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District Regulated Nutrition Programs: Identifying the Gap Between Language in District
Wellness Policies and Implementation Practices in Public Schools

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ABSTRACT

BACKGROUND: The federal government requires that every school district taking part in the Federal Child Nutrition Program have a written district wellness policy of how the districts will address: nutrition education, nutrition guidelines, physical activity, physical education, and parent and community involvement. Although many aspects of school nutrition are federally regulated, there are specific food-related practices that can only be regulated at the district level. Policies concerning these “district-led” practices often appear in the district wellness policy. This study focuses specifically on three topics addressed in district wellness policies: (a) Is free potable drinking water available to students throughout the school day? (b) Are Smart Snacks nutrition standards applied to food sold during fundraisers hosted during school hours? and (c) How do districts address unpaid student balances in the meal program? The aim of this study is to assess how a sample of districts addresses each of these issues in their written district wellness policies and in actual implementation.

METHODS: Through analyzing district wellness policies from 34 districts in Connecticut using the coding tool, the WellSAT 3.0, this study seeks to describe the strength and comprehensiveness of the language of school nutrition policies. The research will be furthered in 4 of these districts through the use of interviews in order to see if there is a difference in the strength of nutrition policy language between districts and the implementation of those nutrition practices in the respective school environments.

RESULTS: Most frequently, school’s practices are stronger than the policy language representing them; however, there were examples of practices in schools that were stronger, weaker, or on par with the written policy. Each of the 4 schools had a policy and practice to address nutrition standards for in-school fundraisers. Only one school had a policy to make water available throughout the entire school day however each districts’ practice was strong. No school had a written policy to address unpaid student meal balances without stigmatizing the students involved, but each of the schools had strong practices.

CONCLUSIONS: Schools are implementing stronger practices than their written policies present. A school’s written policy may not properly represent the strength of their practices.

There are approximately 50.8 million students currently attending public schools in the United States of America¹. Each of these 50.8 million public school students are exposed to the school nutrition environment for 6 hours at a time and consume up to 50% of their daily calories during the average school day. Due to the extent of this exposure, the quality of the school nutrition environment plays an influential role in student health². To maintain transparency and control of nutrition programs and practices, all public-school districts in the United States that participate in Federal Child Nutrition Programs are required to write and implement district wellness policies³.

Federal Regulation of School Nutrition

The implementation of the Child Nutrition and WIC Reauthorization Act of 2004, introduced to the concept of mandatory district wellness policies, and all public school districts were required to write wellness policies by the start of the 2006-2007 school year³. Several years later, the Healthy Hunger-Free Kids Act of 2010 (HHFKA) required the USDA to update the original wellness policy regulations and the regulations for the federal school meal programs⁴. Specifically, the National School Lunch Program was updated to be consistent with the current Dietary Guidelines for Americans. These changes included: an increase in whole grains; a decrease in sodium; an increase in the amount and variety of fruits and vegetables; and calorie maximums for meals based on age groups⁵. These federally regulated improvements positively impact the nutrition environment at public schools by encouraging healthier eating habits for students, including increased fruit and vegetable consumption without an increase in food waste^{6,7,8,9,10,11,12,13}.

The HHFKA also required the USDA to update the regulations for district wellness policies⁴. The USDA 2016 Final Rule⁵ required that, at a minimum, wellness policies must

include specific goals for nutrition promotion and education, physical activity, and other school-based activities that promote student wellness. Policies must rely on evidence-based strategies, nutrition guidelines for all foods and beverages for sale during the school day consistent with Federal meal and nutrition regulations, and standards for all other foods and beverages available at schools. The final rule also made changes to the administration of wellness policies. Each public school district must assess their compliance with their wellness policy and make this assessment available to the public at least once every three years. Districts must also keep record of the school wellness policy, documentation of their compliance with community involvement requirements, the triennial assessment and public notification requirements⁵.

The triennial assessment is conducted by each state department of education to make sure that every district is following all the rules of the federal meal program. During this time, state officials visit schools to observe practices and inquire as to the extent of the district's procedures for federal programs. The state officials also analyze each district's wellness policy to ensure that every district is complying with the mandate to write and update wellness policies with the required material. This assessment is to ensure that districts are following federal law and therefore analysis of district-led practices is not a priority. Due to this triennial assessment, it is vital for schools to match their federal program compliance in policy and practice.

District Wellness Policies

District school wellness policies must include language to explain which practices the schools will be requiring themselves to implement. For district-led practices, the wellness policy must also explain the procedure for implementation⁴. District-led practices are designed and regulated by the local level of governance which means they are not uniform across the country. Since the policy language for these practices is not regulated by the federal government, each

school district in the United States could have different practices for the same subject, or they could be implementing the practices written to different degrees of strength and comprehensiveness. The requirement to have district wellness policies is intended to improve overall child wellness in schools³ by requiring districts to explain their practices in writing, thereby helping the schools to hold themselves accountable for the practices which are implemented in the school environment. The comprehensiveness of each wellness policy is important because the policy acts as the catalyst for implementing certain practices¹⁴. If the practices are not implemented as intended, they can have a negative impact on the students' wellness so it is vital for schools to use data driven practices and strong language in their wellness policies to guarantee clear future implementation. As federal law changes are implemented to guide school meals and other food options to become more focused on offering a healthy variety, student health improves and the risk of obesity and diabetes in young Americans decreases^{2,13,13}.

An effective district wellness policy. Most extant work argues that district wellness policies are most effective when the wellness policy language is strong and comprehensive^{14,15}. Since its release in 2009, the Wellness School Assessment Tool (WellSAT), a policy coding tool, has been used by researchers and advocacy groups to assess the comprehensiveness and strength of district school wellness policies^{14,15,33}. The WellSAT has been found to be a reliable coding tool^{16,17} and had been used to understand that even in schools in low socioeconomic settings, where resources are scarce, a strong and comprehensive wellness policy is possible and has a positive influence on the students¹⁵.

This study is being conducted to identify the strength and comprehensiveness of district wellness policies, and their corresponding practices, in Connecticut. In order to determine the

presence, comprehensiveness, and strength of district policies, a sample of written policies were coded. In order to assess the implementation of practices relevant to a subset of written policy topics, we conducted interviews using questions from an interview measure, the WellSAT-I, with school personnel in four of these districts. The interviews provide a comparison between what is written in the policy and testimony regarding the actual practices that occur.

This study is focused on three policy topics: the availability of free potable water throughout the school day; nutrition standards for school foods sold in fundraisers during school hours; and practices for feeding children with unpaid meal balances. Practices for fundraising during the school day are regulated by the federal government. Therefore, strong written policies and consistent implementation are expected. In contrast, water availability and handling unpaid meal balances are not regulated by federal law. Therefore, variability in both the written policies and the reported implementation of practices is expected – in other words, a gap between the written policy and how the practices are manifested in schools^{18,19,20}. Below is a brief explanation of the pertinence of each policy subject.

Free potable water available throughout the school day. Federal law currently requires that schools make free water available to all students in the cafeteria during breakfast and lunch⁴. This legislation does not address how to handle the availability of free potable water throughout the school day which leaves it up to each school district to implement a policy as they see fit. There is evidence that offering free water throughout the school day reduces the occurrence of childhood obesity and benefits student health^{21,22}. Chiriqui and colleagues found in a national study of district wellness policies that policies rarely mention water availability outside of the mandated water availability during lunch periods²³. Close to 85% of wellness policies they studied did not have a provision regarding access to free water throughout the school day²³.

Fundraising with food to be consumed during the school day. The Healthy Hunger-Free Kids Act requires all competitive foods sold during school hours to meet Smart Snacks nutrition standards²⁴. Foods sold during fundraisers during the school day qualify as competitive foods and therefore must be regulated through the Smart Snacks standards²⁴. The customary nature of school fundraisers and vending machine sales involves sweets and baked goods which provide students with empty calories and excessive amounts of sugar⁹. Before the Healthy Hunger Free Kids Act, competitive food options in schools contributed to childhood health problems and obesity⁹. Due to this, in-school fundraisers are now being oriented towards physical activity-based fundraising⁹. With current federal nutrition regulations for food sales during school hours, one of the next steps to improving student wellness is for districts to follow the federal guideline and mandate Smart Snacks standards for all food sold at in-school fundraising events^{9,23}.

Unpaid meal balances. Finally, in recent years, there has been increasing attention paid to the problem of unpaid school meal balances. This occurs when a student is unable to pay for their meal and therefore incurs a negative charge on their account in order to eat lunch. Some schools have implemented practices, such as providing an inexpensive alternate meal (e.g., a cheese sandwich) to students with high balances of unpaid meal debt, in an attempt to manage that situation and reduce rising school debt^{25,26,27}. These stigmatizing practices have been widely criticized, and have led to state legislation banning meal shaming practices in states such as New York, New Mexico, and Oregon^{28,29}. As a result, there are “widespread inconsistencies in implementation across states and districts” which lead to lunch shaming and other inequities for students²⁰. Punishing students for not being able to afford their hot lunch creates social inequities in schools²⁹.

Implications of the gap. When there is a gap between policy and practice, there are two possible outcomes – the practices may be stronger than the policies, or the practices may fall short of expectations from the policies. When the local policies reflect federal guidance, essentially replicating the regulations, there is more likely to be consistent implementation. However, when the federal regulations are silent on an issue, there is a risk of less than beneficial practices. In a study on federal regulations of school lunches, Linder²⁰ found: “when local school districts are given the discretion to create their own school lunch policies [practices], inconsistent and inequitable treatment of students results”²⁰. Federal requirements and guidance are ever improving for programs, such as the National School Lunch Program, however there are still many district-led practices involved in formulating wellness policies. All of the problems found above for the specific subject areas are connected to a lack of uniform policy procedures^{23,30}.

The goal of this study is to measure the strength of local written wellness policies in three domains and then compare those policies to implementation in a subset of districts. The second phase of the study will allow us to highlight gaps between language and practice. Specifically, we will examine whether the fundraising policies are more strongly written and consistently implemented than the water and unpaid meal balance policies and practices. It is expected that district policies will be stronger for in-school fundraising policies than for the district-led policies because this subject area is federally mandated. It is further expected that fundraising practices in schools will be stronger than those for the district-led practices thereby creating less of a gap between language and practice for the federally mandated practices. It is also expected that there will be more of a gap between strength in policy and practice for the two district-led

subject areas. Does the option to implement a district policy impact the strength of the school program?

METHODS

This inductive mixed methods study will use both qualitative and quantitative data to describe the strength and implementation of nutrition related policies and practices in a sample of Connecticut school districts. This study is being conducted in collaboration with the Connecticut State Department of Education (SDE). All school districts that participate in the federal school meal programs are required to be reviewed triennially by the state agency that oversees the programs. Most of the review involves assessing the districts' compliance with school meal regulations; however, the state also assesses the districts' school wellness policy at this time^{3,4}. The UConn Rudd Center and UConn NEAG School of Education are working with the SDE to provide policy feedback for 34 districts that are scheduled for their triennial review this year. The protocol for this study has been approved by the University of Connecticut IRB.

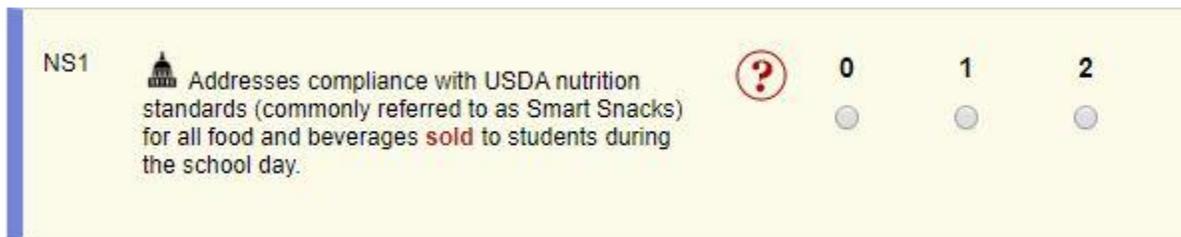
Measures

Written policies. The WellSAT 3.0 tool will be used to measure the comprehensiveness and strength of the language in the district wellness policies from 34 different school districts in Connecticut. The WellSAT is divided into 6 subscales: Nutrition Education, Standards for USDA Child Nutrition Programs and School Meals, Nutrition Standards for Competitive and Other Foods and Beverages, Physical Education and Activity, Wellness Promotion and Marketing, Implementation, Evaluation and Communication. These categories each contain between eight and fifteen items pertaining to the relevant regulations and programs³¹. The WellSAT evaluates how specific topics are addressed through the strength of the language used.

Items are scored as a 0, 1, or 2; 0 (item is not addressed); 1 (item is addressed, but in a vague or non-specific manner); 2 (item is addressed using strong and specific language).

Each wellness policy was coded in entirety so that an overall comprehensiveness and strength score can be calculated as well as individual comprehensiveness and strength scores for each subscale. The comprehensiveness score captures how well the district wellness policy covered all the different topics. For each item, the goal for the coder is to find the language in the wellness policy they are evaluating that states the school's compliance with that program or guideline. For example, see image 1 of the first section of the Nutrition Standards section on the digital WellSAT 3.0.

Image 1³¹



To analyze subsection NS1, the coder will search through the district's wellness policy in order to identify the document which contains language that states the school requires foods sold on campus to meet USDA nutrition standards as cited in federal law. A strong policy, deserving of a 2, would have language similar to:

“Guidelines from USDA’s Final Rule: Nutrition Standards for All Food Sold in School standards apply to a la carte in the cafeteria, in-school stores, snack bars, vending machines, and any other venues where food or candy may be sold on school campuses during the school day, including fundraisers, beginning July 1, 2014 ” and then is followed by a citation of the public law which established these standards³².

While a weak policy, deserving of a 1, would have language similar to:

“All foods sold to students outside of school meals shall meet district nutrition standards (district nutrition standards do not meet Smart Snacks) ”³².

Marlene Schwartz³³, one of the creators of the WellSAT explains the distinction between a score of 1 versus a score of 2 in an article for the journal for the American Dietetic Association:

‘To distinguish between a score of one and two, coders used the scenario of a parent approaching a school board about a school wellness-related concern. If the policy language did not clarify the school’s position on that issue, it was coded as a one; if the parent and school board could easily determine whether or not the school is compliant, the item was coded as a two’³³.

The WellSAT items for this study are: Nutrition Standards item 13: addresses availability of free drinking water throughout the school day; Nutrition Standards item 6: addressed fundraising with food to be consumed during the school day; Standards for USDA School Meals item 4: addressed how to handle feeding children with unpaid meal balances without stigmatizing them³¹.

Interviews. After the districts’ wellness policies were coded, interviews were conducted with relevant faculty and staff at schools in four sample districts. These districts were chosen out of the 34 districts up for evaluation by the SDE as they represent large and small size districts as well as urban and rural parts of the state. The interviews were with the food service directors and school dieticians from each district, as they are the best positioned to know about these school practices.

The interview questions mirror the WellSAT coding tool by asking about the implementation of the policy item. For example, compare image 1 to image 2, of the interrogative form of the first two sections of the Nutrition Standards section of the digital WellSAT 3.0, below.

Image 2³¹³¹

NS1 Interview – Food Service Director	
Are there any foods that are not part of the school meals (known as competitive foods) that are sold to students during the school day? If yes, how confident are you that all of these items meet Smart Snacks nutrition standards?	
0	There are competitive foods sold to students and interviewee states that some items may not meet Smart Snacks standards.
1	There are competitive foods and interviewee is somewhat confident that all items meet Smart Snacks standards.
2	There are no competitive foods, or there are competitive foods and interviewee is very confident that all items meet Smart Snacks standards.
<i>NS1: Addresses compliance with USDA nutrition standards (commonly referred to as Smart Snacks) for all food and beverages sold to students during the school day. The school day begins at midnight the night before and goes until 30 minutes after the final bell.</i>	

NS2 Interview – Food Service Director, Principal	
Do you know where to access the USDA Smart Snacks nutrition standards to check and see if an item can be sold in school during the school day? Can you tell me how you do this?	
0	The respondent does not know where to look to access the standards.
1	The respondent has an idea of where to find the standard, but is not completely sure.
2	Yes, respondent can describe exactly where to find the standards.
<i>NS2: USDA Smart Snack standards are easily accessed in the policy.</i>	

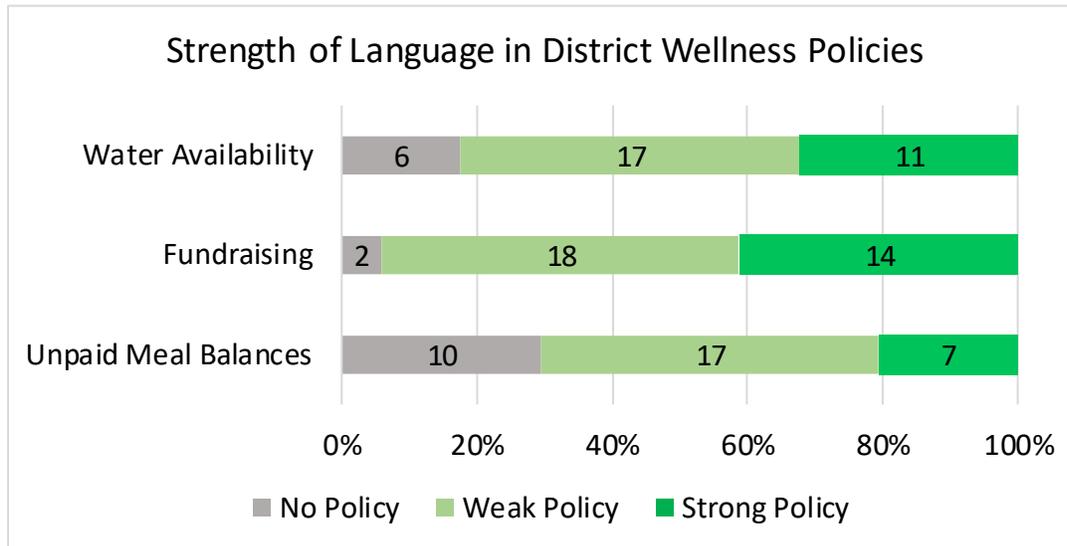
The interview questions for the present study are listed in Appendix A. The questions NS13, NS6, and SM4 inquire as to the specific subject areas. The most recent version of questions, chosen for this qualitative approach, is reflective of specific sections of the WellSAT 3.0 that also ask about how the school follows federal nutrition standards and programs like the National School Lunch Program.

After the interviews were completed, the answers to each question were coded for strength according to how confident and informed the faculty member was on the topic. This is once again done on a scale of 0-2 as seen in image 2. Once again, specific focus was paid to the three specific items NS13, NS6, and SM4. These data allow for a comparison between the degree of implementation to the strength of the wellness policy language.

RESULTS**Written Policy Coding**

Chart 1 presents the number of school wellness policies, out of the 34 districts, that scored a 0, 1, or 2 in the specific subject areas.

Chart 1



Water Availability. A majority of districts had a written policy to make free potable water available throughout the school day with most policies scoring a 1 for weak language. 28 district policies specified that water is made available to all students throughout the school day which leaves 6 policies which do not mention this type of practice. 17 of the 28 policies relied on vague language to represent this practice which means that only 11 of 34 districts had policy language specific enough for a reader to be confident that it would be consistently implemented in the manner specified.

Fundraising during school hours. Districts most consistently had a written policy for the section regarding fundraising; however, it was still common to have a weak written policy, as 18 districts scored a 1 while 14 districts scored a 2.

Unpaid meal balances. Meanwhile, district policies for handling unpaid meal balances were clearly lacking in strength compared to the other subject areas. Ten districts scored a zero for unpaid meal balance language which means they did not have written language in their policy on this topic or their projected practice would stigmatize a child if implemented. Though a majority of districts had a written policy, 27 out of 34 of these policies contained weak or no language. Only 7 of the 34 districts had strong language set forth to depict the practices to be used in schools to handle providing meals to students with negative charges on their accounts, without stigmatizing them in the process.

Interviews

In order to further explore the three subject areas, interviews were conducted at four of the districts. Table 1, below, represents the comparison between interview scores and written policy scores.

Table 1

Comparison between Strength of Written Policies and Current Practices				
Water available all day	District A		District B	
	Written: 0	Practice: 2	Written: 2	Practice: 2
	District C		District D	
	Written: 0	Practice: 2	Written: 0	Practice: 2
Fundraising during school hours	District A		District B	
	Written: 1	Practice: 2	Written: 2	Practice: 2
	District C		District D	
	Written: 2	Practice: 2	Written: 2	Practice: 2
Unpaid meal balances	District A		District B	
	Written: 0	Practice: 2	Written: 0	Practice: 2
	District C		District D	
	Written: 0	Practice: 2	Written: 0	Practice: 2

Water availability. All four focus districts reported during the interviews that water was available all day to students. This means that the three districts which did not have a written policy for making water available throughout the school day did have strong practices implemented in schools. District B earned a strong policy score for the language: “Students and staff will have access to safe, fresh drinking water throughout the school day”³⁴. This was the only district for which there was not a gap between policy and practice for a district-led practice. District B’s food service director did report during the interview that: “in the pre-school they have reusable water bottles in all the classrooms to encourage water intake... and they let the students use the water fountains whenever they ask. It [consumption of water throughout the day] is encouraged and available” at all school levels. However, for the other districts, the gap appeared as water availability was not specified in the wellness policies but strongly implemented in schools. District A’s food service director stated that there is water available throughout the school day and District D’s food service director confidently answered that students have access to water fountains and filling stations during the school day. District C’s food service director also stated “yes, and we encourage it” to the question regarding water availability.

Fundraising during school hours. 3 out of 4 districts had strong policy language for fundraising during school hours. District A’s policy had weaker language than the rest and therefore scored a 1. Their policy states: “...the District strongly encourages the sale or distribution of nutrient dense foods for all school functions and activities.”³⁵ The use of the word “encourage” designates the language as not required. A stronger policy reads like that from District B: “All sources of food sales to students at school must comply with the Connecticut Nutrition Standards for Food in Schools including, but not limited to, cafeteria a la carte sales,

vending machines, school stores and fundraisers.”³⁴ District B’s use of the phrase “must comply”³⁴ **requires** that fundraisers be regulated in this way and therefore scored a 2.

The interviews showed that each school district is implementing strong practices for fundraising during school hours. District A’s food service director explained that there are no fundraising activities allowed during the school day. This practice is scored as a 2 because it guarantees that there is no access to non-certified foods through fundraisers. In District D the food service director reported that “all food and beverage based fundraisers come through me and I have to approve them to make sure that they are compliant,” this also scores a 2 because the food service director previously stated that all approvals are made based off the stringent CT nutrition standards. The other districts reported similar practices for approving in-school fundraisers.

Unpaid meal balances. None of the four focus schools had appropriate wellness policy language for handling unpaid meal balances and, therefore, all scored a zero. Districts B and D did not have policy language for an unpaid meal balance practice while districts A and C had language in their wellness policy calling for alternate meals to be provided to students who had certain levels of unpaid meal balances. In district C, the charging policy reads: “on those occasions that a student does not have money, they will be offered an alternate meal ... alternate meals include... a cheese sandwich, one side item, and milk...”³⁶. For district A the policy reads: “In the event a student has reached the charging limit of -\$10.00, they will be offered an “alternate meal” ... such a meal would consist of a cheese sandwich with fruit and milk ...”³⁷.

During the interviews, specific attention was paid to the food service directors’ answers to SM4 on the WellSAT-I. It was found that all four districts had strong practices for handling unpaid meal balances and that the two districts, A and C, did not practice their stigmatizing

charging policies in the actual schools. District C's food service director was clear that "Our policy says that they will be [provided an alternate meal] but we don't [provide alternate meals]. *We don't ever want to deny a child a meal, that's the most important thing.*" District A's food service director explained that "every student is allowed a single reimbursable meal each day". Then without further prompting went on to describe: "we don't impose any stress on them for not eating. We never refuse a student a lunch and *we do not hand out alternate sandwiches.*" The food service director finished by saying "the policy actually just changed, we have not and do not do alternate meals".

DISCUSSION

As predicted, the written policies and practices regarding Smart Snack standards applying to all fundraising in schools during the school day were consistent across the districts. This may be due to the fact that this policy is required by the federal government. Further, this study took place in Connecticut, a state that does not allow any exemptions for food-based fundraisers; in other words, all food sold during the day for fundraisers must meet Smart Snack standards^{24,38}. Therefore, the finding that all but two of the 34 districts coded have policy language at least recommending, if not requiring, in-school fundraisers to meet competitive food standards, aligns with both the federal and state requirement.

Policies for unpaid meal balance practices were found to be vague throughout the 34 coded districts. This is a complicated issue for schools as they need to set a way to handle negative charges while also designing their practices with the best interests of the students in mind to avoid creating a negative environment for them at school. Both areas need to be satisfied for the language or interview answer to earn a strong score because trends have shown that districts respond to the need for a charging policy with stigmatizing practices that can be unfair

and unhealthy for students^{25,26,29,30}. These practices have been shown in some cases to be purposefully implemented to shame the students' parents as an incentive for them to pay the negative balance on their student's account²⁹. Substitutions of meals like this stigmatize students as they are overtly identified in front of their peers²⁹. Substituting a federally regulated meal with a lower quality one also limits the nutritional value of the food with which the students are provided and this can have a negative impact on student health¹³.

Food service directors and school nutrition programs seem to be taking the potentiality of negative effects into account and providing proper charging services to students. Each food service director who was interviewed emphasized the importance of providing students with appropriate meals and handling the payment for meals directly with the student's parents. It is important for students to remain separate from the money involved in their school meals so they do not feel at fault for their parent's inability to provide them with enough money for lunch. Recently, problems with schools using stigmatizing practices to handle unpaid meal balances has shown up in the national news as communities have come together to pay off lunch debt in order to make schools stop stigmatizing the students^{25,26,27}. This type of attention is likely to play a factor in districts making efforts to develop plans that put the students first. The important steps for schools are to take the time to set up proper communication with parents, so as to communicate any negative charges to them, and to encourage families to take advantage of the free and reduced-price meal programs whenever possible.

It is possible that these stigmatizing charging policies are still written into the wellness policies because the practices changed in the schools and, since neither the federal nor state governments require a specific unpaid meal balance practice, there is no priority to change it in the policy itself. A federal or state requirement can help end these negative and weak practices as

it would require schools to revise their policies thereby forcing them to implement specific practices to attain a positive goal practice during school. Some states are already implementing legislation to control and end meal shaming against students at school through requiring specific practices to be implemented^{28,29}. In the least, further legislation would guide each school's policy language to be stronger and, through this process, the districts can better match their practices to the policy. Strong policy language has been shown to help predict that strong practices will be used in schools¹⁴.

The Gap. The findings from this study document that there is a gap between written policy language and in-school practices. This is a problem because without a strong and comprehensive policy, stakeholders will not be privy to the practices implemented in schools and schools within a district will not have uniform guidance. The district-led practices pertaining to water availability and unpaid meal balances had poor representation in the 34 district policies, with few policies providing strong language. However, the interviews returned strong scores from each of the four focus schools and for each section. A gap even appeared between the policy language and practices for the federally guided provision for fundraising during the school day which shows it is possible for weak policy language to be used for federally guided practices.

It is possible that this gap forms due to a lack of proper communication and coordination between faculty and district leadership¹⁴. During multiple interviews, food service directors spoke to the difficulty of making official changes in curriculum and programs. Often, they understood the problem to be either a lack of funding availability or their program was not prioritized for discussion in district meetings. In terms of water availability, it is possible that there are few written policies for water throughout the school day because it is overlooked as a

commonality. It is assumed that some schools do not include an unpaid meal balance practice description in their policy because they qualify for the community eligibility provision which provides free meals to all students in the district³⁹. Beyond this program, it is also possible that many schools do not include an unpaid meal balance practice description in their policy because they either do not allow students to accrue negative charges or they do not use a formal method for dealing with unpaid balances. Finally, it stands out that neither of these two practices are federally regulated. Without the formal structure, it is easier for districts to overlook important practices when writing their wellness policies.

With all focus schools implementing strong practices, these results show that in-school practices are adapting and progressing faster than their wellness policies. The gap in policy and practice can be detrimental to the system designed by the federal government for triennial assessments as these assessments will not accurately analyze each district's practices unless the assessments take the time to analyze **all**, federal and district-led, practices as they happen in schools. The gap also shows a weakness of the WellSAT 3.0 in that its use of solely analyzing the strength of district wellness policies can only give results as to the strength of the policy and may not be able to accurately represent the strength of actual practices. This study provides valuable background information to why district wellness policy development is important as government assessments do not naturally include deep-dive interviews with school faculty. Schools need to maintain their wellness policies so they are directly associated with their practices. This way they can be properly evaluated, can continue to qualify for government programs, can set guidance for future employees, and provide important information regarding their practices to stakeholders in the public.

Limitations. There are several limitations to this study. First, with the use of interviews, it is hard to ensure that each person is responding completely truthfully and to the extent of their knowledge. It is likely that some of the interviewees will be hesitant to share some of their practices during the interview. It is hard to completely remove the sense of policing that comes with evaluating a school for following federal law, even though most of the questions during the interviews will relate to programs that are not defined by law. Therefore, a potential weakness of this research design is receiving biased interview results, which will thereby skew the comparison between the strength of the policy and the strength of the practices.

Second, this study only included interviews from four districts due to both the design of the State Department of Education's evaluation strategy and the limited time frame for conducting research for this thesis. This limits the generalizability of the results; these findings may not be applicable to other schools or districts with similar variables. Finally, this study focused on 34 districts in Connecticut and, while it adds depth to the state evaluations, it does not represent all Connecticut school districts. Nor may it present generalizable results for out of state schools.

IMPLICATIONS FOR SCHOOL HEALTH

Federal and state guidance and regulations for school wellness policies have evolved substantially over the past 15 years and will continue to develop. As standards change and new requirements are put in place, districts will be able to better implement certain practices. New areas of importance are coming to light as seen with the recent movements toward encouraging schools to recognize best practices in their policies and states enforcing certain guidelines. New York's legislation in 2018 regarding meal shaming is an example that, as new problems are noticed and researched, movement towards solving them can begin²⁸. This study shows the

importance of encouraging districts to update their wellness policies regularly as a gap is clearly forming between the policies and practices. Maintaining strong policy language allows for easy transitioning for new faculty and reliable wellness practices for the students. Districts may need to be encouraged to ensure that they have included all of their best-practices into their written policies.

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APPENDIX

A: Interview questions derived from the WellSAT

USDA Nutrition Standards

1. SM1 Interview – Food Service Director
 - a. Have there been parts of the Healthy Hunger-Free Kids Act (HHFKA) regulations for meals (breakfast or lunch) that have been challenging to implement?
 - b. Are there features of the district’s meal program that are not yet in compliance?
 - c. Which features?
 - d. Which practices do you use instead?
2. SM2 Interview – Food Service Director
 - a. Does the district offer breakfast?
 - b. If yes, is breakfast offered every day?
 - c. Is breakfast offered to all students?
 - d. If no, how are the eligible students decided upon?
 - e. If eligible due to anything inherent (rather than on a signup basis), how is the privacy of these students protected?
3. SM3 Interview – Food Service Director
 - a. How does your school ensure that children who are receiving free/reduced meals cannot be identified?
 - b. Can you give an example of a couple ways that you ensure privacy?
 - c. How confident are you that it is not possible for the students to identify those who qualify for free or reduced lunch?
 - d. How confident are you that the students receiving free/reduced meals do not perceive themselves as identified?
4. SM4 Interview – Food Service Director
 - a. How does the district handle unpaid balances?
 - b. Follow up questions to determine if student is stigmatized:
 - i. How are the student and parents notified?
 - ii. Is the student identified in the cafeteria?
 - iii. How is the student identified? (stamp, carry a card, sit in a specific place, etc.)
 - iv. Is the student refusing a meal, given a different meal, or given the regular meal?
5. SM5 Interview – Food Service Director
 - a. How are families provided information about eligibility for free/reduced priced meals? (If district provides universal free meals, score 2)
6. SM6 Interview – Food Service Director

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- a. Are specific strategies used to increase participation in the school meal programs?
If yes, please describe.
 7. SM7 Interview – Food Service Director
 - a. How long are the breakfast (if applicable) and lunch periods?
 - b. Within that time, how much time do students typically have to sit down and eat their meals?
 - c. Do students who receive free/reduced price meals have equal time as other students?
 8. SM8 Interview – Food Service Director
 - a. Is free (i.e., no cost to students) drinking water available to students during meals (i.e., do not include water for sale).
 - b. Follow up questions can include: Does the cafeteria have water fountains?
 - c. Are there a sufficient number of working water fountains?
 - d. Can students take water back to the table or do they need to drink at the fountain?
 - e. Do students perceive the water and fountains to be clean and safe?
 9. SM9 Interview – Food Service Director
 - a. What is the frequency and amount of training provided to the food and nutrition staff?
 - b. Does it meet the USDA Professional standards? (see below).
 10. SM10 Interview – Food Service Director
 - a. Are you familiar with the farm to school program?
 - b. In your district, is it a priority to procure locally produced foods for school meals and snacks?
 - c. If yes, what efforts are made to increase local procurement?
 - d. Are strategies used in the cafeterias to promote them?

Nutrition Standards

11. NS1 Interview – Food Service Director
 - a. Are there any foods that are not part of the school meals (known as competitive foods) that are sold to students during the school day? If yes, how confident are you that all of these items meet Smart Snacks nutrition standards?
12. NS2 Interview – Food Service Director, Principal
 - a. Do you know where to access the USDA Smart Snacks nutrition standards to check and see if an item can be sold in school during the school day? Can you tell me how you do this?
13. NS3 Interview – Food Service Director
 - a. Are there competitive foods/beverages sold a la carte in the cafeteria during the school day? If yes, how confident are you that all of these items meet Smart Snacks nutrition standards?
14. NS6 Interview – Principal / Food Service Director

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- a. Are there food or beverage fundraisers that sell items to be consumed during the school day? If yes, who is in charge of approving in-school fundraising activities? How confident are you that the people conducting fundraisers understand Smart Snacks nutrition standards?
 - b. How confident are you that items sold in fundraisers meet Smart Snacks standards? (Note: Some states have passed regulation permitting exemptions from the federal law prohibiting non-Smart Snack fundraisers during the school day – this is addressed in the next question)

15. NS9 Interview – Principal

- a. How often do food-based celebrations occur during the school day in elementary schools (e.g., birthday parties, holiday parties)?
- b. Does the district have nutrition standards (such as Smart Snacks) that regulate what can be served?
- c. How are these regulations communicated?
- d. How confident are you that the regulations are followed consistently?
- e. If food-based celebrations are not permitted, how confident are you that they do not occur?

16. NS10 Interview – Principal / Food Service Director

- a. Are foods or beverages served (not sold) to students after the school day on school grounds, including before/after care, clubs, and afterschool programming?
- b. Does the district have nutrition standards (such as Smart Snacks) that regulate what can be served? How are these regulations communicated? How confident are you that the regulations are followed consistently?

17. NS11 Interview - Principal/Food Service Director

- a. Are foods or beverages sold (not served) to students after the school day on school grounds, including before/after care, clubs, and afterschool programming?
- b. Does the district have nutrition standards (such as Smart Snacks) that regulate what can be sold? How are these regulations communicated? How confident are you that the regulations are followed consistently?

18. NS13 Interview – Principal / Food Service Director

- a. Do students have consistent and easy access to either no-cost water or bottled water for purchase throughout the school day? If yes, how?
- b. Do students have access to no-cost water? If yes, at which times during the day?
- c. Follow up questions: Are students are permitted to carry water bottles with them throughout the school day? Are there are water fountains or free water filling stations throughout the school? Is bottled water is for sale during the school day?

Wellness Promotion and Marketing

19. WPM1 - Principal / Teacher

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- a. Are school staff encouraged to model healthy eating and physical activity behaviors in front of students? If yes, how does the school encourage this behavior?
 - b. Examples:
 - i. Provides staff with opportunities to eat healthfully such as subsidized fruits, vegetables, and water in the cafeteria or lounge.
 - ii. Advises staff not to consume sugary drinks at school.
 - iii. Encourages teachers to be active with students.
20. WPM6 - Principal / Food Service Director
- a. Are marketing strategies used to promote healthy food and beverage choices in school? If yes, what foods and beverages are promoted, and how is it done? (Examples of promotion include advertisements, better pricing, and more accessible placement of the healthier items).