Three green apples are arranged in a cluster, with one in the foreground and two behind it. The apples are bright green and have a small stem at the top. The background is white.

Local Wellness Policies in Massachusetts: Do they make the grade?

Lisa Lines, BS, MPH candidate - University of Massachusetts Amherst
llines@schoolph.umass.edu

Lisa Guadagno, MS - Health Dialog

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Background



Photo: Ken Hammond, USDA

1

- On June 30, 2004, President Bush signed Public Law 108-265, the **Child Nutrition and WIC Reauthorization Act of 2004**
- Section 204 of this law required that each local educational agency participating in the school lunch or breakfast program establish a local school wellness policy by the start of the 2006 school year

The Law Requires...

- Goals for:
 - Nutrition education, physical activity and other school-based activities
 - Nutrition guidelines
 - Guidelines for reimbursable school meals
- A plan for measuring implementation
- A plan for involving the community



Photo: Ken Hammond, USDA

2

The law requires that school districts include, at a minimum—

Goals for nutrition education, physical activity and other school-based activities that are designed to promote student wellness in a manner that the local educational agency determines is appropriate

Nutrition guidelines selected by the local educational agency for all foods available on each school campus under the local educational agency during the school day with the objectives of promoting student health and reducing childhood obesity

An assurance that **guidelines for reimbursable school meals** shall not be less restrictive than regulations and guidance issued by the National School Lunch Act

A plan for measuring implementation of the local wellness policy, including designation of 1 or more persons within the local educational agency or at each school, as appropriate, charged with operational responsibility for ensuring that the school meets the local wellness policy

A plan for involving parents, students, and representatives of the school food authority, the school board, school administrators, and the public in the development of the school wellness policy

Many Resources Available to Districts



Numerous organizations developed model policies and other materials designed to assist districts in crafting a policy

Stalker Institute

Action for Healthy Kids: Local Wellness Policy Areas

- Setting Nutrition Education Goals

- Setting Physical Activity Goals

- Establishing Nutrition Standards for All Foods Available on School Campus during the School Day

- Setting Goals in the School Meals Programs

- Setting Goals for Other School-Based Activities Designed to Promote Student Wellness

- Setting Goals for Measurement and Evaluation

National Alliance for Nutrition and Activity convened a work group of more than 50 health, physical activity, nutrition, and education professionals from a variety of national and state organizations to develop a set of model policies for local school districts

USDA's Food and Nutrition Service posted sample policies and language on its website

The School Nutrition Association (SNA) published guidelines, conducted webinars for school nutrition staff, and disseminated sample policies

SNA has conducted 4 studies so far:

- Survey of school nutrition directors (January 2006)

- Analysis of the policies of the 100 largest school districts in the US (October 2006)

- Analysis of 140 policies in 49 states (December 2006)

- Another survey of school nutrition directors (September 2007)



Obtained comprehensive list of operational school districts from Mass. Dept. of Ed. (as of January 2007)

Restricted analysis to districts serving pre-K/K through 12 (excluding charter, technical, vocational, and institutional districts)

Searched online for a wellness policy for each district

- Searched every school district's website

- Searched using Google

- Searched website of the Massachusetts Association of School Committees

Research Questions

1. What are the characteristics of wellness policies in Massachusetts?
2. How many Massachusetts policies are meeting the requirements of the new law?



Policy Evaluation Tool

District	Nutrition education	Physical activity	Other wellness promotion activities	Nutrition guidelines - all campus	Nutrition guidelines - school meals	Assessment plan
	Scale of 0-3: 0=absent, 1=broad, 2=some detail, and 3=detailed					



6

For each policy, two independent reviewers with backgrounds in nutrition, policy analysis, and/or research used a study-specific policy evaluation tool to score each area's level of detail on a scale of 0-3

Original analysis plan included 7 policy areas, including community involvement

Since none of the model policies included community involvement and most policies did not cover, this area of the law was omitted

Analyses of policies were descriptive (length) and semi-quantitative (level of detail)

Policy page length was calculated by number of words divided by 250 words/page

Districts with policies posted online were compared with districts without online policies regarding enrollment size and percent of low-income students

Scores of the two reviewers were averaged to arrive at the final score for each area

Detail analysis was modeled on SNA's method

Policies could not be objectively scored in a simple right/wrong sense, but instead required some rating of the degree to which the policy attained an ideal

Does it cover each of the six areas?

For each area, does it give guidance and detail regarding implementation?

Scoring Rubric Example:

Nutrition Guidelines for School Meals

Score = 0 (absent) if policy did not say *anything* about school meals

Score = 1 (broad) if policy simply said that school meals will meet USDA Dietary Guidelines for Americans

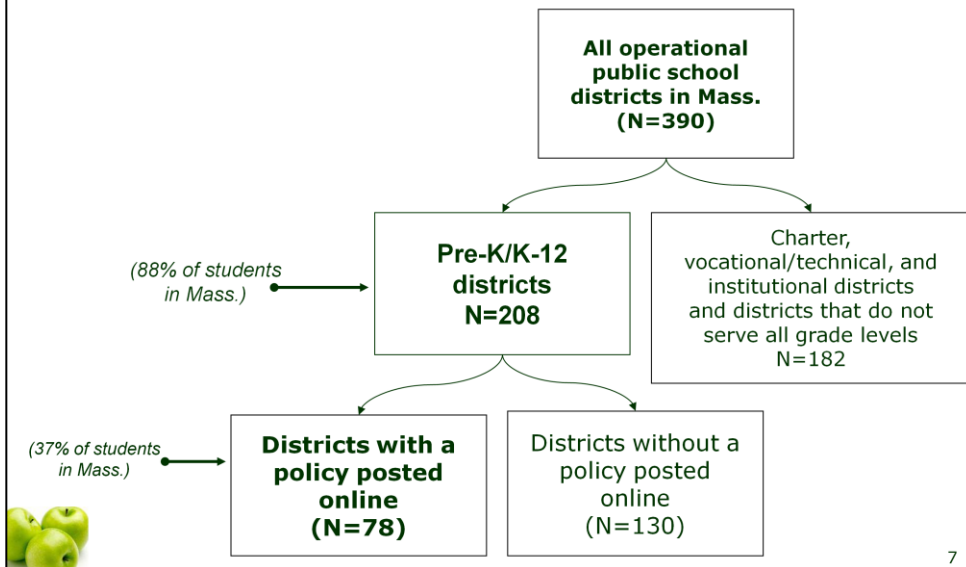
Score = 2 (some detail) if it gave guiding philosophies or stated an intent

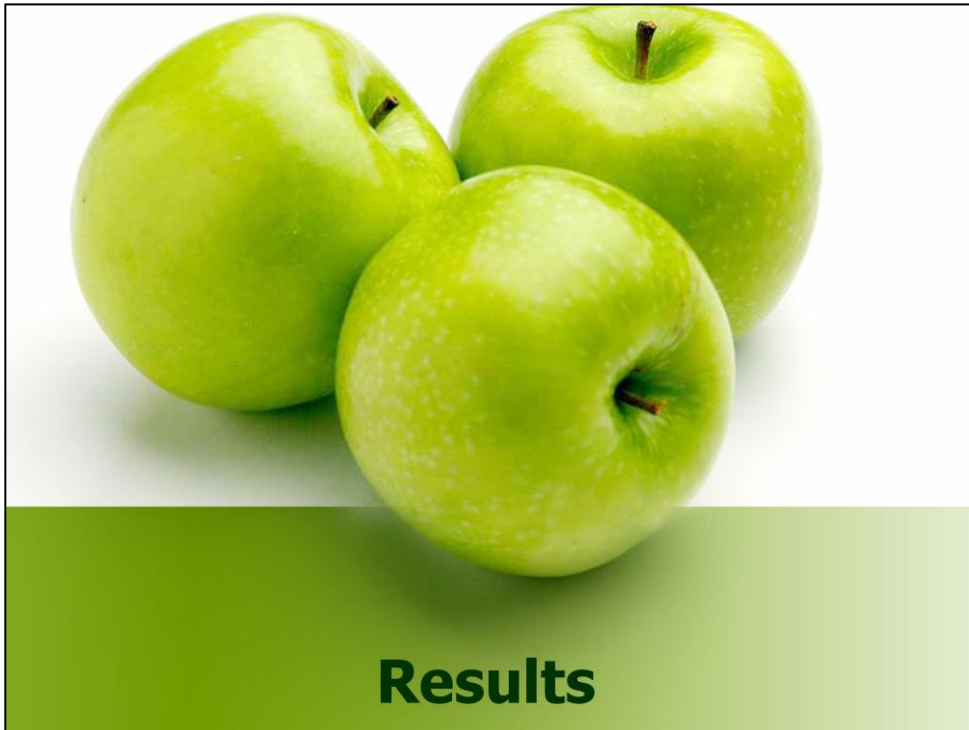
Example: "Offer a variety of nutritious, affordable and appealing foods that accommodate the health and nutrition needs of all students."

Score = 3 (detailed) if policy included *implementable policy guidance* – enough detail that the schools had something to implement

Example: "Offer a variety of fruits and vegetables, offer low-fat and fat-free milk and nutritionally equivalent nondairy alternatives (to be defined by USDA), and ensure that half of the served grains are whole grain."

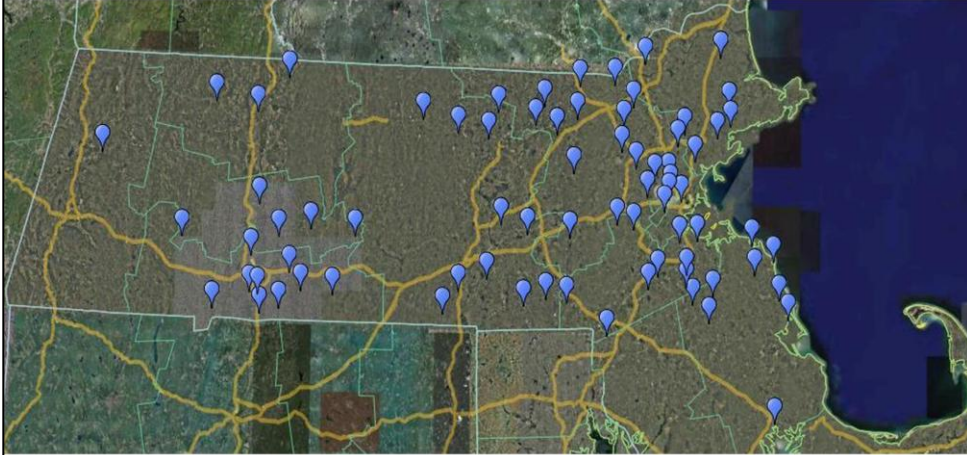
Selection Methodology for Districts Included in Study



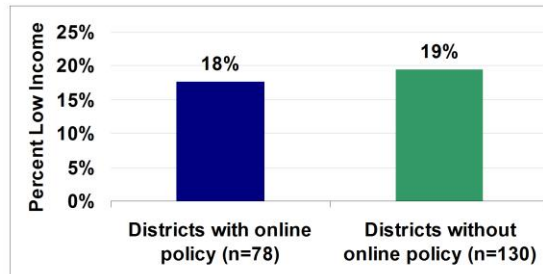
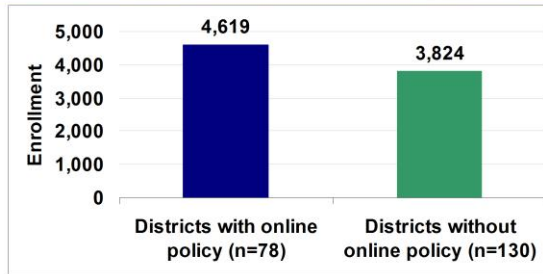


78 policies were evaluated (over 500 pages of text)

Districts Were Fairly Well Distributed Across the State



Districts with Online Policies Were Similar to Those Without



Policy Lengths

	Mass.	Largest 100 Districts Nationwide*	140 Policies from 49 States**
Mean	6.5	5	5
Range	0.5 – 35.1	<1 – 26	<1 – 20

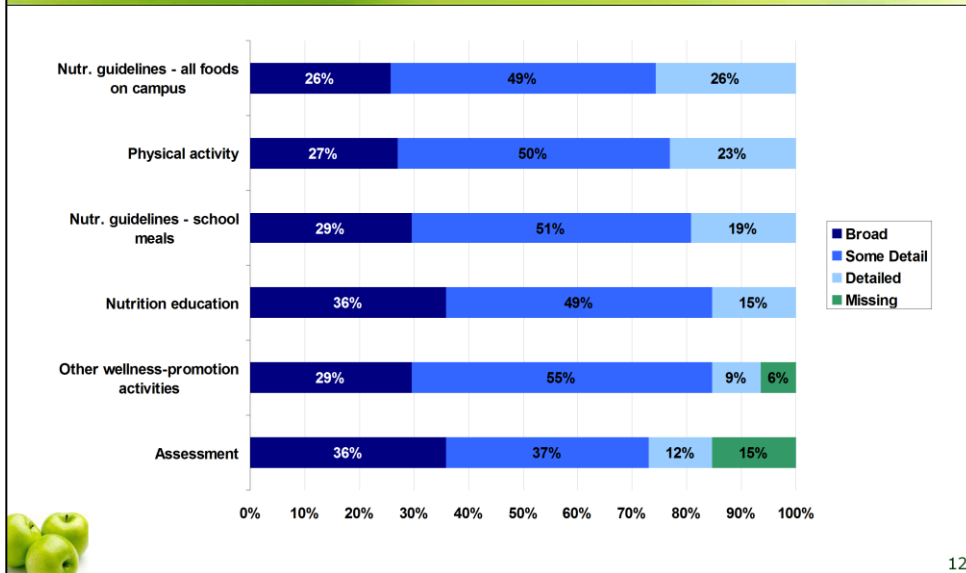


* A Foundation for the Future, School Nutrition Association, 2006
** A Foundation for the Future II, School Nutrition Association, 2006



Photo: Ken Hammond, USDA

Details, Details



Overall, most schools at least mentioned every area of the policy required by law

About half of policies provided some detail and guidance

No more than a quarter of policies contained actionable details on any one policy area

Areas with the most detailed policies were nutrition and physical activity

26% of districts had specific direction for schools on portion sizes, nutrient profiles, percent of calories from fat, etc.

15% were missing information on an assessment plan

6% did not mention other school-based wellness-promotion activities

Nutrition Guidelines – All Foods on Campus

- 55% of policies covered vending machines
- 43% covered food as a reward
- 39% covered school parties, celebrations, and/or fundraisers



Photo: Ken Hammond, USDA

13

Comparing this to the School Nutrition Association study of 140 school districts across the country,

87% of nationwide districts address vending machines

69% addressed fundraisers

66% addressed guidelines for parties

55% addressed food as a reward

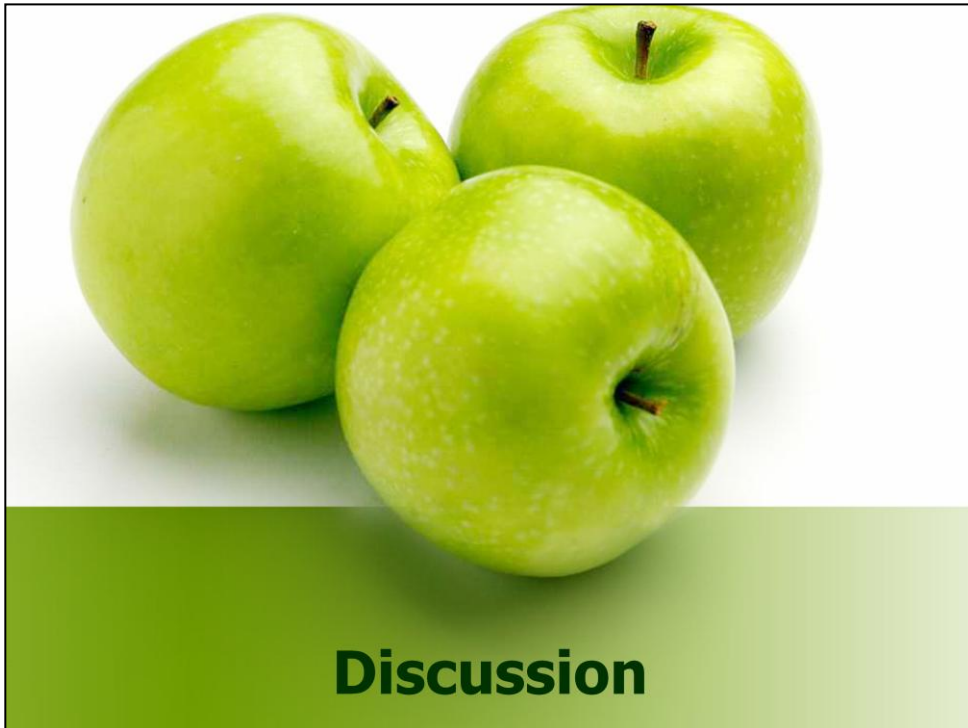
Physical Activity: The Bare Minimum

- “Physical activity outside of physical education classes will be promoted and encouraged”
- “All students will have opportunities, support, and encouragement to be physically active on a regular basis.”



14

Here are two examples of what we considered “broad” guidelines – these are general statements that give no guidance whatsoever to the schools in how to achieve these goals.



Good policy:

- Clear goals and purpose
- Achievable
- Supported by enough funding to be implemented

Bad policy:

- “Empty hand-waving”
- Vagueness in the law’s language left policymakers without clear guidance on what needed to be included, and how to include it

Empty words...

- “Regular” – hourly? daily? weekly?
- “Healthy” – defined by whom?
- “Nutritious” – by what standard?
- “To the extent possible” – who defines what is possible?

Report Card: A few A’s, a few F’s

Nearly all policies could be improved

With all the resources available, how did some schools do so poorly?

More reaching out may be needed

Limitations:

- Some districts may have separate implementation guidelines or administrative rules
- Policy evaluation tool was subjective and concordance was low

Recommendations:

- Future research is needed to develop a standard evaluation tool
- All school districts should consider posting policies online in order to improve transparency