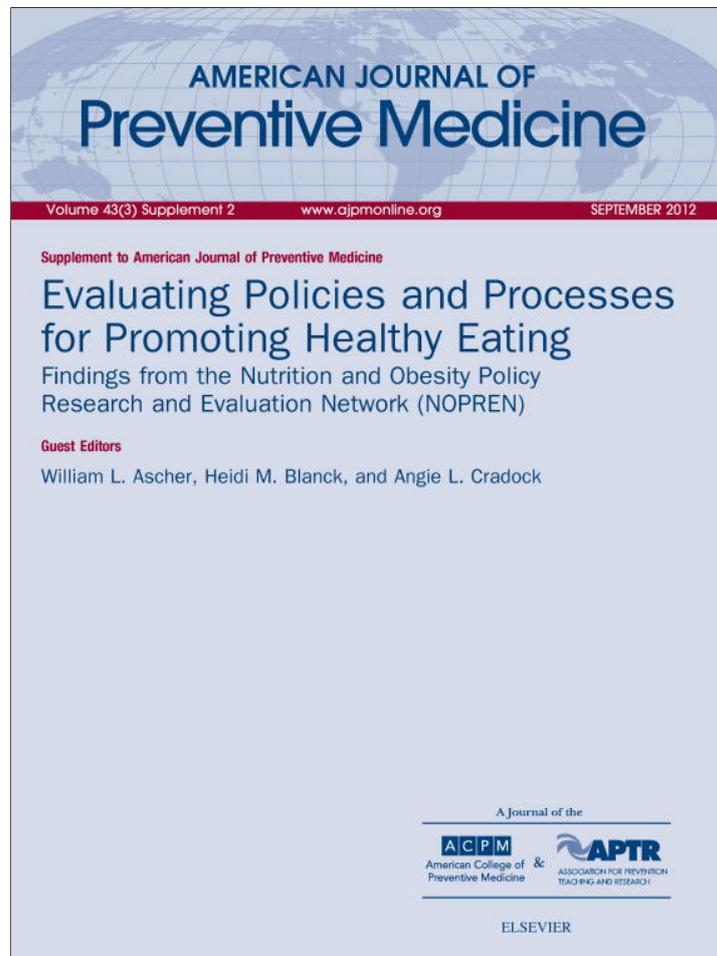


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Understanding Policy Enactment

The New Orleans Fresh Food Retailer Initiative

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Background: Healthy-food financing initiatives have been endorsed as a way to improve food access, but relatively little research exists on understanding the formulation of such policies.

Purpose: This paper investigates the development of the New Orleans Fresh Food Retailer Initiative (FFRI) to highlight factors that enabled and impeded its enactment.

Methods: In 2010 and 2011, semistructured interviews were conducted with 22 key informants with firsthand experience of this case, including representatives from the private sector, nonprofit organizations, and government. A participant-observer approach was used to synthesize these observations with archived written materials and the authors' own observations.

Results: Historical disparities in food access in New Orleans were exacerbated by Hurricane Katrina, which also generated neighborhood activism and a pressing need to rebuild the city. A Food Policy Advisory Committee (FPAC) was formed from diverse groups. This paper describes the evolution of FPAC, its deliberations and report to the City Council, and actions to promote a financing initiative, as well as delays encountered in the process.

Conclusions: Enactment of the FFRI was facilitated by a window of opportunity that opened in the storm's aftermath, broad-based stakeholder buy-in, the existence of political champions, and policy-relevant information that was simple and convincing. Impediments to success included the constant turnover of city staff, a skeptical state bureaucracy, and the many competing priorities in New Orleans. This study highlights the importance of having a clear policy objective to address a well-defined and illustrated problem, key advocates in diverse organizations, and broad-based support for its implementation.

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Introduction

Research and recommendations from authoritative groups, including the IOM, indicate a need for policy action to ensure access to affordable and healthy foods.^{1–5} However, there is relatively little research on the process by which such policies are developed. Recent studies have used regression analysis⁶ and key-informant interviews⁷ to examine factors that enable and impede the enactment of childhood obesity legislation at the state level. Although there have been useful accounts of a previous food financing initiative,^{8,9} more work is needed to understand the

context and details of the policy-making process in other locales.

This paper presents a study of policy formulation and adoption to create the New Orleans Fresh Food Retailer Initiative (FFRI).¹⁰ In March 2011, the City of New Orleans (City) began this program to provide low-interest and forgivable loans for food retailers that locate in underserved neighborhoods and commit to selling fresh fruits and vegetables. The program is administered by The Food Trust (Food Trust) and the Hope Enterprise Corporation (Hope) through a public–private partnership, with combined funds of \$14 million. In describing the development process for the initiative, including facilitators and barriers to the policy's enactment, the objectives are to improve understanding of the policy-formulation process, to inform the development of future obesity prevention policies at the local level, and to provide guidance to other communities about enacting a food financing program.

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Methods

In 2010 and 2011, a total of 22 semistructured interviews were conducted with key informants who were knowledgeable about the FFRI enactment process. Informants were selected purposively from a variety of organizations and included city agency staff, city council members, grocers, representatives from trade associations and financial institutions, public health professionals, and food advocates. IRB approval from Tulane University was granted, and informed consent was given for the interviews, which averaged 50 minutes and were guided by an instrument of 18 questions adapted from the Advocacy Coalition Framework.¹¹ The interview guide is available from the authors on request. A participant-observer approach¹² was used to synthesize these observations with archived written materials (e.g., meeting minutes and presentation slides, reports, city documents) and the authors' observations.

Results

The New Orleans Context

In 2005, Hurricane Katrina devastated New Orleans, flooding 80% of the city's area, causing billions of dollars in property damage, and displacing the city's entire population.^{13,14} Katrina raised the visibility of the tremendous disparity in living conditions between affluent and low-income residents of the city, particularly the limited opportunities of the city's large impoverished African-American population.

The retail food landscape was affected dramatically by the storm. A year after Katrina, only 40% of the supermarkets were in operation. Before the storm, predominantly African-American neighborhoods were half as likely to have a supermarket as were other neighborhoods.^{15,16} By 2007, the disparities in access to supermarkets had worsened.¹⁶

The storm also created an opening for political changes in New Orleans. An extraordinary level of civic activism arose soon after Katrina. Citizens groups pressed for broad policy changes and for resources to rebuild their neighborhoods. Recovery efforts pursued by the city included a series of planning processes at the city, planning district, and neighborhood levels. But the plans produced a laundry list of needs, including those related to food access, housing, infrastructure, health care, police protection, and education, without clear indication of how they should be prioritized.

Emergence of the Food Policy Advisory Committee

Begun in 2006, two initiatives built momentum for food-policy work in the city. Grow New Orleans, a networking group on community food issues, was organized by the nonprofit New Orleans Food and Farm Network. A second collaboration of public health, food security, and social service organizations focused on increasing access to healthy foods. The creation of the New Orleans Food

Policy Advisory Committee (FPAC) in 2007 brought together these groups along with other public and private sector actors to develop a policy agenda around neighborhood food access.

Table 1 illustrates the timeline of events that followed the creation of the FPAC. This effort was initiated by the Tulane University Prevention Research Center (TUPRC), with advice from Food Trust. Both organizations committed substantial staff resources to policy work on healthy-food access in New Orleans, and recognized the need to convene a broader local planning group. Seven organizations formed this core group: Second Harvest Food Bank of Greater New Orleans and Acadiana, Louisiana Public Health Institute, City Health Department, Renaissance Project, New Orleans Food and Farm Network, TUPRC, and Food Trust.

Although their missions varied, these organizations agreed to adopt a strategic focus on improving access to fresh-food retail outlets, defined broadly to include not only supermarkets and grocery stores but also small food stores and farmers' markets. This struck mid-ground between the "supermarkets campaign" that Food Trust had pursued in Pennsylvania⁸ and the food systems approach taken by Grow New Orleans.

To enhance legitimacy, advocates sought and received endorsement by the New Orleans City Council (council). TUPRC established a strong working relationship with the office of Councilmember Arnie Fielkow, who became a consistent champion for the initiative. With Fielkow's support, representatives from the planning group testified before the council's economic development committee. In response, the council unanimously passed a resolution supporting the creation of the New Orleans FPAC, which would be composed of "advocates, retailers, bankers and planners" and would "study the problem of a lack of access to healthy food among New Orleans families."¹⁷ It requested a final report with recommendations by January 2008.

The Study Process

The FPAC study process was led by a core group of individuals from the above-mentioned agencies. They identified and recruited a panel of 32 leaders from diverse fields, including food retail, alternative food systems, public health, social services, and government. The recruitment goal was to get leaders from a diversity of organizations in these fields who were interested in different aspects of food access and would commit to four meetings from June to December 2007. Table 2 lists the organizations involved in the FPAC. Over a 6-month span, participants framed the problem of food access,

discussed the barriers and possible solutions, and agreed on final recommendations.

One important TUPRC activity was the preparation of data to communicate the problems of food access in New Orleans. This consisted of synthesizing national studies on the relationships between access, consumption, and health into simple bullet points that were clear to a nonacademic population. Another important tool was a simple map of New Orleans with neighborhood boundaries that illustrated where supermarkets had not returned. Anyone familiar with New Orleans could see at a glance that most of the city, particularly the poorest sections, remained underserved by supermarkets.

Another important aspect of the process was the broad-based stakeholder engagement. FPAC recommendations were developed and vetted by representatives from diverse groups with relevant experience, giving them more legitimacy. The diverse nature of the FPAC also meant that advocacy and support for the committee's recommendations would come from a wide spectrum of city organizations.

Committee Recommendations

In January 2008, FPAC presented its findings, including ten policy recommendations, one of which advised providing grants and loans to fresh-food retail projects located in underserved areas, as a priority for comprehensive neighborhood development.¹⁸ The council unanimously adopted a second resolution, supporting

Table 1. Timeline of important events in the development and adoption of the New Orleans FFRI

Month	Year	Event
April	2007	"Partnership to Pursue a Food Policy Advisory Committee" presented to City Council's Economic Development Committee
May	2007	City Council supports creation of FPAC, requests report by Jan 2008
June–December	2007	FPAC studies retail food access with four full meetings and three optional meetings
January	2008	FPAC presents ten recommendations to City Council Economic Development Committee
January	2008	City Council supports FPAC recommendations, approves creation of implementation task force
February	2008	FPAC task force begins monthly meetings that continue through April 2009
April	2008	ORDA suggests FPAC provide input on food-access projects
June	2008	ORDA identifies food access projects for funding in long-term recovery plan, including \$7 million for fresh-food retail
July–September	2008	Tulane University Prevention Research Center assists ORDA to develop FFRI project for State application process
May	2009	Application for FFRI submitted to state
June	2009	City releases RFP to administer the FFRI
July	2009	State approves \$7 million in disaster recovery funding for FFRI project
December	2009	RFP for FFRI administration withdrawn because of City contracting policy
January	2010	RFP for FFRI re-advertised
April	2010	TFT and Hope Economic Corporation (Hope) selected by City to administer the FFRI
May	2010	Mayor Landrieu takes office
August	2010	New administration prioritizes FFRI among 100 possible projects for implementation
August–December	2010	City, TFT, and Hope negotiate terms of cooperative endeavor agreement; signed in mid-December
January–March	2011	FFRI implementation details worked out
March	2011	Mayor Landrieu announces initiation of the FFRI

FFRI, Fresh Food Retailer Initiative; FPAC, Food Policy Advisory Committee; ORDA, Office of Recovery and Development Administration; RFP, request for proposal; TFT, The Food Trust

the FPAC recommendations and approving creation of a task force to develop strategies for their implementation.¹⁹ The FPAC task force was organized by the TUPRC and included staff from the City Office of Recovery and Development Administration (ORDA); other city agencies; and representatives from civic and private sector organizations active in the FPAC pro-

Table 2. Organizational members of the New Orleans Food Policy Advisory Committee

Sector	Agencies/organizations
Grocery sector	Associated Grocers, Breaux Mart Supermarkets, ^b Circle Foods, Louisiana Retailers Association, New Orleans Food Co-op, Robert Fresh Market, Rouses, Supervalu, Vietnamese Market, Zuppardo's Family Supermarket
Farmers markets and local agriculture	Grow New Orleans, Marketumbrella.org , New Orleans Food and Farm Network (NOFFN) ^a
Nonprofit organizations	Agenda for Children, Bright Moments, Catholic Charities Archdiocese of New Orleans, The Ruth U. Fertel Foundation, Second Harvest Food Bank of Greater New Orleans and Acadiana, ^{a,b} Share Our Strength, The Food Trust, ^a The Renaissance Project, ^a The Urban Conservancy, Volunteers of America Greater New Orleans
Public health agencies and local government	The Louisiana Public Health Institute, ^a City of New Orleans Health Department, ^a City of New Orleans Office of Recovery and Development Administration (ORDA), New Orleans City Council
Academic institutions	Louisiana State University Agricultural Center, Tulane University Prevention Research Center (TUPRC) ^a
Financial institutions	Capital One Bank; Hope Enterprise Corporation (Hope); Enterprise Community Partners; Francis Financial Group Capital Management (FFC Capital Management); Small Business Administration; Minority Business Development Agency

^aMembers of the core planning group

^bFood Policy Advisory Committee co-chairs

cess. The task force met monthly from February 2008 to April 2009 to promote healthy-food retail development policy.

Funding for a Retail Incentive Initiative

Having involvement from ORDA turned out to be an important element in the development of funding for the initiative. This city office was created in November 2007, and tasked with coordinating the recovery program, connecting policy at the highest levels of city government

with the implementing agencies.²⁰ The administration managed more than \$400 million in federal Community Development Block Grant disaster recovery funds (hereafter recovery funds) that were allocated from the federal level through the state, and budgeted for New Orleans' recovery.

The first head of this office was a well-known planner and proponent of development that supported healthy lifestyles. He charged the Director of Disaster Mitigation Planning with leading the food-access development efforts. Subsequently, the director and several colleagues were invited to become members of the FPAC task force. It was the director who helped to connect the dots between the ORDA funds and the needs articulated by this task force. In April 2008, she suggested that the committee provide input on specific food-access programs for which recovery funds could be sought.

A conference call with committee members and city officials was organized quickly to develop a proposal that included many of the characteristics of the later-adopted initiative. By June 2008, ORDA officially identified \$7 million for this retailer initiative and an additional \$3 million combined for separate community markets and gardens initiatives. The council later approved the projects for the 2009 budget.

Delays in Enactment

The excitement over this apparent victory was followed by close to 3 years of administrative and political delays. Staff turnover was a substantial part of this. ORDA lost the staff person in charge of food access. This was critical, because recovery funds, even though allocated to New Orleans, required separate state approval for each initiative, including a tedious two-stage proposal process. TUPRC assisted with staff time to prepare information for a retail incentive proposal, which was forwarded to the state in September 2008.

In an environment where multiple priorities were competing for the attention of government officials, the food-access projects represented less than 2% of recovery funds and were complicated to administer—so they stalled. State officials, who expected recovery funds to be spent on “bricks and mortar” infrastructure (e.g., rebuilding fire stations), were less familiar with revolving loan programs, and generated extensive back-and-forth questioning. At about the same time, the Director of Disaster Mitigation Planning's office was moved out of ORDA, thus limiting her role as an internal champion for the project. Final state approval for the initiative came in July 2009; almost 9 months after supporting information had been submitted.

The city released a request for proposals to administer the financing initiative, but this was delayed when federal

auditors raised concerns about the city's contracting process. Ultimately, this request was cancelled and reissued when the city revised its contracting policy for the recovery funds. By April 2010, the city had selected Food Trust and Hope to jointly administer the new program. By this point, the outgoing Nagin administration was in its final month, and a contract was not finalized before Mayor Nagin left office.

A New Mayor

Incoming Mayor Landrieu wanted to overhaul the organizational structure at City Hall and to review the allocation of recovery resources. By August 2010, there were 100 projects that the new administration was trying to prioritize for implementation. TUPRC and other FPAC members revived their advocacy for the recovery fund food-access projects. As it turned out, there were strong supporters of improving food access on the new council, and within the Landrieu administration, including the mayor himself.

Because the Landrieu administration wanted to review and fine-tune all recovery efforts, the city met extensively with Hope and Food Trust, the implementing partners. Negotiations among the three parties moved forward, but there were many details in developing such a large proposal, especially one that was based on recovery funds, which require compliance with various federal standards. Moreover, these funds are released on a reimbursement basis, necessitating more-complex administrative procedures between the city and its partners. By December 2010, an agreement had been developed and signed by the major parties. Another quarter was needed to draft program policies, procedures, and promotional materials at all levels. Finally, in March 2011, Mayor Landrieu announced the new FFRI.

Discussion

Factors Facilitating Enactment

Four broad factors facilitated enactment of the FFRI policy. First, there was a window of opportunity that opened in the aftermath of Katrina. There was a clear need for a policy response to rebuild New Orleans, and an unparalleled degree of civic engagement by citizens in the rebuilding process. This included a focus on improving neighborhoods, both their economic viability and their ability to support healthy lifestyles. There were also federal emergency development funds that became available in response to Katrina.

The broad-based stakeholder buy-in, channeled through the New Orleans FPAC, was a second main facilitator to successful enactment, as it focused energies on a specific cause: improvement of the retail food sector. Getting

authorized by the council, but operating as an advisory body, gave FPAC the necessary political legitimacy, yet allowed it to move swiftly at a time when city agencies were still crippled from the storm. This swift action would not have been possible if not for the dedicated staff time made available by both the TUPRC and Food Trust, and the other core organizations involved.

A third important facilitator was the existence of political champions, both on the council and in city government, who endorsed the measure from the beginning and pushed hard to make it happen. Councilman Fielkow was a committed advocate of fresh-food financing, giving an opening to advocates to present at early committee meetings, marshaling support on the council for the FPAC resolution, and monitoring progress of the initiative throughout its journey to enactment. A senior ORDA official, in the city administration, was a key actor in making the link to funding through emergency block grants.

Finally, information and analysis was important to the process because it was made available early on in a simple, clear, and convincing manner. Documentation of the food-access problem with maps showing a reduction of supermarkets in many areas of the city convinced policymakers of the need for the action to improve the food environment, as did a simple summary of national-level studies linking neighborhood food access to improved diet and health. The experience of the food retail initiative in Pennsylvania^{8,21} gave confidence to stakeholders that such an initiative could be successful in New Orleans, and helped navigate the challenges of enactment.

Factors Impeding Enactment

The constant turnover of city staff was one of several factors that impeded success of the initiative. There was a continuing need to re-educate staff about the importance of FFRI, the specific contents of the initiative, and what was needed for it to pass each of the subsequent administrative hurdles. In this regard, a second impediment was the lack of a stable internal champion in the city administrative bureaucracy. Such a person could have prioritized continued action on the initiative and perhaps kept the delays in enactment to a minimum.

A third impediment was the presence of a skeptical state bureaucracy that was unfamiliar with the public-private partnerships involved in financing new retail food development. This skepticism translated into administrative delays. A final impediment to progress on the initiative was the existence of many competing priorities in New Orleans. The devastation of Katrina affected every sphere of city life including housing, education, health care, police protection, and infrastructure. Although there was no real opposition to a food financing initiative,

these other issues often demanded and received more immediate attention.

Insights Into Other Situations

Despite the specific nature of this New Orleans study, there are general lessons to be learned for those seeking to influence policy, particularly that related to healthy-food financing. A window of opportunity that created political will and available financing was a key facilitator of policy enactment. Katrina was unique, but there are many crises or focusing events that bring government attention to a problem and create windows of opportunity for change.²² Such windows may be precipitated by changes in political leadership, by dramatic changes in economic conditions, or by the strength of popular mobilizations (such as the Tea Party or Occupy movements) to shift the national mood. They also can be facilitated by the organizing power of recent changes in social media and technology. In crisis-prone areas, policy advocates can plan ahead for windows of opportunity, even though the specific timing of a new event is unknown.

Identifying and cultivating political champions is a key part of policy work, as is obtaining broad-based stakeholder input and support. Local food-policy advisory committees,²³ as well as Prevention Research Centers,²⁴ exist throughout the country and can be at the forefront of marshaling support for initiatives to improve food access for underserved populations. Information and analysis is important to the policy process, especially when it is timely and clearly presented.

Impediments to the policy enactment process in New Orleans also have broader resonance. Although Katrina was a rare event, it generated the same range of competing priorities that might be found in many localities where funding is tight and human resources are limited. Moreover, enablers and impediments are often interrelated. Champions within city government facilitated policy enactment, yet it was the restructuring of this very bureaucracy that removed critical support and delayed progress.

To overcome obstacles to progress, the experience from New Orleans highlights the importance of having a clear policy objective that addresses a well-defined and illustrated problem, with motivated champions and a collaboration of organizations that can develop broad-based support for its implementation.

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