacy efforts by The Coalition for Healthy School Food (CHSF) in partnership with DOE School Food.<sup>22</sup> Also, in the spring of 2018, City Council started the review process of a newly introduced resolution for banning processed meats in public schools. While hospitals and other public institutions have been less proactive in adopting some of the abovementioned programs, some progress exists on this front as well. Through a \$400,000 investment, NYC Health + Hospitals launched a Pilot Plant-Based Lifestyle Medicine Program (2018) which aims to encourage plant-based diets across NYC public hospitals and thus prevent or ameliorate the conditions of patients suffering from chronic diseases connected to their nutrition (e.g., diabetes, high cholesterol, high blood pressure).

**Table 2.** Select New York City and State Initiatives Aligned with GFPP Values

<b>NYC ACTION</b>	<b>YEAR</b>	<b>TYPE OF ACTION</b>	<b>DESCRIPTION</b>
<b>GFPP VALUE: LOCAL ECONOMIES</b>			
<b>Local Food Procurement (Local Law 50)</b>	2011	Law	<p>The law required the City to develop new food procurement guidelines<sup>23</sup> for agencies purchasing food for senior centers, and child care facilities among others. City agencies can now give price preference for NY State products and purchase them if their cost does not exceed 10 percent above the lowest bidder cost providing non-local options.<sup>24</sup></p> <p>In 2012, the New York City Department of Education bought an estimated \$25 million worth of regional products, equaling at least 14 percent of the City's total food budget.<sup>25</sup></p>
<b>NYC Food System Metrics (Local Law 52)</b>	2011	Law	The law required NYC to start tracking and reporting annually on city food system metrics. <sup>26</sup>
<b>Taste NY</b>	2013	Program	Creates fiscal opportunities and hosts events for New York State food and drink producers. <sup>27</sup>
<b>New York Thursdays</b>	2015	Program	<p>The program was started as part of nationwide initiative promoted by the Urban School Food Alliance with the goal to have 50 percent of Thursday lunch menu at DOE schools from within New York State.<sup>28</sup></p> <p>In FY 2017, DOE spent \$26 million on produce, milk, and yogurt that was locally or regionally grown or produced (not including distribution costs). Of that, \$6.9 million was spent on produce, and \$19.1 million was spent on milk and yogurt. This represents a 6 percent increase in the amount spent on local and regional products since the previous fiscal year.<sup>29</sup></p>
<b>Greenmarket Regional Food Hub</b>	2016	Project	New York State invested \$15 million in the development of Greenmarket Regional Food Hub at Hunts Point. Anticipated completion: 2021.
<b>New York State Grown &amp; Certified (local economy component)</b>	2016	Program	<p>A program by NYS with the aim to promote New York agricultural producers and growers who adhere to food safety and environmental sustainability standards.<sup>30,31</sup> Grown &amp; Certified funding covers costs for new packaging, labeling, and in-store signage, and other promotional materials.</p> <p>At present, NYS Grown &amp; Certified products can be purchased at 680 stores and there are 2,321 New York farmers and producers participating in the program, collectively representing over 482,000 acres of NY farmland.</p>
<b>Vital Brooklyn</b>	2017	Program	A state-funded program focused on promoting community development and wellness in Central Brooklyn (i.e., State Assembly districts 42, 43, 53-60). <sup>32</sup> A total of \$1.4 billion in state funds have been earmarked for Vital Brooklyn projects in eight key areas of intervention: Open Space and Recreation, Healthy Food, Comprehensive Education & Youth Development, Economic Development & Job Creation, Community-Based Violence Prevention, Community-Based Health Care, Affordable Housing, and Resiliency. Among the initiatives supported through the Healthy Food area are fresh food programs, community gardens, and a food hub feasibility study.

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New York Grown for New York Kids: "No Student Goes Hungry"	2018	Program	The "No Student Goes Hungry" <sup>33</sup> initiative quadruples state reimbursement for school meals (\$0.25/meal) for K-12 schools that purchase 30 percent of their lunch ingredients from New York farms. This was made through a provision in the State 2018-19 Budget which also doubled state funding for Farm to School grants to \$1.5 million. <sup>34</sup>
Riker's Island and Local Eggs	2018	Contract Award	Recent announcement that Riker's Island has accepted the Common Market's bid to provide regionally-sourced eggs from a family-run farm located within 250-mile radius from New York City.
Emergency Food Assistance Hub / Collective Purchase Model	2018	Model	Leadership at the West Side Campaign Against Hunger has been awarded funding to develop a collective purchase model. This will allow emergency food assistance centers to have more control over the types of products provided to community members.
<b>GFPP VALUE: NUTRITION</b>			
Farm to School	2002	Program	Grants financial assistance to schools to procure locally farmed food. <sup>35</sup>
Calorie Labeling on chain restaurant menus	2006	Law	All chain food restaurants (with more than 15 stores in the US) are required to provide calorie warnings on menus.
Trans fat ban	2007	Law	Banned artificial trans-fat in NYC restaurants (amendment to NYC Health Code Article 81).
Agency Meals and Food Standards (Mayoral Executive Order 122)	2008	Executive Order	The executive order set Agency Standards for Meals/Snacks Purchased and Served by City agencies. <sup>36</sup>  The Standards have been implemented by 11 city agencies through a mayoral executive order since 2008 and by 40 public and private hospitals in NYC participating in the Healthy Hospital Food Initiative since 2010.
National Salt Reduction Initiative	2009	Initiative	NYC DOHMH led a nationwide initiative to encourage food companies to reduce sodium content in 62 categories of packaged food and 25 categories of restaurant food.
Shop Healthy NYC!	2012	Program	A program throughout which DOHMH partners with residents, food retailers, food suppliers and distributors to increase access to healthy food in underserved neighborhoods throughout the city. <sup>37</sup>
FRESH (Food Retail Expansion to Support Health) Program	2009	Program	City Council approved the FRESH Program, a zoning and financial bonus program by NYCEDC, DCP, and DOHMH offering incentives to full-service grocery stores in underserved areas. <sup>38</sup>
Fruit and Vegetable Prescription	2013, 2016	Program	Pilot program at city hospitals.
Good Choice Initiative	2014	Program	A pilot program of DOHMH that helps food distributors identify items in their inventory that meet lower sodium and other nutrition criteria <sup>39</sup> in compliance with the NYC Food Standards. <sup>36</sup> The Good Choice nutrition criteria apply to 25 food and beverage categories, including prepackaged snacks, sliced bread, and salad dressing.
Sodium Labeling on chain restaurant menus	2015	Law	All chain food restaurants (with more than 15 stores in the US) are required to provide sodium warnings on menus.

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Fresh Connect	2016	Program	Provides financial incentives to those already on assistance programs to purchase local farmed produce. <sup>40</sup>
Pharmacy to Farm Prescription	2017	Program	NYC DOHMH through a Food Insecurity and Nutrition Incentive (FINI) Grant from USDA offers \$30 in Health Bucks at four pharmacies across the city in Manhattan, Brooklyn, and Queens.
Pilot Plant-Based Lifestyle Medicine Program	2017	Program	A pilot for patients in NYC public hospitals to adopt plant-based diet to improve or reverse chronic conditions such as heart disease, diabetes, obesity, high cholesterol, and high blood pressure. Funding of \$400,000 is provided through NYC Health + Hospitals – the entity operating the public hospitals and clinics in New York City. <sup>41</sup>
Eliminated School Lunch Fees	2019	Program	Thanks to this state-level program, students who qualify for reduced-price school meals, are no longer required to pay a .25 cent fee for breakfast or lunch. <sup>42</sup>
Phasing out processed meats and cutting red meat purchases by fifty percent	2019	Plan	NYC’s new strategic plan OneNYC 2050 includes policies that will lead to the the reduction of red meat purchases by fifty percent and the phasing out of processed meats from New York City’s institutional food procurement by 2040.
<b>GFPP VALUE: VALUED WORKFORCE</b>			
Earned Sick Time Act (Paid Sick Leave Law)	2014	Law	The Act created the legal right to sick leave for 3.4 million private and nonprofit sector workers. For one third of those workers (nearly 1.2 million), the Paid Sick Leave Law (PSL) marked the first time they had access to this workplace benefit. On March 20, 2014, Mayor Bill de Blasio expanded the PSL to approximately 500,000 more workers, 200,000 of whom did not previously have it. <sup>43</sup>
Increased minimum wage for food employees in New York State	2015	Law	The new law requires that any person working at a Fast Food Establishment must be paid the Minimum Wage for Fast Food Workers. After four annual increases started in 2015, the wage will be \$15/hour in 2018. <sup>44</sup>
Local Law 11	2016	Law	Protected employees in large grocery stores from immediately losing their jobs after an ownership transition.
Fair Workweek and Fast Food Deductions	2017	Law	These new laws put an end to unfair and unpredictable scheduling practices in fast food and retail industries. <sup>45</sup>
<b>GFPP VALUE: ENVIRONMENTAL SUSTAINABILITY</b>			
Regional Farmland Preservation	1992, Expanded 2012, 2016	Program	The City supported preservation of farms in New York City watershed through the Watershed Agricultural Program. <sup>46</sup>
Environmentally Preferable Purchasing (EPP)	2005	Program	A program by the NYC Mayor’s Office of Contract Services (MOCS) which sets minimum environmental standards for goods purchased by City agencies (Local Laws 118, 119, 120, and 121 of 2005). Agencies must meet or exceed these standards pertaining to waste production, energy and water use, greenhouse gas emissions, indoor air quality, recycled and reused content and the presence of hazardous substances. <sup>12</sup> A separate Packaging Reduction Guidelines initiative was developed following the adoption of Local Law 51 of 2011.

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Local Law 77	2013	Law	A Local Law which mandated the development of an organic waste pilot collection program in New York City. <sup>47</sup>
Local Law 146	2013	Law	A local law requiring the separation of commercial organic waste for certain businesses.
New York State Grown & Certified (environmental component)	2016	Program	<p>A program by NYS with the aim to promote New York agricultural producers and growers who adhere to food safety and environmental sustainability standards.<sup>30</sup> Grown &amp; Certified funding covers costs for new packaging, labeling, and in-store signage, and other promotional materials.</p> <p>At present, NYS Grown &amp; Certified products can be purchased at 680 stores and there are 2,321 New York farmers and producers participating in the program, collectively representing over 482,000 acres of NY farmland.</p>
Food Donation and Food Scrap Recycling Act (Senate Bill S6278)	2016	Law	An act which requires State-operated agencies and their contractors to divert food waste to food donation or food recovery programs. <sup>48</sup>
Meatless Mondays	2019	Program	A program by the Department of Education (DOE) – and championed by Brooklyn Borough President Eric Adams – which provides all-vegetarian breakfast and lunch to all public schools in New York City and consists every Monday. This will be enacted during the 2019-2020 school year. <sup>49,50</sup>
Plastic Bag Ban (Senate Bill S1508)	2019	Law	A ban on single-use plastic bags will be enacted in March of 2020, a 5-cent fee will be charged for paper bags. This executive order aligns with the OneNYC 2050, <sup>51</sup> and its goal of reducing food retail waste, as well as harmful plastic pollution.
<b>GFPP VALUE: ANIMAL WELFARE</b>			
NYC Animal Welfare Advocate (Mayor's Office)	2015	Newly created post	A new Animal Welfare Community Liaison was appointed in the Office of the Mayor, Community Affairs Unit.
DOE Chicken	2018	Bid request	A new bid by the NYC Division of Contracts and Purchasing – on behalf of Department of Education (DOE) and the Office of School Food – for frozen chicken products requesting that the chickens be humanely raised on an all-vegetarian diet and never be administered antibiotics. The products will be distributed to about 1,250 school kitchens. <sup>20</sup>

## 4. Research Methods

This study focused on addressing four main research aims:

- *Aim 1: Build a deeper understanding of how food is procured at two selected NYC institutions: The Administration for Children's Services (ACS) and the Human Resources Administration (HRA).*
- *Aim 2: Explore facilitators and barriers to adoption of the Good Food Purchasing Program in the identified agencies.*
- *Aim 3: Through an evaluation of current institutional procurement contracts, determine the Top 22 NYC Food Vendors, the largest suppliers of food to city programs.*
- *Aim 4: Conduct preliminary analyses of Top 22 NYC Food Vendors and their company values in order to assess alignment with the GFPP.*

In order to achieve the research aims, researchers employed several methods of qualitative inquiry. While analysis drew predominantly on semi-structured interviews, a survey distributed to city vendors allowed for a better understanding of the extent to which they currently participate in values-based purchasing. In order to take a more granular look at institutional food procurement in NYC, researchers employed a multiple case study research design, with each "case" defined as one of the government, or government-funded, institutions being explored.

### *Sampling and Data Collection*

#### *Aims 1 and 2:*

The Administration for Children's Services (ACS) and the Human Resources Administration (HRA) were chosen as the primary case studies for three main reasons. First, these are agencies that serve two of the most vulnerable groups when it comes to food procurement and nutrition – small children and low-income, food insecure New Yorkers and their families. Second, in terms of volume of food purchases, as evidenced from the publicly available contract data, current food procurement contracts with the two agencies score among the top contracts in terms of dollar amount and, thus, have strategic role in shaping the City's food system and its social and environmental outcomes. And, third, these two agencies were selected because of their complex relationships with hundreds of community-based organizations.

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Sampling for interviews was done purposively following a review of peer-reviewed and grey literature and conversations with CUNY Urban Food Policy Institute staff. These conversations elicited Institute knowledge in order to identify employees with childcare centers, and programs connected to the Administration for Children's Services, and food pantries and kitchens affiliated with the Human Resources Administration's Emergency Food Assistance Programs who were able to speak to agency food procurement as well as the perceived impact of the Good Food Purchasing Policy on procurement. Researchers also employed snowball sampling as subjects introduced potential contacts during the course of interviews. A list of 31 different organizations and entities were identified, and potential participants were invited to participate via email and/or phone.

In sum, researchers conducted in-depth, semi-structured interviews with 19 subjects representing 12 different organizations. All contacts had the option to opt out of the interview process or terminate the interview at any point in time. Interview questions were designed to explore procurement procedures as well as the potential perceived impact of the Good Food Purchasing Policy on daily operations for the three different cases/ institutions. Questions also explored the perceived facilitators and barriers to adoption of the Good Food Purchasing Policy. Interviews lasted up to 60 minutes and were conducted over the phone and in person.

**Table 3. Interviews with select New York City Institutions**

Agency	Organizations	Individuals
ACS	n = 3	n = 4
HRA	n = 6	n = 10
Other*	n = 3	n = 5
<b>TOTAL</b>	<b>N = 12</b>	<b>N = 19</b>

*\*In this case, "other" refers to an organization or entity that was not directly involved with either agency, but was able to provide insight into certain aspects of procurement, including relevant policies and procedures*

### *Aims 3 and 4:*

A parallel, complementary effort was a survey of NYC food vendors. The survey, based on GFPP baseline assessment standards, was sent to the Top 22 food vendors that contract with NYC institutions based on total procurement dollars from 2015-2019. Procurement dollars were ascertained via FOIL requests submitted through the NYC OpenRecords system as well as via analysis of the Department of Citywide Administrative Services' regularly updated "[Active Requirement Contracts by TITLE](#)" document.<sup>52</sup> Vendors with the Department of Education were ascertained exclusively through a FOIL request. Contract amounts were then garnered through the Department of Education's [Vendor Portal](#).<sup>53</sup> The Top 22 vendors were recruited via email or phone by the PI or another member of the research team to complete the survey. The survey was

developed using Qualtrics and the link shared with top vendors. At the end of the study period, 14 survey responses were received.

### *Data Analysis*

#### *Aims 1 and 2:*

All interviews were recorded, transcribed, and uploaded to NVivo Pro 11 for coding and thematic analysis. Prior to coding, all transcripts were reviewed so researchers were familiar with the data. Development of codes was both deductive and inductive. Drawing from the research aims, a priori codes were developed prior to analysis. These codes were facilitators, challenges, and barriers, as they are paramount to the research question and are addressed directly in the interview guides. During analysis, additional codes were generated based on interviewee data, providing a more nuanced look at major themes. Review of the data was an ongoing, iterative process. Upon review of the data sets, emergent themes were recoded in order to more accurately organize the data and, in some cases, recruit additional interviewees.

#### *Aims 3 and 4:*

In order to highlight the scale of institutional food procurement among NYC institutions, researchers collected data on vendor contracts through NYC's Open Data database as well as through FOIL requests sent to individual institutions. Table 6 summarizes those findings and presents the 22 vendors with the highest dollar contracts with NYC. From this list, surveys were distributed to learn if these vendors participate in requirements-based contracts as well as how their purchasing practices align with the 5 GFPP values. Of the 22 vendors, 14 responded to the survey. New York State's Freedom of Information Law (Public Officers Law §87 et. seq.) allows members of the public to access records of governmental agencies.

## 5. Findings on Barriers and Facilitators for Selected Institutions

### Administration for Children's Services (ACS)

Administration for Children's Services
<p><b>Population served</b> – The ACS works on behalf of New York City's children and families through the provision of child welfare, juvenile justice, and early childcare and education services. The ACS funds programs for more than 100,000 children eligible for subsidized care.</p>
<p><b>Number of Meals Served Annually (Food Metrics Report 2018)</b> – 15,533,416</p>
<p><b>Relevant Policies</b></p> <p><i>Child and Adult Care Food Program (CACFP)</i> – A federal program providing reimbursement for nutritious meals and snacks served in childcare centers and other educational settings. This policy is coordinated through the New York State Department of Health.<sup>54</sup></p>

While the ACS serves more than 15 million meals every year, each early childcare center works independently to identify vendors, purchase foods, and serve meals. Thus, at present, procurement is not centralized through the ACS offices and the city does not procure on behalf of all ACS centers that receive funds through CACFP. As the City is taking steps to incorporate most pre-k programs under the Department of Education (DOE).<sup>55</sup> While DOE will likely take over managing the procurement for these institutions it is still unclear what this would entail for food procurement specifically. Conversations with individuals responsible for food procurement in early childcare centers and programs elicited potential barriers and facilitators that could impact GFPP adoption here in NYC.

**Table 4. Overview of Interviewed Institutions for the ACS case study**

Interviewed Institution	Description
Institution #1	One of the country's oldest settlement houses, offering many social support services. Serves more than 390,000 meals annually, including to its Head Start and after school and summer camp programs.
Institution #2	Anti-poverty organization providing comprehensive supports to more than 46,000 children, youth, and their families in high-needs NYC neighborhoods.
Institution #3	Agency working on behalf of New York City's children and families through the provision of child welfare, juvenile justice, and early childcare and education services. Funds programs for more than 100,000 children eligible for subsidized care.

### *Barriers*

One of the major barriers to emerge from interviews was the lack of infrastructure needed to support the scale of NYC procurement. Without adequate storage and processing facilities, interviewees worried that it would be impossible to consistently provide fresh, local produce. This very real barrier comes into play especially when organizations try to make local purchase of fruits and vegetables a priority. For instance, one interviewee reflected on their organization's inability to provide local green beans because they take too long to process and they were not equipped to manage the task. While this is one example, the need to address NYC's infrastructural development cannot be understated. Without adequate facilities to prepare farm produce and food items for consumption, NYC's ability to comply with the GFPP will prove challenging.

Embedded in this barrier is the notion of scale. Interviewees continuously brought up concerns they had in regard to being able to provide enough food to feed the populations they, and other ACS-supported sites, serve. As one interviewee noted,

*“For me, I can maybe get locally sourced fish. I can get produce grown in NY State. I have that option. On the larger scale you don't have the option.”*

Worth noting is that in the context of this particular conversation, scale, as a barrier, was used in reference to the inability of institutions like the Department of Education to be able to purchase enough food to serve its population. As discussed, ACS childcare sites are responsible for negotiating their own vendor contracts and purchasing their own foods. This means that scale is less a barrier and the ACS organizational scheme would theoretically lend itself well to the exploration of smaller, more manageable contracts with vendors that more closely align with the GFPP standards.

Interviewees also raised concerns about the dearth of information regarding “what everyone's doing.” In other words, when faced with the imposition of another policy, knowing whether or not institutions are already meeting certain GFPP standards would help ascertain the need for the GFPP, but also the feasibility of implementing more stringent procurement requirements. This uncertainty should be a target for the NYC Coalition as campaign decisions are finalized and the possibility of conducting additional baseline assessments is raised.

Interviewees also reflected on concerns regarding the campaign design and encouraged a strong, concerted effort to ensure that the policy is supported publicly. With all policies at risk of seeming too top-down, interviewees noted that conversations need to be public in order to garner enough support from key constituencies. Beyond the campaign, interviewees also urged the coalition to

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ensure that, through monitoring implementation, the policy is working to benefit local communities and consumers.

### *Facilitators and Opportunities*

Despite concerns and questions, interviewees pointed to several potential facilitators that could help garner support for GFPP adoption.

One of these was an alignment with current practices and policies. ACS sites that receive funding through CACFP are held to very specific federal nutrition requirements that encourage the provision of fruits and vegetables. Should these standards mirror those of the GFPP, it might be easier to encourage institutional adoption due to overlap in existing requirements as well as the potential to be more open to implementing new ones. This policy alignment could prove to be a selling point, and if communicated strategically, a way to encourage institutional adoption.

Interviewees also reported the availability of resources that could help childcare centers identify vendors and businesses, making the switch to values-based purchasing less burdensome. One interviewee referenced the Department of Health and Mental Hygiene's Good Choice List.<sup>56</sup> Interviewees felt that promoting this resource could help assuage the concerns of hesitant adopters. In addition, one interviewee made a strong case for pursuing group purchasing organizations (GPOs, see also Box 1) to help identify vendors and negotiate prices that are fair. This interviewee has been working with Food and Supply Source (see also Table 5), a for-profit business that is "a one-stop food, services and supply partner to nonprofits, social and human service sector organizations throughout the United States."<sup>57</sup> This respondent found that Food and Supply Source's ability to simplify and streamline their organizational purchasing, while working to identify vendors that can provide better foods at lower prices. Moreover, Food and Supply Source is familiar with CACFP and can assist contracted vendors to comply with these requirements:

*"They have someone on site, they have people all over. They're familiar with CACFP so they know what we're looking for already, that's what makes it easy. I don't have to go to them and say I can't use A, B, and C. They know I need whole wheat pasta."*

Strategic partnerships with experienced companies could help address concerns over organizational capacity to implement new standards and to adhere to new policies.

**BOX 1. Group Purchasing Organizations (GPOs) as Strong Partners for ACS procurement**

**What is a Group Purchasing Organization (GPO)?** GPOs are third-party entities that combine purchases of their member organizations in order to obtain better discounts of high-quality products from vendors, distributors, and manufacturers.<sup>58,59</sup> Based on the principle that collective purchasing increases bargaining and market power, GPOs can lead to lower costs and savings on overhead. GPOs encourage competition among vendors for a group’s bid, which drives down prices. GPOs are also called co-ops, collectives, consortia, leveraged buying or procurement groups. In addition to increased buying and bargaining power, GPOs can reduce administrative workload and encourage sharing of expertise.

**How do GPOs work?** GPOs usually require a membership fee to enroll and all members must sign a purchasing contract that specifies product amount and brands. The main two types of GPO are vertical and horizontal. Vertical GPOs serve its members in specific industries, whereas horizontal GPOs serve its members in a defined geography across various industries. Vertical GPOs have a high purchasing power for industry-specific products, while horizontal GPOs have high buying power for general or more commonly purchased products. For example, if you compare a vertical GPO in a healthcare industry, they would have high purchasing power for MRI machines, whereas a horizontal GPO would have high purchasing power for printer paper regardless of industry type. Both vertical and horizontal GPOs are used for food purchasing.

**Who uses GPOs?** This is a common practice used in many industries and sectors to purchase raw materials and supplies. Examples of industries include healthcare, foodservice, utilities, industrial manufacturing, and agriculture, and not-for-profit profit community-based organizations.

**What is the role of GPOs in collaborative food procurement?** A foodservice or grocery GPO’s role is to work exclusively with foodservice operators in the marketplace to negotiate purchasing contracts with supply chain services such as vendors or distributors.<sup>60</sup> Some categories of food purchases include meats, fresh produce, frozen food, processed foods, bread, beverages, and consumables.

**Table 5. Examples of New York-based GPOs in Institutional Food Procurement**

GPO	Description
<i>Essensa</i>	In 2011, the City of New York partnered with Essensa to offer substantially discounted, bulk prices on a wide range of products for community-based organizations. <sup>1</sup> Within in their food program, they work closely with one of the nation’s leading food distributors, US Foods, the Mayor’s Office, and other suppliers to support community organizations’ efforts to purchase locally grown food at a discount. <sup>61</sup>
<i>Food and Supply Source</i>	Specifically designed for nonprofits and human service organizations, Food and Supply Source offers savings between 10-35 percent on food and supplies at no cost to the organization. Food and Supply Source currently works with the Children’s Aid Society in NYC.

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<i>Group Purchasing Service (GPS)</i>	The Federation of Protestant Welfare Agencies (FPWA) established a Group Purchasing Service for FPWA members, worker cooperatives, and nonprofit agencies with 501 (c) (3) status and currently has 300 purchasing partners. GPS was designed for their purchasing partners to maximize their buying power and save costs that can be used to strengthen their programs and initiatives.
<i>Innovatix Business &amp; Industry</i>	Owned by Premier, Innovatix’s services primarily focus on reducing members’ expenditures through significant discounts on products as a result of their \$44 billion worth of purchasing power and more than 20 years of group purchasing service experience. <sup>62</sup>
<i>Pandion Optimization Alliance</i>	Originating in 1946, Pandion operates as a GPO and a supply chain management company. <sup>63</sup> They provide purchasing contracts at the national level for an array of products and services to their partners residing in all 50 states.

When asked how the GFPP might impact their work, interviewees noted a “ripple effect” that implementation of a comprehensive, values-based policy could provoke. For instance, one interviewee noted that with more political backing, organizations might be able to take on issues they do not usually address, such as the pay and benefits of food workers. Further, the acquisition of more affordable city-wide contracts could make it easier to purchase foods that are now often too expensive, like more sustainable meat. This facilitating factor was also mentioned in the case study on the Human Resources Administration, discussed below.

### *Human Resources Administration (HRA)*

<p><b>Human Resources Administration (HRA)</b></p> <p><b><i>Population served</i></b> – The HRA addresses poverty and income inequality in NYC through the provision of various assistance programs, including food and emergency rental assistance. The HRA serves more than 3 million New Yorkers through its 12 major public assistance programs.</p> <p><b><i>Number of Meals Served Annually (Food Metrics Report 2018)</i></b> – N/A</p> <p><b><i>Relevant Policies</i></b></p> <p><i>Emergency Food Assistance Program (EFAP)</i> – EFAP is sponsored by the NYC Department of Social Services/ Human Resources Administration. EFAP is a city-based policy whereby pre-cut food orders are distributed monthly to HRA/EFAP monitor-approved food pantries and soup kitchens. The Food Bank for New York City handles all logistics.<sup>64</sup></p> <p><i>Hunger Prevention and Nutrition Assistance Program (HPNAP)</i> – HPNAP is a New York State program designed to address food insecurity through the distribution of funds used to purchase nutritious food items through the Food Bank for New York City or the United Way of New York City. Eligibility for pantries and soup kitchens is based on months in operation and 501(c)(3) status.<sup>65</sup></p>
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To better understand procurement within the Human Resources Administration, we interviewed individuals from various hunger prevention organizations ranging in size and overall impact. As shown in Table 5, these organizations varied in terms of where the food that is distributed comes from as well as how that food is disseminated. Despite differences in practices, conversations elicited notable barriers and facilitators to adoption of the GFPP.

**Table 5. Overview of Interviewed Institutions for the HRA case study**

Interviewed Institution	Description
Institution #1	Organization serving more than 1,000 community partners (pantries and kitchens). Food items come through Feeding America, as donations, and via direct purchase. Also participates in various advocacy and education efforts around food and income inequality.
Institution #2	Anti-poverty organization that also serves as local administrator for New York State Department of Health’s Hunger Prevention and Nutrition Assistance Program (HPNAP), partnering with more than 400 community-based organizations. This has amounted to the distribution of more than \$7 million and the provision of more than 3.4 million meals to more than 360 emergency food providers.
Institution #3	One of the nation’s largest and oldest supermarket-style food pantries with a mobile market and social services department component, as well.
Institution #4	A large food rescue organization helping to feed the more than 1.2 million food insecure New Yorkers. Rescues approximately 61 million pounds of food to be delivered to hundreds of food pantries, soup kitchens, and community partners throughout NYC.
Institution #5	Community college- based food pantry, provided as a part of Single Stop’s suite of supportive services for college students.
Institution #6	State agency that monitors the implementation of the Hunger Prevention and Nutrition Assistance Program (HPNAP).

*Barriers*

One of the major barriers was the issue of cost. Specifically, interviewees noted that in the food assistance space, food pantries and kitchens often focus on "stretching their dollars" in order to be able to feed as many food insecure individuals as possible. If adoption of the GFPP required the purchase of higher-priced items, it is believed that this could undermine the goal of "feeding as many as possible." Similarly, representatives from programs accepting food donations expressed concerns that the GFPP standards could limit the type, and therefore the quantity, of food they

## **Bringing the Good Food Purchasing Program to NYC Report**

could accept and distribute. This was perceived as a significant barrier, especially by smaller non-profit organizations that lack the funding and the operational capacity of larger food assistance programs that can purchase through other channels.

Similarly, interviewees noted that emergency food is already highly regulated, which isn't always a good thing. For instance, interviewees described the decision made by authorities in Washington D.C. to enforce strict nutritional guidelines in food pantries, with a perceived negative impact on the pantries' ability to procure adequate amounts of food. For pantries and kitchens that purchase the majority of their food distribution supply – as opposed to those that receive majority food donations to distribute – this could prove challenging.

Interviewees also noted that NYC's geography and climate precluded access to year-round local and fresh produce. With a desire to maintain a consistent inventory of products for their consumers, interviewees noted that their organizations sometimes purchase food from other states, especially during the winter months. Other interviewees expressed concerns about how the GFPP might impact their ability to purchase culturally relevant food items for their diverse populations- items that are often grown, or processed, far from NYC. The potential conflict with the GFPP's preference for local procurement was identified as a potential barrier.

A final barrier to emerge from the data was "policy restrictions," or the impact that the Hunger Prevention and Nutrition Assistance Program (HPNAP) and the Emergency Food Assistance Program (EFAP) requirements might have on the likelihood that the GFPP is adopted. For instance, in NYC, the central vendor for HPNAP foods is Driscoll, a food distributor servicing the Tri-State area. Since food banks and pantries must procure through Driscoll, there is little opportunity to pursue other vendors that might be more aligned with the GFPP values. Additionally, EFAP funding only covers shelf-stable food items. For smaller sites that rely exclusively on this food to distribute, there is a chance that the nutrition profile of EFAP items wouldn't meet the GFPP standards.

While these barriers are substantive, interviewees mentioned several facilitators that might support the campaign for GFPP adoption as well as opportunities that could directly address some of the barriers they identified.

### *Facilitators and Opportunities*

Based on their interactions with their City Council members, some interviewees reported that the current City Council seemed open to policies like the GFPP. Given that a campaign would need to engage the public, an invested City Council might significantly help the cause.

Furthermore, interviewees observed that there is good access to food distributors and processors in NYC. Compared to other cities with few such vendors, NYC organizations should find it easier to find suitable sources that can meet GFPP standards.

Interviews with staff from both HRA and ACS sites showed that emergency food work often aligns with or shares GFPP values. For instance, one of the interviewees acknowledged that their organization has partnered with the ASPCA to provide dog food to food pantries, recognizing, and responding to, the fact that household pets can also be food insecure. Additionally, one interviewee recounted that in 2000, and with the help of Just Food, HPNAP funds were used to support the establishment of a small CSA, connecting food-insecure individuals to local, fresh produce. More generally, HPNAP has guidelines for the types of foods that can be purchased, which include nutrition standards and requirements for purchasing a certain percentage of local and fresh foods. These examples highlight the fact that emergency food programs, while seeking to provide as much food as possible, also take into consideration the GFPP priority values when they can, writing them into policy, even. That Driscoll must comply with the HPNAP requirements is particularly promising as we consider vendor receptivity and ability to implement GFPP standards. Further strategic adjustments to current practices could lead to considerable advances in providing foods that more closely align with the GFPP values on a more consistent basis.

In New York City, most food assistance programs are supported by state and federal funding streams. Thus, municipal adoption of the GFPP might have a limited impact on the types of foods served by agencies that rely on state and federal funding for food procurement. The NYC coalition should explore how these policies would overlap should the GFPP be adopted city-wide. That said, regardless of whether or not the policy impacted HRA procurement directly, interviewees commented on how the GFPP could have a "ripple effect" on their procurement choices. That is, if City institutions can negotiate contracts that are more affordable and that prioritize local foods, for instance, emergency food assistance programs might be able to leverage those and, in turn, procure foods that are more affordable and local. Thus, while Driscoll is the central vendor for HPNAP-funded food assistance programs, and therefore less likely to be impacted by a City-based policy initiative, the adoption of the GFPP might encourage Driscoll to adjust its practices to more closely align with the GFPP standards by providing antibiotic-free meats, for instance. This, in turn, could lead to better products for food assistance programs. Similarly, the adoption of the GFPP could influence the types of foods provided through EFAP. With interviewees acknowledging EFAP's current lack of local foods and its distribution of commodity products, there is the possibility that the GFPP could influence EFAP offerings to include more products that reflect the GFPP standards, including fresh fruits and vegetables.

**BOX 1. An Evolving Debate: Perspectives from Elected Officials and Procurement Experts**

***GFFP & FARM-TO-INSTITUTION – AN EXPERT PANEL***

On February 20, 2019, Lenox Hill Neighborhood House, a multi-service community-based organization that serves people in need on the East Side of Manhattan and on Roosevelt Island, hosted a Farm-to-Institution Panel, focusing on how procurement can help address some of the food and nutrition-related issues that affect so many New Yorkers. Former Director of Food Policy in the Mayor's Office, Barbara Turk, commented on the power of institutional procurement to essentially "change the market," referencing the GFFP and its focus on values-based purchasing as an example. While promoting institutional procurement as a mechanism for changing our food system, she also noted that the New York State constitution prohibits procurement from having social or charitable goals. According to Turk, changing the language of procurement and bidding could have a huge impact on local food distribution and make the adoption of policies like the GFFP more feasible. Turk also highlighted the need for infrastructure initiatives, including the construction of more kitchens, as a way to enhance food initiatives in NYC.

When questions turned to local foods, Sarah Barton, Director of Program Development with the NY State Department of Agriculture and Markets, pointed to some of the barriers to local procurement, namely supply chain, distribution, last mile and aggregation challenges, but also to her department's commitment to providing technical assistance in finding cost-saving opportunities for institutional purchase. Barton has also pushed for the centralization of institutional procurement, including the creation of a single database to help streamline procurement.

***NYC BOROUGH PRESIDENTS WEIGH IN***

To add to this, at the "Borough Presidents on NYC Food Policy" talk hosted by the Hunter College New York City Food Policy Center in April 2019, the Borough Presidents pressed the importance of strong food policy, pushing for more administrative coordination. Bronx Borough President Ruben Diaz Jr. and Manhattan Borough President Gale Brewer reflected on the need for strong top-down leadership, but also acknowledged the importance of on-the-ground urgency and an engaged public to really push leadership to act. Staten Island Borough President James S. Oddo emphasized the need for that on-the-ground support. From this conversation, it seems that local elected officials are open to procurement policies as a strong pillar of NYC food policy. Several public officials appear to be eager to take action on stronger local food policy, an urgency that could help propel the campaign for GFFP adoption forward.<sup>66</sup>

Finally, interviewees noted that establishing a collective purchase model for food banks and food pantries could enhance the potential "ripple effect" of the GFFP. If food assistance programs and organizations work together to negotiate specific contracts for specific products, this could help guarantee a certain level of procurement which could, in turn, lower prices. If institutional procurement practices encourage vendors to lower prices, all food banks and pantries stand to benefit whether or not they're directly affected by the GFFP. As one interviewee explains:

*“So, if the city, obviously having lots of purchasing power, could influence different growers, different vendors, to increase their standards to meet the GFPP requirements, enabling a pricing structure that is accessible and feasible for organizations.”*

On a related note, collective purchase models could help address the fact that smaller pantries don't have the option to turn away donations or to demand healthier foods by virtue of their size. As Greg Silverman, Executive Director of the West Side Campaign Against Hunger, noted at the Lenox Hill Farm-to-Institution Panel, bringing together the more than 900 emergency food assistance programs would aggregate purchasing power such that all pantries could make healthy choices. Silverman is leading the effort to develop a collective purchase model for emergency food providers in NYC.

#### **BOX 2. GrowNYC's Regional Food Hub Expansion**

Several interviewees noted the potential for GrowNYC's new state-of-the-art regional food hub to help address infrastructure concerns facing agencies procuring food. Set to open in 2021, the new hub will occupy 75,000 square feet and house space to distribute and aggregate, refrigerate, and process foods. In 2016, the 5,000 square foot Greenmarket Co. Hub distributed more than 2.5 million pounds of food to New Yorkers, sending \$2.2 million in sales to small and mid-sized NY State farmers. With the expansion, the hub is expected to purchase 18 million pounds of food with a value of \$13.2 million.<sup>67</sup> With the expansion enabling GrowNYC to purchase for economies of scale, growers, distributors, and wholesale buyers stand to benefit.

GrowNYC has begun talks with NYC institutions and agencies about the potential to meet an increased demand for fresh fruits and vegetables that are local and that support the NYS economy. As these conversations continue, and institutions realize that concerns about adequate space and processing capabilities might be addressed by the expanded hub, support for the GFPP could strengthen. There is already evidence to suggest this, as Lynn Loflin, Executive Chef at Lenox Hill's Teaching Kitchen, noted that it was thanks to the Greenmarket Co. Food hub that they were able to switch to local food procurement at Lenox Hill.<sup>68</sup> That the expansion was strongly supported by many New Yorkers, including Manhattan Borough President Gale Brewer and various members of City Council, only enhances the perception that NYC is ready for a policy like the GFPP, both ideologically and logistically.<sup>67</sup>

## 6. Findings on NYC’s Current Food Procurement Patterns

### Contract Analysis

As Tables 6 and 7 show, with almost \$760 million in food procurement contracts, the Department of Education is responsible for the majority of NYC spending on procurement of food. Given that the DOE provides free daily breakfast and lunch for more than 1.1 million NYC public school students, it is no surprise that its purchasing would represent such a large percentage of the City’s procurement dollars. Given the scale of the DOE’s food procurement, it will be important for the coalition to consider the impact that DOE adoption of the GFPP could have on citywide procurement. The DOE’s Office of School Food active participation in the Urban School Food Alliance, the partnership among several big city school systems, adds to the potential for the DOE to serve as an important anchor for NYC’s GFPP campaign.

**Table 6.** Total contract amounts with DOE contracts included.

RANK	VENDOR	VENDOR TYPE	TOTAL CONTRACT AMOUNT (Dollars)	AGENCY
1	*METROPOLITAN FOODS INC.	Food Distribution	232,693,194.00	DOE + unspecified
2	*TERI NICHOLS INSTITUTIONAL FOOD	Food Distribution	197,499,825.00	DOE + unspecified
3	*MARAMONT CORPORATION	Food Distribution	100,753,520.00	DOE
4	*OPERATIVE CAKE	Direct Manufacturer Contract	83,500,350.00	DOE
5	CREAM O LAND DAIRIES LLC	Milk Distribution Contract (vs. Milk Supply Contract)	65,550,959.20	DOE + unspecified
6	*BARTLETT DAIRY	Milk Distribution Contract (vs. Milk Supply Contract)	48,440,150.00	DOE
7	*CHEFS CHOICE FOOD DIST.	Food Distribution	31,289,970.00	DOE
8	H SCHRIER & COMPANY INC	Food Distribution	13,014,825.73	HRA, DOC + unspecified
9	ROBBINS SALES COMPANY INC	Food Distribution	10,864,921.20	HRA + unspecified
10	JAMAC FROZEN FOOD CORPORATION	Food Distribution	5,026,497.50	HRA + unspecified
11	ATLANTIC BEVERAGE COMPANY INC	Beverage Distribution	4,008,235.36	HRA + unspecified
12	WILD PENGUIN CORPORATION	Food and Beverage Consulting	3,775,720.00	DOC + unspecified
13	NEBRASKALAND INC	Food Distribution	3,251,613.20	Unspecified
14	JAY BEE DISTRIBUTORS INC	Food Distribution	3,164,189.21	HRA, DOC + unspecified
15	*MICHAEL FOODS INC.	Direct Manufacturer Contract	2,904,315.00	DOE

16	*GOLDEN KRUST CARIBBEAN BAKERY	Direct Manufacturer Contract	2,883,743.00	DOE
17	KEEFE GROUP LLC	Food and Services Distribution	2,694,607.20	DOC
18	FRANK GARGIULO & SON INC	Multinational Produce Provider	2,123,021.56	Unspecified
19	ENVIRONMENTAL AGRICULTURAL	Catering and Events	1,829,171.84	Unspecified
20	UNIVERSAL COFFEE CORP	Not sure; various contracts for all sorts of food items	1,824,499.65	HRA, DOC + unspecified
21	GLOBAL FOOD INDUSTRIES LLC	Direct Manufacturer Contract (frozen foods)	1,718,058.25	DOC + unspecified
22	*BARILLA AMERICA, INC.	Direct Manufacturer Contract	1,544,737.00	DOE
			Total without DOE	\$61,997,039.07
			<b>TOTAL</b>	<b>\$820,356,123.90</b>

*\*New to Top 22 when active and registered DOE contracts, based on April 2018 FOIL request, were included. Unspecified used when contract award, ascertained via OpenData portal, did not list which agency made the purchase request or when contract title did not include agency.*

**Table 7. Vendors for case-study agencies (ACS and HRA)\***

<b>Agency</b>	<b>Vendors</b>
<b>ACS</b>	Environmental Agricultural Training Cooking Light, Inc.** Chrisway Foods Inc.** Alimade, LLC**
<b>HRA</b>	H Schrier & Company, Inc. Atlantic Beverage Company, Inc. Cardinal Foods LLC Jamac Frozen Food Corporation Jay Bee Distributors, Inc. Robbins Sales Company, Inc. Universal Coffee Corp WM R Hill Co, Inc. Regal Trading Inc.**

*\*Note: Contracts listed are current or ended in February 2019. HRA vendor determined if agency was noted in contract title. ACS vendors were ascertained via FOIL Request response received 1/16/19. All ACS contracts amounted to less than \$100,000.*

*\*\*Vendors not in the top 22.*

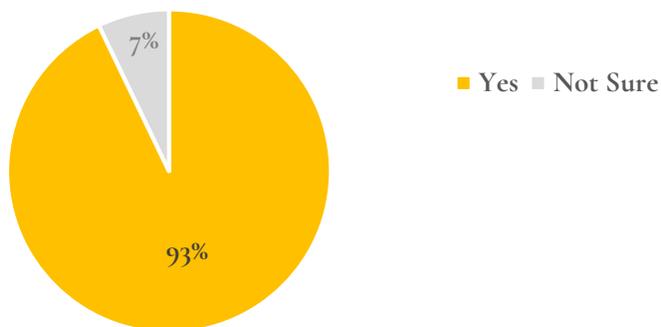
Vendor Survey Results

Of the top 22 vendors, 14 completed the survey (see Appendix B). The survey findings indicate that 93 percent reported that they have received requests to supply food that meets certain nutritional requirements (e.g., only organic, non-GMO) or that food is produced locally (Figure 3A). When asked to what extent they source foods that meet certain nutritional requirements, (e.g., maximum levels of sodium, sugar, and/or fat) only 36 percent cited that they “always source” such foods, and the same percentage will only do so “when required by a contract.” Overall, about a third of respondents mentioned that sourcing foods that need to comply with nutritional requirements is part of their business practices (Figure 3B).

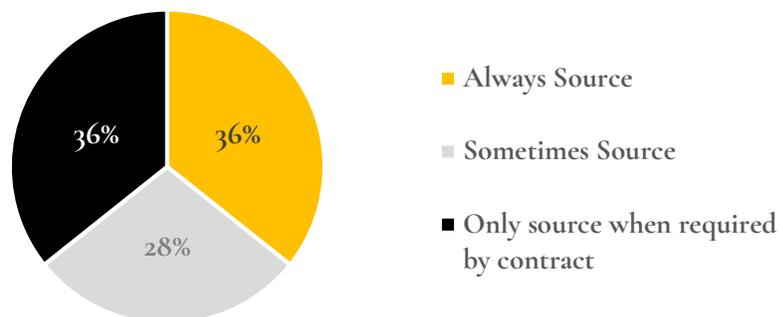
Among them, 10 declared that they source food products from local producers or manufacturers (Figure 4A), where we define “local procurement” as within 250 miles for produce and 500 miles for meat. Eight out of ten specified their motive to source locally, and the principal reason is company policy/mission, followed by contract requirements (Figure 4B). The main foods sourced locally were produce and poultry, followed by red meat (Figure 4C).

Figure 3. Survey respondents’ assessment of sourcing of foods that meet certain nutritional requirements.

A. Have you ever received a request to supply food that meets certain nutritional requirement (e.g. only organic, non-gmo) or that is produced solely locally? (n=14)

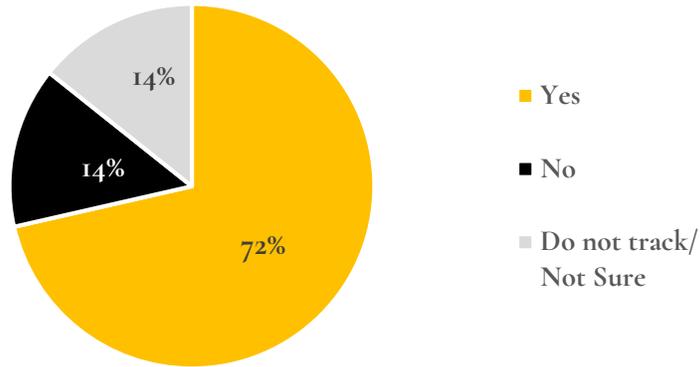


B. To what extent do you source food products that meet specific nutrition requirements (e.g., maximum levels of sodium, sugar, and/or fat)? (n=14)

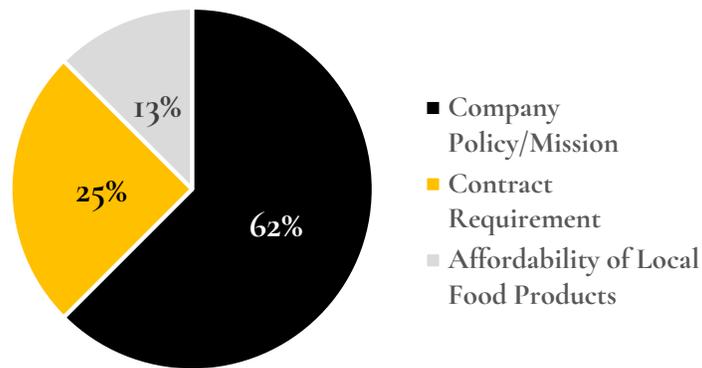


**Figure 4.** Survey respondents' assessment of local food procurement practices.

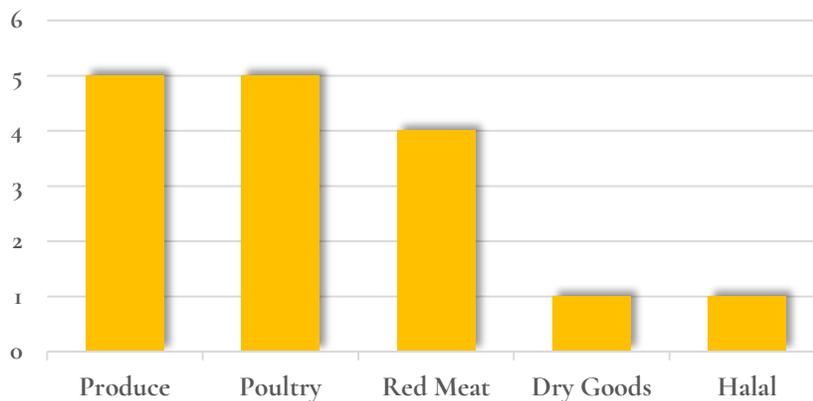
A. We define local procurement as within 250 miles for produce and 500 miles for meat. Do you source food products from local producers or manufacturers? (n=14)



B. What is your primary reason for sourcing locally? (n=8)



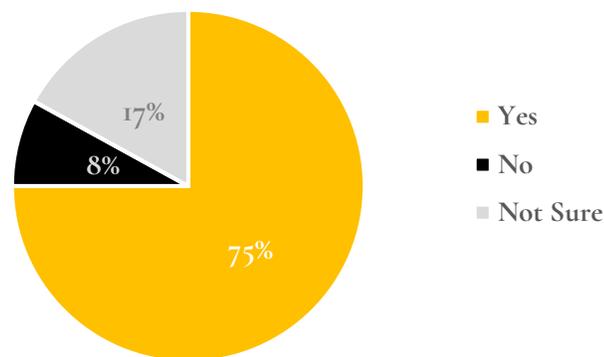
C. What are some of the specific food products you source locally? (n=8)



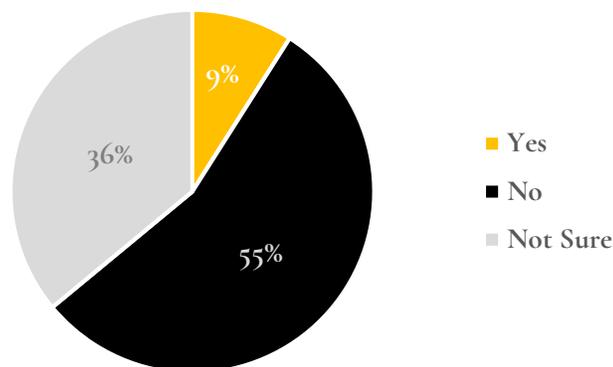
Few survey respondents followed the labor practices recommended by the GFPP. All but two vendors hired only non-union workers, one used a mix of union and non-union labor, and the other used only union workers. Seventy-five percent of vendor respondents reported that their organization has a social responsibility policy as part of their labor practices, 17 percent were unsure if a social responsibility policy existed in their company, and 8 percent did not have one (Fig. 5A). Only one of the surveyed vendors reported an affiliation with a Fairtrade organization (Fig.5B).

**Figure 5. Survey respondents' assessment of their labor practices. (GFPP, Valued Workforce)**

A. As part of your labor practices, do you follow a social responsibility policy? (n=12)



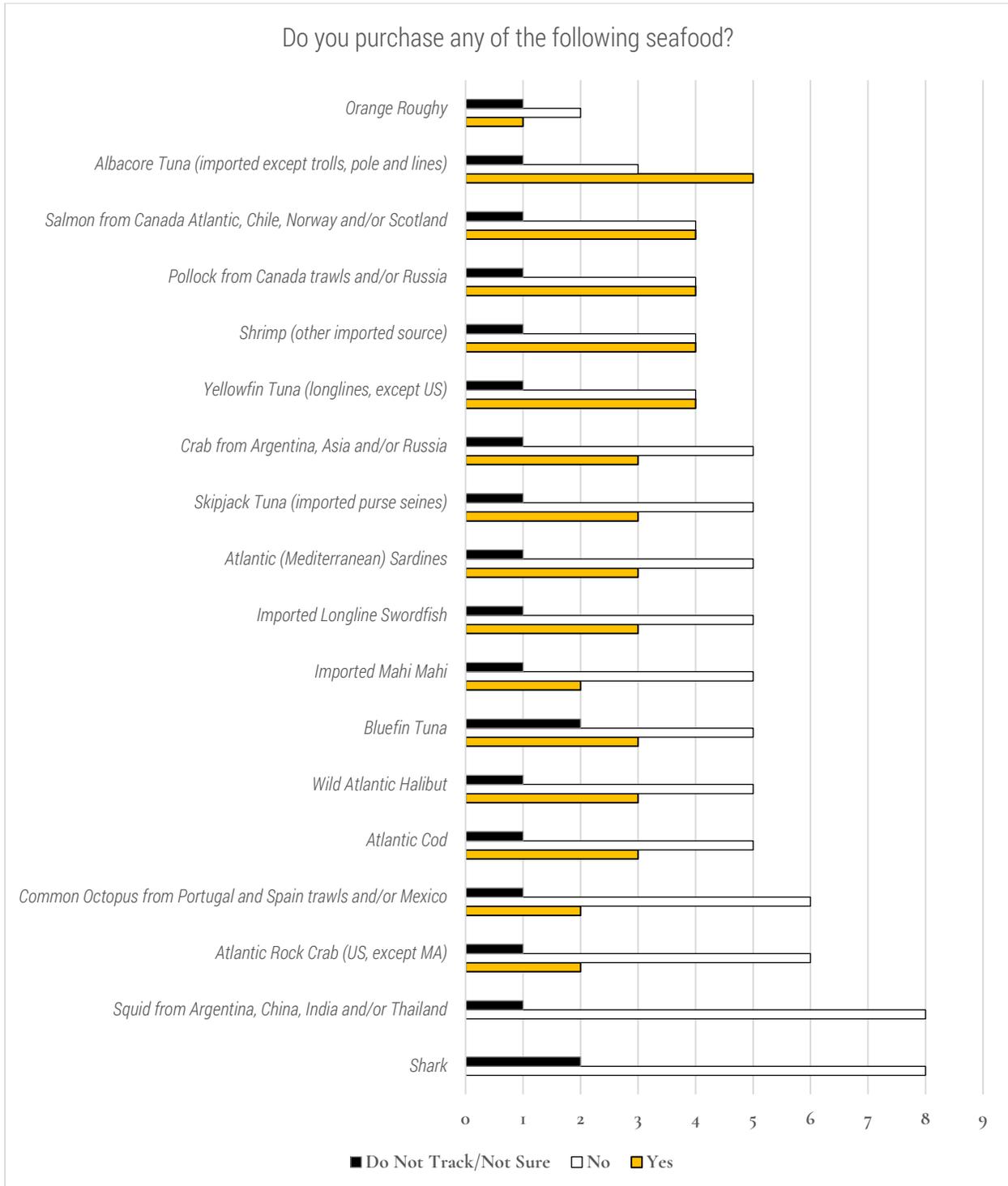
B. Are you certified by any of the following three organizations?  
1. Fair for Life; 2. Fairtrade America (Fairtrade International FLO); 3. Fairtrade USA (n=11)



Ocean-friendly seafood choices are key to environmentally sound institutional food procurement practices. To assess the degree to which top city food vendors adhered to sustainable seafood guidelines, survey respondents were asked whether they purchased any of the seafood items currently considered as endangered or whose farming is harmful to other marine life and ecosystems. The Monterey Bay Aquarium Seafood Watch program has created detailed, science-based guidelines on seafood consumption for the Northeast region classifying seafood in three main categories: *best choices*, *good alternatives*, and seafood to *avoid*.<sup>69</sup> This survey focused on the latter.

Many vendors declared that they usually purchase some of the seafood on the “avoid” list, especially tunas and salmons, but in general, as shown in Figure 6, most of them do not purchase endangered marine species or seafood from inadequately managed farming operations.

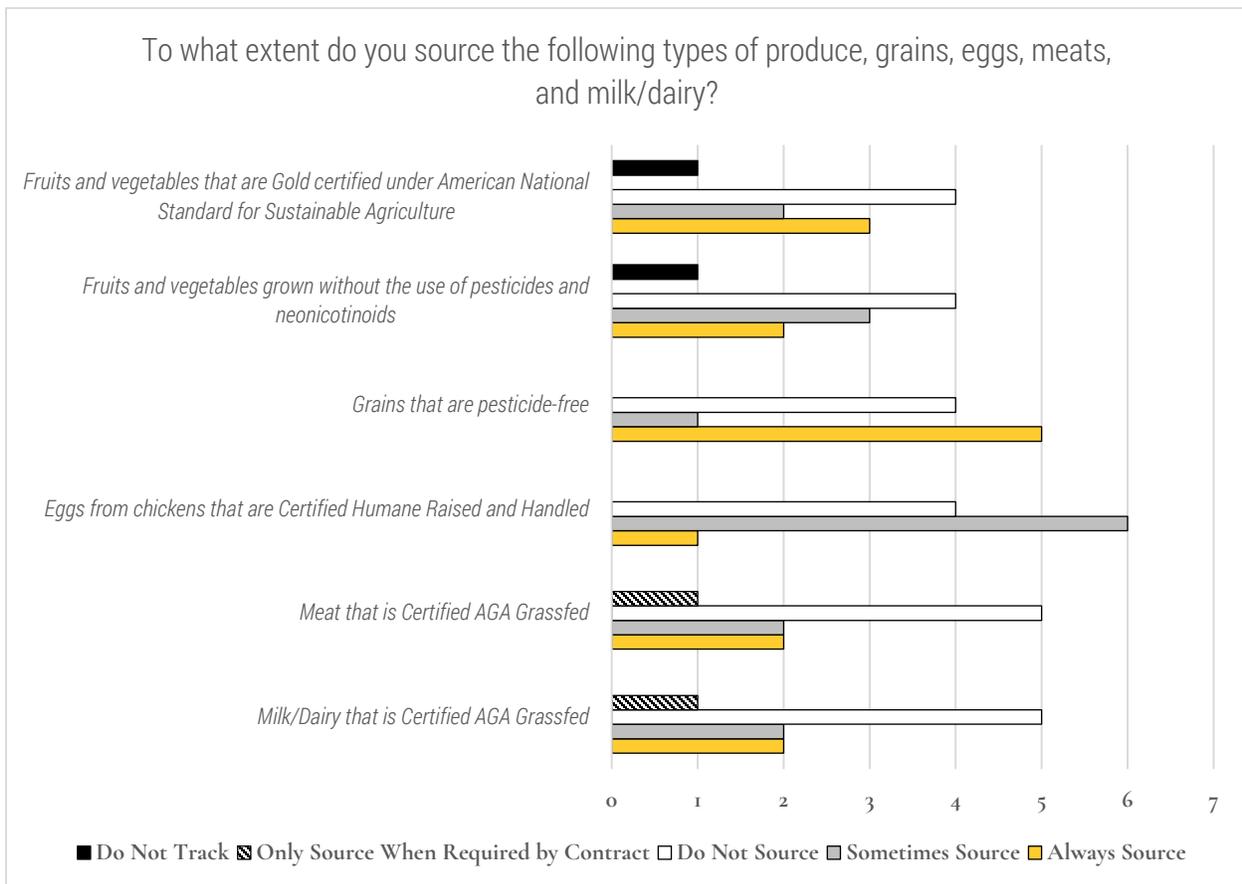
**Figure 6. Survey respondents' assessment of seafood items to avoid (GFPP *Environmental Sustainability*).**



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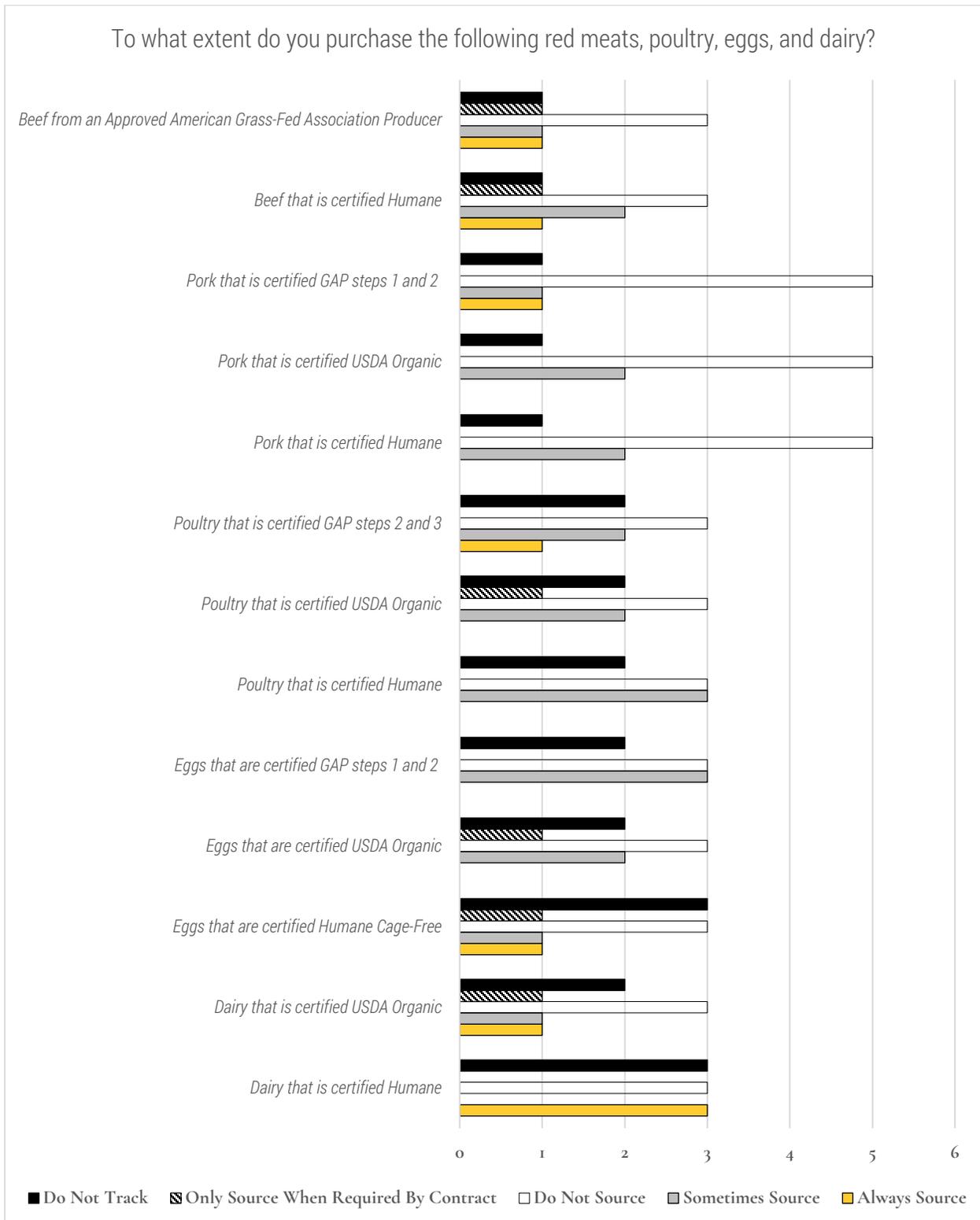
Finally, as shown in Figure 7, most vendors reported that they do not source or just sometimes source products with animal welfare certifications or eco-labels for fruits and vegetables. The only exception is pesticide-free grains, which the majority of the vendors reported to “always” source (Figure 7).

**Figure 7. Survey respondents’ assessment of produce procurement practices. (GFPP, Animal Welfare).**



Ultimately, the extent to which a food product was procured in alignment with GFPP values varied depending on the type of food sourced. As shown in Figure 4, 10 of 14 vendors source food products from local producers or manufacturers and about one third of them procured red meat, poultry, and produce locally. However, as shown in Figure 8, there was significant variability among which specific certifications were followed and no certification was sometimes or always followed by more than 3 of the 14 responding vendors.

**Figure 8.** Survey respondents' assessment of animal products procurement practices. (GFPP, *Environmental Sustainability*).



## 7. Discussion and Conclusions

Our research revealed distinct as well as overlapping barriers and facilitators to GFPP adoption. For HRA and emergency food programs, cost, federal regulations, and policy restrictions from state-level programs like HPNAP, were perceived as the main constraints to institutionalizing the holistic, value-based approach to food purchasing outlined in the GFPP. For ACS and early care and education centers, the lack of infrastructure, the modest volume of purchases, and a limited information on steps toward good food procurement taken by similar institutions, were among the key barriers noted by interviewees in this research.

Both early care centers and emergency food providers underscored how alignments between their work and the GFPP value areas already exist and thus can facilitate GFPP adoption, provided policies and regulations are in place. Additionally, both types of institutions noted how a collective purchasing model or the use of a group purchasing organization can help reconcile affordability and nutritional, environmental, and human and animal rights standards. Key informants with expertise in early care centers also pointed to resources that can help identify GFPP-aligned vendors as a further opportunity to ease GFPP adoption and implementation. Easy access to a variety of different food distributors in New York City, was highlighted by lead emergency food programs as a distinct advantage and facilitator for implementing higher standards for institutional food procurement in the City in cooperation with selected vendors.

**Table 8.** Comparison between the findings from this research and previous phases.

	<b>Cities who have adopted the GFPP (*)</b>	<b>NYC Stakeholders (*)</b>	<b>NYC Select Institutions (Research in this Report)</b>
<b>Barriers</b>	Cost Staff Resistance Adoption Timeline	Set in ways Perception of “already doing this” Bureaucracy Scarcity of resources <i>Constituents (**)</i> <i>Formalities</i> <i>Logistics</i>	Cost Highly regulated federal programs Policy restrictions from state programs Lack of infrastructure Scale Insufficient system-level knowledge of what other institutions are doing
<b>Facilitators</b>	GFP Center Support Support from a Champion or Political Ally Alignment	Comprehensiveness Alignment Interest Support <i>Approach</i> <i>Scaling Up</i> <i>Messaging</i> <i>Groundwork</i>	Favorable political climate Easy access to multiple food distributors Alignment “Ripple effect” Collective or group purchasing models Resources that can help identify GFPP-aligned vendors

\*Based on prior research supported by ASPCA and carried out in early 2018 for the NYC GFPP Coalition and Campaign.

\*\*Text in italics denotes themes phrased as concerns rather than barriers or as suggestions rather than facilitators by the interviewees.

The key lessons learned from these selected institutions both confirm and further extend the findings revealed during the previous phase of this research which explored the perspective of cities who have already adopted the GFPP as well as selected stakeholders invested in institutional food procurement in New York City (Table 8).

Finally, the analysis of the contract data as well as ancillary secondary data sources revealed that, in addition to ACS and HRA, another institution that warrants in-depth research is the NYC Department of Correction (DOC). As the *Next Steps* box illustrated below, DOC is strategically positioned to lead in GFPP adoption and implementation both for its scale — with nearly 10 million meals served annually — as well as historical policy changes to advance healthy nutrition and more recently local food procurement.

### **Next Steps. Exploring Barriers & Opportunities to GFPP in the NYC Department of Correction**

**Population served** – The New York City Department of Correction is responsible for the custody, control, and care of New York City's imprisoned population, housing the majority of them on Rikers Island. It houses a daily jail population between 12,000 and 17,000 inmates and institutional meals are prepared for both inmates and staff.

**Number of Meals Served Annually (Food Metrics Report 2018)** – 9,986,153 meals.

**Food infrastructure and preparation:** The Department operates 200 food-serving sites at 10 facilities and has five kitchens. It has a centralized system of meal production ensuring that the same meal is served across all facilities.

**Steps toward GFPP** – DOC has been taking steps to increase the nutritional value of its food procurement since the late 1990s and early 2000s when eliminated fat fryers from the kitchens and started rolling out standardized recipes. Additionally, DOC also removed sugar-sweetened beverages and sugary foods from its procurement system and substituted whole milk with 2 percent fat milk and subsequently with 1 percent fat milk.<sup>70</sup> In 2018, it was announced that Riker's Island has accepted the Common Market's bid to provide regionally sourced eggs from a family-run farm using responsible farming practices (i.e., cage-free and certified humanely raised chickens) located within 250 miles from New York City.

#### **Vendors identified through contract search**

- H Schrier & Company, Inc.
- Global Food Industries
- Jay Bee Distributors, Inc.
- Keefe Group LLC
- Universal Coffee Corp
- Wild Penguin Corporation
- Cookies and More, Inc. (not top 22)
- Finesse Creations, Inc. (not top 22)
- Pacto Corporation (not top 22)

## 8. Recommendations

### *For the NYC Good Food Purchasing Policy Coalition*

- 1. Advocate for citywide adoption of the GFPP to make full use of NYC's food purchasing power.*
- 2. Identify ways that GrowNYC's future food hub in the Borough of Bronx might address many of the logistical concerns described as barriers to GFPP adoption. Additionally, explore opportunities for the new hub to meet the scale of NYC's institutional food procurement.*
- 3. Work with City institutions to identify specific strategies for better aligning current policies (i.e., HRA emergency food provision with HPNAP and EFAP) with GFPP goals and for reducing any conflicts. Similarly, explore potential for policies like HPNAP to allow for additional vendors.*
- 4. Given the NYC Department of Education's scale of procurement, and the fact that it has already taken steps to include specific language in their bids as well as identify GFPP-related goals for their operations, continue to advocate for that agency to lead the way toward citywide GFPP adoption.*
- 5. Advocate for the city to test and adopt collective purchasing models that can influence the development of more affordable contracts and help establish a tailored support system to aid in transitioning to GFPP procurement approach.*
- 6. Continue to ensure that the campaign for GFPP adoption makes the expansion and development of public awareness and support a priority.*

### *For NYC Institutions and Agencies*

- 7. Explore the ability of group purchasing models to support institutions in finding vendors that better align with the GFPP values, such as Food and Supply Source.*
- 8. Develop a tracking system to monitor procurement in order to continually assess alignment with values-based purchasing models. As proposed by the NYS Department of Agriculture and Markets, explore the possibility of a centralized institutional procurement system.*

9. *With support from the Center for Good Food Purchasing and the NYC Coalition for adoption of the GFPP, consider adding local, fresh options under the Emergency Food Assistance Program (EFAP).*
10. *Create structures and processes that allow for effective community input and increased transparency, including through making the outcomes of GFPP baseline assessments publicly accessible.*

*For Future Research*

11. *Carry out research to support the development of tools or resources that can help institutions and their programs more easily identify GFPP-aligned vendors.*
12. *Conduct an in-depth case study on NYC Department of Correction (DOC) to deepen understanding of innovations in current food procurement practices as well as identify opportunities for their normalization through adoption of the GFPP.*

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## Appendices

### *Appendix A: Interview Protocol: Agencies*

THE CITY UNIVERSITY OF NEW YORK  
*Graduate School of Public Health and Health Policy  
Urban Food Policy Institute*

## INTERVIEW GUIDE

### **Title of Research Study:**

Bringing the Good Food Purchasing Program to New York City: Using Case Studies to Explore Key Barriers and Facilitators

### **Principal Investigator:**

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### **Researcher:**

Kylie Repasy, MPH  
Research Assistant, CUNY Urban Food Policy Institute

### **Introduction and Informed Consent**

You are being asked to participate in this interview because of your experience working with and knowledge of institution-level food procurement in New York City. The purpose of this interview is to gather information about the process of food procurement at [NAME OF INSTITUTION] as well as your perception of how adoption of the Good Food Purchasing Policy (GFPP) might affect that process in order to inform the campaign for GFPP adoption in NYC. Our goal is to use the information you provide so that our Institute can present an accurate overview of institutional food procurement and shed light on the facilitators and barriers to policies that might affect current systems. If you agree to participate, we will ask you to answer a series of questions related to your agency's process for procuring food. The entire interview should take no longer than 60 minutes to complete. There are no risks to your participation in this interview. If you do not wish to answer a question, you can skip it and go to the next question. To protect your privacy, we will keep all responses confidential and only research personnel will have access to the information you provide. All individual answers will not be disclosed to anyone outside our research team. We will separate any identifying information you provide about your agency from your responses and will store this information separately in order to maintain confidentiality of all participants. Your participation in

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this interview is voluntary. If you have any questions, you can contact Rositsa T. Ilieva at Rositsa.Ilieva@sph.cuny.edu, Kylie Repasy at Kylie.repasy@sph.cuny.edu, or Katherine Tomaino Fraser at Katherine.Tomaino@sph.cuny.edu. If you have any questions about your rights as a research participant or if you would like to talk to someone other than the researchers, you can contact CUNY Research Compliance Administrator at 646-664-8918 or [HRPP@cuny.edu](mailto:HRPP@cuny.edu).

If it is okay with you, we would like to record this interview for analysis.

*Do you have any questions for me about what I just read? Do you agree to participate?*

<i>I'd like to start with some general questions about you and your work here at [name of agency].</i>	
1	Can you tell me how long you've worked at [name of agency]?
2	Could you explain what [name of agency] does?
3	Could you describe your role here at [name of agency]?
<i>Great! The next set of questions are designed to explore the process of food procurement at [name of agency].</i>	
4	Suppose I wanted to purchase produce for all agency centers. Could you describe the steps I would take to make that purchase?
5	What are the most important considerations when deciding what products to purchase and from whom?
<i>Great! The next set of questions focus on your knowledge of the Good Food Purchasing Program.</i>	
6	Are you familiar with the Good Food Purchasing Program/Policy?  <i>If yes→ Continue to Question 6a.</i> <i>If no→ Continue to Question 6b.</i>
6a	6b
Could you explain what you know about the GFPP?	Could you explain what you know about how food is purchased here in NYC's government agencies, such as the Department of Education and the Department of Health, or institutions

	<p>receiving government funding for their food purchases, such as early care centers and emergency food assistance providers.</p>
<p style="text-align: center;"><i>Thanks so much.</i></p> <p><i>The next set of questions focus on the Good Food Purchasing Program and how it connects to the work you do. Before moving on, I just want to take a second to read the Center for Good Food Purchasing’s definition of the Good Food Purchasing Program.</i></p> <p><i>Developed in Los Angeles in 2011, “The Center for Good Food Purchasing’s Good Food Purchasing Program provides a metric-based, flexible framework that encourages large [often public] institutions to direct their buying power toward 5 core values: (1) local economies – or the support for small and mid-sized agricultural and food processing operations within the local area or region, (2) environmental sustainability, (3) valued workforce, (4) animal welfare, and (5) nutrition. Through the Program, the Center for Good Food Purchasing works with institutions to establish supply chain transparency from farm to fork, evaluate how current purchasing practices align with the Good Food Purchasing Standards, set goals, measure progress, and celebrate successes in using institutional purchasing power to improve the food system.” The GFPP has been adopted in several cities around the country such that public institutions are now working with the Center for Good Food Purchasing to align their food procurement with the 5 aforementioned values.</i></p> <p><i>Thus far, the GFPP has been adopted by the city of Los Angeles, Los Angeles Unified School District, Oakland Unified School District, San Francisco Unified School District, Chicago Public Schools, Chicago Parks District, city of Chicago, District of Columbia Public Schools (DCPS), Washington, DC. Currently there are active campaigns for GFPP adoption in Austin, Madison, Cincinnati, New York, and the Twin Cities.</i></p>	
7	<p><b>Could you explain which of the values, if any, are most important to the work you do with [name of agency]? Again, the values are: local economies, environmental sustainability, valued workforce, animal welfare, and nutrition.</b></p>
8	<p><b>Given this description, what do you anticipate to be some of the major barriers to adoption of the GFPP in NYC?</b></p>
9	<p><b>Given this description, what do you anticipate to be some of the major facilitators to adoption of the GFPP in NYC?</b></p>
<p style="text-align: center;"><i>Great. The next set of questions focus on the perceived potential impact of the Good Food Purchasing Program on agency food procurement in NYC.</i></p>	
10	<p><b>Could you explain how this policy, if adopted, might impact your work at [name of</b></p>

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	agency]?
11	<p>To what extent do you feel NYC agencies or institutions receiving government funding for food purchases already adhere to these values in purchasing?</p> <p>Probe: Can you explain what makes you think that?</p>
12	<p>Given what you know about agency food procurement, how likely do you think it would be for public institutions in NYC to adopt the GFPP?</p> <p>Probe: Can you explain what makes you think that?</p>
13	<p>Which of the 5 GFPP values do you think would be the easiest for the city to use to guide their food purchasing practices?</p>
14	<p>Which of the 5 GFPP values do you think would be most difficult for the city to use to guide their food purchasing practices?</p>
<p><i>Thank you so much for your time today. Is there anything you would like to add that we did not get a chance to discuss?</i></p>	

Appendix B: Vendor Survey

GENERAL QUESTION					
1	<b>Has your company ever participated in a requirement-based contract?</b> <i>Requirements might include nutrition considerations or sourcing distance limits, for example.</i>				
	Yes			Not Sure	
NUTRITION					
2	<b>To what extent do you source food products that meet specific nutrition requirements (e.g., maximum levels of sodium, sugar, and/or fat)?</b>				
	Always Source	Sometimes Source	Only source when required by an account/contract	Do Not Source	Not Sure
LOCAL ECONOMIES					
3	<b>We define "local" procurement as within 250 miles for produce and 500 miles for meat. Do you source food products from local producers or manufacturers?</b>				
	Yes	No	Not Sure	Do Not Track	
3a	<i>(If yes)</i> <b>What are some of the specific food products you source locally?</b> (Open-Ended)				
3b	<i>(If yes)</i> <b>Please estimate what percentage of total food products are sourced from local producers or manufacturers.</b> (Percentage Estimate)				
4	<i>(If yes)</i> <b>What is your primary reason for sourcing locally?</b>				
	Company Policy / Mission	Contract Requirement	Affordability of Local Food Products	Other reason?	
VALUED WORKFORCE					
5	<b>Which of the following best describes the employment status of workers?</b>				
	Union Workers	Non-Union Workers	Combination of Union and Non-Union Workers	Worker Cooperative	Other (Please Explain)
6	<b>As part of your labor practices, do you follow a social responsibility policy?</b>				
	Yes	No	Not Sure		
6a	<i>(If yes)</i> <b>Can you describe the major components?</b> <i>(Union or non-poverty wages, respect for freedom of association and collective bargaining, safe and healthy working conditions, prohibitions of child labor?)</i> (Open-Ended)				
7	<b>Are you certified by any of the following organizations?</b> Fair for Life Fairtrade America (Fairtrade International FLO) Fairtrade USA				
	Yes	No	Not Sure		
ENVIRONMENTAL SUSTAINABILITY					
8	<b>To what extent do you source the following products?</b>				

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<b>Milk/Dairy that is Certified AGA Grassfed.</b>					
Always Source	Sometimes Source	Only source when required by an account/contract	Do Not Source	Not Sure	Do Not Track
<b>Eggs from chickens that are Certified Humane Raised and Handled.</b>					
Always Source	Sometimes Source	Only source when required by an account/contract	Do Not Source	Not Sure	Do Not Track
<b>Meat that is Certified AGA Grassfed.</b>					
Always Source	Sometimes Source	Only source when required by an account/contract	Do Not Source	Not Sure	Do Not Track
<b>Grains that are pesticidefree.</b>					
Always Source	Sometimes Source	Only source when required by an account/contract	Do Not Source	Not Sure	Do Not Track
<b>Fruits and vegetables grown without the use of pesticides and neonicotinoids.</b> <i>(If more information needed: listed as prohibited for fresh produce by Whole Foods' Responsibly Grown Program.)</i>					
Always Source	Sometimes Source	Only source when required by an account/contract	Do Not Source	Not Sure	Do Not Track
<b>Fruits and vegetables that are Gold certified under American National Standard for Sustainable Agriculture</b> <i>(If more information needed: also known as ANSI/LEAO 4000, a "comprehensive sustainable agriculture standard that empowers the entire agricultural supply chain, from producers to consumers, to decisively advance sustainability in agriculture.")</i>					
Always Source	Sometimes Source	Only source when required by an account/contract	Do Not Source	Not Sure	Do Not Track
<b>9</b>	<b>When purchasing seafood, do you purchase any of the following?</b> <i>(<a href="https://www.seafoodwatch.org/-/m/sfw/pdf/guides/mbaseafoodwatch-northeastguide.pdf?la=en">https://www.seafoodwatch.org/-/m/sfw/pdf/guides/mbaseafoodwatch-northeastguide.pdf?la=en</a>)</i>				
	<b>Atlantic Cod</b>	Yes	No	Not Sure	Do Not Track
	<b>Orange Roughy</b>	Yes	No	Not Sure	Do Not Track
	<b>Wild Atlantic Halibut</b>	Yes	No	Not Sure	Do Not Track
	<b>Shark</b>	Yes	No	Not Sure	Do Not Track
	<b>Bluefin Tuna</b>	Yes	No	Not Sure	Do Not Track
	<b>Imported Mahi Mahi</b>	Yes	No	Not Sure	Do Not Track
	<b>Imported Longline Swordfish</b>	Yes	No	Not Sure	Do Not Track
	<b>Atlantic (Mediterranean) Sardines</b>	Yes	No	Not Sure	Do Not Track
	<b>Atlantic Rock Crab (US, except MA)</b>	Yes	No	Not Sure	Do Not Track
	<b>Skipjack Tuna (imported purse seines)</b>	Yes	No	Not Sure	Do Not Track
	<b>Yellowfin Tuna (longlines, except US)</b>	Yes	No	Not Sure	Do Not Track
	<b>Albacore Tuna (imported except trolls, pole and lines)</b>	Yes	No	Not Sure	Do Not Track
	<b>Shrimp (other imported source)</b>	Yes	No	Not Sure	Do Not Track

<i>Location-based:</i>						
Crab from Argentina, Asia and/or Russia		Yes	No	Not Sure	Do Not Track	
Common Octopus from Portugal and Spain trawls and/or Mexico		Yes	No	Not Sure	Do Not Track	
Pollock from Canada trawls and/or Russia		Yes	No	Not Sure	Do Not Track	
Salmon from Canada Atlantic, Chile, Norway and/or Scotland		Yes	No	Not Sure	Do Not Track	
Squid from Argentina, China, India and/or Thailand		Yes	No	Not Sure	Do Not Track	
<b>ANIMAL WELFARE</b>						
10	<b>To what extent do you source the following products?</b>					
	<b>Dairy – Certified Humane</b>					
	Always Source	Sometimes Source	Only source when required by an account/contract	Do Not Source	Not Sure	Do Not Track
	<b>Dairy – Certified USDA Organic</b>					
	Always Source	Sometimes Source	Only source when required by an account/contract	Do Not Source	Not Sure	Do Not Track
	<b>Eggs – Certified Humane CageFree</b>					
	Always Source	Sometimes Source	Only source when required by an account/contract	Do Not Source	Not Sure	Do Not Track
	<b>Eggs – Certified USDA Organic</b>					
	Always Source	Sometimes Source	Only source when required by an account/contract	Do Not Source	Not Sure	Do Not Track
	<b>Eggs – Certified GAP Steps 1 and 2</b> <i>(If more information needed: per the Global Animal Partnership's 5-Step® Animal Welfare Rating)</i>					
	Always Source	Sometimes Source	Only source when required by an account/contract	Do Not Source	Not Sure	Do Not Track
	<b>Poultry – Certified Humane</b>					
	Always Source	Sometimes Source	Only source when required by an account/contract	Do Not Source	Not Sure	Do Not Track
	<b>Poultry – Certified USDA Organic</b>					
	Always Source	Sometimes Source	Only source when required by an account/contract	Do Not Source	Not Sure	Do Not Track
	<b>Poultry – Certified GAP Steps 2 or 3</b> <i>(If more information needed: per the Global Animal Partnership's 5-Step® Animal Welfare Rating)</i>					

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Always Source	Sometimes Source	Only source when required by an account/contract	Do Not Source	Not Sure	Do Not Track
<b>Pork – Certified Humane</b>					
Always Source	Sometimes Source	Only source when required by an account/contract	Do Not Source	Not Sure	Do Not Track
<b>Pork – Certified USDA Organic</b>					
Always Source	Sometimes Source	Only source when required by an account/contract	Do Not Source	Not Sure	Do Not Track
<b>Pork – Certified GAP Steps 1 or 2</b> <i>(If more information needed: per the Global Animal Partnership's 5-Step® Animal Welfare Rating)</i>					
Always Source	Sometimes Source	Only source when required by an account/contract	Do Not Source	Not Sure	Do Not Track
<b>Beef – Certified Humane</b>					
Always Source	Sometimes Source	Only source when required by an account/contract	Do Not Source	Not Sure	Do Not Track
<b>Beef – Beef from an Approved American Grass-fed Association Producer</b>					
Always Source	Sometimes Source	Only source when required by an account/contract	Do Not Source	Not Sure	Do Not Track