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Linking Education, Activity and Food (LEAF) Report on Child Nutrition & Physical Activity Advisory Committee (CNPAAC) Formation and District Policy Development Executive Summary

BACKGROUND

In response to California's child obesity epidemic the California legislature passed Senate Bills 19 and 56, titled the Pupil Nutrition, Health and Achievement Act of 2001. The cornerstone of SB 19/56 is the establishment of nutrition standards for competitive foods and beverages sold on school campuses during the school day. Competitive foods and beverages are individual items sold outside of the school meal program by various campus venues such as student stores, vending machines and snack bars. They also include items sold à la carte by school food service departments.

In order to pilot test the implementation of SB 19/56, the California Department of Education (CDE) Nutrition Services Division, with funding from the California Department of Food and Agriculture (CDFA), established the Linking Education, Activity and Food (LEAF) program. In addition to implementing SB 19/56 standards, schools participating in the LEAF pilot program were instructed to implement policies to promote the consumption of California grown fresh produce as well as develop and implement a variety of policies to improve student nutrition and fitness.

The SB 19/56 legislation required an evaluation of the pilot effort, with findings to be reported to the California legislature. CDE contracted with the Center for Weight and Health (CWH) at the University of California, Berkeley, to conduct a multi-component, cross-site evaluation of the LEAF program. The current report is one in a series that describes the findings of that evaluation. It presents a content analysis of the district-level nutrition and physical activity policies developed by each of the 12 LEAF grantees, as well as a descriptive comparison of the process involved in the formation of each respective CNPAAC, the formulation of district policy, and the adoption of those policies according to mandated district protocol.

Data for this report were obtained from a combination of sources for the 9 pilot and 3 policy districts, including periodic progress reports, CDE Nutrition Services Division progress reports, interviews with key LEAF Team members, district evaluator reports, and pre/post site self-assessment surveys.

CNPAAC FORMATION AND FUNCTION

CNPAAC Formation and Composition

The majority of districts assembled a diverse and well-represented CNPAAC, drawing from within the district as well as from the greater community to strengthen committee composition. Specific recruitment strategies included presentations at Board meetings, Principals' meetings, and school-site staff meetings, as well as promotion through the local media and networking with local community health advocates and agencies.

Eleven out of 12 districts (92%) included a food service director on their CNPAAC, as well as representatives from external agencies. The majority of districts also included district-level and school-level administrators (primarily superintendents, assistant superintendents, and principals), nutrition education specialists, teachers, and a district evaluator. Surprisingly, only about half of the LEAF districts included a Board member, parents, students, or a school nurse on their CNPAAC; even fewer (25%) included food service staff.

Interestingly, the diversity in membership within many CNPAACs led to a certain degree of polarization on specific issues which hindered the policy process, most frequently related to the impact of mandatory nutrition standards on the generation of revenues at district high schools. CNPAACs were also negatively impacted by inadequate representation of teachers and students, whose schedules oftentimes did not permit attendance at meetings. Committee members often felt that student input was especially valuable, perhaps even more important than that of teachers, with the exception of physical education (PE) teachers. District and assistant superintendents, Board members, and LEAF Project Coordinators were identified as key players within the CNPAACs, and districts that lacked this high-level support often struggled with policy adoption.

Only one district out of 12 did not succeed in establishing a functional CNPAAC; reasons cited by interviewees included a lack of administrative support resulting from staff retirements and personnel turnover, as well as a lack of communication, motivation and follow-through by the LEAF Team itself.

Once the CNPAAC members were identified and recruited, the districts established agendas and scheduled their first meetings, with most beginning this process by March 2003. A majority of the CNPAACs (58%) met on a monthly basis; four district CNPAACs met approximately every 2 months, and one district CNPAAC met twice a month.

Baseline Tasks

Most LEAF districts began by completing a series of tasks that would establish the foundation for the drafting and promotion of their district policies. Key activities conducted by a majority of districts included:

- Introduction and presentation of CNPAAC and LEAF goals to the School Board.
- Review of current Board policies pertaining to nutrition and physical activity.
- Identification and review of model sample policies, most commonly those provided by the California School Board Association, USDA, National Association of State Boards of Education, and Project LEAN.
- Formation of working groups or subcommittees.
- Assessment of the current school and community environment regarding nutrition and physical activity.

- Networking with school-based and community-based affiliates in order to create awareness, gain support, and identify partners.

DISTRICT POLICY DEVELOPMENT, ADOPTION AND IMPLEMENTATION

Drafting and Revision of District Policy

Most of the grantees indicated that the actual drafting of the policy was not a difficult task, provided that they (a) completed the baseline steps outlined above, and (b) limited the number of writers to a core group. The districts did not follow a standardized format in the drafting of their policies, and certain CNPAACs opted for a single, comprehensive policy that specified the required components while others chose to divide their content into separate policies with accompanying administrative regulations.

It should be noted that at least 5 districts (A, F, G, H, L) indicated that their CNPAACs struggled with the distinction between *Board policy* and *administrative regulations* while drafting their policies. This proved to be a confounder that caused some CNPAACs to flounder early in the drafting process.

Many districts relied on the work of smaller subcommittees to circumvent the lack of consensus on key issues. Observations also indicate that the drafting process went more smoothly when an identified core group of writers drafted the documents; the larger CNPAAC then provided feedback based on their diverse points of view. Experiences also suggest that districts in the process of revising nutrition and/or physical education policies may take longer to integrate additional legislative language related to nutrition standards into their policies than districts that are developing their policies for the first time.

Policy Adoption

The policy adoption process required anywhere from one to 5 months for most districts, depending on the magnitude of the revisions requested by the Board. Five of the 12 districts (42%) passed their policies between October 2003 and January 2004; the remaining 7 districts passed their policies between April 2004 and September 2004. Having a superintendent, assistant superintendent and/or Board member on the CNPAAC proved indispensable because of their familiarity with the process and their knowledge of how to work effectively with the Board.

Policy Communication and Implementation

At the initiation of the grant period, all LEAF districts were instructed to (a) develop an Action Plan for LEAF policy implementation, and (b) communicate district LEAF policies to the public. Due to the relatively compressed timeframe of the pilot LEAF grant (21 months), the 12 pilot districts were faced with the challenge of simultaneously convening their CNPAAC, developing district policy with the requisite LEAF components, and implementing their policies prior to their actual adoption. As a result, pilot districts communicated to the public their efforts and progress in both policy development and implementation concurrently, primarily through presentations to Board members, principals, faculty, parent and student groups, and community-based health organizations. The 3 policy grantees, on the other hand, were able to focus their efforts entirely on CNPAAC recruitment, policy development and policy adoption over their 12 month grant period, without the additional charge of simultaneous implementation.

Most of the districts that simultaneously developed, presented and adopted administrative regulations along with their broader district policies (Districts C, D, F, K, M) were able to implement these policies to a substantive degree within their districts within the LEAF timeframe. This was more of a challenge for the one district that chose to wait until after the policy was adopted to begin implementation.

Simultaneous development and adoption of both the policy and administrative regulations proved to be the most effective. Those districts that adopted their policies early in the grant period but were without administrative regulations were challenged to implement their policies on a district-wide basis.

Obstacles to Policy Development and Implementation

CNPAAC challenges occurred primarily during the formation and early convening of the committee, and then later at the point of policy implementation. The many issues that surfaced and were resolved by the CNPAACs provide beneficial lessons to districts that are planning or are involved in a similar policy formulation process.

The following key obstacles to *CNPAAC formation and/or function* were identified:

- The committee had inadequate representation and/or participation.
- The diverse committee members had different visions for the policy (lack of consensus).
- The policy process was more time-consuming than everyone expected.

Obstacles to *drafting the policy* included:

- The process for developing the administrative regulations was unclear.
- It was difficult to integrate the required LEAF components into the existing policy using the established district writing protocol.

The following was identified as the chief obstacle to *policy adoption*:

- It was difficult to get the policy on the Board agenda for approval.

Significant obstacles to *implementing the policy* included:

- Certain campus and district entities expressed reluctance to change, which raised concerns over non-compliance. An overwhelming majority of CNPAACs cited this as the greatest obstacle to the successful implementation of their policies.
- District and campus entities were concerned specifically about the potential loss of revenues resulting from the food and beverage restrictions specified in all but one of the Board policies.
- The new policies are difficult to regulate and enforce. CNPAAC members cited concerns over their inability to monitor and enforce the new regulations, pointing to the lack of consequences for non-compliance.

Overall, despite these obstacles and challenges, all 12 LEAF districts successfully adopted Board nutrition policies and 11 of the 12 adopted physical activity policies by September 2004. Findings from this evaluation also suggest a sustainable future for district CNPAACs in at least half of the LEAF districts.

POLICY CONTENT

Analysis of the content of the LEAF-related policies developed and adopted by the 12 grantee districts revealed that though most of the district policies were quite comprehensive, the inclusion of specific and required elements tended to be limited to those required by law or LEAF, suggesting that districts are reluctant to impose stricter requirements than those already required by law. At the same time, many of the policies included elements in several categories that went beyond what was required by law or the LEAF project, suggesting that with adequate support districts will self-regulate in some areas, especially

to build upon existing requirements such as strengthening nutrition standards and extending them to all grade levels.

The district policies generally did not reflect the depth or breadth of the LEAF implementation strategies; the LEAF districts did much more than was required or recommended in their policies. This may reflect a reluctance to self-impose “unfunded” mandates and highlights the dilemma faced by districts that, while supportive of the philosophy of improved nutrition and physical activity, are unable to fund its implementation. Furthermore the districts may feel it inappropriate to require very specific implementation strategies in their policies.

None of the policies included all the language and content required by SB 19. Only 2 required elements (nutrient standards and ensuring that no pupil goes hungry) were included in more than 60% of the district policies. Only 2 districts incorporated more than half of the 29 elements required by legislation in their policies, and most included around 20%. Comments from LEAF team members indicate that they may have been unaware of all the required elements; it appears that others may not have included some elements because they were not deemed to be important, were too general to be useful in a policy, or were too controversial (at their district) for gaining consensus or approval. Similarly, many of the policies did not include or refer to all applicable federal and state regulation. When included these regulations were often inaccurately or incompletely restated or paraphrased, suggesting limited awareness and/or understanding of these regulations. It therefore appears that districts could benefit from simplified summaries or sample language that covers the applicable state and federal regulations.

Relatively few policy elements were stated in terms that required adherence; instead language tended to “encourage,” “support” or express the district’s intent. Likewise the policy language was often not specific enough to be enforceable and therefore left implementation and compliance open to interpretation. In the absence of specific requirements, implementation becomes highly dependent on individual levels of motivation and interest, which may weaken the likelihood for sustainability.

LESSONS LEARNED

The following emerged as significant lessons learned from the CNPAAC and policy process among the 12 LEAF grantee districts and serve as useful guidelines for other districts involved in similar efforts:

Recruiting and Running an Effective Committee

- Set up meetings in such a way that people will attend.
- Give members a specific task that they can complete for each meeting.
- Involve the superintendent and a school Board member from the start.
- Provide superintendents, assistant superintendents and Board members an appropriate role on the CNPAAC.
- Explore ways to involve students in CNPAACs and policy implementation that is meaningful yet practical given their interests, age and other obligations.
- Get committee representation from both inside and outside the district.
- Create separate working groups within the larger CNPAAC to focus on specific policy issues.
- Build a core group of dedicated, committed members.

Drafting a Policy

- Take advantage of existing policies and borrow freely.
- Policy content appears to be largely driven by state and federal legislation and regulation or other requirements.
- There is a need for simple explanations of federal and state regulation concerning school nutrition and physical activity.
- Stay well-connected with people and existing committees within the district that have ties to outside resources and understand the policy process.
- Create a core group of writers who can do the actual drafting, and then get feedback from the larger CNPAAC.
- Involve the superintendent in the drafting of the policy.
- Concurrent development of policy and administrative regulations appears to be most effective.
- Multiple committees with overlapping roles and parallel processes can slow efforts down.

Adopting a Policy

- Continually update the Board at as many Board meetings as possible.
- Include Board members on your CNPAAC.
- Have the superintendent or assistant superintendent present the policy to the Board for adoption.

Communicating and Implementing a Policy

- Create a website to promote and distribute the new policy.
- Carry out social marketing and continued educational efforts for the wider community, parents, and students as you draft your policy.
- Additional funding or other incentives may be necessary to ensure ongoing promotion and increased provision of fresh fruits and vegetables.
- Incentives in the form of test requirements may be needed to ensure that adequate nutrition education is provided to all students.
- Greater commitment from the districts, the State and stakeholders is needed to improve PE and related athletics programs, many of which are dependent on funding through candy, soda or junk food-related sales.
- Districts may need to consider a phase-in period for compliance with nutrition standards at the high schools, as a compromise to resistance by entities at all levels, and in order to get the policy passed.
- Effective means and methods for monitoring and enforcement need to be explored.

Overall

- Set realistic and achievable goals.
- Leave enough time for the entire process.