

Nutrition Environment and Services

Schools should prioritize their **Nutrition Environment and Services**, given the links between healthy eating and good overall child health. The U.S. Department of Agriculture heavily regulates school nutrition, with requirements for wellness policies,¹ food served and sold in schools,^{2,3,4} marketing of unhealthy foods and beverages,¹ training for school nutrition professionals,⁵ and unpaid school meal policies.⁶

This analysis explores the extent to which a sample of local education agency (LEA) policies from the 2017-2018 school year addressed emerging nutrition environment and services topics, including marketing of healthy foods, standards for foods outside traditional school meals, and provisions for unpaid school meal debts. The LEAs studied are a sample of 432 agencies, spanning 19 states and the District of Columbia (hereafter “selected states”; see maps below and [Methods Appendix](#) for more details on the state selection), and include both public school districts (“districts”; n = 368) and charter LEAs (n = 64).⁷

Within the Nutrition Environment and Services domain, we assessed six topics (see [Coding Appendix](#)). In this brief, we present data separately for districts and charter LEAs.

Public School District Policies

The district sample included 368 LEAs in the selected states, weighted to be representative of districts at the state level. For these data, we determined the percentage of the topics addressed, on average, across the districts within each state and across all districts studied. To support easy comparisons in the comprehensiveness of district policy across states, percentages were given one of four designations: none (0%), low (< 36%), moderate (36% to < 71%), or comprehensive (≥ 71%).

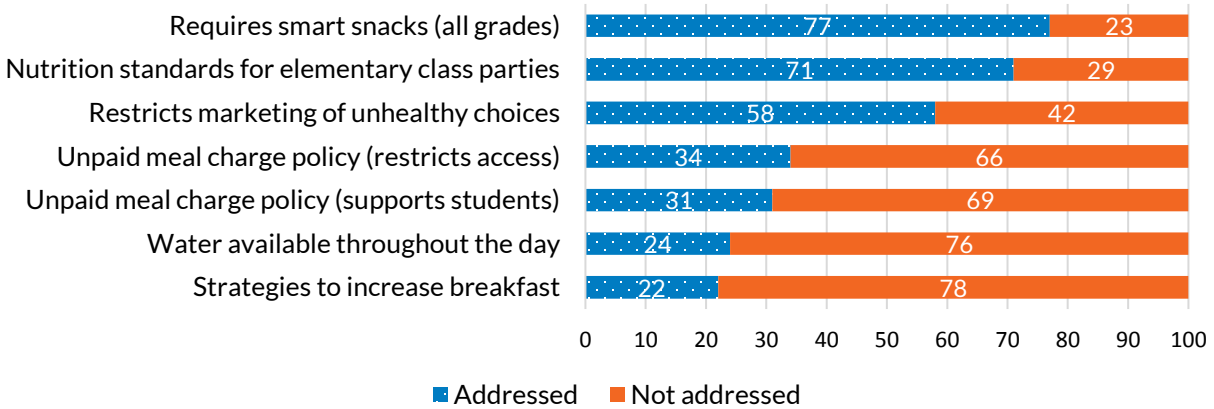
Notably, this assessment does not speak to the prescriptiveness of LEA policies; policies that included firm mandates and policies that merely encouraged activity counted equally in this measure of comprehensiveness. (See [Methods Appendix](#) for more information on our coding process.)

For each of the 20 states, we also present a comparison between district data and state statutes and regulations for the same six nutrition environment and services topics. The same categorizations of none, low, moderate, and comprehensive are used to present the state data. Note that the state data presented herein only represent a sub-set of the state law data compiled and presented in our companion [state law report](#) and the state law data included in the National Association of State Boards of Education (NASBE) [State Policy Database on School Health](#).

Overall, none of the 20 states had district policies that cover nutrition environment and services comprehensively.

- In 14 states, the districts had, on average, moderate coverage of nutrition environment and services topics (range: 45% to 67%; average: 54%). In six states, districts had low coverage (range: 24% to 36%; average: 31%).
- Seventy-seven percent of districts in the selected states required schools to at least meet the federal *Smart Snacks* standards at all three grade levels (see [Figure 1](#)). *Smart Snacks* standards limit the fat, sugar, sodium, and calorie content of competitive food sold in schools.⁴ Another 17 percent of districts addressed nutrition standards for competitive foods; those standards, however, either did not meet *Smart Snacks* standards, or were only recommended.

Figure 1. Percentage of public school districts in the selected states covering nutrition environment and services topics in written policy

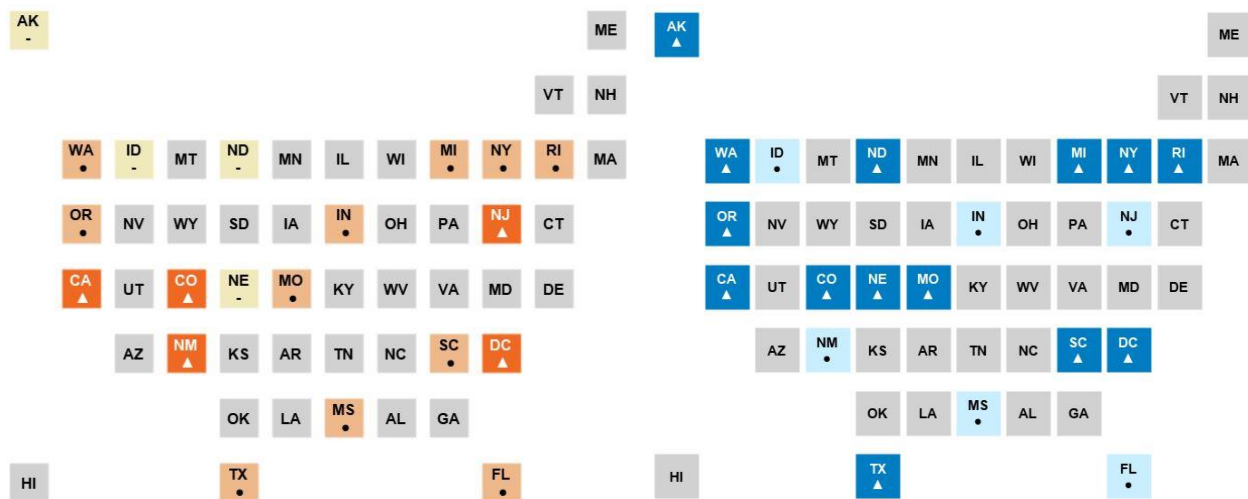


- **Sixteen percent of districts analyzed encouraged strategies to increase participation in school breakfast.** Some districts (6%) required strategies to promote breakfast for all students in all schools.
- **Nearly one-third of districts in the selected states (31%) included provisions to limit “school lunch shaming.”** Such policies support student access to healthy meals—even if the account has a negative balance—for instance by ensuring that students receive the same lunch as their classmates instead of an alternative meal.
- **Another third of districts (34%) included unpaid meal provisions that overtly identify students and/or deny meals to students.** The remaining third of districts (35%) did not have provisions related to unpaid meal charges despite USDA requirements that districts develop such policies by 2017.⁶ Experts agree that while unpaid meal debt is a challenge for districts, there are alternative best practices to help offset the financial burden without stigmatizing students.⁸
- **Twenty-two percent of districts analyzed required that free water be made available to students throughout the school day, beyond the federal requirement for meals.**² Inadequate hydration may impair a student’s cognitive functioning.⁹
- **Half of the districts (50%) in the selected states required restrictions on the marketing of unhealthy food and beverage products.** Under federal rules, district wellness policies must prohibit the marketing of foods and beverages that do not meet Smart Snacks standards.¹ Another seven percent of districts had policies in place that encourage schools to restrict marketing of unhealthy food and beverages.
- **Fifty-five percent of districts analyzed encouraged nutrition standards for classroom parties;** an additional 16 percent required that food and beverage products brought in for classroom celebrations follow specific nutrition standards. The implementing regulations for the federal Healthy, Hunger-Free Kids Act of 2010 require school districts to adopt nutrition standards for food that is provided, but not sold, to students such as through classroom parties.¹

For the majority of the 20 states, nutrition environment and services topics were addressed more comprehensively by district policies than by corresponding state laws.

- District policies in 12 states were, on average, more comprehensive than their states' laws, and in six states, district policies and state laws were similarly comprehensive (see Figures 2a and 2b). This is not surprising, given that all districts participating in federal child nutrition programs (including National School Lunch and School Breakfast programs) are required to have a local wellness policy that includes guidelines consistent with the Smart Snacks standards for nutrition outside the meal programs.⁴ Districts are also required to restrict junk food marketing in schools.¹ District policy provides moderate coverage of topics related to nutrition services in 14 states, whereas state policy provides moderate coverage in only 5 states.

Figure 2a and 2b. State law (left) and public school district comprehensiveness of nutrition environment and services topics in policy



These maps show the proportion of states (left panel) and districts (right panel) in each of the 20 selected states that have [■] **comprehensive** (state panel: 0; district panel: 0), [▲] **moderate** (state panel: 5; district panel: 14), [●] **low** (state panel: 11; district panel: 6), or [-] **no** (state panel: 4; district panel: 0) coverage of nutrition environment and services topics in state and district policies, respectively. For this report, only the 20 states represented with colored squares were studied (at the state and district levels); states shown in gray were excluded from this analysis.

- District policies on the sale or offering of foods outside the meal programs are markedly more comprehensive than state laws. This is likely because school districts participating in the federal child nutrition programs are required to comply with federal Smart Snacks standards and local wellness policy regulations.^{1,4} While 94 percent of districts maintained policies on competitive foods, only 65 percent of states did so. Additionally, 71 percent of districts addressed the provision of foods in class parties at the elementary level, compared to only 20 percent of the states.
- The only topic more commonly addressed in state law than district policies related to strategies to increase breakfast participation. Forty-five percent of states addressed providing breakfast at school as compared to only 22 percent of districts in the 20 states.

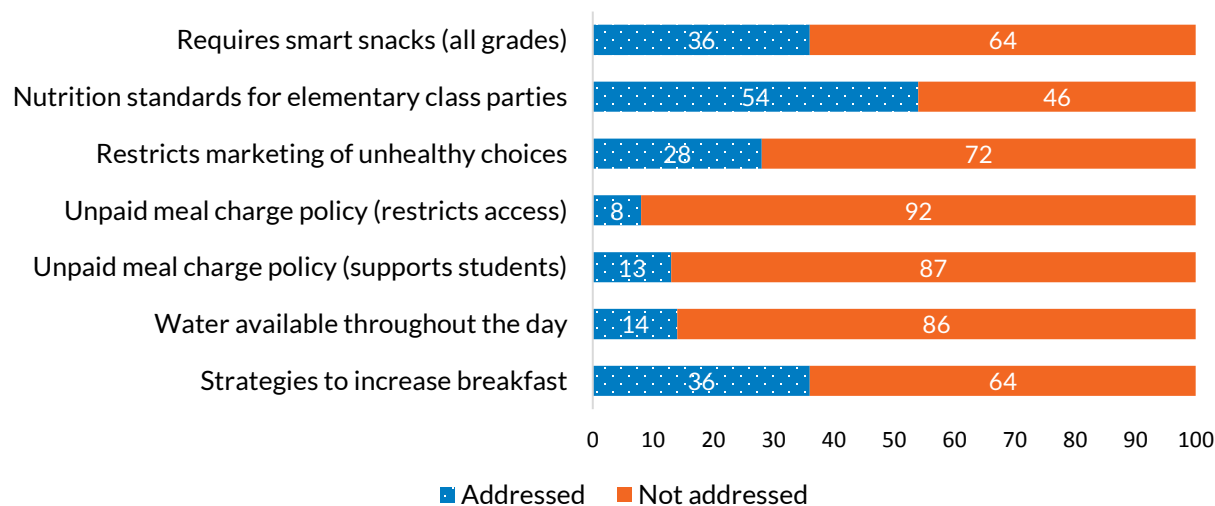
Charter LEA Policies

We also collected policies for a sample of 64 charter LEAs across the 20 selected states. Depending on the structure of charter LEAs in a given state, such policies may be applicable for a single school or for multiple schools run by the same charter provider. Charter policies often addressed different aspects of nutrition environment and services when compared to district policies. Because the number of charter policies collected in a single state was often small (proportionate to their representation across all LEAs in the state), we chose to look across the full sample of charter schools rather make generalizations at the state level.

About two-thirds (64%) of charter LEAs addressed nutrition environment and services topics in their policies.

- **Of all nutrition topics examined, charter LEAs most often addressed nutrition standards for class parties (54%)** (see Figure 3). Notably, prior research conducted in districts nationwide shows that having any type of policy encouraging healthier food items (or no food items) in classroom parties is associated with such practices at the school level.¹⁰ Thus, charter LEAs with such policies are taking a proactive stance to support a healthier school food environment.
- **Only half of charter LEAs examined (50%) addressed nutrition requirements for foods sold outside of school meals, with 36 percent requiring Smart Snacks standards at all three grade levels.** This is an area of growth and development for charters, particularly if they participate in federal child nutrition programs, which require compliance with the Smart Snacks⁴ standards and school meal³ regulations.
- **Thirty-six percent of charter LEAs addressed strategies to increase breakfast participation through policy.** This topic is addressed more often in charter policies than in district policies for the 20 selected states.
- **Only 13 percent of charter LEAs include provisions that address “school lunch shaming” in ways that support students.** The vast majority (80%) of charter LEAs had no policies on unpaid meal charges, and 8 percent included provisions restricting access to meals for students with outstanding debt. It is important to note that some charter LEAs do not serve meals on their campuses.

Figure 3. Percent of charter LEAs covering selected nutrition environment and services topics in written policy



The Institute for Health Research and Policy at the University of Illinois at Chicago, in partnership with Child Trends, examined the extent to which 11 healthy schools domains are addressed in local education policies across 20 strategically selected states (including 19 states and the District of Columbia; see Methods section for details on the sampling methodology). These domains include the 10 components of the Whole School, Whole Community, Whole Child (WSCC) model: Health Education; Physical Education and Physical Activity; Nutrition Environment and Services; Health Services; Counseling, Psychological, and Social Services; Social and Emotional Climate; Physical Environment; Employee Wellness; Family Engagement; and Community Involvement. An additional domain, WSCC References, addresses the extent to which district policies include explicit references to the WSCC model, or similar language such as the Centers for Disease Control and Preventions' Coordinated School Health model. Sub-briefs covering the other domains can be found at <https://www.childtrends.org/publications/the-current-landscape-of-school-district-and-charter-policies-that-support-healthy-schools>.

¹ Local School Wellness Policy Implementation Under the Healthy, Hunger-Free Kids Act of 2010, Final Rule, (2016). 81 Federal Register 50151. Retrieved from: <https://www.gpo.gov/fdsys/pkg/FR-2016-07-29/pdf/2016-17230.pdf>.

² Healthy, Hunger-Free Kids Act of 2010. PL 111-296; 124 Stat 3183. 2010(111th Congress). Retrieved from: <https://www.gpo.gov/fdsys/pkg/PLAW-111publ296/pdf/PLAW-111publ296.pdf>.

³ Nutrition standards in the National School Lunch and School Breakfast Programs. (2012). 77 Federal Register 4088. Retrieved from: <https://www.gpo.gov/fdsys/pkg/FR-2012-01-26/pdf/2012-1010.pdf>.

⁴ National School Lunch Program and School Breakfast Program: Nutrition standards for all foods sold in school as required by the Healthy, Hunger-Free Kids Act of 2010, final rule. (2016). 81 Federal Register 50132. Retrieved from: <https://www.fns.usda.gov/school-meals/fr-072916d>.

⁵ Professional Standards for State and Local School Nutrition Programs Personnel as Required by the Healthy, Hunger-Free Kids Act of 2010, Final Rule, (2015). 80 Federal Register 11077. Retrieved from: <https://www.fns.usda.gov/school-meals/fr-030215>.

⁶ U.S. Dept. of Agriculture, Food and Nutrition Service. (2016). Memo SP 46 2016: Unpaid Meal Fees: Local Meal Charge Policies. Retrieved from: <https://fns-prod.azureedge.net/sites/default/files/cn/SP46-2016os.pdf>

⁷ For purposes of this work, a charter LEA is an LEA listed in the U.S. Department of Education's Common Core of Data (SY 2014-15) as an "Independent Charter District."

⁸ Spruance, L.A., Hill, S., Nixon, A., Lavering, M., Burton, J.H., Patten, E. (2019). The relationship between unpaid school meal policies and debt in Child Nutrition Programs. *Journal of Nutrition Education and Behavior* 51(7):S50-S51.

⁹ Centers for Disease Control and Prevention. Increasing Access to Drinking Water in Schools. Atlanta GA: US Dept. of Health and Human Services; 2014.

¹⁰ Turner L., Chriqui, J.F., Chaloupka, F.J. (2013). Classroom parties in us elementary schools: the potential for policies to reduce student exposure to sugary foods and beverages. *Journal of Nutrition Education and Behavior* 45(6):611-9.