

LEAF

Linking Education, Activity, and Food

**Pilot Implementation of SB 19
in California Middle and High Schools**

Report on Participant Assessment of the Adequacy of SB 19

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I. Background and Methodology

As part of their participation in the Linking Education, Activity and Food (LEAF) program, participating schools (middle and high schools) were required to adhere to the SB 19 legislation. As such, the teams charged with leading the implementation of LEAF at the participating school districts gained valuable insight into the appropriateness and feasibility of implementing the SB 19 requirements. In order to capitalize on these experiences, LEAF team members were asked to complete a questionnaire in order to evaluate the adequacy of each component of SB 19. The questionnaire was administered to 47 team members (see tables 1-2) from the 9 LEAF districts at a LEAF networking meeting held on May 20, 2004.

School district	# of respondents
A	7
B	5
C	5
D	5
E	6
F	5
G	4
H	5
J	5
Total	47

Position	# of respondents
Coordinator	8
Evaluator	8
Administrator	7
Food Service	6
Physical Education	6
Other*	12
Total	47

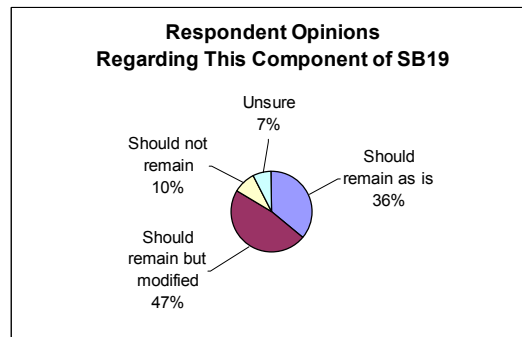
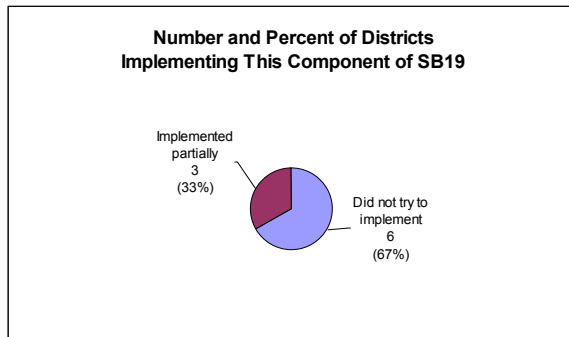
* includes teachers, nutrition specialists, school nurses, etc.

The precoded questionnaire included both multiple choice and open ended questions. Responses to the multiple choice questions were precoded, data was entered, and frequencies for total respondents were generated using SAS. Frequencies were also generated for responses from only food service directors and project coordinators in order to examine whether this particular group expressed opinions distinct from the group as a whole. Responses to open-ended questions were paraphrased, entered into Excel, and grouped by similarity of response. Summaries of the responses were generated by a researcher experienced in analyzing qualitative data.

II. Compliance with, and assessment of the adequacy of, individual SB 19 requirements

Each component of the SB 19 legislation is restated below followed by a summary of the respondents' assessment of the degree to which their district complied with the component and their opinions concerning the appropriateness of the component for inclusion in future legislation.

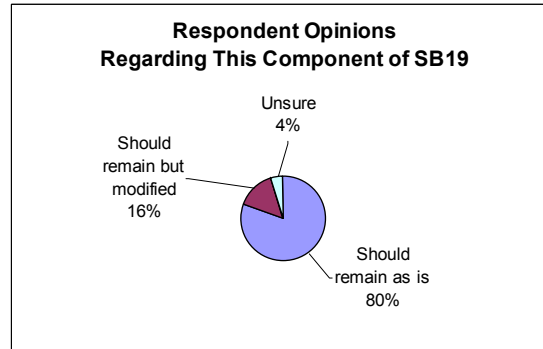
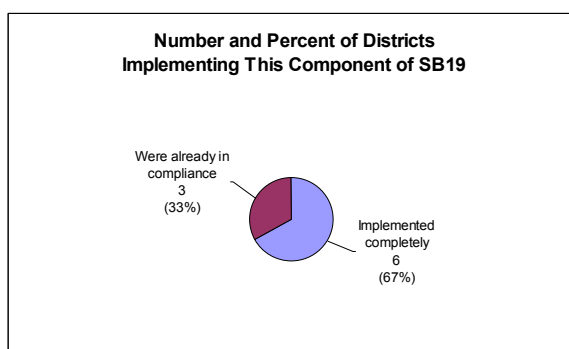
1. Every school may post a summary of the nutrition and physical activity laws and regulations and shall post the district’s nutrition and physical activity policies in public view within all school cafeterias and central eating areas.



► When analyzed separately, food service directors and project coordinators were less likely to recommend modifications (33%) and slightly more likely to recommend that this component remain as is (42%) or not remain (17%) compared to the group as a whole.

None of the districts completely implemented this component of the legislation (primarily because they were unaware of it and/or had not yet finalized their policy). Only 36 percent of total respondents felt it should remain in the legislation as is. Almost half of total respondents, however, felt it should remain in the legislation in a modified form. Although most respondents were sympathetic to the intent of this provision, they did not feel that it was an adequate means to reach the objective of communicating their policies to the public. Specifically the respondents recommended that the policy should not necessarily be posted as is, but rather shorten and simplified for public consumption. They also felt there should be flexibility in terms of how it is distributed and where it is posted. Several respondents mention that posting a policy was an insufficient means of increasing awareness and ensuring enforcement and would therefore need to be linked with other activities. A few respondents felt it was not feasible to post a policy because of lack of space, problems with tampering, too many documents being posted, etc.

2. Districts may convene a Child Nutrition and Physical Activity Advisory Committee (CNPAAC) that shall develop and recommend policies for adoption by the school board.

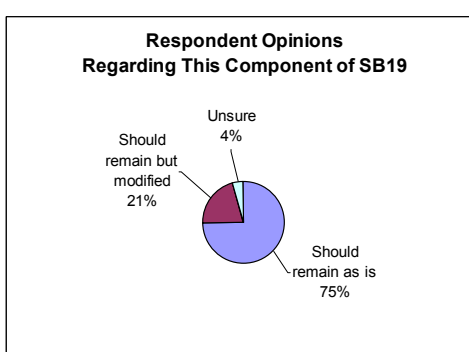
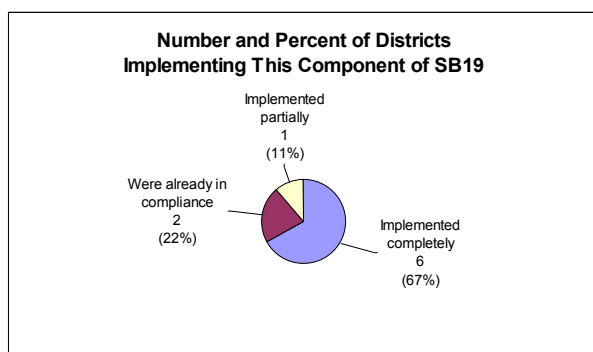


► When analyzed separately, food service director and project coordinator opinions were found to be similar to the group as a whole.

All of the districts implemented this component and the majority of total respondents felt it should remain in the legislation as is. They felt CNPAACs were important to facilitate collaboration, communication, involvement and support from different stakeholder groups. The need for diverse representation of stakeholders was emphasized. The respondents perceived the CNPAAC as an important tool in general and for policy development, sustainability and enforcement in particular. Specific recommendations included the following but none were mentioned by more than one respondent:

- Retain “may” language—committee may not be necessary in all cases
- Connect CNPAAC to Coordinated School Health Task Force
- Make workable for all districts: base administrative procedures on more overarching national recommendation.
- Should become a required committee and meet at least once a year to review policy (1)

3. CNPAAC must include school board members, administrators, food service directors, food service staff, parents, pupils, physical and health education teachers, dietitians, health care professionals, interested community members.



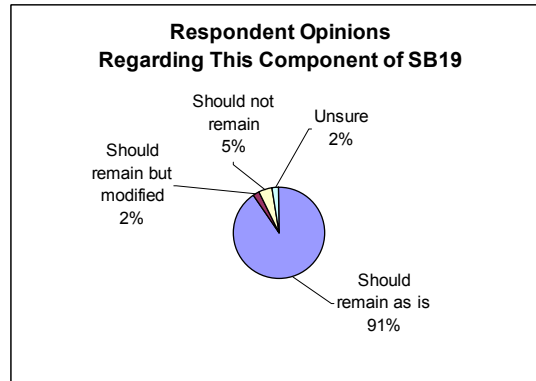
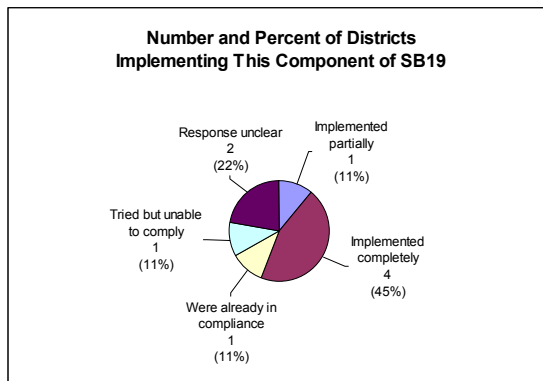
► When analyzed separately, food service director and project coordinator opinions were found to be similar to the group as a whole.

All but one of the districts implemented this provision completely. Some respondents mentioned difficulty in recruiting representation of certain required members due to lack of interest or reluctance of administration to allow staff to participate. The respondents cited the need for a variety of perspectives and representation of all stakeholder groups in order to ensure the policy is well-rounded and successfully implemented. The respondents mention that having adequate representation of the CNPAAC helps improve communication, provides peer validation and provides for checks and balances.

Specific recommendations (and number of responses) for this component included:

- Change “must” to “should” or distinguish between (4)
- Encourage student participation (2)
- Include physical education on CNPAAC/ focus more on physical activity (2)
- Include science teachers on CNPAAC (2)
- Require smaller number of members (2)
- Specify that pilot program implementers must be CNPAAC members (1)
- Needs to be a full-time funded position (1)

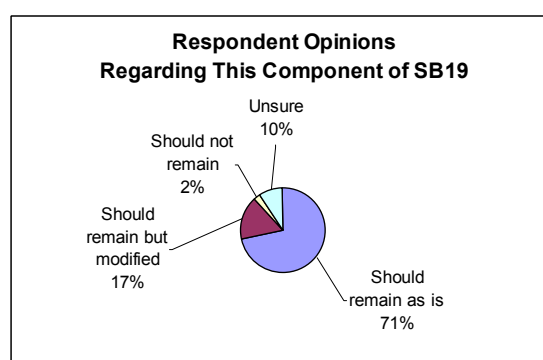
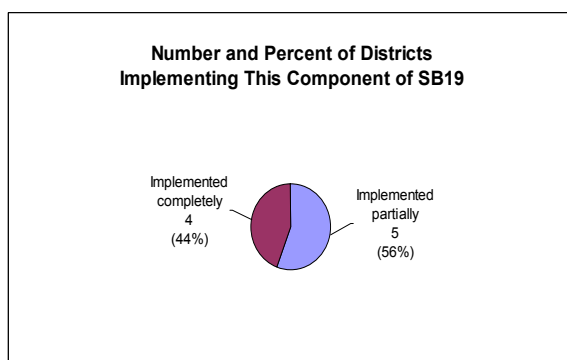
4. CNPAAC must hold at least one public hearing.



► When analyzed separately, food service directors and project coordinators were slightly less likely to recommend that this component remain as is (83%) and more likely to indicate that it should not remain (17%) compared to the group as a whole.

The requirement for a public hearing was strongly supported by the respondents: 90 percent of total respondents indicated that this component should remain as is; however less than half of the districts were able to comply completely with this component. The lack of compliance was primarily due to timing (they plan to hold the hearing at a later date) and/or lack of awareness or clarity regarding the requirement. The respondents reported that a public hearing is important in order to get public input, facilitate collaboration and communication, and ensure that all stakeholders (in addition to those on the CNPAAC) have a voice. One respondent commented that board meetings are already public meetings [and therefore an additional forum is not required]. The only recommendation for improving this component was to increase the opportunities to publicize [the policy].

5. Sale of all foods on school grounds shall be approved for compliance by a person or persons designated by the school district.



► When analyzed separately, food service director and project coordinator opinions were found to be similar to the group as a whole.

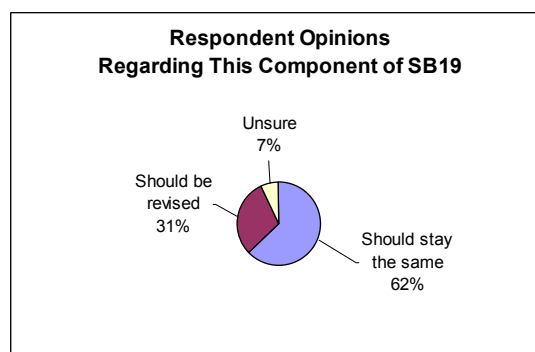
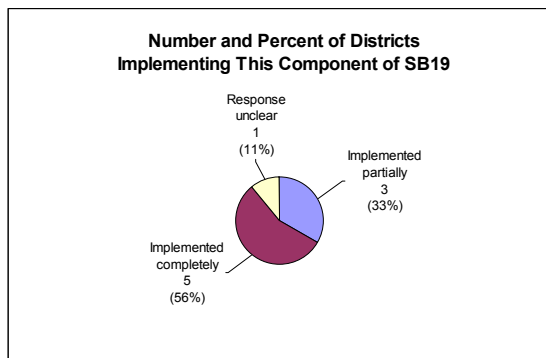
Less than half of the districts were able to fully implement this policy. Barriers cited included the costs involved, the difficulty of getting buy in from everyone, lack of knowledge by those implementing the standards, resistance to change, and reluctance to impose restrictions on others.

However, a majority of total respondents supported this component of the legislation. They recognized the need for enforcement and the value of having one centralized person responsible so that standards are uniformly applied across the district. In particular, one respondent believed this would help relieve the burden on individual principals. Seventeen percent felt that this component of the legislation should be modified. Suggestions for modifications included:

- Provide financial support (for enforcement)
- Ensure that the designated person has adequate authority and support
- Incorporate accountability and consequences
- Require that the Child Nutrition Program approve all foods and beverages
- Be flexible—don't establish a "food police"

Only 2 percent felt certain that this component not be included, primarily due to concerns about lack of funding and effective means of enforcement: it "will have no meaning if enforcement is ineffective."

6. SB19 standards for competitive foods: not more than 35% of calories from fat, not more than 10% of calories from saturated fat, not more than 35% of total weight from sugar.



► When analyzed separately, food service directors and project coordinators were slightly more likely to recommend that this component remain the same (71%) compared to the group as a whole.

About one-half of the districts were able to completely implement this policy at the LEAF schools. Difficulty with enforcement (especially with the PTA, classroom teachers and other fundraisers) was identified as a barrier as well as the difficulty in locating appropriate vendors. However, this component was strongly supported by a majority of total respondents. Sixty-two percent supported keeping this component of the legislation as is. Almost one-third felt revisions were needed and most of these wanted stricter standards. No one definitively wanted this component of the legislation removed.

Recommended additional standards (number of respondents):

- Stricter in general (2)
- Limits on sodium content (4)
- Limits on hydrogenated/ trans fats (3)
- Stricter limits on sugar content (3)
- Prohibit certain types of foods (in addition to nutrient standards), i.e. chips (fried or baked) and electrolyte replacement drinks (2)
- Restrict artificial colors/flavors (2)
- Stricter limits on fat content (1)

- Required levels of vitamins and minerals (1)
- Limits on calories and portion sizes (1)
- Standards for packaging (1)

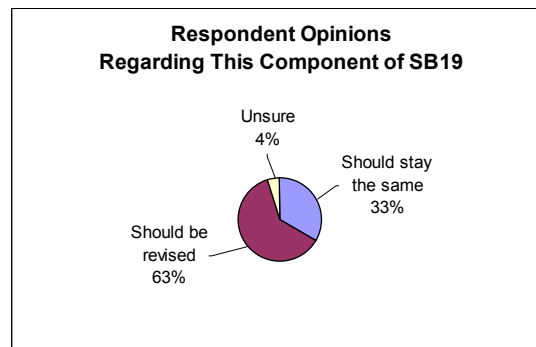
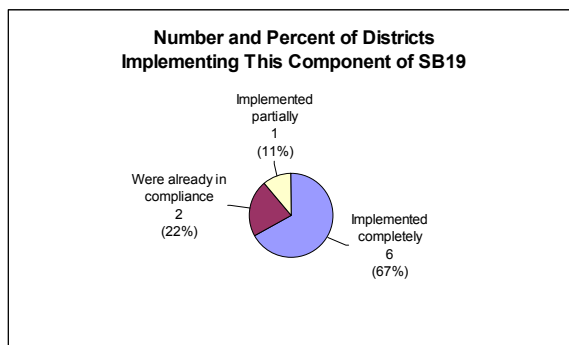
Recommended loosening of standards (number of respondents):

- Increase sat fat limit to 15% for entrees (1)
- Allow sugar substitutes (1)
- Allow non-compliant competitive foods 3-6 times/year (1)
- Phase in over 5-year period: start with elementary, onto middle school and then to high schools (1)

Only 2 comments were made regarding why this component should not be included in future legislation:

- Too strict for entrée items—inadvertently discourages à la carte entrée items and hence increase in snack items
- Challenge of financial sustainability

7. SB 19 standards for beverages: only water, milk, fruit drinks with no less than 50% fruit juice and no added sweeteners; no carbonated beverages; no serving size larger than 12 oz except for water, milk and electrolyte replacement beverages; servings of electrolyte beverages may not exceed 20 oz.



► When analyzed separately, food service director and project coordinator opinions were found to be similar to the group as a whole.

All but one of the districts was able to completely implement this policy. The passage of SB 677 was an incentive. The SB 19 nutrient standards for beverages were strongly supported by the respondents. Although only 33 percent indicated the beverage standards should remain as is, another 63 percent thought they should be revised and the majority of those thought they should be made more restrictive. Only 4 percent were unsure about including nutrient standards for beverages in future legislation and no one definitively opposed beverage standards. Three concerns with the beverage standards clearly rose to the top: allowing for some types of carbonation, restricting electrolyte replacement beverages, and restricting the fat and added sweetener content of milks. One individual expressed concern about the beverage standards given what s/he perceived to be conflicting opinions regarding the health risks associated with various types of beverages.

Recommended additional/more restrictive nutrient standards for beverages:

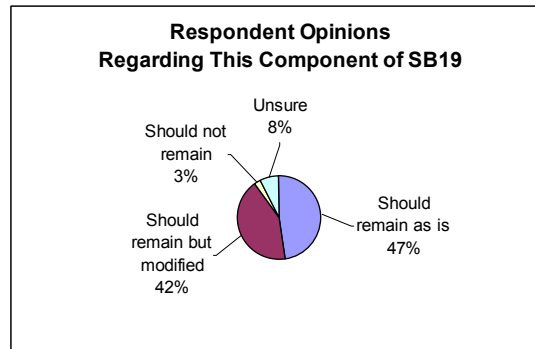
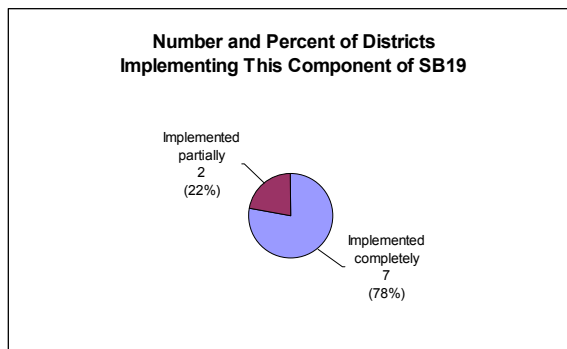
- Limit or eliminate electrolyte replacement beverages (9)
- Add limits on fat and added sugar content of milk (8)

- Limit portion sizes and/or calories per portion (3)
- No artificial colors or flavors (2)
- 100% juice only (1)
- Allow only water during the school day (1)
- Apply standards to whole district (1)
- Prohibit carbonated beverages (except carbonated fruit juice) in K-8; strongly discourage in grades 9-12

Recommendations for less restrictive standards:

- Allow all or certain types of carbonation (i.e. not phosphoric acid) (12)
- Allow added sweeteners in beverages with 50% or more juice (1)
- Allow a few days a year when non-compliant beverages can be sold (1)
- Take existing beverage contracts into consideration (1)
- Allow sugar substitutes (1)

8. The sale of non-compliant foods and beverages on campus only allowed if sale occurs ½ hour before or after school day.



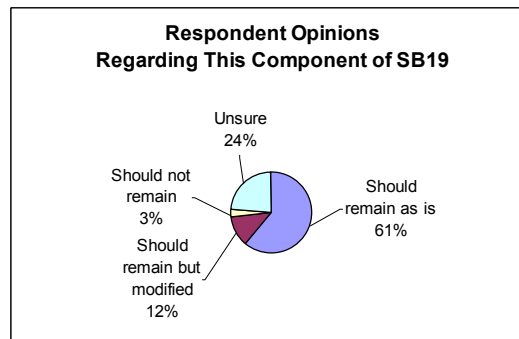
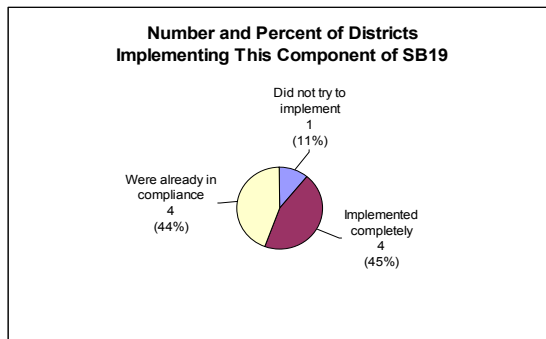
► When analyzed separately, food service directors and project coordinators were slightly less likely to recommend that this component remain as is (38%) and more likely to recommend modifications (54%) compared to the group as a whole.

Most of the districts were able to implement this policy completely and the other 2 implemented it part. The reluctance of teachers to cease candy sales was mentioned. Although less than half of total respondents felt this component should remain, another 42 percent of total respondents thought this component should be retained with modification. Their recommendations tended to support additional restrictions on times when non-compliant foods and beverages can be sold. Respondents indicated this component of the legislation is important because the school should uniformly model and support healthy behaviors. Concerns raised were the difficulty of enforcing the standards and the contradiction implicit in allowing before and after school sales of non-compliant items. However, one respondent thought current language should be retained because it allows after school programs to run snack bars.

Recommended modifications:

- No sales of non-compliant items before school (7)
- No sales of non-compliant items at any time (6)
- Allow sale of non-compliant items for a limited number of fundraisers and after school events (3)
- No sales of non-compliant items any time at elementary schools; limited sales in secondary schools (1)
- Do not allow children to sell non-compliant items at any time, even off-campus (1)
- Use the San Francisco Unified School District provisions (1)
- Provide funding for student activities so they don't have to sell junk (1)

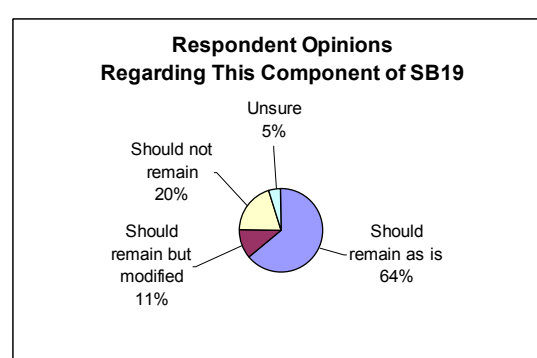
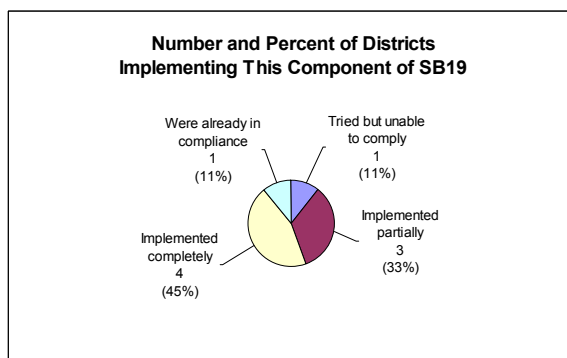
9. The serving sizes of entrée items and side dishes shall no be no larger than the portions of those foods served as part of the federal school meal program.



► When analyzed separately, food service directors and project coordinators were less likely to be unsure (11%) and therefore more likely to recommend modifications (22%), and slightly more likely to indicate that this component should not remain (11%) or remain as is (67%) compared to the group as a whole.

All but one of the districts implemented this policy, and one did not try to implement it at all. Opinions regarding this component were fairly mixed. Although the majority (61%) of total respondents supported the retention of this component, 24 percent were unsure, and 12 percent recommended that modifications be made. Those that supported this wording pointed to the importance of controlling portion sizes. Three respondents recommended the complete elimination of à la carte sales. Several respondents felt it was irrelevant to their district since they already do not sell entrees à la carte. The few who opposed this component felt it was arbitrary and impractical: “if you offer half a portion do you really want to prohibit a larger one offered à la carte.”

10. Fruit and non fried vegetables shall be offered for sale at any location where food is sold.

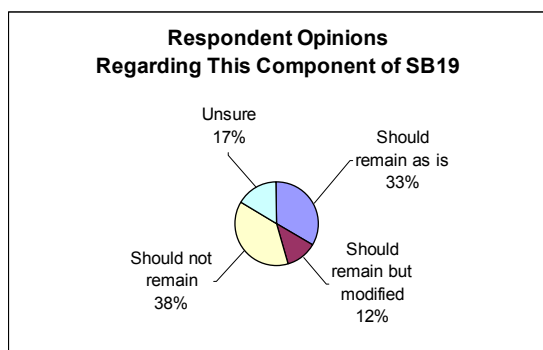


► When analyzed separately, food service directors and project coordinators were less likely to recommend that this component remain as is (50%) and slightly more likely to indicate that this component should not remain (29%) compared to the group as a whole.

Slightly over half of the districts were either already complying with this policy or were successful in implementing it completely. The rest were either partly or completely unsuccessful in implementing the policy. Therefore of all the components of the legislation, this policy

represented the biggest challenge to these districts. Although the majority of total respondents (64%) supported this provision, it received the largest percentage of responses recommending that it not be retained in the legislation (20%). Those who support this component cited concern for children’s health and the need to encourage the consumption of fruits and vegetables by increasing exposure and accessibility. Those who oppose this provision believed that fruits and vegetables do not sell well (7)¹ or are too perishable (4) so it is not feasible, realistic or practical (4) to offer them in every venue. Recommendations included that the provision of fruits and vegetables at every venue should not be mandatory, but rather encouraged (4), that the legislation specify “fresh” fruit (1) and that competitive food sales should be eliminated anyway (1).

11. These restrictions on competitive foods will only become operative if monies are appropriated for the Department of Education to provide technical assistance that includes the following issues: model nutrition programs and best practices, financial management of food service programs, fundraising mechanisms, pupil activities that encourage healthy eating among pupils.



► When analyzed separately, food service directors and project coordinators were more likely to recommend that this component remain as is (43%) compared to the group as a whole.

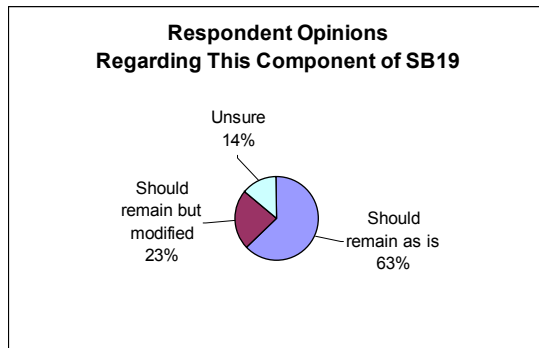
There was a lack of consensus regarding this part of the legislation. Those who supported this provision felt that resources and technical assistance are needed and budgets are limited. One respondent pointed out that just because some schools have been successful without additional funding doesn’t mean all schools can. Another respondent felt however that if no funds were allocated for technical assistance the schools should do this anyway. Those who felt that additional funding should not be required in future legislation believed that technical assistance is not essential for implementation and that having the policies contingent on funding gives districts an “out.” Several respondents felt that the health of children had to override any funding concerns: “it is too important.”

Recommendations:

- Should become part of the regular program
- Set up local agencies or task forces to support districts
- Only provide technical assistance by staff that are knowledgeable about schools, food service operations and associated student body issues and laws
- Need state to prohibit all competitive food sales
- Need principal’s support

¹ Numbers in parentheses refer to number of respondents.

12. Increase in meal reimbursement to \$0.23 for free and reduced price meals; \$0.10 reimbursement for full price meals.



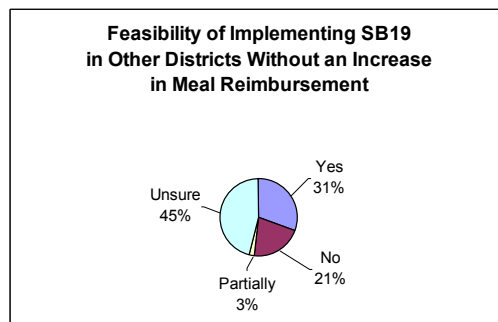
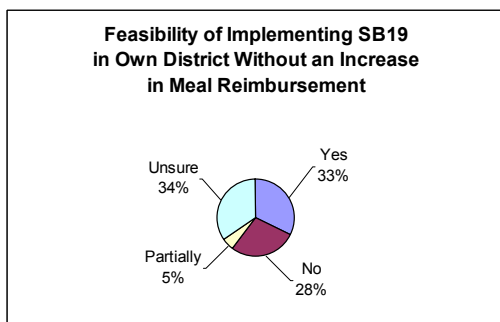
► When analyzed separately, food service directors and project coordinators were almost twice as likely to recommend modifications (43%) and slightly less likely to recommend that this component remain as is (57%) compared to the group as a whole.

The majority of total respondents felt that the increased meal reimbursement should remain in future legislation. Respondents described 4 primary reasons why additional funding is needed in order to implement SB 19:

- Providing healthier foods and beverages is more expensive (9)
- Additional activities are necessary to promote and gain support for providing healthy choices (2)
- There is a need to offset losses from decreases in à la carte sales (2)
- Provides an incentive to schools, especially those that might not otherwise be motivated (1)

The most frequently mentioned concern was the costs involved in providing healthier options. Specifically mentioned were the increased costs associated with providing more fresh produce, salad bars and packaged salads. They reported that providing these healthier options increases labor, food, and packaging costs. Salad bars in particular were identified as being labor intensive. However, respondents believed that the state should make this investment to improve the health of the students.

Recommendations for modifications primarily concerned the need to increase the reimbursement even more, i.e. to 25 cents per meal, have it apply to all meals including full price, and have it apply at all grade levels. They also thought it was important that the increased reimbursement be permanent and that a mechanism be incorporated so that meal reimbursement rates increase in accordance with increases in food costs.



► When analyzed separately, food service directors and project coordinators were slightly more likely to indicate that they could not implement SB 19 in the absence of increased meal reimbursement in their own district (36%) compared to the group as a whole.

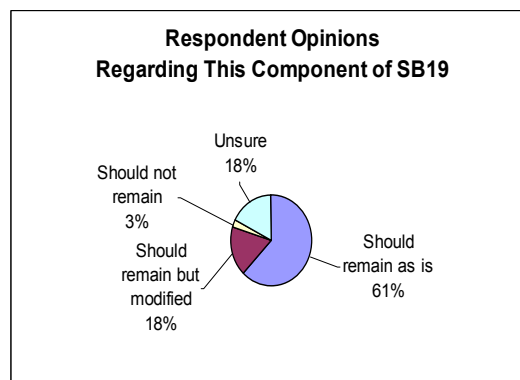
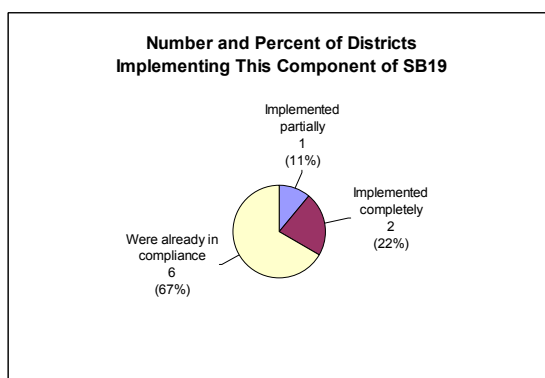
Total respondents were fairly equally divided as to whether they could implement SB 19 in the absence of increased meal reimbursement: one-third thought they could, a little over one-third were unsure, and a little less than one-third thought they could not. Five percent thought they could implement it in part. Those who felt they could implement it without additional reimbursement described the following conditions that would be required:

- Strong commitment and support from stakeholders (4)
- Staff development (1)
- Public relations campaign to ensure buy-in (1)
- If extra fresh fruits and vegetables are not required (à la carte sales revenues are needed to support extra costs of providing more fresh produce)
- If at least 85% of students qualify for free and reduces price meals (1) (because of less dependence on à la carte sales)
- If have universal breakfast (which can help offset reduction in à la carte revenues) (1)
- If able to replace non-compliant à la carte items with compliant ones (1)

Those who were thought they would not be able to implement SB 19 without increased meal reimbursement mentioned that costs had increased as a result of SB 19 implementation (5), that it would be especially difficult for large districts (4), and that it could not be implemented at a “quality” level without additional funding.

When asked regarding other districts’ ability to implement SB 19 without additional funding, responses were fairly similar as those made with regard to their own district, however a larger percentage were uncertain. The reasons and conditions mentioned were also the same, but more mention was given to the greater challenges faced by larger school districts and high schools. One respondent felt that the legislation should only encourage, but not mandate, SB 19 policies which should be decided on a local level.

13. To qualify for increased meal reimbursement the full price meals shall follow the USDA enhanced Food Based Meal Pattern, USDA Nutrient Standard Meal Planning, USDA Traditional Meal Pattern or California SHAPE Menu Patterns.



► When analyzed separately, food service directors and project coordinators were less likely to be unsure (8%) and therefore slightly more likely to recommend that this component remain as is (67%) or not remain (8%) compared to the group as a whole.

Most (67%) of the districts were already in compliance with this policy and another 22 percent became compliant during the course of the LEAF project. Most supported including this component in future legislation in order to help ensure that minimum nutrient standards for all meals are met. Recommendations for modifications to this component included:

- Remove the option of using the Traditional Meal Pattern (2)
- Only require 80% compliance (1)
- Food based menu planning should not allow averaging fat content of meals over the week (1)
- Link compliance to increased reimbursement (1)

The only reason mentioned for not including this component is that it is redundant (already required).

Summary

Overall, the respondents were quite successful at implementing the various components of the SB 19 legislation. All but 4 of the 11 components described above were either completely or partially implemented by the LEAF districts. The nutrient standards for competitive foods and the provision of fruits and vegetables at all venues were each not implemented by one district and the posting of the policy was not implemented by 6 districts. It also appears that from 2 to 4 districts were unable to hold a public hearing regarding their policy. In most cases, 78 percent (7 of 9) or more of the districts were able to comply completely with the various components of the legislation. Those components most likely to be implemented in their entirety included: formation of the CNPAAC (100%), composition of the CNPAAC (89%), nutrient standards for competitive beverages (89%), limits on the size of à la carte entrees (89%), meal planning method (89%), and prohibition on sale of non-compliant items during the school day (78%). Those components that were more likely to be implemented only in part included: having a designated person to determine compliance with nutrient standards; posting the policy; nutrient standards for competitive foods; and providing fruits and vegetables at every venue.

Overall, the respondents also tended to be very supportive of the various components of the legislation. Although from 4 to 67 percent of total respondents recommended changes to the various components, many of these recommended modifications were to strengthen or clarify the language; fewer recommendations were made to weaken the wording. For 6 of the components, a very small minority of total respondents, 2 to 10 percent, recommended that the component not be included at all in future legislation. Only two components were definitely opposed by over 10 percent of total respondents: requiring the provision of fruits and vegetables at all venues (20% opposed) and having statewide implementation of nutrition standards contingent on funding to the state for technical assistance (38% opposed).

Food service directors and project coordinators, when analyzed separately, also tended to be supportive of many components of the legislation, with 9 components supported by 50 percent or more of these respondents. The most notable difference between opinions among these respondents compared to total respondents was observed for the component regarding meal reimbursement increases: 43 percent of food service directors and project coordinators recommended modifications to this component, while only 23 percent of the total group

recommended modifications. In addition, five components were definitely opposed by over 10 percent of these respondents: posting a summary of nutrition and physical activity laws and regulations as well as the district's nutrition and physical activity policies in public view (17% opposed), requiring CNPAAC to hold at least one public hearing (17% opposed), requiring that serving sizes of entrée items and side dishes be no larger than the portions of foods served as part of the federal school meal program (11% opposed), requiring the provision of fruits and vegetables at all venues (29% opposed) and having statewide implementation of nutrition standards contingent on funding to the state for technical assistance (36% opposed).

III. Comments and Recommendations Regarding What Should be Included in the Districts' Nutrition and Physical Activity Policies

The SB 19 legislation recommended that the LEAF pilot school districts convene a CNPAAC and required that the CNPAAC develop and recommend to the governing board policies on nutrition and physical activity. A list of issues to be addressed by the district policy was included. The LEAF team members were asked whether their district had addressed each of these issues in the nutrition and physical activity policies, whether they would recommend each policy element be required in future legislation, and why or why not. Two of the 18 elements that were included in the legislation were inadvertently left out of the questionnaire and thus only 16 are addressed in this report. The team member responses are summarized in Table 1 below.

Table 1: LEAF Team Member Comments Regarding Policy Components Required by SB 19				
Policy Component	Yes, included in policy document % of districts¹ n=9	Yes, include in future legislation % of total respondents n=47 (% of food service directors and project coordinators, n=14)	Why or why not?	Recommendations
A. Implement SB 19 nutrition standards	89%	85% (71%)	Pros: Need for specific and policy-based standards and guidelines that uniformly apply to all schools Cons: The standards are conflicting, imperfect, too restrictive or difficult to implement	<ul style="list-style-type: none"> • Increase flexibility (3) • Make legislation stronger/stricter(3) • Add standards on salt (1), artificials (1), portion size (1) and total calories (1). • Disallow electrolyte replacement beverages (1) • Apply universal standards as opposed to local legislation (1)
B. Encourage healthy/discourage unhealthy fundraisers	89% ^{2,3}	93% (79%)	Pros: Fundraisers are a major source of unhealthy foods and if they are not restricted they would undermine impact of nutrition standards; everyone on campus needs to take responsibility Cons: Student will lose out on beneficial activities if no alternate funding identified	None reported
C. Ensure no pupil is hungry	89%	85% (86%)	Pros: Addresses an important issue and emphasizes need for marketing the school meal program Cons: Redundant - already being done; impossible to ensure this - can only make foods available - some children still won't choose school foods; hard to evaluate and enforce.	<ul style="list-style-type: none"> • Strengthen • Do not allow districts to block schools from provision 2 status • Change language from “ensure” to “make available”
D. Improve nutrition standards	100%	95% (93%)	Pros: <ul style="list-style-type: none"> • Important to continue improving (2)⁴ • General policy statements are better than specific standards (1) • Increases values of nutrition and learning as dual effort (1) • The earlier introduced the better accepted (1) Cons: none reported	<ul style="list-style-type: none"> • Strengthen standards for food service/NSL requirements (1) • Specifically address à la carte (1) • Keep as is for competitive foods (1) • Address artificial colorings (1) and electrolyte [replacement beverages] (1) • Need specific standards(1) • No need to ban artificial sweeteners if objective is to reduce obesity (1)

¹Multiple team members answered each question. Possible responses were yes, no, or unsure. Districts were deemed to have included the component in the policy if the respondents from that district consistently reported yes. Districts were not deemed to have included the component if respondents from the same district consistently answered “no”, gave conflicting responses, or were consistently “unsure.”

<p>E. Increase availability of fresh fruits and vegetables, encourage schools to make fruits and vegetables available wherever food is sold</p>	<p>89%</p>	<p>88% (79%)</p>	<p>Pros:</p> <ul style="list-style-type: none"> • Improves health (2) and supports CA farmers (2) • Students will choose healthier options if available (3) • Familiarity and access become routine and habit <p>Cons:</p> <ul style="list-style-type: none"> • Fruits and vegetables do not/will not sell (2) 	<ul style="list-style-type: none"> • Leave “increase availability” but do not require (1) • Allow strategies to come from policy development (1) • Need to quantify (1)
<p>F. Ensure, to extent possible that food served is fresh</p>	<p>67%</p>	<p>83% (64%)</p>	<p>Pros:</p> <ul style="list-style-type: none"> • Healthier (2) • Students prefer/want this (2) • Discourages processed foods and encourages farm fresh foods (2) • Less cost in the long run due to less throw away (1) <p>Cons:</p> <ul style="list-style-type: none"> • “Fresh” is too vague, not sure what this means (3) • This is already done to the extent possible (1) 	
<p>G. Encourage participation in lunch program by eligible pupils</p>	<p>100%</p>	<p>95% (93%)</p>	<p>Pros:</p> <ul style="list-style-type: none"> • Important to offer and demonstrate healthy eating to all students including low-income (8) • This area needs more energy (1) <p>Cons:</p> <ul style="list-style-type: none"> • Redundant—districts already do this (1) 	<ul style="list-style-type: none"> • Need more money to sustain (1) • Implement a card system or other transparent method (2) • Require that any school can apply for prov. 2 based on USDA requirements, not district rules (1)
<p>H. Integrate nutrition and physical activity into overall curriculum</p>	<p>89%</p>	<p>93% (93%)</p>	<p>Pros:</p> <ul style="list-style-type: none"> • Important to link to classroom (4) • Currently inadequate or not addressed (2) • Physical activity is crucial component of health (1) • Healthier students will be able to tackle academics (1) <p>Cons:</p> <ul style="list-style-type: none"> • Already in our curriculum (1) • Could be difficult with testing (1) 	<ul style="list-style-type: none"> • Need to strengthen, do more (2)

<p>I. Ensure professional development for food service staff</p>	<p>45%</p>	<p>87% (50%)</p>	<p>Pros:</p> <ul style="list-style-type: none"> • Need to reach those on the “frontlines” (4) • Everyone needs to be on the same page (1) • Ensure sustainability (1) <p>Cons:</p> <ul style="list-style-type: none"> • Our policy doesn’t specify food service (3) • Already required for Child Nutrition Programs (1) • We already do extensive staff development (1) • Our district has no inservice days in the calendar (1) 	<ul style="list-style-type: none"> • Needs to be more inclusive; staff, administrators, teachers and food service staff all need training (2) • Was inadequate (1) • Ensure is too strong of language (1)
<p>J. Ensure students have a minimum of 30 minutes to eat lunch and 20 minutes to eat breakfast</p>	<p>67%</p>	<p>95% (67%)</p>	<p>Pros: Currently there is not enough time and more time is needed to ensure healthy eating and provide a pleasant experience. (9)</p> <p>Cons:</p> <ul style="list-style-type: none"> • May have resistance because of behavior, supervision resources (1) • We made it a recommendation, not a mandate (1) • Other factors (bus schedules, bells, union contracts) influence time for meals (1) 	<ul style="list-style-type: none"> • Should be longer (1) • Should be mandated to prevent districts from taking it away (1)
<p>K. Improve quality of PE and increase training of PE teachers.</p>	<p>67%</p>	<p>90% (77%)</p>	<p>Pros:</p> <ul style="list-style-type: none"> • Need to improve PE programs (3) • PE teachers need training (2) • Need to value PE (1) • Important to support a fit lifestyle for the children (2) <p>Cons:</p> <ul style="list-style-type: none"> • Classes too big, prevents implementation (2) • Not enough money (1) • State regulations already exist (1) 	<ul style="list-style-type: none"> • Need more money from state for PE programs (1)

<p>L. Enforce existing PE requirements</p>	<p>100%</p>	<p>90% (92%)</p>	<p>Pros:</p> <ul style="list-style-type: none"> This is important so that the requirements are understood, implemented and enforced (5) <p>Cons:</p> <ul style="list-style-type: none"> Already required (1) No one checks or is responsible (1) 	<ul style="list-style-type: none"> Make requirements more stringent (3) Only at middle schools (1) More money to PE (1) Add more innovative programs to PE (1) State needs to hire someone to review, evaluate, enforce the PE requirement (1) Need to address teacher contracts—teaching time, money for equipment (1)
<p>M. Alter economic structures to reduce dependency on sale of less healthy foods</p>	<p>56%</p>	<p>75% (50%)</p>	<p>Pros:</p> <ul style="list-style-type: none"> Sustainability (2) Schools and especially children shouldn't have to fundraise (2) Need to reduce dependency on (unhealthy) food sales (2) <p>Cons:</p> <ul style="list-style-type: none"> Schools need flexibility to support programs (3) Schools have many site specific issues to address (2) Statement is unclear (1) Should be a strategy not a policy (1) 	<ul style="list-style-type: none"> Need more funding/help from state (3) Include language that encourages food service to create economically sustainable programs that support healthy nutrition (1) Offer task force to assist schools attain sustainability through healthy food & beverage sales (1)
<p>N. Develop a financing plan to implement the policies</p>	<p>34%</p>	<p>59% (23%)</p>	<p>Pros:</p> <ul style="list-style-type: none"> Investing in student health is a sound financial decision (1) Money is needed for these programs (1) <p>Cons:</p> <ul style="list-style-type: none"> Legislation needs to provide funding (3) This is an administrative regulation, not policy (2) Flexibility is needed to be able to take advantage of new opportunities; financing plans can change month to month (2) Legislation should not require this even though it is desirable (1) Should not legislate more work for food service (1) Not sure what this means (1) 	<ul style="list-style-type: none"> Add an outline or possible plans (1)

<p>O. Increase the availability of organic produce and school gardens</p>	<p>33%</p>	<p>70% (38%)</p>	<p>Pros:</p> <ul style="list-style-type: none"> • Yes for school gardens (3) • Yes for organic produce (1) • Organics should be required because chemicals/pesticides are undesirable/dangerous (2) • Gardens crucial for hands on learning curriculum integration and provides good role modeling, socialization (3) • Gardens provide produce for cooking class (1) • We should eat more California fruits and vegetables (1) <p>Cons:</p> <ul style="list-style-type: none"> • No to organic produce due to limited availability, difficulty obtaining and high cost (7) • Organic produce may not improve nutritional status, unnecessary (4) • No garden at middle school – was too difficult to staff, resulted in limited space and/or overgrown crops (2) • Unrealistic to require (1) • No money for gardens (1) 	<ul style="list-style-type: none"> • Should “encourage” use of organic, not mandate (3) • Require organics when economically feasible (1) • Do not mandate, just recommend (1) • These are separate issues [organics and gardens] (3) • Have gardens play bigger part of curriculum (1)
<p>P. Collaborate with farmers markets</p>	<p>45%</p>	<p>63% (31%)</p>	<p>Pros:</p> <ul style="list-style-type: none"> • This is fundamental (2) • For collaboration with community (2) • Requirement essential for fresh produce (1) • Need to expose students to gardening and school farm (1) <p>Cons:</p> <ul style="list-style-type: none"> • Should say farmers, not farmers markets (3) • Not practical or realistic for all/ availability can be limited (4) • Can interfere with goal of increasing nutritious foods to children (1) • Desirable, but not to be demanded (2) 	<ul style="list-style-type: none"> • Require wherever available or possible, on a school by school basis (6) • Include in an administrative regulation (1)

² Some respondents were unaware of the requirement.

³ Respondents indicated that this component was not passed yet.

⁴ Numbers in parentheses refer to number of respondents.

Summary

The extent to which the policy components listed in Table 1 above were incorporated into the policies developed by the LEAF districts varied from 33 percent to 100 percent. It should be noted, however, that in some cases the policies for the districts had not been finalized and therefore additional elements may have been added at a later date. Those elements that were most likely (89% or more) to be incorporated, concerned restrictions on the sale of competitive foods and beverages, increasing the availability of fruits and vegetables, increasing access to the meal programs, integrating nutrition and physical activity into the curriculum and enforcing existing PE standards. Those elements included by approximately two-thirds of the districts concerned serving fresh foods, ensuring adequate time to eat, and improving PE. Elements concerning food service staff development, financial planning to support the other policies, organic produce, school gardens and farmers markets were only included by about half or less (33-56%) of the districts.

In nearly all instances total respondents were more likely to recommend inclusion of the policy requirements in future legislation than had actually included the requirement in their own district's policies. Fifty-nine to 99 percent of total respondents recommended that a given element be included in future legislation. Only 4 elements were supported by less than 83 percent of total respondents: altering economic structures to reduce dependency on sale of less healthy foods (75%), developing a financing plan to implement the policies (59%), increasing the availability of organic produce and school gardens (70%) and collaborating with farmers markets (63%). Although these elements were supported by *relatively* fewer numbers of total respondents, the majority still recommended that these policy requirements be included in future legislation.

When analyzed separately, food service directors and project coordinators were generally less likely to recommend that many of these components be included in future legislation. Most notably, 5 elements were supported by less than a majority of this group of respondents: ensuring professional development for food service staff (50%), altering economic structures to reduce dependency on sale of less healthy foods (50%), developing a financing plan to implement the policies (23%), increasing the availability of organic produce and school gardens (38%), and collaborating with farmers markets (31%). An additional 3 elements were supported by less than 75 percent of these respondents: implementing SB 19 nutrition standards (71%), ensuring to the extent possible that food served is fresh (64%), and ensuring students have a minimum of 30 minutes for lunch and 20 minutes for breakfast (67%).

Respondents' comments indicated the following areas of controversy:

- How specific the legislative requirements should be. For example, many respondents commended the specificity of the SB 19 nutrient standards whereas others wanted them to be more general. Another example is that several respondents felt that references to "encouraging fresh food is served" were too vague and difficult to interpret.
- Whether the legislation should "require" or "mandate" inclusion of these elements in district policies or just "encourage" them. For example one respondent said that a

minimum time for meals “should be mandated to prevent districts from taking it away” whereas another preferred it remain a recommendation and not a mandate.

- “Strictness” of the legislation. Many respondents wanted stronger (stricter nutrient standards) that covered issues such as portion size, calories and that disallow “sports drinks”. Many also wanted stricter PE requirements. Others preferred more general terminology.

Reasons for desiring less strict or specific language centered on the following issues:

- difficult to implement
- too restrictive
- not enough flexibility (for adapting to local circumstances)
- conflicts with other policies or priorities
- specific language better decided on at the local level
- specific language should be in administrative regulations not the policy itself

Reasons for recommending language which is stronger and more specific included:

- easier to enforce
- easier to understand
- not subject to conflicting interpretations
- easier to evaluate
- ensures sustainability and consistency over time

Furthermore, some of the recommended policy elements, such as encouraging participation in the lunch program, were considered unnecessary because they are already being implemented or are already required.

Overarching themes:

- *Importance and benefit of all of the measures to the health and well-being of the children.*
Statements by respondents indicated their very strong support of measures to improve school nutrition and physical activity and the need for schools to give these issues a higher priority.
- *Concern about keeping focused on priority issues.*
Most tended to support legislation that facilitates: limits on competitive foods, increased PE, more health education and improvements in the meal programs. There was less consensus regarding legislation to require or encourage organic produce, school gardens and farmers markets. Reservations tended to center around the costs involved and other feasibility issues. Some respondents felt that although these measures were desirable they are less of a priority than the other measures they viewed as more directly impacting student nutritional status and fitness.
- *The need to “do more” in all of the areas.*
Many comments focused on the need to “do more.” However in order to do more several needs were identified. The need for more funding was the most frequently mentioned,

followed by the need for more enforcement and encouragement from the state, the need for enforcement and monitoring at the local level because “no one is responsible”, the need to address institutional barriers such as teachers’ contracts (that may limit flexibility), purchasing systems etc., and the need for assistance with “how-to” implement the requirements without jeopardizing other programs.

IV. Concluding Comments by Respondents

The respondents were asked if they had any additional suggestions that would be useful in the crafting of future legislation. Their comments are summarized below. All of the suggestions were aimed toward strengthening and expanding on SB 19; none were aimed toward weakening the legislation. They recommended expanding limits on competitive foods, increasing access to and quality of the meal programs, and expanding nutrition education. Their recommendations focused on policies that would incentivize or enable schools to improve their food and activity environments.

Additional limits on competitive and à la carte foods and beverages

- Require SB 19 rules in all schools (all grade levels)
- Eliminate à la carte meals altogether
- Financial penalties for selling soda

Increase access to reimbursable meals

- Only serve NSL meals (so cash and free are indistinguishable)
- Universal eligibility for meal school programs

Improve variety/quality of school meals

- Require NSL to be 100% organic within a 10 year phase-in period
- Make vegan choices available (at every meal)
- Creative changes such as salad bars and school farmers’ markets

Expansion/ incentives for nutrition education

- Incorporate[nutrition & fitness] into mandated education minutes
- Nutrition education and gardening classes in *after school programs*

Increase involvement of stakeholders:

- Professional development for teachers regarding health and nutrition
- Student representation on CNPAACs, student nutrition committees and taste testing

Increase institutional support

- Increased funding to support required changes “put money where mouth is”
- Longer school days and number of days per year [to accommodate longer meal periods, more PE and nutrition education]
- Posting of nutrition information for school meals and snacks

Finally, respondents were asked for any additional suggestions. Most of their comments centered on the need for a more comprehensive and coordinated approach that is adequately

supported financially and enforced. Some respondents would like to see the scope of SB 19 expanded whereas others would prefer more flexibility. Their comments are summarized below.

The need for a comprehensive approach that does not increase the administrative burden on the schools and is supported by adequate resources:

- That the legislation be integrated into sensible, clean policy that is supported by sufficient resources and planning foresight so that it does not add to the endless responsibilities that schools endure
- Carefully craft legislation to avoid another layer of paper work
- Piecemeal legislation is not the answer
- Need a comprehensive approach rather than piecemeal approach that pits stakeholders against each other
- Base administrative procedures on national recommendations rather than transient state legislation
- More attention to institutional barriers such as janitorial staff dictates, union contracts, bell and bus schedules, and inadequate funding.
- Additional resources and support for school food, health education and fitness programs.
- Added responsibilities should be supported by proper resources

The need for monitoring, enforcement and incentives:

- Focus on enforcement rather than more legislation
- Enforcement should be addressed in the policy
- Need consequences for not enforcing policies
- Implement and enforce current requirements instead of adding more
- Require administrative regulations, detailed implementation plan, and evaluation
- Include nutrition and fitness items on Standardized tests (as an incentive for incorporating these into the school day.

Increase scope:

- Increase PE teacher involvement
- Include foods and beverages served to school staff
- Should apply to high schools also (not just K-8)

Increase flexibility:

- Consider using CSFSA nutrient standards
- Focus on recommendations not mandates
- More adaptable to different district protocols

Ideas for technical assistance:

- Require that vendors supply nutrient analyses
- Provide funding for LEAF grantees to mentor or collaborate with other districts
- Build on lessons learned from successful efforts in other schools