

Superintendent Perspectives on Local School Wellness Policy Implementation

Summary of Findings Report November 2018

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Executive Summary

Background

Schools present a unique environment to improve the health and well-being of children. Since the 2006-2007 school year, the United States Department of Agriculture (USDA) has required that all school districts participating in the federal Child Nutrition Programs develop and implement a local school wellness policy (LWP) that sets forth nutrition and physical activity goals for students (see [Appendix A](#) for more details on the rule). School administrators, particularly superintendents, play a vital role in successfully implementing LWPs and are cited by school professionals as being a critical stakeholder group. Yet, few studies in the literature have examined superintendents' perspectives and experiences with implementation, particularly since the LWP final rule.

Method

This report summarizes the findings of qualitative focus groups and interviews with superintendents and assistant superintendents [hereafter referred to together as superintendents] conducted between March and July 2017. Superintendents were asked about their perspectives and experiences with LWP implementation, evaluation, and reporting. Focus groups took place on March 1-2, 2017 at The School Superintendents Association (AASA)'s annual meeting in New Orleans, Louisiana. AASA is a professional organization that includes over 13,000 superintendents, chief executive officers, and senior school administrators. Six focus groups were conducted with a total of 39 participants from 22 different states across the United States. In addition, key informant interviews were conducted between May and August 2017 with 14 participants who had previously participated in focus groups. Additional information on the sample, methods, and interview guides can be found in Appendices [B](#), [C](#), and [D](#).

Key Findings

Key findings and highlights from this report include:

- Superintendents reported that overall LWP implementation and acceptance of changes improved over time; a wide range of positive improvements to school wellness environments were reported
- Wellness approaches extended beyond the LWP to include the social emotional learning (SEL) of students and staff wellness initiatives
- Superintendents played many roles during LWP implementation; roles and responsibilities varied by district size
- Challenges were noted with evaluation of LWP implementation outcomes
- Superintendents reported the strong role of state law, technical assistance, and other creative partnerships with outside organizations that facilitated LWP implementation
- Superintendents noted concerns about food and beverage marketing, yet a wide range of marketing and fundraising practices were reported

- 'Flexible' school meal standards will likely not drastically change current school meal practices
- Superintendents identified barriers to LWP engagement and provided recommendations for how to support district leaders to engage with LWP implementation
- Recommendations also included addressing issues associated with accessing wellness-promoting environments in home and community environments, as well as wellness education for parents

Background

Schools present a unique environment to improve the health and well-being of children, given the influence and contact they have with students.¹ Since the 2006-2007 school year, Congress and the United States Department of Agriculture (USDA) have required that all school districts participating in federal Child Nutrition Programs develop and implement a local school wellness policy (LWP) that sets forth nutrition and physical activity goals for students.² A LWP is defined as “a written document of official policies that guide a local educational agency (LEA) or school district’s efforts to establish a school environment that promotes students’ health, well-being, and ability to learn by supporting healthy eating and physical activity.”³ The most recent wellness policy final rule requires, at minimum, the following:

- *Goals for nutrition promotion and education;*
- *Goals for physical activity and other school-based activities that promote student wellness;*
- *Nutrition guidelines for all foods and beverages available on each school campus during the school day that are consistent with federal school meal standards and standards for foods and beverages sold outside of school meal programs (i.e., “competitive foods and beverages”);*
- *Policies for food and beverage marketing that allow advertising of only those foods and beverages that meet Smart Snacks in School;*
- *Permission for stakeholders (parents, students, teachers, school food authority, school board, school administrators, and the public) to participate in policy development, review, and updates;*
- *A requirement for the district to inform and update the community about the policy’s content and implementation;*
- *A requirement for the district to periodically measure and make available to the public an assessment on implementation, including school compliance, alignment with model wellness policies, and a description of progress made in attaining the wellness policy goals; and*
- *Designating one or more district and/or school officials responsible for ensuring school-level compliance with the wellness policy.*

School administrators – particularly superintendents – play a vital role in the process of successfully implementing LWPs and are cited by school professionals as being a critical stakeholder group.⁴ A previous study found that administrators play a key role in promoting school health by creating a climate of health.⁵ However, a limited number of studies explore superintendents’ experiences with and/or reactions to LWPs and their engagement with school wellness efforts. Given the most recent final rule, it is important to understand the experiences and perspectives of this key stakeholder group to advance implementation of LWPs in school districts.

Overall experiences with local school wellness policy (LWP) implementation

Superintendents were asked to describe their experiences related to LWP implementation. The following themes highlight participants' overall experiences and reflections related to their implementation efforts.

“On a positive path”

Many superintendents recalled initial resistance to changes to school wellness environments; however, most participants noted that overall, most LWP changes were increasingly accepted by students, faculty, and staff over time. Importantly, most superintendents noted that overall progress with respect to wellness was positive.

- *I still think it's a process and if you asked our teachers, principals, nutrition services folks...They would tell you yes, it's been positive. **Again, it's been a process. I think it's on a positive path.***

This finding is consistent with previous National Wellness Policy Study stakeholder studies that examined school nutrition policy implementation,⁶⁻⁷ as well as with other studies in the literature,⁸ that while barriers were initially noted, over time, students and the school community eventually accepted changes to the school health and wellness environment.

LWP implementation led to improved school health environments

Superintendents described a wide range of positive practices that were anecdotally noted as improvements to the school health environment as a result of LWP implementation. Examples of school practices related to nutrition education, school nutrition, and physical activity were provided.

- *I think its built awareness, so when I see teachers taking a **brain break** or an activity break, which is routine in our elementary classrooms, they realize that kids can't just sit all day. That they need to get up and they'll be more alert and focused if they have a little break and get around and move.*
- *I do think, this is just my personal opinion, that **students are learning about healthy choices** about food, based on the food served to them. So when they go in there, they get to choose certain amounts and it's all good food there. So, I do think it's making an impact, but I have no data to support it.*
- *We've also got a movement going with flexible furniture. We don't buy standard desks and chairs anymore. Instead we have samples of furniture where kids can stand at a café table, they can sit at a small table with a yoga table. A number of different seating options or standing options for them to do their work. **Teachers are finding it makes a huge difference.***

Times have changed: LWPs shifted schools toward a culture of health

In addition to changes with nutrition and physical activity practices, superintendents reported that LWP implementation initiated dialogue in their school districts and communities that slowly led to shifts in a culture of health. As a result, participants described a notable difference in what has become the 'norm' for wellness-related awareness and practices in schools.

- *I think our kids now are...their sense of **awareness on wellness and health is so much better than our generation.** I'll give you an example, we have salad bars in our elementary schools and they'll self-serve...all of the sudden you've got kindergarteners going in there. Now I may have a kindergartener that takes 20 tomatoes and nothing else. I may have another that takes 20 cucumbers and nothing else, but I follow some of the kids around and they eat that. To me, in talking to the kids...[they say] 'yeah I like cucumbers and it's good for me.' Even at a kindergarten or 1st grade level, I think there's just a better awareness.*
- *There's so many things acceptable today that you would have **said absolutely not 10 years ago.** We'll get up as a class and go to the water fountains.*
- *When I started in education, to say 'we're going to provide a wellness week for staff or bring yoga in or recognize that there's anxiety and stress...30-40 years ago you just kind of dealt with it. **'We do education and that's it.'** The change has been remarkable, the message from the district is, 'that's ok to do' and even more strongly, 'we want you to do this.'*
- ***It's a discussion that you wouldn't have had before,** good or bad. Why are we doing this? Why are we not doing this? It's important in the communication part of it.*
- *It's [LWPs] been a catalyst for discussion and has moved us along the pathway that's probably a positive pathway. Not without some resistance and bumps in the road, but **as I said earlier, it's a process. It's an evolution, not a top down edict that you can just wave a wand and it's going to change the world. It takes time.***
- *But I think it really was a **cultural shift,** you see it in food service but also in the culture of your organization. The kids having the bottles with the school logo on their water, water fountains everywhere, and teachers embracing the ball chairs so the kids can move.*

Wellness approaches beyond the LWP

For many superintendents, wellness initiatives extended beyond the LWP provisions, with an emphasis on approaches that were responsive to the needs of their student populations. Participants described 'doing what's right for the children,' rather than focusing solely on wellness mandates.

- ***If you care about kids, you're not driven by mandates.** And if you don't care about kids, you're in the wrong business.*
- *Personally, as a superintendent, I love economics and I know it's all about money, the bottom line. However, **philosophically, I personally have to do what's right for children.** To turn it from red to black because we're losing money, I feel a personal obligation to*

spin it and say to the parents ‘we’ve got to take care of your kids holistically, so they can think and become responsible citizens and have a responsible life.’

- *...Within the sphere of education and public education in America there are all rhetorical battles occurring and divisiveness around funding and around charters and around vouchers, while people are ranting and raving about all that I just want to make sure that time is not elapsing for our students, wherein we are failing to capitalize on opportunities to convince them that making an investment in their own health and...**to promote health is one of the smartest educational investments we can make.***

A ‘whole child’ approach is critical

The most common and ‘hot topic’ approach noted outside of the LWP mandate was related to the ‘whole child,’ with particular attention to the social-emotional learning (SEL) needs of students, which was highlighted as a critical issue by a majority of participants.

- *...Totally resonates with the understanding that kids who are chronically absent are...those are the ones who are ill, maybe they have mental health issues, physical health issues that are impacting their attendance and therefore missing instructional time. That’s the single strongest correlate. If you can get ‘em there [school], everything described about creating that kind of environment is so important in nurturing and welcoming and creating a culture in a school that’s not strictly about academic achievement. **It messages to kids that we care about the whole child.***
- *If we emphasize **working with the whole child**, take a holistic educational approach that we’re in it for the kids. As long as we remember that, we’re mindful of how important, how profoundly important student health is to outcomes but also how central it is to our mission. All of our districts have mission statements that talk about lifelong learning and productive members of society. If people are morbidly obese, or they can solve a complex mathematical equation but **they can’t take care of themselves because we didn’t instill those habits, then we’ve fallen terribly short of what we need to do as educators.***

SEL was reported to be an acute and critical concern from superintendents across low and high poverty school district communities, with a wide range of influences. In higher poverty districts, superintendents perceived that concerns were associated with uncertainties of poverty, hunger, family immigration and legal status; superintendents from low poverty school districts were concerned with academic performance, social media and bullying, among other topics.

Notably, while SEL was a strong concern across superintendents and the ‘whole child’ approach was referenced repeatedly, only one superintendent in the follow-up interviews reported that they had heard of the Centers for Disease Control and Prevention (CDC)’s Coordinated School Health (CSH) or Whole School, Whole Child, Whole Community (WSCC) models,⁹ although many expressed interest in learning more once they were introduced to the framework.

Staff wellness is an important component of the wellness approach

Many participants shared staff wellness initiatives that had been implemented at their districts concurrently with LWP implementation. Often, these initiatives were linked to external organizations – such as health insurance organizations – that provided additional incentives and rewards for participation. Superintendents saw these efforts as an important component of LWP initiatives that emphasized role modeling and promoting the health of all school members.

- *It really is about the wellness of everybody, because **if your staff isn't healthy, they can't meet the needs of kids...**And if we can't help meet the needs of families, then we can't help meet the needs of our students.*

Roles in LWP implementation

Implementation roles: District size matters

Participants were asked to describe their roles and other school professionals' roles in LWP implementation. Broadly, superintendents' roles varied by district size; participants from smaller districts commented that they may be more likely to be engaged in multiple roles:

- *I'm not a typical superintendent in that I run the business office and the grants program. I'm **a lot more involved** than the district down the road, you know, I'm a single site LEA.*

Amongst the larger school districts, superintendents delegated the role of LWP implementation to school professionals to implement, monitor, update and report on changes to the LWP. Described as a “*differentiated approach*,” roles varied based on the component of the policy e.g., school meal components were designated to food service director. In addition, most noted that the designated role at the school level was also responsible for communicating with the wellness committee/health advisory committee at the district level.

- *I think it's more of a team approach. The district nurse has her part, business manager has another part, and the teachers have another part because they're implementing the standards within the classroom setting. So there's not like a person doing all of it. It's a **very differentiated approach**.*
- *Again, I agree. It's always the superintendent, but we have people...there's certainly **layers or levels that help us out**. I would say cabinet member officials as well as assistant superintendent that really do the groundwork of everything. Yes, if it's not implemented correctly, it falls on my shoulders.*
- *It [LWP] just establishes that this is the standard by which everyone is supposed to operate and you have other staff members along the way whose responsibility it is to monitor and implement. You might not need to get involved unless someone reports an infraction or some inconsistencies or challenges, then the policy needs to be revisited...I think in other districts...**smaller districts you're a chance to be a leader, role model, grant writer, leader of the 5k, you know.***

The following table lists the types of professionals at the district and school level that superintendents described as having responsibility for implementation, monitoring, updating, and reporting on changes to the LWP. As noted, these “*differentiated roles*” were more typical in larger school districts compared to smaller districts.

| Table 1. Common district and school positions involved in LWP implementation | |
|--|---|
| District Level | School Level |
| <ul style="list-style-type: none"> • Child nutrition directors • Assistant superintendents • Director of nurses • Office of student and staff wellness • Human resource directors • Student services supervisors • Business managers • District wellness coordinators • Communications directors • Supervisors of special services | <ul style="list-style-type: none"> • Principal/administrator • Cafeteria managers • School nurses & psychologists • Guidance counselors • Health & physical education teachers • Other teachers |

Notably, of the many stakeholders involved at the school level, superintendents cited the school principals as playing a critical role in LWP-related activities.

- *....the buck stops with the principal. We have assistant principals and principals, so building administrators work hand in hand with the staff. So it’s kind of a group effort, but the buck stops with the principal.*

Finally, most participants reported that their district had formed wellness committees or health advisory committees; most of the district/school staff with LWP-related responsibilities were active on the district committee and reported back to the administration and to schools. Superintendents noted that the frequency of meetings varied from monthly, quarterly, and annually. In addition, some noted that their committees reported to the school board if there were proposed changes.

Superintendent roles: “Putting feet to the policy”

Many superintendents described direct involvement with ensuring that the policy was effectively translated into practice. Key activities of “*put[ting] the feet to the policy*” were to effectively engage their faculty/staff, coordinate and delegate implementation tasks, and solicit feedback from stakeholders. In other cases, superintendents more directly asserted their authoritative position.

- *I see my role as being able to show people the gap between what our policy says and our actual practice. Helping us find ways to close that. So celebrating what we are doing well but also finding the one or two priority areas we need to work on further.*

- *Food service directors generally **don't have the same kind of teeth** in their recommendations to principals...I have the luxury in my role of saying, 'I appreciate that you don't like this, but this is what we're going to do and you're going to have to do it. And how can I help you do it or can I send the food service director over to help you understand how to do it.'*

Superintendent roles: Public relations

Another key role that superintendents noted was one of supporting LWP implementation through communications and public relations; for example, by directly addressing concerns with stakeholders (e.g., parents). Superintendents described facilitating implementation by communicating the intentions of the policy, encouraging stakeholders, as well as being the bully pulpit and ensuring wellness was on the agenda.

- *A lot of our [wellness] programs involve parents, so **publicizing those programs** and of course attending [the initiative/event] in order to further the initiative.*
- *I say there are **three things I'm focusing on and that's it**. One of them will always be the wellness piece. That message is reiterated over and over and over again [in reference to bully-pulpit].*
- *So in the background, sometimes I have to **take on the naysayers** to someone who feels that the wellness initiatives stifle their parenting responsibilities. That doesn't happen very often, but it has happened so it's worth noting that at some point, I become the **defender of the policy**. I try to do that in the background though.*
- *Literally, my office is in the school building so if I'm in the **district I have lunch in the cafeteria**...It never fails, sometimes I'll take it to one of the faculty rooms and they'll say 'that looks really good, where did you get that salad?' I'd say 'in the cafeteria. They serve it every day.'*
- *...All strata of personnel are aware of the policy...**if they don't know it, they can't implement it, so I take responsibility.**'*

Dual perspectives of the wellness-academic connection

Superintendents described their perceptions about how LWP implementation holds the potential to improve academic outcomes while at the same time noting the challenges with causally linking LWP implementation with academic achievement and other health-related outcomes more broadly.

Improving wellness environments has the potential to improve academics

Many superintendents described perceptions that improving school wellness environments through healthy meals, activity breaks, and overall wellness efforts can only improve attention, learning ability, and test scores.

- *I think the more data you can provide as evidence...but to be perfectly honest, who doesn't already know that? I mean, sorry, but **are we really doubting that healthier kids***

do better [academically]?...So I think having data to support it is great, but I can't believe that any audience you talk to would have people who aren't believers that the **healthier our kids are the better it is.**

- I believe that **when the butt gets numb, the brain gets dumb.** I shouldn't say it but I will. You need to get up and move a little bit. Especially smaller children, they need a little bit of activity. Especially as the day goes on.
- Many of our kids are on free and reduced lunch, so the fact that they are provided with breakfast, lunch, and dinner...whether that's tangentially related to the wellness policy, I think that has the **positive benefit on academics.** The fact that they get a nutritious meal and snack...Well, **hungry kids don't generally do well.**
- It's more than a coincidence that **higher state testing scores are as strong as they are.** If a student is of better health and they sense that the school is a partner in that process and a welcome place, then they're more likely to come to school and be prepared to take a test. It is clearly indicated that systems that have incorporated wellness activities, such as that which has been suggested by several [participants in the focus group] have a better learning environment and therefore maximizing their results in any assessment that's conducted.
- Also with having water, so many classrooms the kids have bottles of water. Some schools have even bought plastic bottles with the school name on it. So they realize that if children are well hydrated, that their needs are taken care of, **things will go better academically** and they'll be more able to pay attention.

Multifactorial influences on academic achievement: "Really hard to put it as causation"

Despite superintendents' positive perceptions about the potential for LWP to improve academic performance, they also cited challenges with measuring this relationship. Some superintendents noted that this complexity was due to the myriad of interventions that were implemented simultaneously, resulting in multifactorial influences; others described the challenges of having limited capacity to evaluate their LWP initiatives.

- That was one thing I was going to say about my role in this is oversight and evaluation of what we're doing. **How do you determine whether or not it's [LWP implementation] effective either to [improve] academic performance or to anything in general?** Because you're spending time and money on it, so what's the benefit of this policy and practice? We've had conversation about that and we really haven't collected data...we feel like every time we are trying to decide whether that made a difference academically, we look back and go 'yeah but we made these other 18 different changes.' So we haven't really found a way to assess whether or not an improvement, other than maybe physical health but not from an academic standpoint.
- I think it's **really hard to put it as causation** but when you start to look at rising test scores and there are a lot of things, I think it's one of the things affecting that. It's one factor. We can't say 'this caused that' but we can say 'we know we're improving' as

*we've been working on implementing a **wellness policy and [a focus on] the whole child.***

- *I don't think we can disaggregate the data to represent just the health initiatives as the cause of any improvement. Every time we've tried to look at it, **it's beyond our resources and research to determine...is it the new math curriculum making the scores go up or is it the new way to do homework.***

Opportunities for measuring LWP implementation outcomes

A handful of superintendents described evaluation efforts; these examples were unique cases where superintendents cited specific outcomes – related to student attendance and SEL – as a result of LWP implementation.

- *One area where it is quantifiable is, and we've seen it, is attendance. If Johnny knows he's going to have breakfast, he wants to be there and he'll put that added pressure on the parent that may or may not focus on that being important. We've seen, especially when we put it in the classroom, **we've seen increased attendance.***
- *We've also seen an added benefit with the different furniture [for physical activity] and different things for students to use, truancy and particularly **being late to class, has gone down.** They want to get there first because they want to get that piece [of physical activity equipment] they like and get that seat they like. It's those little things that add up.*
- *We're beginning to **collect qualitative data** that it [referring to a mindfulness initiative] is having significant causative impact on student's focus, conduct, building culture in classrooms.*

Notably, many superintendents reported that their districts collected student-level data or that Child Nutrition departments collected data with respect to the school meals program; however, as noted above, few had made links between these data and LWP or other health outcomes.

- *Our district participates every other year in the **Youth Risk Behavior Survey**, [Youth Risk Behavior Surveillance System (YRBSS)], so we have that data and we put that into our strategic plan as one of our key indicators.*

Superintendents' perceived challenges with the evaluation of LWP outcomes is important to highlight, given that the LWP final rule requires an assessment/evaluation plan for the policy, as well as a person with "authority and responsibility to ensure" compliance with the policy.¹⁰ In many school districts, the superintendent may be a natural position to hold responsibility for these roles.

[Role of state law, state technical assistance, and external partnerships](#)

Superintendents paid attention to state laws

Superintendents were asked to describe their familiarity with federal, state, and district LWP-related laws and regulations. While federal laws were mentioned, superintendents most frequently referenced their respective state laws and guidelines in comments about LWP implementation, monitoring, and reporting.

- *In [Southern state], they required a couple years ago everyone to have what they call a SHAC [school health advisory committee]...But every school district in the state has to have something of the nature, that focuses on social-emotional learning.*
- *One of the benefits of being in the state of [Midwestern state] is that they've kind of been one of the states ahead of the curve, in terms of implementing different standards relative to student wellness. Kind of ahead of the federal government. For example, when the nutritional standards were being changed...we were already well on the path so that wasn't too earth-shattering.*
- *I will tell you we've pretty much followed what our state has prescribed for us to adhere to.*
- *I know our state has some specific guidelines towards the amount of exercise students are expected to get a week and then all the government regulations around food. We also include some information in there about bringing food in from outside.*
- *In [Southern state], we have a cupcake law. You do not mess with a parent's right to bring cupcakes on a kid's birthday.*

As described, the superintendent from a Midwestern state noted that because their state law was “*ahead of the curve...*” this was reported to be a facilitator for LWP implementation. On the other hand, another superintendent noted that their state law, described as a ‘*paper tiger,*’ did not strictly require implementation and enforcement; thus many were not incentivized to act.

- *[Midwestern state] has a paper tiger, basically. There's no actual accountability mechanism for it [state wellness law], but the state board of education had adopted a Coordinated School Health policy and I think the actual wording is that schools are 'strongly encouraged' to adopt a Coordinated School Health framework.*

Whether the state law was seen a strong facilitator or a ‘*paper tiger,*’ participants were still aware of and referenced state law and guidelines frequently. In this way, most superintendents were acutely aware of state accountability measures and recommended this as one mechanism to encourage more school leaders to become involved (described further below).

State technical assistance was key

Superintendents were asked to describe the types of resources and partnerships that were utilized during LWP implementation. State agencies were the most commonly reported entities for resources and technical assistance.

- *The **state director does a very good job of disseminating information**, if you have questions you can call him directly. That department does a really good job of getting that information out and working with us on anything we need.*
- *[Northeastern state] has a process where they'll support you through taking a look at your policy, evaluating it against some of the updated standards. I believe that state is in pretty good shape – a few years ago when I was in a previous district and we did our wellness policy, the state standards were higher at the time than the federal.*

Partnerships and grant funding advanced wellness initiatives

Forming partnerships with external organizations emerged as a common strategy to implement wellness initiatives. External partnerships typically took the form of securing services, such as student health clinics and food banks services, or grant funding to purchase equipment or other needed resources for wellness activities. In this way, superintendents reported creative ways that they had engaged local organizations in supporting their wellness initiatives.

- *We've also worked with one of the **state universities**. They have an outreach program, especially for the parent education, with nutrition and physical activity.*
- *We've partnered with a [physical activity initiative] kind of organization. We have a local organization in our city, so **the elementary district has partnered with that group** to try to increase physical activity for the community, but focusing on starting in schools.*
- *It's expensive to eat healthy, in most places. That is an ongoing challenge. One of the pieces we've done is to partner with **non-profit organizations** that have opportunities for large quantities of vegetables and fruits to be purchased at low-cost. We are making sure our parents are aware of those and giving opportunities for that access.*
- *They [local food bank] actually have a **pop-up food pantry** that comes every 2 weeks, but only once a month during the summer. During the school year, every two weeks and we rotate it between our schools. We service about 80 to 120 families based on time of the week and it's all very good food products. You know, nutrition is something the food bank spends a lot of time working on with their partners...We're addressing some of the food insecurity in our community because of the high low-income, or socioeconomic stresses that we have.*

Initiatives were often specific to the resources and organizations available in the local community. Superintendents liked that partners provided evidence-informed resources that aligned with the goals of the school districts' LWP plan. Some partners also provided marketing materials to promote the wellness initiatives to parents and the community, which saved school professionals' time and resources. The following table lists examples of organizations and collaborative efforts that advanced wellness initiatives, as reported by participants. In some cases, superintendents were directly involved with reaching out to partners and writing grants; in other cases, they provided oversight for the designated roles at the district.

Table 2. Partnerships and examples of collaborative efforts

| Type of Partner | Examples of collaborative efforts with external partners |
|--|--|
| Health Services-Related Organizations | |
| Health insurance agency | Participated in insurance agency’s wellness program to reduce health insurance rates [for staff wellness] |
| Mental health center | Partnered to create a mental health center managed by a private company |
| Local health foundation | Obtained grants from local foundations to assist with LWP implementation |
| Local hospitals | Partnered with local hospitals to provide safety equipment, health screenings, or satellite clinics on school campus |
| Local nursing schools | Partnered with student nurses from area colleges to assist with mandated physicals |
| State, Higher Education, and County Partners | |
| State health, child nutrition, and education agencies | Utilized state-level expertise for sample wellness policies and programs |
| University extension | Received nutrition and wellness education curriculum for students and parents |
| County extension | Organized nutrition education for students, e.g., taste testing and nutrition information |
| Other Key Partners | |
| Non-profit organization | Partnered to provide cooking classes for students after-school and parents |
| National organization for physical activity | Received playground equipment |
| Off-site wellness center | Partnered to provide comprehensive wellness activities (eg. physical activity, drug education, healthy eating). |
| Third-party food services management company | Partnered for enhanced purchasing power and assistance with knowledge of federal guidelines |
| Local food bank | Partnered to offer fruits and vegetables to families |

In addition, superintendents utilized external funding to various degrees in their wellness implementation efforts. Grants were obtained from many creative sources to support wellness initiatives:

- *We participated in a PEP [Physical Education Program] grant probably 5 or 6 years ago. A major component of that grant was **devising a wellness policy**, one of the requirements for the grant, so that helped a lot.*
- *We have mini grants offered through the [western state] Department of Education for schools that want to implement a 5k walk or in-class garden. It is limited and when you see, you better get it.*

- *We have two school nurses that have been maintained in our district, a nurse practitioner, a nutritionist, the nurse practitioner and nutritionist are supported by the wellness center which **are both grants from the state and subsidies from outside.***
- *The midwest dairy affiliate with the National Dairy Council, Fuel Up to Play 60 program has been something a lot of us have tapped into. That's included some grant money to **help more of these initiatives forward.***
- *A fitness center from the governors' alliance for health and wellness. It was \$100,000 grant that we received. There were three in the state and we were one of them...Then we also put in a fitness trail and that was from another grant that we got from the [baseball team name]...Both of those things were part of an initiative to pull in the community to our campus and to **involve them in some healthy lifestyle choices** that we are promoting here at the school campus.*

One superintendent noted that partnerships and external grants often replaced or supplemented funds that were formerly provided by state budgets:

- *A lot of districts, as a result of their state governments are strapped...I remember in [state name], and it's been some time ago...there **used to be state resources, incentives, and financial grants** that helped benefit not only student health, but staff and employee health. As **state budgets have struggled** and this and that of course, that gets considered to be some of the low hanging fruit and goes away the quickest, so anything that districts are doing now are really kind of on their own or through the community or community agencies that recognize the importance of health and wellness with kids.*

Perspectives on specific provisions in LWP related to food and beverages

Food and beverage marketing

One of the newer provisions in the LWP final rule, which took effect for the 2017-2018 school year, requires school districts to have a food and beverage marketing policy (see [Appendix A](#)). While the final rule requires that school districts only allow food and beverage marketing that meets the federal *Smart Snacks in School* standards,¹¹ school districts can opt for more stringent policies that: 1) only allow food and beverage marketing that meets nutrition criteria stronger than *Smart Snacks in School* standards; or 2) not allow any food and beverage marketing.

We asked superintendents about their awareness of these new final rule requirements, their perception of food and beverage marketing more broadly, as well as the types of marketing occurring in their respective schools. During both focus groups and follow-up interviews, we showed visual examples of food and beverage marketing ([Appendix E](#)) to facilitate discussion.

Superintendents were not aware of the LWP final rule food and beverage marketing provision

The majority of superintendents were not aware of the LWP final rule requiring districts to have a food and beverage marketing policy. Most reported they did not have a marketing policy as a provision of their LWPs; only a few participants were able to recall their specific policy.

Superintendents expressed concerns about food and beverage marketing in schools

The majority of superintendents agreed that food and beverage marketing allowed companies to target students who are consumers of their products. Such practices were reported to have potentially harmful impacts on students' health.

- *Just to repeat it [food and beverage marketing] is **insidious and evil** and must be combatted.*
- *Because they're getting a foothold in the school. If you want to make a lot of money, you get yourself in with kids, with parents, and it's junk food.*
- *I hearken it back to the late 90s when the cigarette companies were giving school districts posters, supposedly to discourage smoking. Holy cow, when you looked at those posters...both my counselor and I, I was a principal then - said **there's no way we're putting this up in the hallway**. It was a different way to market to kids.*
- *I don't think they [food companies] have student's well-being in mind. I think it's for profit.*

A wide range of food and beverage marketing practices were reported

Despite common perspectives and concerns, superintendents reported a wide range of food and beverage marketing practices in their respective districts. For example, some reported that they do not allow *any* type of marketing regardless of the type of items, which they reported to be easier to enforce compared to making exceptions. Others (noted below) focused on healthier food and beverage marketing, and others had no restrictions or policy related to marketing.

- *We're not allowing that [food and beverage marketing]. That's in part because of our policies about advertising in schools. We have to treat everybody the same, so **if you do one of those, you have to do them all**.*
- *Say we allow [candy company] to come in and put all their flyers out to market themselves, I also have to then let a group that I might not be in favor of come in and market. So a religious group or an anti-political group or a far-right or far-left group. If I let one in, I really can't not let everyone else in. **A zero tolerance policy to say, we don't let anyone in.***

Some superintendents reported that they improved their practices by only permitting healthy food and beverage marketing to align with their LWP practices.

- *Specifically in my district, we wouldn't participate in any of those programs because the marketing component **isn't attracting kids to food we want them to have**...We do not hang up or promote something with [fast food restaurant].*

- *The only change we've made is we do farmer's markets so we're **promoting healthy eating**, it's a positive change to get students more interested in different kinds of fruits and vegetables.*
- *What we do allow [for food and beverage marketing] is what we see is more positive, in terms of healthy food choices.*

Lastly, some superintendents noted no restrictions on food and beverage marketing, with minimal oversight of practices.

- *Sometimes vendors will give donations to help you try and move things. They get some free advertisement out of it and we get something.*

A handful of superintendents described tough decisions to allow food and beverage marketing – as a “means to an end” – due to budgeting shortages in their districts.

- *Obviously it is a marketing tool for [fast food restaurant], but you know what, I just believe if we can get kids to read, it is important that to me especially K-1, 2 and 3 if you can read, you can conquer the world. If you can't read you are going to have a tougher time at it. Whatever we need to do to encourage children to read...so, yeah we are promoting [restaurant] pizzas, but yeah it is **a means to an end** for us that we are encouraging kids to read.*

Fundraising

Superintendents were asked about fundraising efforts that occurred in their respective school districts. The LWP final rule reinforces the requirement that all food and beverage items sold during the school day on school campus must meet *Smart Snacks* standards¹² ([Appendix A](#)).

Fundraising occurred mostly after school hours

Superintendents reported that a notable change in fundraising practices was that most fundraisers occurred after school hours and off school campus.

- *I do not think you would see as much of that any more as maybe you would have five or six years ago. I do think that...now granted there are some organizations for example our band booster club, they'll have a night at the local, let's say [restaurant] or something will donate 10% of their gross sales one night to the band boosters. So we'll send information out to all the members of the band, at least their parents...But **I don't think you would see this in the schools**. So there's the difference.*

The most common fundraisers reported were student and parent organizations partnering with chain and local/non-chain restaurants to hold dinner fundraisers, where a percentage of proceeds would be donated to the school district. While some superintendents noted that

these fundraisers focused on healthier restaurants, others noted that this was not always the case.

- *Yeah, I mean, that seems to be kind of in vogue is these, you know, **10% of all sales at this restaurant go to the school**...but I don't typically see fast food, like around here usually it is [restaurant].*
- *Our PTO has connected with [fast food restaurant] with the concept of putting something on one of our banners outside the building...Their [fast food restaurant] argument, I would assume, is that there is a healthy option. I think the rare times I used to go there, there is some reality to it that there is a healthy option. But in that reality, we all know they're selling a whole lot more french fries than they are bottles of water or fruit cups.*

Superintendents noted that promotions of such fundraising events typically occurred directly to parents through email notifications and not to students, while others noted that such events would be promoted district-wide on campus.

- *Or these business like [restaurant] will have a night where whatever club they're representing can get 10% of kickback from the sale that go on that night. We **don't advertise that through the school**, it generally gets advertised outside the school. Or if it is advertised, it's really just advertised to adults but indirectly it's going to impact kids. They're gonna take their kids, if they have them, to the event.*

During discussions about fundraising activities, a majority of superintendents noted that Parent Teacher Associations/Organizations (PTAs/PTOs) were commonly involved. While most participants reported a process to formally approve fundraising activities for school groups, some noted that often PTAs/PTOs are not required to adhere to such procedures as most fundraising occurred after school hours and they are considered a separate entity from the school district. Superintendents acknowledged that this was a complex issue, as PTAs/PTOs provided valuable funding and thus were hesitant to make changes to such practices.

- *If it is a school fundraiser and the money is going to go to the school there is a process where they have to submit a fundraiser form that has to be approved. But **if it is the PTA doing the fundraiser I do not believe that is the case**...I'm not aware of a district level form that has to be completed and approved for a PTA fundraiser.*
- *Well, I mean it is a funding issue. I mean, **PTAs are a valuable partner** when it comes to funding. I mean there are a lot of things schools wouldn't have if it weren't for PTAs raising funds.*
- *It's attractive to kids and the power of media is obviously at play here. I don't know many kids who don't like [restaurant]. This [restaurant] night, we do it with some reservation. **It's hard to get the PTA to not to want to do this**. When you work with parent-teacher organizations, they want to do this stuff. I think it's bittersweet.*

- *You know, the [baseball team] will say we're going to give you free tickets for this. Well they give you one ticket and a family of four is going to have to buy more tickets. We try to stay away from anything that is for-profit. Now the PTAs, we do allow the PTAs to do that...[restaurant] night, they still do about 3 or 4 of them as a fundraiser. **That's the PTA, we'll let them do it**, but the school themselves, we won't do it...The PTAs might go to [restaurant]. We have stayed away from having these companies come into the schools.*

One superintendent was less hesitant about allowing PTO to hold fundraisers that “*implicitly endorse*” unhealthy practices:

- *The other thing that we have to do is we have to be very conscientious about the decision making we are engaging in at a leadership level, because it is too easy to say, 'oh great PTO has got the [restaurant] fundraiser going'...I **guess we are all going to implicitly endorse that** because we are going to run 1,000 copies and send them home in their Thursday folders so everyone can see [restaurant mascot] and look, '20% of all sales are donated to school'. Yay! What is that on a meal, somebody tell me, is that 12¢? That is awesome. Your budget problems are solved [laugh].*

Child Nutrition Program Flexibilities for Milk, Whole Grains, and Sodium

'Flexible' standards will not drastically change practices

In the follow-up interviews, superintendents were asked if they were aware of the announcement by the USDA Secretary in May 2017 for Child Nutrition Program Flexibilities for Milk, Whole Grains, and Sodium. Briefly, the announcement stated that states may offer exemptions for meeting whole grain-rich components, may continue to meet the sodium target 1 level but were not required to advance to higher sodium restrictions, and finally, to allow low-fat (1% milk fat), flavored milk as part of the school lunch and breakfast programs and as part of the *Smart Snacks* requirements.¹³

Most superintendents commented that despite initial challenges with the revised school meal standards that were required beginning in school year 2012-2013, allowances for 'flexible' nutrition standards would not lead to drastic changes to current practices in their respective school districts.

- *It's almost like if you were required to save energy and they required you to put solar panels on all your school buildings. Then they say now we're not going to require that anymore. Well, **you're not going to rip them out** and say we're going to back an inefficient system that costs us more.*
- *We would stay with the healthier food. **We've come a long way** and...the kids are getting used to it and making those choices.*
- *While I appreciate that thought, it might be easier for districts to have less rigorous standards, **that's not the direction that I think my district needs to go in**, or will be*

going in. I think that given the fact that we live in a food oasis [referring to food desert] where we are it is really incumbent on us who provides two meals plus a snack a day to make sure that the quality of food that these children are getting is top notch, and so we will not be relaxing our standards.

- *I don't see us ever reverting to a world where we are consciously or willfully promoting the consumption of junk foods in school **regardless of what national, state level policy or policymakers promote.***

A few participants noted that some flexibilities with the standards will be welcomed as a relief, particularly for the sodium requirements.

- *It gives us a little more **wiggle room** to make our students happier...I think we restrict them, based on what they eat at home versus what we feed them at school...with less restrictions, I think our students will be happier with the choices.*
- *We support the delaying of moving forward to the next step...**particularly as it relates to sodium**, just because it's been challenging to get to where we've gotten and I think we're at a relatively comfortable and acceptable point.*

Superintendent engagement

Superintendent engagement is an important factor in the successful implementation of LWPs. When asked how superintendents can be better engaged in LWP implementation initiatives, participants noted that while colleagues may understand the importance of wellness in schools, they were not incentivized to engage due to competing priorities and lack of accountability, as well as limited time and resources.

Barriers to superintendent engagement

Barriers to engaging in wellness initiatives

Superintendents noted that many of their respective states required greater accountability measures for non-wellness initiatives, presenting challenges to be engaged or sustain engagement with LWP initiatives. As a result, with the exception of pockets of high socioeconomic school districts, the majority of participants noted that LWPs were not a 'hot topic' at the time of this study.

- *Typically what people want to know or when people are asking questions, wellness is not a top thing on the list. They want to know about **that academic thing you're trying or something you're doing with behavioral issues.** Those are the things that are the top of everyone's list. Not that wellness isn't important, it's just not the hottest of the hot issues.*
- *I would guess that it would have to be higher on the list. With **so many other initiatives** that we're dealing with, I can honestly say that in all my years I've never been in a*

meeting [with other superintendents] that was specifically focused on student wellness, or even that it came up in conversation.

- *To me, time is the biggest [barrier]. **Time and finances.** So just where do you fit in the day with so **many competing interests**. Where do you find funds to integrate on a larger scale into classrooms. Where do you have the time and energy to equip the teachers to be able to deliver a quality program. It's just...can only fit so much into the school day.*

Two superintendents noted that the challenges of moving wellness up on the priority list were related to the lack of accountability required for LWP implementation, particularly at the state level. This is consistent with the aforementioned theme that superintendents were acutely aware of state laws and accountability measures.

- *I know for a lot of my peers, everything we're focused on is about student achievement and improving test scores **because that's how we're being graded at the state level.** Any policy or practice is really a second thought, an afterthought, because I have stay focused on academic achievement...so I think about wellness, but a lot of my colleagues would be like, that's just kind of a checkbox. What do I need to do, **what's the bare minimum I need to do?** If I can't tie that directly to student achievement, I don't want to put a lot of energy and effort into it. I just need to do whatever I'm mandated to do.*
- *What gets measured, gets done and basically when your schools are going to judged on...Other than the school lunch program, which also has very strict guidelines that obviously the **state actually comes in and monitors**, there's not the level of monitoring or the level of data collection to get feedback that results in...and I'm glad there isn't...that results in these if you don't make this then this kicks in type of thing. I think the best way to put it is, **what gets measured gets done**, and this is not something that gets measured, with the exception of the federal lunch program.*

Superintendents' recommendations for strategies to promote engagement

Superintendents were asked if they had any recommendations to facilitate awareness and engagement with LWP implementation amongst their colleagues.

Link LWP outcomes and goals with academics

As described above, superintendents reported being challenged with linking academic outcomes to LWP implementation for evaluation purposes. Many noted that having access to research linking LWP with academic outcomes would support their initiatives.

- *So, if you can **connect it in your research to academic performance**, if you can disaggregate that data in ways...we don't have the resources to do. That may be helpful to continue the efforts.*
- *Everybody wants to tie the work that you're doing to academics, no matter what it is. Whether it's wellness or...everyone is like, "how does that impact learning?"*

Promote access to best practice tools and resources

Superintendents' perceived challenges with measurement and evaluation of LWP outcomes is important to highlight, given that the LWP final rule requires an assessment/evaluation plan for the policy. Participants noted that it would be helpful to have access to tools and repositories of best practices for LWP implementation. Examples of technical assistance tools and various mediums were provided:

- *So that if someone in the area, three hours away from me, is doing a really great program and I want to learn about it, that's **a landing place for me to go and find out about it**. With a contact, to contact that person and say tell me more about your whatever program. I think often times education lives in these little silos and we duplicate so much of our work because there's no way for us to connect. If we could figure out how to remove some of those silos, that would help us connect in a stronger way.*
- *If you gather **best practices and create an inventory**, one of the things that could be done is promoting the practicality and awareness of what's possible and what's out there. It's not insurmountable. There's a good reason to do it and you can connect it to the evaluation of the principal and not in a negative way. Have it be a lens for public relations.*
- *If there was a **tool we could use that had been vetted**, that would help us evaluate our wellness program, that would be easy to administer to principals and teachers and provide reasonable data to help us gauge over the course of 5 years to say...we're making a difference, we're not making a difference...and where can we make changes. Because the policies that are written for student wellness are pretty similar across the nation, because they're put out often by the school boards association...We have many similarities in our wellness regulations and policies, if you could find ways to assess them...that would be helpful to me.*
- *Yes, [webinars] are one of the best ways because even if something happens and I don't get to watch the webinar live, you can send me a presentation and most of us are up in the middle of night so that's an opportunity to watch it. Or it's a Friday afternoon and I'm going to watch this webinar. It's the way we can put more opportunities for learning into our days.*
- *Send them something that is really engaging that they can watch a **60-second to two minute YouTube** that says how this is going to make their life easier in some way quickly with some quick data points in it, you might get more of a connection.*

Other superintendents noted that wellness could be more broadly disseminated in a targeted manner at conferences where school leaders convene.

- *It's the **largest statewide conference** [Midwestern school administrators conference]... That's the chief business officials, superintendents, and the school boards. That's 800+ school districts...The big thing out there now is crisis training, with all the things going on in the world. There's a lot on technology, a lot on newest laws and regulations. There are*

some things, not telling you there's nothing, but the whole wellness piece is not represented the way it should be.

Improve local and state accountability systems

Superintendents described one way to increase awareness and motivate their colleagues to engage with wellness is to ensure more accountability measures at the local and/or state level. As noted above, participants were highly aware of state accountability measures but noted that this was lacking for wellness-related initiatives. By elevating the topic of wellness to the school board locally and nationally, the participants noted that it would become a higher priority.

- *I suggest that you interact with school boards and encourage them to encourage their superintendent with **hiring as well as evaluation to value these activities** [wellness initiatives] as opposed to just counting the number of wins that the football team has...so the national school board groups might be helpful, the National School Boards Association (NSBA) have indicated in my observation that they are interested...because you are certainly accountable, **you are hired and evaluated by your school board.***

Educate Superintendents about wellness

Superintendents noted that they did not receive any formal education about wellness in their graduate and other training programs. A handful of participants noted that promoting wellness in such training programs would enhance awareness about this topic and facilitate engagement.

- *I got a master's degree in education and then an education specialist degree, then a PhD. **I don't recall anywhere**, other than maybe a brief mention in a curriculum class, on the **importance of health education or wellness.***
- *I don't think anybody took a class either, you know when you get yours master's degree or you go on and get your doctorate, but **there wasn't anything on wellness.** It's not a topic...I'm going to teach master's classes for people who want to become administrators and in terms of their curriculum or anything they touch upon.*

Encourage delegation

To address limited time and competing priorities, participants suggested educating superintendents that they can lessen the burden of implementation by delegating activities to the wellness committee and coordinators.

- *I think most superintendents I can think of understand the significance of wellness in their districts...One of the things I offer to my colleagues is the understanding that, **while you need to lead it, you don't have to do it...**For me, that's the most important part of our wellness policy. Who is the coordinator and that the committee is functioning.*

Additional recommendations beyond the school wellness environment

Health equity and wellness

Ensure wellness is accessible for all students

Several superintendents expressed concerns that students faced critical barriers to accessing healthy environments outside of schools. Participants from school districts in higher poverty communities noted several structural and socioeconomic barriers to affording healthy foods, including poverty, food insecurity, and an abundance of unhealthy food retail in the community.

- *I think that there are a lot of students would like to eat better but **because of economic issues they can't**. They just can't. One of the things with being on a [Native American] reservation, I've noticed coming from the outside in, is **that the local grocery has a lot of sugary stuff there. It's easy for them to buy that**. It's hard to get the business part to jump on the bandwagon with our wellness program...Yes, they want to eat better but at the same time, there's barriers that we just can't follow through on it. It has a lot to do with economics.*
- *I see it as a big step, when we talk affluence vs our free and reduced population, I do see that from our affluent population but our free and reduced....it's [restaurant], the cheap food, the gas store foods, it's that type. My fear is that as we move into the future, it's going to be **a continual separation of the haves and the have nots**...Eating healthy is expensive.*
- *That maybe something because of the poverty levels, it's **probably very difficult for families to buy healthier foods** so...we have seen some of our different diverse groups that BMI might be higher too. Sometimes I read it's cultural and we don't know if it is, it's probably due to economics.*
- *We proportionally have more students that are obese but I think it's a **direct function of poverty as well**. If you're in poverty, you can't make the best food choices when you're at the store or using SNAP [Supplemental Nutrition Assistance Program]...Of course, healthier kids are more focused in class and perform better and have higher self esteem.*

Many superintendents described programs that their districts had undertaken in attempts to address these barriers, such as Universal Free Breakfast Programs, Summer Food Service Programs, weekend backpack programs, and partnerships with local food pantries.

Superintendents noted that increases in poverty in their communities, particularly after the 2008 recession, shifted their wellness initiative efforts towards programs that address food insecurity.

- *One of the other extensions of the health and wellness piece is our homeless student population. So in addition to the homeless student population, we also have other students that on the weekends, they may not have healthy meals. We have something called a Power Pack and **these students get a backpack and it has nutritious meals**. We have over 500 students who get those every weekend.*

- *We've gone from free and reduced lunch to **universal breakfast**, but we still have children in our community that are food insecure. When they have their lunch on Friday, they have no guarantee that they're going to eat again until Monday morning. Out of that has arisen, I'm actually in Rotary and our Rotary club sponsors backpacks, which I thought was a local phenomenon but it's all over.*
- *We have **pop-up food pantry** where...we were able to get a grant from [company] to pay for this. They actually have a pop-up food pantry that comes every 2 weeks, but only once a month during the summer. During the school year, every two weeks and we rotate it between our schools.*
- *We live a very high poverty area – 76% of our students district-wide are eligible for free and reduced lunch. In fact, we've implemented a program in our district where every student is eligible for free and reduced lunch [referring to Community Eligibility Provision program], so no one has any stigma attached to them because anyone can have free food whenever they need it.*

Parent and family education

Provide family wellness education

Superintendents also reported challenges with families who they perceived as lacking nutrition and wellness education. Specifically, nutrition practices in the home were noted to undermine the improvements that the school district had made to school food environments. Further, some noted frustrations that the school district was held responsible to educate students about health and wellness topics that were not traditionally under the realm of schools.

- *The most difficult part for us is never the kids, it's the parent education. So, the principal and I are standing outside greeting parents one morning and the **whole family has the [junk food] and [soda]**. The whole family, the father, the mother, and three kids and they're all under 4th grade.*
- *I'll piggyback that, it's funny to me how under the gun public education is, yet public education takes on all of the social woes of society. We have to do all these things, we're not just educating the child in reading, math, and writing. **We're educating all these things that the family used to do**, there's such a family breakdown now that the school is responsible for these things. It falls on the backs of education for us to do all these things.*

Some superintendents incorporated parent wellness education and outreach as part of their LWP initiatives, while others planned to include parent education in future wellness initiatives.

- *I will say that because of these wellness initiatives, we have been more creative in looking for ways to **expose parents and students to healthier lifestyles**.*
- *We have parents that come in and learn how to cook healthy at home because they're on the run so much. Basketball, wrestling, whatever, that they don't really get to sit down and have a healthy meal. That's where the nutritionist comes in, gives them some*

*recipes and how to do it and it helps at home. We can do so much at school and we have those students almost all day, but when they go home, they're gone from us. **So we want to try to help at home too in order for the kids to get healthier and that's what we've been doing for the past couple years now.***

In this study, there was one exception of a superintendent from a highly affluent school district who observed that parents were very conscious of healthy eating and wellness and had no challenges with promoting these behaviors at home. This superintendent noted that while he communicated with parents on a wide range of issues, education about nutrition and wellness was not a perceived need.

Conclusion

This report outlines the experiences and perspectives of superintendents, who are critical stakeholders in the implementation and sustainability of LWP implementation, evaluation and reporting. Superintendents in this study reported that acceptance to LWP implementation improved with time and that they observed a range of positive improvements to school wellness practices and culture. Notably, many reported that their districts' LWP approaches included SEL, 'whole child,' and staff wellness initiatives, many of which were implemented through partnerships and grants from external organizations. Participants were keenly interested in how LWP approaches led to changes in student academic performance; however, they reported challenges with assessment strategies and resources to conduct such evaluations.

This report points to opportunities to respond to superintendents' recommendations for facilitating their roles and engagement in school wellness initiatives, particularly as they relate to evaluation of LWPs. Superintendents are interested in sharing and learning about best practices, tools, and resources to advance their evaluation efforts. Further, some called for improved local and state accountability in order to increase motivations to engage with LWP implementation and evaluation. With the required LWP final rule provisions taking effect for the 2017-2018 school year, it is an opportune time for school wellness advocates, government, and technical assistance providers to address these recommendations. Supporting superintendent engagement is a critical step to ensuring sound district-wide implementation, evaluation, and sustainability of wellness initiatives.

APPENDIX A

USDA Local Wellness Policy Final Rule Summary

Since the 2006-2007 school year, the United States Department of Agriculture (USDA) has required that all school districts participating in the federal Child Nutrition Program develop and implement a local school wellness policy (LWP) that sets forth nutrition and physical activity goals for students.¹⁴ The Healthy, Hunger-Free Kids Act of 2010 prompted adoption of a final rule¹⁵ that renewed and expanded the LWP requirements; the requirements took effect for the 2017-2018 school year.

Under the local wellness policy final rule, wellness policies are required to include, at a minimum:

- Goals for nutrition promotion and education, physical activity, and other school-based activities that promote student wellness after reviewing and considering evidence-based strategies;
- Nutrition guidelines for all foods and beverages available on each school campus during the school day that are consistent with Federal school meal standards and *Smart Snacks in School* nutrition standards;
- Nutrition standards for all foods and beverages provided, but not sold, to students during the school day;
- Policies for food and beverage marketing that allow advertising of only those foods and beverages that meet *Smart Snacks in School*;
- Permission for stakeholders (parents, students, teachers, school food authority, teachers of physical education, school health professionals, school board, school administrators, and the public) to participate in policy development, implementation, review, and updates;
- A requirement that the district annually inform and update the community about the policy's content, implementation, and any updates;
- A requirement that the district triennially measure and make available to the public an assessment on implementation, including school compliance, alignment with model wellness policies, and a description of progress made in attaining the wellness policy goals; and
- Designating one or more district and/or school officials as wellness policy leadership who are responsible for ensuring school-level compliance with the wellness policy

Incorporated by reference into the final rule are two regulations that are independently required by all districts that participate in the National School Lunch and School Breakfast Programs: (1) Nutrition Standards in the National School Lunch and Breakfast Programs,¹⁵ (effective school year 2012-13) and (2) *Smart Snacks in School*¹⁶ (effective school year 2014-15).

Food and beverage marketing guidelines

One notable update to LWPs was the addition of the food and beverage marketing provision. Marketing is defined as “advertising and other promotions in schools,” commonly including “oral, written, or graphic statements made for the purpose of promoting the sale of a food or beverage product made by the producer, manufacturer, seller, or any other entity with a commercial interest in the product.” For the first time, the USDA now limits unhealthy food and beverage marketing on school campuses to allow only items that meet *Smart Snacks in School* standards. Specific highlights to note include:

- The provision applies to: exterior of vending machines, posters, menu boards, coolers, trash cans, and other food service equipment, as well as cups used for beverage dispensing.
- The provision does not apply to: clothing or personal items used by students or staff, the packaging of products brought from home for personal consumption, or materials used for educational purposes in the classroom or as part of a health or nutrition education curriculum.

For school districts with existing marketing boards, such as sports scoreboards, these do not need to be removed immediately but the school should consider replacing or updating them to reflect the marketing guidelines as new contracts are negotiated. Lastly, the final rule makes explicit that states and school districts maintain the discretion to adopt broader or more stringent policies such as those addressing marketing outside of school hours (e.g., evening sporting events) or prohibiting food and beverage marketing on school campuses altogether.

APPENDIX B

Methods

This study included focus groups and key informant interviews with superintendents and assistant superintendents [hereafter referred to together as superintendents] conducted during March – July 2017. The focus groups took place on March 1-2, 2017 at The School Superintendents Association (AASA)'s annual meeting in New Orleans, Louisiana. AASA is a professional organization that includes over 13,000 superintendents, chief executive officers, and senior school administrators. Superintendents who provided written consent to be contacted after focus groups were eligible to participate in follow-up interviews. Follow-up interviews took place from April – August 2017 with a sub-set of the focus group participants.

Sampling and Recruitment

Superintendents who had registered for the AASA annual meeting were sent an email from AASA staff, inviting them to participate in focus groups. Those who responded were assigned to one of six focus group time slots. Using data from National Center for Education Statistics (NCES) Common Core of Data¹⁷ (SY 2013-2014), we further assigned participants based on their school district characteristics, primarily the majority free and reduced price eligibility (used as a proxy for socioeconomic status of the population). This step was taken to create homogenous groups – to the extent possible – in order to facilitate focus group discussions.¹⁸ Additional district characteristics are defined as follows:

- Census Region: West, midwest, south, and northeast, based on Census classifications.
- Locale: Urban (i.e., large-to mid-size city), suburban, rural, and township, based on Common Core of Data classifications.
- Socioeconomic status: The percent of students eligible for free and reduced-price lunch (FRPL) – grouped by tertile – has been used as a proxy for SES within districts.
- District size: Total student enrollment in pre-kindergarten through 12th grade, divided into tertiles.
- Race/ethnicity: Majority white ($\geq 66\%$ non-Hispanic white), majority African-American ($\geq 50\%$ non-Hispanic African-American), majority Hispanic/Latino ($\geq 50\%$ Hispanic/Latino), and diverse (not falling into the previous three categories).

Instrumentation

A focus group guide ([Appendix C](#)) was created with input from USDA Food and Nutrition Service officials. This guide was pilot tested with two superintendents to refine the flow and terminology of questions. The follow-up interview guide ([Appendix D](#)) was created in advance but heavily revised after conducting the focus groups to reflect additional topics that emerged and required further probing. Specifically, questions on personal experiences with implementation and evaluation, and food and beverage marketing were further explored in the follow-up interviews. The follow-up guide was not pilot tested due to time constraints.

Procedures

Six focus groups, each lasting approximately 60 minutes, were conducted with a total of 39 participants at the AASA meeting. Superintendents completed a brief survey before the focus group; moderators ensured that participants had signed the consent form prior to commencing the groups. The consent forms had a box to indicate those participants who agreed to be contacted for individual follow-up interviews. All focus groups were audio recorded with participants' permission and audios were transcribed by a research assistant or a professional transcription service. Superintendents were sent a \$50 gift card following the focus groups for their participation. As noted, following the focus groups, those who had indicated interest were contacted via email to schedule a telephone follow-up interview.

Analysis

Transcripts were uploaded into Atlas.ti v8 for team coding. A coding guide was created using the focus group and follow-up interview guides and iteratively revised throughout team coding. Three analysts, trained in qualitative methods, convened weekly to discuss coding discrepancies, code definitions, and emergent themes. Memos were used to document progress and analysis over the course of meetings. Analysis included principles of constant comparative analysis. Data from focus groups and follow-up interviews were compared to deepen the existing themes and conduct negative case analysis.

Table 1. Characteristics of Superintendents' school districts (n=39)

| Characteristic | N (%) |
|---------------------------------|--|
| Census region | <p>West 6 (15%)</p> <p>Northeast 15 (38%)</p> <p>South 7 (18%)</p> <p>Midwest 11 (28%)</p> |
| Locale | <p>Rural 9 (23%)</p> <p>Suburb 21 (54%)</p> <p>Township 6 (15%)</p> <p>Urban 3 (8%)</p> |
| Socioeconomic status (tertiles) | <p>Low (0-33%) 19 (49%)</p> <p>Medium (34 – 66%) 12 (31%)</p> <p>High (67-100%) 8 (20%)</p> |
| District size (tertiles) | <p>Small ($\leq 5,312$) 28 (72%)</p> <p>Middle (5,313-10,624) 9 (23%)</p> <p>High ($\geq 10,625$) 2 (5%)</p> |
| Race/ethnicity | <p>Majority White 25 (64%)</p> <p>Majority Hispanic 3 (8%)</p> <p>Majority Black 4 (10%)</p> <p>Other 7 (18%)</p> |

Table 2. Characteristics of follow-up Superintendents' school districts (n=14 of the total 39 focus group participants)

| Characteristic | N (%) |
|---------------------------------|---------|
| Census region | |
| West | 3 (21%) |
| Northeast | 2 (14%) |
| South | 5 (36%) |
| Midwest | 4 (29%) |
| Locale | |
| Rural | 4 (29%) |
| Suburb | 7 (50%) |
| Township | 3 (21%) |
| Urban | 0 (0%) |
| Socioeconomic status (tertiles) | |
| Low (3-27%) | 5 (36%) |
| Medium (28 – 57%) | 5 (36%) |
| High (73-99%) | 4 (28%) |
| District size (tertiles) | |
| Small (533 - 2,162) | 5 (36%) |
| Middle (2,196 -4,488) | 5 (36%) |
| High (5,630 – 16,221) | 4 (28%) |
| Race/ethnicity | |
| Majority White | 7 (50%) |
| Majority Hispanic | 3 (21%) |
| Majority Black | 0 (0%) |
| Other | 4 (29%) |

In addition, follow-up participants (n=14) had been employed in a superintendent role from 4 to 29 years with the average length of time as 13 years.

This study was approved by the University of Illinois at Chicago (UIC) Institutional Review Board (#2015-0720) and the University of Connecticut Institutional Review Board (H15-165).

APPENDIX C

Focus Group Guide

Superintendent Focus Group Guide

Introduction

Thank you very much for agreeing to participate in this group. We are researchers at the University of Illinois at Chicago and the University of Connecticut, my name is [MODERATOR NAME] and this is [ROOM ASSISTANT NAME]. It is now [current time] and the group will end at [ending time]. Is everyone able to stay until [end time]? Please let us know if you need to leave for any reason.

As you know, we are interested in hearing your impressions about local wellness policies (LWP) in your school districts. These focus groups are part of a larger study, the National Wellness Policy Study, where we are looking at the impacts and implementation of Healthy, Hunger-Free Kids Act policies. You, as Superintendents and/or Assistant Superintendents, are an important voice in the field of education, and we are very appreciative that you're taking the time to participate in this research.

Ground Rules:

There are a few ground rules I want to cover before we start. First, everyone's opinion is valuable. There are no right or wrong answers, just different opinions. Please allow each person to speak and do not interrupt while someone is speaking or have side conversations. Even if you whisper, it will be picked up by the audiotape and will be disrupting your colleague's voice. Second, if you agree or disagree with a statement by someone, please wait until they are finished speaking and then share. Third, if you're not sure about a question I've just asked, please ask us to repeat or clarify the question. Fourth, please do not share the names of other participants or any comments that you heard in this focus group with others outside of this room. We ask that you respect the confidentiality of our discussion here this morning.

On your consent forms, you've indicated that you are ok with the focus group being audio recorded. I just want to make sure that this is ok? This is mainly for our purposes and will only be heard by research personnel. Your names or personal information will not be disclosed in any of our reporting documents.

[Obtain verbal consent from each participant]

Introductory Questions:

To get started, let's go around the group for introductions.

1. Please tell us your first name and, the state where you work, and how long you've been working in this role as Superintendent or Assistant Superintendent.

Awareness of LWP

First, we want to start with your general awareness and impressions about local wellness policies. Please note that we don't expect you to know all of the answers, instead we want to understand what you're aware of in your roles and what remains unclear.

1. Have you heard about the Healthy, Hunger-Free Kids Act?
 - Probe: [If yes]: Can you tell me what you know about this law?
 - Probe: [If no, provide a brief description]
2. When I say school wellness policy, can you tell me what comes to mind?
 - Probe: Are there any federal guidelines that you're aware of that pertain to school wellness policies?
 - Probe: Are there any state guidelines that you're aware of that pertain to school wellness policies?
 - Probe: What are the required components of the school wellness policy?
3. As you may know, a final rule for wellness policy was adopted last year, have you heard recently about any changes within your district as a result of this?
4. Are you aware of the school wellness policy that your school board adopted at your district?
 - Probe: [if yes]; What are the provisions of the policy? E.g. nutrition education
5. Are you aware if your school district has formed a wellness committee?
 - Probe: [If yes]: Are you involved in the committee? What types of activities is the committee involved in?

Oversight and Reporting

Now, we'd like to hear about any ways that you have been involved with implementation, monitoring and evaluation of your district's local wellness policy and wellness initiatives.

6. What are your responsibilities, as Superintendents, with respect to the wellness policy?
7. Are you aware of who is responsible for implementing the wellness policy at the district level?
 - Probe: What kind of staff person?
 - Probe: How frequently do you communicate with them?
 - Probe: What do they update you on?
8. Are you aware of who is responsible for implementing the wellness policy at the school level?
 - Probe: How does this person communicate with you or the district?
9. Does the district publically report on updates to the wellness policy?
 - Probe: Who is responsible for public updates?
 - Probe: Have you sent flyers, newsletters, emails, website, text alerts?
 - Probe: Have you worked on updating/revising the wellness policy, involving stakeholders, updating the public, establishing policy leadership, evaluating, etc.
10. Does your district collect or receive data about the health of students in your district?
E.g., obesity data

- Probe: How does this influence your wellness initiatives, if at all.

TA and Resources

Next, I'd like to ask you to recall the types of resources you may have seen or used related to wellness initiatives, such as nutrition education, physical activity, as we've just discussed.

11. Have you partnered with any state agencies or other organizations for wellness policy implementation, monitoring or evaluation?
 - Probe: Local/county agencies, non-profits, universities?
12. Have you heard of or used Team Nutrition resources from the US Department of Agriculture?
 - Probe: [If yes] how did this info come to you?
 - Probe: [If yes] How do you use Team Nutrition at your district?
13. What other types of resources or support would be helpful or would have been helpful for your district to implement the wellness policy?
14. What other types of resources or support would be helpful or would have been helpful for your district to monitor and evaluate the wellness policy?

Perceived Benefits & Barriers

Next, we'd like to hear about any positive outcomes or benefits that you've observed as a result of the wellness policy or any barriers you've experienced with implementation.

15. How, if at all, do you feel that changes made as a result of the wellness policy have impacted academic performance in any way?
 - Probe: Data collected? Anecdotes?
 - Probe: Do you think that wellness initiatives have the potential to impact academic performance in the future? How?
16. How, if at all, do you feel that changes made as a result of the wellness policy have impacted students' health in any way?
 - Probe: Data collected? Anecdotes?
 - Probe: Do you think that wellness initiatives have the potential to impact health in the future? How?
17. Have you observed any benefits or positive impacts as a result of wellness initiatives in your district?
 - Probe: Staff health, student knowledge of health, absenteeism
 - Probe: Does the wellness initiative have the potential to impact [Fill in from above] in the future? How?
18. What have been the challenges of engaging with wellness activities as a Superintendent/Assistant Superintendent?
 - Probe: Awareness, cost, time, resources, other mandates or priorities
19. What is your understanding of the Every Student Succeeds Act (ESSA)?
 - Probe: Do you see potential to align wellness initiatives with provisions of ESSA?

20. What, if any, future challenges do you see with sustaining the changes made from the wellness policy?
21. Do you see your fellow Superintendent colleagues engaging with wellness initiatives in their respective districts?
 - Probe: [If no]: What would it take to motivate you and/or your colleagues to be more involved with wellness efforts in your district?
 - Probe: Do you believe fellow Superintendents would be more engaged in wellness initiatives if they personally valued health?

Food Marketing

Next we'd like to shift to a specific wellness policy topic that focused on food marketing.

22. [Show one at a time, 1-5 example pictures of score boards, vending machines, etc that show logos or food ads].
 - Do any of your schools have these types of ads on campus outside of the cafeteria?
 - Probe: Do you consider these examples to be food marketing? Why or why not?
 - Probe: Has your district made any recent changes to the types of food marketing on campus?

Smart Snacks & Meal Patterns [Time permitting]

Lastly, I have some questions about another specific component of the wellness policy, the Smart Snacks and school meals provisions.

23. Have you heard about the Smart Snacks standards? [Clarify, if some are unclear]
24. What recent feedback, if any, have you received about Smart Snacks?
 - Probe: Have you dealt with any issues or complaints? If yes, how did you manage these issues?
25. What recent feedback, if any, have you received about the school meal program?
 - Probe: Have you dealt with any issues or complaints? If yes, how did you manage these issues?

Closing Questions

26. Is there anything else you'd like to share about LWP or wellness initiatives at your school district?
27. Do you have any questions for us at this time?

Thank you so much for participating in this group. We really appreciate your time and contribution to this project. Before you go, please make sure we have your correct address so we can send your gift card.

Appendix D

Follow-Up Interview Guide

Introduction

Thank you very much for participating in the focus group at the AASA conference and thank you again for agreeing to participate in this follow-up interview. My name is [MODERATOR NAME] and [NAME] is also on this call to take notes. This interview will last until approximately [TIME], will you be able to speak until that time? Please let me know if you need to go at any time.

As you know, both the focus group and now this interview are part of a larger study, the National Wellness Policy Study, where we are looking at the impacts and implementation of Healthy, Hunger-Free Kids Act policies. At this time, we're looking to hear details of your personal experiences with implementing local wellness policies (LWPs).

Before I begin, in your consent form, you've indicated that you are ok with being audio recorded. I just want to make sure that this is ok? This is mainly for our purposes and will only be heard by research personnel. Your names or personal information will not be disclosed in any of our reporting documents. Also, I want to make sure that you're aware that there is no additional incentive for participating in this interview, beyond the \$50 gift card you received/will be receiving for your participation in the focus group.

[Obtain verbal consent from participant]

[If participant declines audio tape, switch to note taking]

Introductory Questions:

1. Please remind me how long you've been working in this role as Superintendent/Assistant Superintendent at [district name].
2. Please tell me about your current involvement with wellness initiatives?
 - Probe: What types of initiatives is the district currently working on?
3. Since the focus groups in New Orleans, have you made any new progress or additional changes to your wellness initiatives at the district?

LWP Monitoring, Evaluating, Reporting:

4. Please tell me more about the process of monitoring and evaluating your district's LWP?
 - Probe: What, if any, challenges have you had with monitoring and evaluation?
5. Are there ways that you evaluate the LWP to see how and if it is affecting outcomes?
 - Probe: E.g., academic performance, health etc?
6. Does your district collect health data on students? How do you use the data?
 - Probe: What are barriers to collecting health data in your district?
7. How have changes to the LWP been communicated within the district?

8. How have changes to the LWP been reported to the public (e.g., parents, community members)?

Social-Emotional Learning (SEL) and Whole Child:

9. In the focus groups, many Superintendents spoke about social-emotional learning as a priority in their district. Is social-emotional health a priority issue in your district?
 - Probe: Is SEL a component of your wellness policy?
 - Probe: What initiatives, if any, have you implemented in this area?
10. Have you heard of the Coordinated School Health Approach?
11. Have you heard of the Whole Child, Whole Community, Whole Child Approach?
 - Probe: If yes – In what ways have you implemented this approach at your district?

Perceived Benefits & Barriers:

Next, we'd like to hear about any positive outcomes or benefits that you've observed as a result of the LWP or any barriers you've experienced with implementation.

12. Have you observed any benefits or positive impacts as a result of wellness initiatives in your district?
 - Probe: Staff health, student knowledge of health, absenteeism
13. What have been the challenges of implementing wellness initiatives?
 - Probe: Cost, time, resources, other mandates or priorities
14. What future challenges do you see with sustaining the changes made from the LWP?
15. Are there additional wellness initiatives that your district has not yet explored that you'd like to pursue in the future?
16. How do you envision LWP influencing your students in 5 years? 10 years?

Resources and Technical Assistance:

In the focus groups, we talked about sources of resources or partnerships that Superintendents had used to facilitate wellness initiatives.

17. How, if at all, do you stay updated on research related to school wellness?
 - Probe: Where does your information come from? (Professional associations, news, journals)
18. What would be the best way to connect you with resources linking academic performance with health?
 - Probe: Webinars, conferences, emails
19. In the focus groups, most people said that the responsibility for implementation ultimately falls on the superintendent. What other ways can What do you think would help support sSuperintendents in their role of ensuring LWP implementation? be better supported to engage with LWP implementation?

Additional Topics/Questions

Marketing:

Next we'd like to shift to a specific wellness policy topic that focused on food marketing.

20. [Show one at a time, 1-5 example pictures of score boards, vending machines, etc that show logos or food ads].
- Do any of your schools have these types of ads on campus outside of the cafeteria?
Probe: [if blanket ban]: How did this ban take effect?
 - Probe: Do you consider these examples to be food marketing? Why or why not?
 - Probe: Has your district made any recent changes to the types of food marketing on campus? Do you have concerns about food marketing?

Staff Wellness:

21. Has your district implemented any staff wellness initiatives?
- Probe: Who has promoted these initiatives?

ESSA:

22. How has your district, in any way, connected the LWP and its activities with ESSA goals?
- Probe: What has been the impact of this effort? What kinds of challenges have you faced in this effort?

Closing Questions:

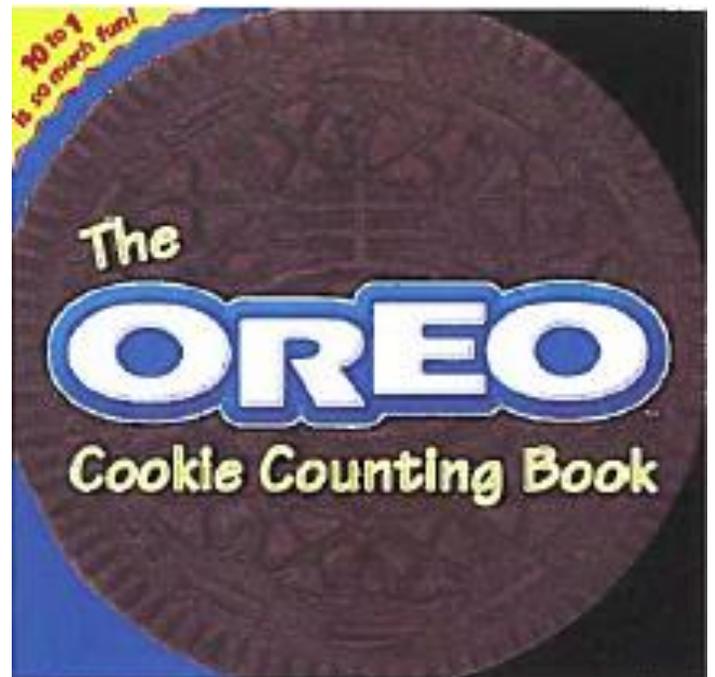
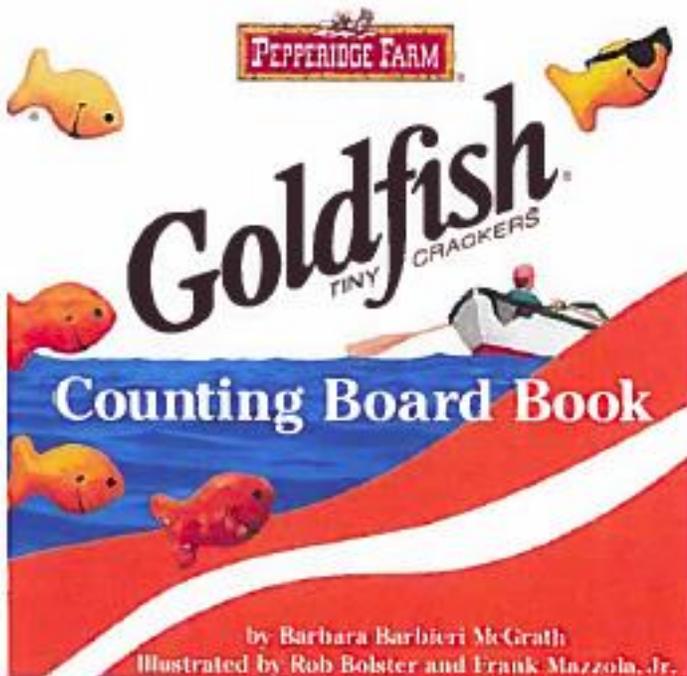
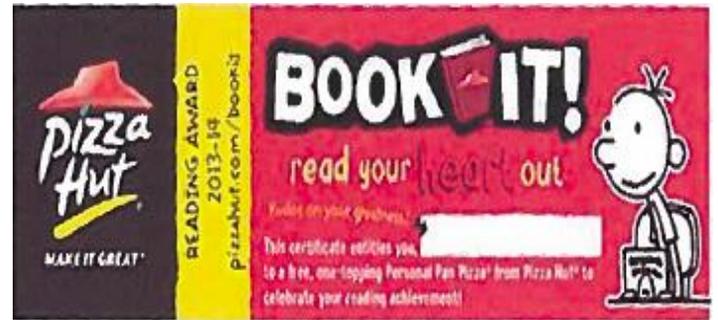
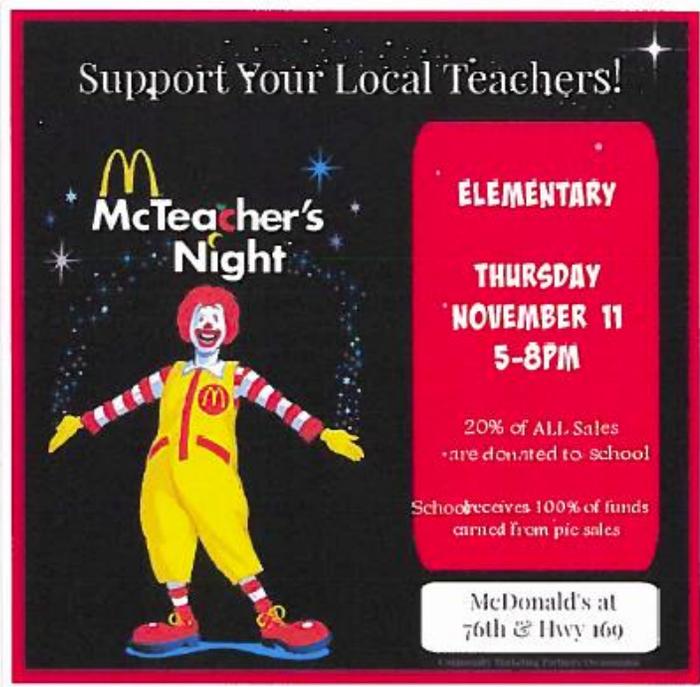
23. Is there anything else you'd like to share about wellness initiatives at your school district?
24. Do you have any questions for us at this time?

Thank you so much for participating in this group. We really appreciate your time and contribution to this project. We will send you a summary of the findings once we complete the analysis.

APPENDIX E

Food and Beverage Marketing Examples

The following visual examples were provided during the focus groups and interviews to facilitate discussions about food and beverage marketing.



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