

Working on Wellness: How Aligned are District Wellness Policies with the Soon-To-Be-Implemented Federal Wellness Policy Requirements?

Nationwide Baseline Information from the 2014 –15 School Year

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**NATIONAL
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Executive Summary

Healthier students are better learners, and when children spend most of their waking hours at school, their health and well-being becomes a key component of their education.^{1,2} For over a decade, Congress and the United States Department of Agriculture (USDA) have been requiring that all school districts participating in the Federal Child Nutrition Programs adopt and implement nutrition and physical activity goals for students during the school day through the use of a local wellness policy.^{3,4}



FEDERAL WELLNESS POLICY REQUIREMENTS

School districts that participate in any of the Federal Child Nutrition Programs have been required to have a wellness policy in place since the 2006-07 school year when the *Child Nutrition and WIC Reauthorization Act of 2004* provided the first guidelines.³ In 2010, wellness policy requirements were renewed and expanded in the *Healthy, Hunger-Free Kids Act*.⁴ Recently, in 2016, the USDA issued a final rule entitled, *Local School Wellness Policy Implementation under the Healthy, Hunger-Free Kids Act of 2010*.⁵ The wellness policy final rule further strengthens district wellness policy requirements, and takes effect at the start of the 2017-18 school year.

Under the local wellness policy final rule,⁵ wellness policies are required to include, at a minimum:

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

Incorporated by reference into the wellness policy final rule are two regulations that are independently required by all districts that participate in the National School Lunch and School Breakfast Programs: (1) *Nutrition Standards in the National School Lunch and Breakfast Programs*,⁶ (effective school year 2012-13) and (2) *Smart Snacks in School* ^{7,8} (effective school year 2014-15).



REPORT OVERVIEW

This report provides data on **district wellness policies** in effect at the start of the 2014-15 school year. This report does not evaluate implementation at the school level, but rather evaluates the content of on-the-books policies adopted at the district level. Data presented reflect the percent of districts for school food authorities (SFAs) nationwide.

This report will provide:

- Insights as to district policy readiness for or **alignment with** the provisions of the **wellness policy final rule** given the forthcoming implementation effective date (school year 2017-18),
- Baseline information that tracks the **incorporation of Smart Snacks** standards into district wellness policies during the first year of implementation (school year 2014-15), and
- An assessment of the scope (i.e., **comprehensiveness**) and intensity (i.e., **strength**) of wellness policy provisions in district policies within and across all topic areas, and by selected district characteristics.

MAJOR FINDINGS

Although 97% of districts had adopted wellness policies at the start of the 2014-15 school year, the number of required component areas that were included varied greatly. Only 57% of district policies included all federally-required topics. Overall, district wellness policies addressed 42% of all items evaluated by the [National Wellness Policy Study](#) and about one-third of all provisions were required.

As school districts review and revise their wellness policies for the 2017-18 school year to comply with the wellness policy final rule, the baseline information provided herein highlights areas to target for policy revision and enhancement. Highlights from the 2014-15 school year include:

- Although 94% of district policies addressed goals for **nutrition education**, the number of evidence-based nutrition education practices included in policies was considerably lower.
- Goals for **physical activity** were similarly addressed in a great number of district policies (93%); however, only 19% of district policies addressed a specific amount of time for physical activity for elementary school students, 10% addressed time for middle school students, and 6% addressed physical activity time for high school students.
- **Physical education**, although not a required wellness policy component area under the wellness policy final rule, is often included as an essential part of physical activity provided during the school day. Still, only 11% of district policies required that half of the time spent in physical education involve moderate to vigorous physical activity.

- Beginning school year 2012-13, nutrition standards for **school meals** were strengthened and increased the availability of fruits, vegetables, and whole grains, while restricting saturated fat, trans fat, sodium, calories per week, and available milk fat varieties.^{6,*} Eighty-nine percent of district wellness policies required that their district meet USDA meal standards in text.[†] However, those policies ensured compliance by incorporating a reference to the Federal rule, and not by including the detailed nutrition standards within the wellness policy itself.
- This report provides data for the first year of **Smart Snacks in School** implementation. At the start of the 2014-15 school year, only 36% of district policies met the *Smart Snacks* nutrition standards.[†] Moreover, only 4% of district policies included the details of *Smart Snacks* within the text of the policy itself; the rest of the districts provided a reference to state and/or Federal law.
- Starting school year 2017-18, the wellness policy rule will require that **in-school marketing** be restricted to those foods and beverages that are allowed to be sold under *Smart Snacks*. Although not yet required to do so, 14% of district policies prohibited the marketing of unhealthy foods and beverages as of the 2014-15 school year.
- Under the wellness policy final rule, eight **key stakeholders** are required to be involved in the development, implementation, review, and update of local wellness policies. Results varied in how many stakeholders were required to be involved in each process as of the 2014-15 school year, with 65% of districts still failing to include the original six stakeholders required in the development of the local wellness policy since the 2006-07 mandate provided in the *Child Nutrition and WIC Reauthorization Act*.³
- Opportunities for **staff wellness**, while not a required wellness policy component area, help create a consistent healthy school environment.¹¹ Over one-quarter of district policies addressed the creation of staff wellness programs and 18% addressed providing physical activity opportunities for staff during the 2014-15 school year.
- **Implementation, evaluation, and reporting** practices should undergo many changes aimed at increasing transparency in the 2017-18 school year under the wellness policy final rule.⁵ Although 84% of policies included implementation plans at the start of 2014-15, only 19% required a plan for evaluation, 26% required a report to the public, 18% addressed posting the wellness policy publicly offline, and 9% addressed posting the wellness policy online.



* On May 1, 2017, Secretary of Agriculture Sonny Perdue announced that USDA would begin the regulatory process to provide greater flexibility for school meals in the areas of whole grains, sodium, and milk fat of flavored milk.⁹ On May 5, 2017, Congress included language in Division A Section 747 of the Consolidated Appropriations Act, 2017 (P.L. 115-31) that requires USDA to provide flexibility around the whole grain-rich, sodium, and flavored milk requirements for school year 2017-2018.¹⁰ As a result, for school year 2017-2018, States may grant exemptions to the whole grain-rich requirements and flavored milk requirements, and schools that meet sodium Target 1 will be considered compliant with USDA sodium requirements.

† This analysis examined district wellness policy *language* to assess the extent to which district policies make specific note of the Federal school meal and *Smart Snacks* standards. Of course, all schools participating in the Federal Child Nutrition Programs are required by Federal law to adhere to the Federal standards. This report does not suggest otherwise; rather, we sought to identify to what extent districts were reinforcing these requirements in their policies.

OPPORTUNITIES AHEAD

As districts review and revise their wellness policies in the months and years ahead, they will want to focus on those provisions that will be required under the local wellness policy final rule as of the start of the 2017-18 school year. Key opportunities for policy revision include but are not limited to:

- incorporating **nutrition education** provisions into the wellness policy after reviewing evidence-based strategies;
- **prohibiting marketing** of foods and beverages that are not compliant with the Federal *Smart Snacks* standards and promoting good nutrition practices;
- encouraging **physical activity opportunities throughout the school day** including through quality, active time being spent in physical education;
- fully outlining the **Federal school meal and Smart Snacks standards** into the district policy so that local implementers are clear on the Federal standards;
- considering adoption of a **fundraiser exemption** policy that is at least consistent with your state's fundraiser exemption policy and that supports good nutrition and healthy eating;
- including a full range of **stakeholders** in the review, revision, and updating of the wellness policy including parents, students, food service workers, administration, the school board, the public, **physical educators and school health professionals**;
- being **transparent**—ensuring that school stakeholders, parents, students, and the community are aware of and know how to locate the wellness policy and promote it throughout the district to ensure consistency district-wide.



Introduction

Healthier students are better learners, and when children spend most of their waking hours at school, their health and well-being becomes a key component of their education.^{1,2} Providing a safe and healthy place to learn, eat, and play can contribute significantly to children’s overall health and achievement.

For over a decade, Congress and the United States Department of Agriculture (USDA) have been requiring that all school districts participating in the Federal Child Nutrition Programs adopt and implement nutrition and physical activity goals for students during the school day through the use of a local wellness policy.^{3,4} The language included in these district wellness policies is critical to implementing the Federal standards and the nutrition and physical activity goals that are established within them.

WHAT IS A LOCAL WELLNESS POLICY?

A local wellness policy is “a written document of official policies that guide a school district’s efforts to establish a school environment that promotes students’ health, well-being, and ability to learn by supporting healthy eating and physical activity.”¹² School districts that participate in any of the Federal Child Nutrition Programs have been required to have a wellness policy in place since the 2006-07 school year when the *Child Nutrition and WIC Reauthorization Act of 2004* provided the first guidelines.³

In 2010, wellness policy requirements were renewed and expanded in the *Healthy, Hunger-Free Kids Act*.⁴ Recently, in 2016, the USDA issued a final rule entitled, *Local School Wellness Policy Implementation under the Healthy, Hunger-Free Kids Act of 2010*.⁵ The wellness policy final rule further strengthens district wellness policy requirements, and takes effect at the start of the 2017-18 school year. Figure 1 depicts the history of congressional and USDA wellness-related policymaking to date.

Figure 1. Historical progression of local wellness policy requirements



FEDERAL WELLNESS POLICY REQUIREMENTS

Beginning with the 2017-18 school year, the local wellness policy final rule⁵ requires wellness policies to include, at a minimum:

- *Goals for nutrition promotion and education, physical activity, and other school-based activities that promote student wellness after reviewing and considering evidence-based strategies;*
- *Nutrition guidelines for all foods and beverages available on each school campus during the school day that are consistent with Federal school meal standards and Smart Snacks in School nutrition standards;*
- *Nutrition standards for all foods and beverages provided, but not sold, to students during the school day;*
- *Policies for food and beverage marketing that allow advertising of only those foods and beverages that meet Smart Snacks in School;*
- *Permission for stakeholders (parents, students, teachers, school food authority, teachers of physical education, school health professionals, school board, school administrators, and the public) to participate in policy development, implementation, review, and updates;*

- A requirement that the district annually inform and update the community about the policy's content, implementation, and any updates;
- A requirement that the district triennially measure and make available to the public an assessment on implementation, including school compliance, alignment with model wellness policies, and a description of progress made in attaining the wellness policy goals; and
- Designating one or more district and/or school officials as wellness policy leadership who are responsible for ensuring school-level compliance with the wellness policy.

The wellness policy final rule incorporates by reference two additional USDA regulations that are independently required by all districts that participate in the National School Lunch and School Breakfast Programs. Nutrition guidelines for all foods available on campus must meet the Federal requirements for: (1) school meals⁶ and (2) *Smart Snacks in School* nutrition standards.^{7,8} The most recent Federal school meal standards, *Nutrition Standards in the National School Lunch and Breakfast Programs*,⁶ took effect school year 2012-13. The standards aligned school meal requirements with the *Dietary Guidelines for Americans*¹³ and provided for increases in fruits, vegetables, and whole grain-rich products as well as reductions in the amount of saturated fat, trans fat, sodium, and calories.^{6,*} *Smart Snacks* took effect at the start of the 2014-15 school year, and provided nutrition standards for all foods and beverages sold *outside* of the school meal program, on the school campus, during the school day.^{7,8}

As of fiscal year 2016, 30.3 million students participated in the National School Lunch Program^{14,15} and 14.5 million participated in the School Breakfast Program.¹⁶ As a result, the rules established in the wellness policy, school meal, and *Smart Snacks* final rules are incredibly far-reaching.

REPORT OVERVIEW

This report provides data on **district wellness policies** in effect at the start of the 2014-15 school year. This report does not evaluate implementation at the school level, but rather evaluates the content of on-the-books policies adopted at the district level. Data presented reflect the percent of districts for school food authorities (SFAs) nationwide. Understanding district wellness policy text can help identify potential successes and challenges to implementation within schools across the country.

For readers interested in historical information on district wellness policies nationwide, we refer you to our prior reports on this topic which covered school years 2006-07 through 2013-14.¹⁷⁻²⁰ Although the data presented herein provide similar data points to prior monographs, prior years' studies were based on a different sample frame and, therefore, cannot be directly compared. However, the data across all years are consistent in terms of trends, prevalence, and strength. Items discussed below were specifically chosen as relevant to the new Federal wellness policy-related rules and evidence-based standards.

This report will provide:

- Insights as to district policy readiness for or alignment with the provisions of the **wellness policy final rule** given the forthcoming implementation effective date (school year 2017-18),
- Baseline information that tracks the incorporation of **Smart Snacks** standards into district wellness policies during the first year of implementation (school year 2014-15), and
- An assessment of the scope (i.e., **comprehensiveness**) and intensity (i.e., **strength**) of wellness policy provisions in district policies within and across all topic areas, and by selected district characteristic.

* On May 1, 2017, Secretary of Agriculture Sonny Perdue announced that USDA would begin the regulatory process to provide greater flexibility for school meals in the areas of whole grains, sodium, and milk fat of flavored milk.⁹ On May 5, 2017, Congress included language in Division A Section 747 of the Consolidated Appropriations Act, 2017 (PL. 115-31) that requires USDA to provide flexibility around the whole grain-rich, sodium, and flavored milk requirements for school year 2017-2018.¹⁰ As a result, for school year 2017-2018, States may grant exemptions to the whole grain-rich requirements and flavored milk requirements, and schools that meet sodium Target 1 will be considered compliant with USDA sodium requirements.

Study Methods

DISTRICT POLICY COLLECTION

This study examined hard copies of written wellness policies obtained via Internet research and direct communication with public school districts located in 46 of the 48 contiguous states and the District of Columbia. Policies were obtained for the 2014-15 school year, with the day after Labor Day serving as a proxy for the first day of the school year. District policies were collected for a nationally-representative sample of SFAs that completed the SFA Director Survey as part of the USDA's School Nutrition and Meal Cost Study (SNMCS). SNMCS recruitment was completed for 548/633 (86.6%) SFAs, and SNMCS data collection for this survey component was completed for 518/548 (94.5%) SFAs. District policies were successfully obtained for 496/518 (95.8%) of these SFAs. In a very small number of instances, policies were collected for individual public or private schools where that was considered the relevant policy for the SFA. The entities from which all policies were obtained will be referred to as "districts" hereafter.

For purposes of this study, **WELLNESS POLICY** was defined to include: 1) the actual district wellness policy; 2) the associated administrative policies, including implementation regulations, rules, procedures, or administrative guidelines; and 3) any district, state, or model policies that were referenced within the wellness policy or administrative documents.

DISTRICT POLICY CODING

All policies were analyzed by two trained analysts using an adaption of a wellness policy coding scheme originally developed by Schwartz et al.,²¹ presented in Chriqui et al.,¹⁷ and modified over time by the National Wellness Policy Study team and presented in related district policy reports.^{17-20,22} Significant revisions were made to incorporate *Smart Snacks* standards for the 2014-15 school year. District policies were evaluated in 10 wellness-policy related component areas, presented in Table 1. The detailed coding tool is available on the National Wellness Policy Study [website](#).

For each policy provision described, data are presented on the percentage of district policies with: 1) a strong policy; 2) a weak policy; or 3) no policy. We defined **STRONG POLICY PROVISIONS** as those that were definitely required and specified an implementation plan or strategy. Strong policy provisions included language such as *shall, must, will, require, comply, and enforce*. When evaluating competitive food provisions, strong policies were also broken out based on whether or not the provision was required and met *Smart Snacks* standards^{7,8} and/or the 2007 IOM competitive food and/or beverage standards²³ or were required but did not reach these benchmarks.

We defined **WEAK POLICY PROVISIONS** as those that included vague terms, suggestions or recommendations, as well as those that required action, but noted exceptions for certain grade levels or certain times of day. Weak policy provisions included language such as *should, might, encourage, some, make an effort to, partial, and try*.

Table 1. Number of district wellness policy provisions captured for each category, school year 2014-15

POLICY CATEGORY	NUMBER OF PROVISIONS
Nutrition education	7
Physical activity	10
Physical education	15
School meals	24
Competitive foods and beverages	120*
Marketing and promotion	3
Communication and stakeholder input	5
Evaluation and implementation	9
Reporting requirements	20
Staff wellness and modeling	3
TOTAL	216

* Includes a total of 109 variables coded specifically for vending machines (21), school stores (21), à la carte (23), class parties (21), and fundraisers (23).

SCOPE AND INTENSITY OF DISTRICT WELLNESS POLICIES

In addition to examining individual provisions across the 10 wellness policy component areas, we also examined the scope (i.e., comprehensiveness) and intensity (i.e., strength) of district policies across and within all component areas captured in this report. **Comprehensiveness scores** reflect a measure of scope or the proportion of provisions analyzed that were addressed in each district's policy (regardless of whether the provisions were required or encouraged/suggested). **Strength scores** reflect the proportion of provisions analyzed that were definitively required.

Calculating Comprehensiveness and Strength Scores

Comprehensiveness scores represent the proportion of policy provisions that were addressed (required or encouraged/suggested).

Strength scores represent the proportion of provisions that were definitively required in each district's policy.

Both the comprehensiveness and strength scores were multiplied by 100 to reflect a scale of 0 to 100. Separate scores were calculated for each of the 10 policy areas examined herein as well as for overall comprehensiveness and strength across all 10 areas for each district policy. In one example, if a district's policy addressed three of six nutrition education provisions examined and two of these provisions were definitively required, the policy's nutrition education comprehensiveness score would be 50 out of 100 (three divided by six, times 100) while the nutrition education strength score would equal 33.33 out of 100 (two divided by six, times 100).

DISTRICT CHARACTERISTICS

District comprehensiveness and strength scores were also analyzed according to district characteristic obtained from the National Center for Education Statistics (NCES) Common Core of Data.²⁴⁻²⁶ Specifically, we examined how district comprehensiveness and strength scores varied based on the following characteristics:

- **Race/Ethnicity:** The proportion of students in grades 1-12 that were non-Hispanic white, non-Hispanic African-American, or Hispanic/Latino was used to categorize the racial/ethnic distribution into four categories using O'Malley et al.'s analysis of school characteristics associated with middle and high school student obesity rates.²⁷ Categories included: majority white ($\geq 66\%$ non-Hispanic white), majority African-American ($\geq 50\%$ non-Hispanic African-American), majority Hispanic/Latino ($\geq 50\%$ Hispanic/Latino), and diverse (not falling into the previous three categories).
- **Socioeconomic status:** The percent of students eligible for free and reduced-price lunch (FRPL) has been used as a proxy for SES within districts.²⁸ FRPL is based on verified family income or categorical eligibility based on household participation in other Federal assistance programs, including the Supplemental Nutrition Assistance Program and Temporary Assistance for Needy Families.²⁹ Groupings of FRPL were computed as tertiles.
- **Locale:** Divided into urban (i.e., large-to mid-size city), suburban, rural, and township.
- **District size:** Measured by total student enrollment in pre-kindergarten through 12th grade, district size is divided into tertiles.
- **Census Region:** Based on Census classifications,³⁰ separated by West, Midwest, South, and Northeast.

Table 2 summarizes the characteristics of districts included in this study.

Table 2. District characteristic statistics, school year 2014-2015

CHARACTERISTIC	%
RACE/ETHNICITY	
Majority White (≥66%)	65.37%
Majority African-American (≥50%)	7.12%
Majority Hispanic/Latino (≥50%)	8.33%
Diverse racial/ethnic	19.18%
SOCIOECONOMIC STATUS	
Low SES (>60.20% FRPL)	29.95%
Medium SES (>39.72%-60.20% FRPL)	38.74%
High SES (≤39.72% FRPL)	31.31%
LOCALE	
Urban (large- to mid-size city)	13.03%
Suburb	21.26%
Rural	45.27%
Township	20.44%
DISTRICT SIZE	
Small (≤1,437)	55.30%
Medium (1,438-5,655)	31.63%
Large (≥5,656)	13.07%
CENSUS REGION	
West	15.97%
Midwest	39.97%
South	25.74%
Northeast	18.32%

DATA ANALYSES

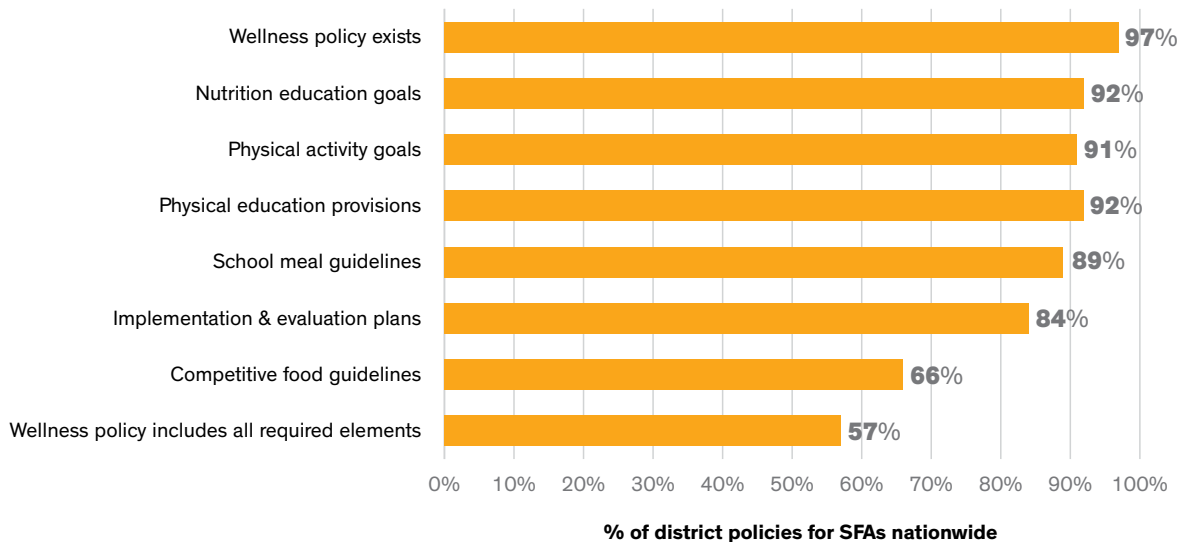
All analyses were conducted in Stata/SE 13.1. Policy prevalence data presented herein were survey-weighted to be representative of the percentage of district policies for a nationally-representative sample of public SFAs offering the National School Lunch Program (NSLP). When aggregating across all three grade levels, policy prevalence data count each district-grade level combination as a separate observation. The statistical significance of grade level differences was determined using the Pearson chi-squared statistic with the Rao and Scott^{31,32} second-order correction from a two-way tabulation of district policy and grade level, counting each district-grade level combination as a separate observation.

Similarly, comprehensiveness and strength score data presented in this report were survey-weighted to be representative of the mean comprehensiveness and strength of district policies for the nationally-representative sample of SFAs. When aggregating across all three grade levels, comprehensiveness and strength scores were averaged across the three grade levels, with a single observation per district. Statistical significance for differences in comprehensiveness and strength by district characteristics was computed from bivariate linear regressions of comprehensiveness and strength scores on the given characteristics, with a single observation per district. Statistical significance for differences in comprehensiveness and strength by grade level was computed from bivariate linear regressions of comprehensiveness and strength scores on grade level, counting each district-grade level combination as a separate observation.

District Policy Alignment with Federal Standards

At the start of the 2014-15 school year, approximately 97% of districts had adopted a local wellness policy. However, the percent of districts that included requirements for individual, required component areas varied greatly. As of the beginning of school year 2014-15, only 57% of districts included ALL elements that have historically been required within their wellness policies (Figure 2). Since the marketing restrictions are newly required as of 2017-18 school year, they are not presented in Figure 2 but only 14% of districts required that food and beverage advertising, if allowed, be limited to those items that meet the *Smart Snacks* standards as of school year 2014-15.

Figure 2. District wellness policy and required component area adoption, school year 2014-15



This section provides baseline information as to how district wellness policies for SFAs nationwide aligned with the soon-to-be-implemented Federal rules at the start of the 2014-15 school year. Data will be presented for each of the Federal wellness policy component areas, including:

- Nutrition education
- Physical activity and physical education
- School meals
- Competitive foods and beverages
- Marketing
- Stakeholder participation
- Staff wellness and
- Reporting, implementation, and evaluation

Each component area will address: (1) a description of what is required under the Federal rules; (2) the importance of the wellness policy component area and how it contributes positively to student health; and (3) data on district wellness policy alignment with the Federal rules as of school year 2014-15 (which can serve as a preliminary baseline leading into the final rule effective date of school year 2017-18).

NUTRITION EDUCATION

What does the wellness policy final rule require?

Goals for nutrition education have been a required component of local wellness policies since the 2006-07 school year. However, starting in school year 2017-18, the wellness policy final rule requires that goals for nutrition education be developed after reviewing and considering *evidence-based* strategies.⁵

The importance of nutrition education

The Centers for Disease Control and Prevention's National Health Education Standards recommend assuring that there is a sequential, comprehensive curriculum in which students are learning and practicing skills and behaviors to promote health, and that adequate time is being spent on nutrition.³³ Well-implemented nutrition education curricula can help children obtain healthy weights³⁴ and body mass indexes,³⁵ increase fruit and vegetable consumption^{34,36} and positive attitudes towards these foods,³⁶⁻³⁸ and may improve academic performance.³⁹

How do district wellness policies measure up?

At the start of the 2014-15 school year, 94% of district policies addressed goals for nutrition education. However, evidence-based nutrition education practices were not as prevalent. Table 3 presents data on the nutrition education provisions that were addressed in the district wellness policies as of the 2014-15 school year. Specifically:

- More than one-fifth of district policies did not address a nutrition education curriculum at each grade level.
- Close to two-thirds of district policies addressed incorporating nutrition education into other subjects throughout the day, but only 35% required the practice.
- Nutrition education training for teachers was addressed in less than half of all district policies, with only 10% of policies requiring that teachers receive training.

WORKING ON WELLNESS: Making nutrition education an integrated part of the school day



Nutrition education and healthy eating habits do not have to stop at the end of one lesson on nutrition. Instilling healthy meal patterns, learning about food groups, and identifying sources of sugars and fats can all be integrated as part of math, science, and play.⁴⁰ Other activities, such as hands-on learning in school gardens or using the cafeteria as a learning laboratory, can also be a fun way to get students excited about nutrition and eating healthy foods.⁴⁰ About 40% of district policies were yet to address integrating nutrition education and 86% did not mention a school garden as of school year 2014-15, so there is room for district policy growth in this area.

Table 3. Nutrition education provisions addressed in district wellness policies by grade level of applicability, school year 2014-15

PROVISION	STRENGTH	ALL GRADES	ELEMENTARY	MIDDLE	HIGH
Nutrition education goals	None	6%	6%	6%	6%
	Weak	2%	2%	2%	2%
	Strong	92%	92%	92%	92%
Nutrition curriculum for each grade	None	21%	20%	20%	22%
	Weak	38%	37%	38%	38%
	Strong	41%	42%	42%	40%
School gardens	None	86%	85%	85%	88%
	Weak	14%	14%	14%	12%
	Strong	0%	0%	0%	0%
Nutrition education training for teachers	None	56%	56%	55%	57%
	Weak	34%	34%	34%	34%
	Strong	10%	10%	10%	10%
Nutrition education integrated into other subjects	None	40%	39%	40%	41%
	Weak	25%	24%	25%	27%
	Strong	35%	37%	36%	33%
Nutrition education teaches behavior-focused skills	None	21%	21%	21%	22%
	Weak	16%	16%	16%	15%
	Strong	63%	63%	63%	63%
Number of nutrition education courses or hours specified*	None	94%	97%	96%	90%
	Weak	6%	3%	4%	10%
	Strong	0%	0%	0%	0%

Due to rounding, some percentages may not sum exactly to 100.

Strong= required; Weak = encouraged/suggested; None= no policy.

* Difference in prevalence between grade levels is statistically significant at the p<.05 level.

PHYSICAL ACTIVITY & PHYSICAL EDUCATION

What does the wellness policy final rule require?

Goals for physical activity have also been a required wellness policy component area since the 2006-07 school year. The wellness policy final rule reaffirms this requirement and similarly states that goals must be developed after reviewing and considering *evidence-based* strategies.⁵ Although physical education is not listed as a required component area, it is often included as an essential part of physical activity provided during the school day.

The importance of physical activity & physical education

Physical activity helps build and maintain bone and muscle mass, reduces the risk of becoming overweight and developing other chronic diseases, reduces depression and anxiety, and may help improve academic performance for students.^{1,41} Moreover, providing classroom physical activity breaks⁴² and time for recess⁴³ adds to the 60 minutes of physical activity that is recommended for children every day.^{1,44} In addition, national standards for physical education recommend that students in elementary school participate in physical education class for a minimum of 150 minutes per week, and that students in middle and high school participate for a minimum of 225 minutes per week.⁴⁵

How do district wellness policies measure up?

Although goals for physical activity were addressed in 91% of district policies, provisions addressing a specific amount of time for physical activity were addressed far less often and varied by grade level. Tables 4 and 5 present data on the physical activity and physical education provisions, respectively, that were addressed in the district wellness policies as of school year 2014-15. A few highlights include:

- Only 19% of district policies addressed time for physical activity for elementary school students, 10% of district policies addressed time for middle school students, and 6% addressed time for high school students.
- Eighteen percent of district policies required that physical activity breaks be provided throughout the school day. Another 40% recommended such breaks.
- Less than one-quarter of district policies required recess for elementary school students on a daily basis.
- Physical education was mentioned in 92% of district policies. However, only 5%, 2%, and 1% of district policies required the nationally recommended amount of minutes at the elementary, middle, and high school levels, respectively.
- Although 70% of district policies addressed teaching about physically active lifestyles in physical education, only 11% of policies actually required that half of the time spent in physical education involve moderate to vigorous physical activity.

WORKING ON WELLNESS: Making time for physical activity



When students are given time for physical activity breaks and recess, there are improvements in their cognitive skills, academic behavior, and achievement.⁴⁶ Although more than 90% of district policies included goals for physical activity, about the same percent of districts failed to address an amount of time during which students would receive physical activity on a daily or weekly basis. Moreover, only about 18% of district policies required that there be physical activity opportunities *throughout* the day, such as active classroom breaks.

Table 4. Physical activity provisions addressed in district wellness policies by grade level of applicability, school year 2014-15

PROVISION	STRENGTH	ALL GRADES	ELEMENTARY	MIDDLE	HIGH
Goals for PA	None	7%	7%	7%	7%
	Weak	2%	2%	2%	2%
	Strong	91%	91%	91%	91%
PA for every grade level	None	35%	30%	37%	39%
	Weak	27%	25%	27%	28%
	Strong	38%	45%	36%	33%
Amount of time for PA*	None	88%	81%	90%	94%
	Weak	4%	4%	4%	4%
	Strong	8%	15%	6%	3%
PA opportunities throughout the day (e.g., classroom breaks)	None	42%	41%	42%	43%
	Weak	40%	39%	40%	42%
	Strong	18%	20%	18%	16%
Community use of facilities for PA	None	70%	69%	69%	71%
	Weak	14%	15%	15%	13%
	Strong	16%	16%	16%	16%
Safe active routes to school	None	82%	81%	80%	84%
	Weak	7%	8%	8%	5%
	Strong	11%	11%	11%	11%
Prohibit using PA as punishment	None	69%	68%	70%	71%
	Weak	12%	13%	12%	12%
	Strong	18%	19%	18%	17%
Daily recess (ES level only)	None	67%	67%	--	--
	Weak	10%	10%	--	--
	Strong	23%	23%	--	--
Less than daily recess (ES level only)	None	80%	80%	--	--
	Weak	12%	12%	--	--
	Strong	8%	8%	--	--
PA opportunities before/after school (excl. intra/extramural sports)	None	90%	89%	90%	91%
	Weak	4%	5%	4%	3%
	Strong	6%	6%	6%	5%

Due to rounding, some percentages may not sum exactly to 100.

Strong= required; Weak = encouraged/suggested; None= no policy.

* Difference in prevalence between grade levels is statistically significant at the p<.05 level.

Table 5. Physical education provisions addressed in district wellness policies by grade level of applicability, school year 2014-15

PROVISION	STRENGTH	ALL GRADES	ELEMENTARY	MIDDLE	HIGH
Physical education provisions	No policy	8%	8%	8%	7%
	PE addressed	92%	92%	92%	93%
PE curriculum for each grade	None	27%	27%	27%	27%
	Weak	25%	24%	24%	28%
	Strong	48%	49%	49%	45%
PE requirement: ≥150 mins/week (ES); ≥ 225 mins/week (MS/HS)*	None	72%	65%	68%	85%
	Weak	25%	30%	30%	14%
	Strong	3%	5%	2%	1%
PE required to teach about a physically active lifestyle	None	30%	30%	30%	29%
	Weak	5%	4%	5%	5%
	Strong	65%	65%	65%	66%
PE competency assessment required	None	43%	44%	44%	42%
	Weak	7%	6%	7%	7%
	Strong	50%	50%	50%	51%
PE classes, courses, or credits (HS level only)	None	76%	--	--	76%
	Weak	5%	--	--	5%
	Strong	19%	--	--	19%
Frequency of PE (strong=daily)	None	90%	88%	90%	93%
	Weak	5%	7%	4%	3%
	Strong	5%	5%	5%	4%
Teacher-student ratio for PE	None	85%	82%	86%	88%
	Weak	10%	11%	10%	9%
	Strong	5%	7%	4%	4%
Safe/adequate facilities for PE	None	81%	81%	81%	82%
	Weak	11%	11%	10%	11%
	Strong	8%	8%	9%	7%
PE time devoted to moderate-to-vigorous physical activity	None	60%	54%	62%	65%
	Weak	28%	34%	25%	25%
	Strong (at least 50%)	11%	11%	13%	10%
Requires PE to be taught by state-authorized physical educator	None	60%	59%	59%	61%
	Weak	7%	11%	5%	5%
	Strong	33%	30%	36%	34%
Requires PE teachers to be trained in PE skills	None	75%	74%	74%	76%
	Weak	7%	6%	6%	7%
	Strong	19%	19%	19%	17%
Prohibits waivers to get out of PE	None	90%	89%	89%	91%
	Weak	1%	1%	2%	0%
	Strong	9%	9%	10%	8%
Requires annual health assessment in PE class	None	59%	56%	59%	62%
	Weak	40%	42%	40%	36%
	Strong	2%	1%	2%	2%
Requires provision of free drinking water in gymnasium	None	100%	100%	100%	100%
	Weak	0%	0%	0%	0%
	Strong	0%	0%	0%	0%

Due to rounding, some percentages may not sum exactly to 100

Strong= required; Weak = encouraged/suggested; None= no policy.

* Difference in prevalence between grade levels is statistically significant at the p<.05 level.

SCHOOL MEALS

What does the wellness policy final rule require?

Under the wellness policy final rule, school meals served must be consistent with the Federal school meal nutrition standards.^{5,6} This has been a wellness policy requirement since 2006-07. However, during the 2012-13 school year the nutrition standards for school meals became stronger. The Federal rule on school meals increased the availability of fruits, vegetables, and whole grains, and restricted saturated fat, trans fat, sodium, calories per week, and available milk fat varieties.^{6*} In addition, the school meal rule requires that free drinking water be readily available in the food service area during mealtime.

The importance of nutrition standards for school meals

In fiscal year 2016, school meals served lunch to 30.4 million students, 22.1 million of who received meals through free and reduced price lunch.^{14,15} The increased availability of healthier school meal items such as fruits, vegetables, whole grains, and low-fat dairy can be used as a tool to promote healthy eating behaviors among children.⁴⁷

How do district wellness policies measure up?

Districts have been required to provide an assurance that meals served meet Federal standards since wellness policies were first required in 2006, so it is unsurprising that 89% of district wellness policies required that their district meet USDA meal standards.[†] However, examining the method used to incorporate the Federal nutrition standards demonstrates that general Federal or state law references are common (see Sidebar Figure). District policies that incorporate Federal and/or state requirements by reference will change, should the Federal or state laws change. In other words, if a Federal or state law were weakened or strengthened, district policies incorporating these laws by reference also would be weakened or strengthened, respectively. Examples of district policy language incorporating Federal or state law include:

Federal reference included in district policy:

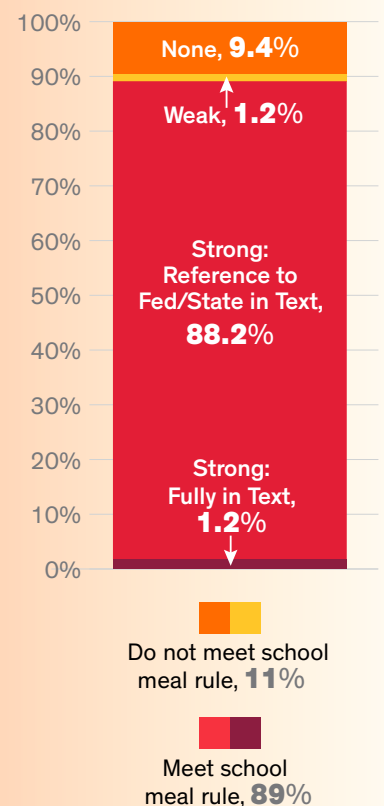
- School meals will comply with the Federal requirements found in 7 CFR 210.10.
- School meals served will meet USDA regulations.

State law reference included in district policy:

- Reimbursable meals shall comply with the nutrition standards adopted by the state (and the state included or referenced Federal school meal requirements).

District policy incorporation of Federal school meal guidelines, school year 2014-15

% of district policies for SFAs nationwide with School Meal Guidelines that...



* On May 1, 2017, Secretary of Agriculture Sonny Perdue announced that USDA would begin the regulatory process to provide greater flexibility for school meals in the areas of whole grains, sodium, and milk fat of flavored milk.⁹ On May 5, 2017, Congress included language in Division A Section 747 of the Consolidated Appropriations Act, 2017 (PL 115-31) that requires USDA to provide flexibility around the whole grain-rich, sodium, and flavored milk requirements for school year 2017-2018.¹⁰ As a result, for school year 2017-2018, States may grant exemptions to the whole grain-rich requirements and flavored milk requirements, and schools that meet sodium Target 1 will be considered compliant with USDA sodium requirements.

† This analysis examined district wellness policy language to assess the extent to which district policies make specific note of the Federal school meal standards. Of course, all schools participating in the Federal Child Nutrition Programs are required by Federal law to adhere to the Federal standards. This report does not suggest otherwise; rather, we sought to identify to what extent districts were reinforcing this requirement in their policies.

In addition, some individual nutrient standards that govern school meals were explicitly required in district wellness policies, although not very often. Specifically, during the 2014-15 school year:

- Provisions limiting the fat content of milk were only seen in 9% of policies.
- Fat content of *flavored* milk provisions were seen even less often, in 2% of policies.
- Although a requirement since 2012, only 27% of districts required that drinking water be available for free in the food service area during mealtime within their wellness policies, although most schools may be providing water in practice.⁴⁸

Table 6 provides information on all school meal-related provisions captured in the district wellness policies as of school year 2014-15.

WORKING ON WELLNESS: Strategies to increase student participation work



Taste tests, grab-and-go, and efforts to make meals more appealing result in more students choosing to eat healthy school meals.^{49,50} Nevertheless, an opportunity exists for about half of all district policies to include such effective ways of boosting healthy meal participation.

Table 6. School meal-related provisions addressed in district wellness policies by grade level of applicability, school year 2014-15

PROVISION	STRENGTH	ALL GRADES	ELEMENTARY	MIDDLE	HIGH
School meal nutrition guidelines must meet Federal standards	None	9%	9%	9%	10%
	Weak	1%	1%	1%	1%
	Strong: Requires Federal/USDA meal standards w/o defining	88%	89%	89%	87%
	Strong: Requires Federal/USDA meal standards and defines	1%	1%	1%	1%
School Breakfast Program	None	27%	27%	27%	26%
	Weak	16%	16%	16%	17%
	Strong	57%	57%	57%	57%
Low-fat cooking methods	None	82%	82%	82%	81%
	Weak	4%	4%	4%	4%
	Strong	14%	14%	14%	14%

Due to rounding, some percentages may not sum exactly to 100.
Strong= required; Weak = encouraged/suggested; None = no policy.

PROVISION	STRENGTH	ALL GRADES	ELEMENTARY	MIDDLE	HIGH
Strategies to increase participation in meals	None	50%	51%	50%	50%
	Weak	32%	32%	32%	32%
	Strong	17%	18%	17%	17%
Closed campus at lunch	None	94%	94%	94%	94%
	Weak	3%	3%	2%	3%
	Strong	3%	3%	3%	4%
Recess before lunch (ES level only)	None	80%	80%	--	--
	Weak	15%	15%	--	--
	Strong	5%	5%	--	--
Adequate time to eat meals (20 mins for lunch; 10 mins for breakfast)	None	34%	34%	34%	35%
	Weak	52%	51%	52%	52%
	Strong	14%	15%	14%	13%
Nutrition-related training for food service staff	None	55%	55%	55%	56%
	Weak	37%	37%	37%	36%
	Strong	8%	7%	8%	8%
Nutrition information for school meals	None	77%	77%	77%	78%
	Weak	14%	15%	14%	14%
	Strong	9%	9%	9%	8%
Farm-to-school/ cafeteria program	None	93%	93%	93%	94%
	Weak	6%	6%	6%	5%
	Strong	1%	1%	1%	1%
Only 1%/skim milk at meals	None	9%	8%	8%	10%
	Weak	1%	1%	1%	1%
	Strong	90%	90%	90%	89%
Fat content of flavored milk	None	9%	9%	9%	10%
	Weak	1%	1%	1%	1%
	Strong: Limited to non-fat	90%	90%	90%	89%
	Strong: Ban	0%	0%	0%	0%
Provisions for free drinking water at meals	None	9%	9%	9%	10%
	Weak	1%	1%	1%	1%
	Strong	90%	90%	91%	89%
Whole grain-rich requirement	None	8%	8%	7%	9%
	Weak	2%	2%	3%	2%
	Strong: < USDA	0%	0%	0%	0%
	Strong: Meets USDA	89%	90%	90%	88%
Whole grain exemption	Not mentioned	100%	100%	100%	100%
	Exemptions allowed	0%	0%	0%	0%
	No exemptions allowed	0%	0%	0%	0%
Number of whole grains served	None	9%	9%	9%	10%
	Weak	1%	1%	1%	1%
	Strong: < USDA	0%	0%	0%	0%
	Strong: Meets USDA	89%	90%	90%	88%
Number of fruits and/or vegetables served	None	9%	9%	9%	10%
	Weak	1%	1%	1%	1%
	Strong: < USDA	0%	0%	0%	0%
	Strong: Meets USDA	89%	90%	90%	88%

Due to rounding, some percentages may not sum exactly to 100.
Strong= required; Weak = encouraged/suggested; None= no policy.

PROVISION	STRENGTH	ALL GRADES	ELEMENTARY	MIDDLE	HIGH
Juice as fruit or vegetable serving	None	9%	9%	9%	10%
	Weak	1%	1%	1%	1%
	Strong: Meets USDA	89%	90%	90%	88%
	Strong: Exceeds USDA	0%	0%	0%	0%
Number of meat/meat alternatives served	None	9%	9%	9%	10%
	Weak	1%	1%	1%	1%
	Strong: < USDA	0%	0%	0%	0%
	Strong: Meets USDA	89%	90%	90%	88%
Number of milk/milk alternatives served	None	9%	9%	9%	10%
	Weak	1%	1%	1%	1%
	Strong: < USDA	0%	0%	0%	0%
	Strong: Meets USDA	89%	90%	90%	88%
Min/max calories daily	None	9%	9%	9%	10%
	Weak	1%	1%	1%	2%
	Strong: < USDA	0%	0%	0%	0%
	Strong: Meets USDA	89%	90%	90%	89%
Calories from saturated fat	None	8%	8%	8%	9%
	Weak	2%	2%	2%	2%
	Strong: < USDA	0%	0%	0%	0%
	Strong: Meets USDA	89%	90%	90%	89%
Sodium	None	9%	8%	8%	10%
	Weak	2%	2%	2%	2%
	Strong: < USDA	0%	0%	0%	0%
	Strong: Meets USDA	89%	90%	90%	88%
Trans-fat	None	9%	9%	9%	10%
	Weak	1%	1%	1%	1%
	Strong: < USDA	0%	0%	0%	0%
	Strong: Meets USDA	90%	90%	90%	89%

Due to rounding, some percentages may not sum exactly to 100.
Strong= required; Weak = encouraged/suggested; None= no policy.

COMPETITIVE FOODS AND BEVERAGES

What does the wellness policy final rule require?

The wellness policy final rule requires that district policies comply with the *Smart Snacks* standards.⁵ *Smart Snacks* provides nutrition standards for all foods and beverages sold outside of the school meal programs (commonly referred to as competitive foods and beverages) during the school day. Typically, this includes items sold through vending machines, school stores, à la carte lines, and in-school fundraisers. Classroom parties, fundraisers held *outside* of the school day, and food brought from home are not subject to the Federal rule.⁷ However, beginning school year 2017-18, the wellness policy final rule requires that districts adopt a policy on food and beverages *provided*, but not sold, which would include classroom parties and food used as a reward.

Smart Snacks Nutrition Standards

Smart Snacks food requirements include both a general standard for competitive foods as well as specific nutrient standards that must be met by every item sold. To be allowable, a food item must: (1) be a grain product that contains 50% or more whole grains by weight or have whole grains as the first ingredient; or (2) have as the first ingredient one of the non-grain main food groups; or (3) be a combination food that contains at least ¼ cup fruit and/or vegetable; or (4) through July 1, 2016 contain 10% Daily Value of a nutrient of public health concern (calcium, potassium, vitamin D, or dietary fiber). In addition, a food item that meets one of the above criteria must also meet all of the nutrient standards in Table 7.

Under *Smart Snacks*, allowable beverages at all grade levels include:

- plain water (carbonated or uncarbonated),
- low-fat or non-fat unflavored milk,
- non-fat flavored milk, and
- 100% fruit and vegetables juice.

All beverages at the elementary and middle school levels must be caffeine-free. Additional beverages are allowed in high schools, including flavored and/or carbonated beverages that contain ≤5 calories per 8 ounces or ≤ 10 calories per 20 ounces (limited to 20 ounce servings) and other flavored and/or carbonated beverages that contain ≤40 calories per 8 ounces or ≤60 calories per 12 ounces (limited to 12 ounce servings). Milk, water, and 100% juice are limited to 8 ounces at the elementary school level and 12 ounces at the middle and high school levels.⁷

Although in-school fundraisers are regulated by the *Smart Snacks* nutrition standards, under *Smart Snacks* state agencies may adopt a policy that allows for a certain number of exempt fundraisers or fundraising days each school year.⁷ Although states have the power to set this exemption policy, district wellness policies may adopt stricter standards than their state allows.

Table 7. Smart Snacks Nutrient Standards

NUTRIENT STANDARD	SMART SNACKS REQUIREMENT
Total Fat*	≤ 35% calories from total fat as served
Saturated Fat*	< 10% calories from saturated fat as served
Trans Fats*	Zero grams of trans fat as served
Sugar**	≤ 35% of weight from total sugar as served
Sodium	Snacks: ≤ 230 mg sodium per item as served*** Entrees: ≤480 mg sodium per item as served, including any added accompaniments
Calories	Snacks: ≤ 200 calories per item as served, Entrees: ≤350 calories per item as served
Accompaniments	Must be included in the nutrient profile as part of the food item served

*Exemptions to the standard include reduced fat cheese, nuts, seeds, nut/seed butters, products consisting of only dried fruit with nuts and or seeds with no added nutritive sweeteners or fats, seafood with no added fat.

**Exemptions to the standard include dried whole fruits or vegetables, dried whole fruit or vegetable pieces, and dehydrated fruits or vegetables with no added nutritive sweeteners.

***Effective July 1, 2016 snack items must be ≤ 200 mg sodium per item.

The importance of nutrition standards for other foods and beverages

Competitive foods and beverages found in vending machines, school stores, and à la carte lines can detract from a healthy eating space if the nutrition standards are not consistent with the healthy standards promoted in school meals. Historically, when given the option, children chose less healthy options when available.^{51,52} However, student consumption of noncompliant foods off-campus tends to decline or at least does not increase as stronger nutrition standards are implemented.⁵³

How do district wellness policies measure up?

Overall, district policies regulating the sale of foods and beverages outside of meals were stronger at the elementary school level, followed by middle and then high school. Complete bans on competitive food and beverage sales were more likely to be seen at the elementary school level as compared to middle and high school.

At the start of school year 2014-15, only 36% of district policies met the *Smart Snacks* standards;* however, the manner in which the standards were incorporated into the policies varied greatly, including complete bans on competitive food, references to a state law that requires *Smart Snacks* compliance, references to the Federal rule, and in some cases a complete restatement of the *Smart Snacks* standards within the text (see Sidebar Figure). Depending on the language used to refer to *Smart Snacks*, district policy will effectively change should state and/or Federal law change. Notably, less than 4% of district policies included the details of the *Smart Snacks* nutrition standards within the text of their policy.

Examples of Federal reference within district policy included:

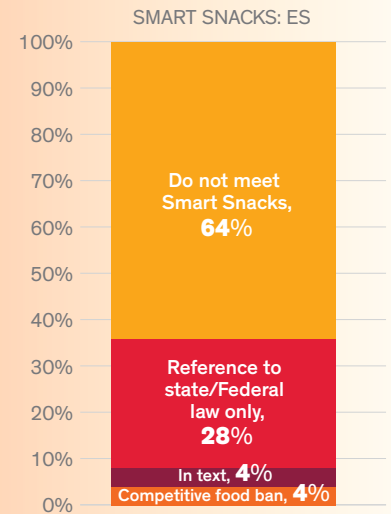
- The Child Nutrition Program will comply with the Federal requirements established in 7 CFR 210.11.
- Foods and beverages sold will meet Federal *Smart Snacks* nutrition standards.
- Competitive foods will meet USDA regulations.

Examples of state law reference within district policies included:

- All foods and beverages sold shall comply with the competitive food laws adopted by the state (and state law either included or referenced Federal requirements).

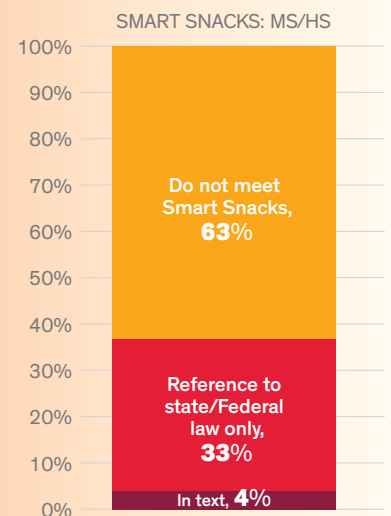
District policy incorporation of *Smart Snacks* nutrition standards, school year 2014-15

% of district policies for SFAs nationwide with nutrition standards that...



Do not meet Smart Snacks, **64%**

Meet Smart Snacks, **36%**



Do not meet Smart Snacks, **63%**

Meet Smart Snacks, **37%**

* This analysis examined district wellness policy *language* to assess the extent to which district policies make specific note of the Federal *Smart Snacks* nutrition standards. Of course, all schools participating in the Federal Child Nutrition Programs are required by Federal law to adhere to *Smart Snacks*. This report does not suggest otherwise; rather, we sought to identify to what extent districts were reinforcing this requirement in their policies.

Table 8 broadly illustrates the extent to which district policies met *Smart Snacks* standards for four locations of sale during the school day (i.e., vending machines, school stores, à la carte lines in the cafeteria, and in-school fundraisers) and in classroom parties even though it was not required prior to school year 2017-18 (we included parties here simply to assess the extent to which district policies were rising to the level of *Smart Snacks* for party provisions).

Table 8. Smart Snacks requirements by location of sale and grade level of applicability, school year 2014-15

PROVISION	STRENGTH	ALL GRADES	ELEMENTARY	MIDDLE	HIGH
Vending machine restrictions during the school day*	None	20%	16%	22%	21%
	Weak	30%	29%	29%	32%
	Strong: < Smart Snacks	9%	10%	10%	8%
	Strong: Meets Smart Snacks	35%	31%	37%	38%
	Strong: Ban	6%	14%	2%	1%
School store restrictions during the school day*	None	24%	20%	27%	27%
	Weak	29%	31%	27%	28%
	Strong: < Smart Snacks	10%	11%	10%	8%
	Strong: Meets Smart Snacks	35%	32%	37%	37%
	Strong: Ban	2%	5%	0%	0%
À la carte restrictions during meal times*	None	20%	21%	20%	20%
	Weak	29%	27%	29%	32%
	Strong: < Smart Snacks	11%	13%	11%	10%
	Strong: Meets Smart Snacks	35%	32%	37%	37%
	Strong: Ban	4%	8%	2%	1%
Fundraisers during the school day	None	27%	28%	27%	27%
	Weak	31%	29%	31%	32%
	Strong: < Smart Snacks	4%	5%	4%	3%
	Strong: Meets Smart Snacks	34%	31%	36%	36%
	Strong: Ban	4%	7%	2%	2%
Classroom parties*	None	39%	39%	39%	41%
	Weak	54%	54%	54%	53%
	Strong: < Smart Snacks	1%	1%	1%	1%
	Strong: Meets Smart Snacks	4%	2%	6%	5%
	Strong: Ban	1%	4%	0%	0%

Due to rounding, some percentages may not sum exactly to 100.

Strong= required; Weak = encouraged/suggested; None= no policy.

* Difference in prevalence between grade levels is statistically significant at the $p < .05$ level.

Although 64% of district policies did not meet *Smart Snacks* standards in their entirety, some districts did meet individual nutrient standards within one or more venues even if they did not meet all *Smart Snacks* standards. Table 9 shows the percent of all district policies that met each individual *Smart Snacks* nutrient standard across the four locations of sale examined for this study.

Detailed data on district policy requirements for specific *Smart Snacks* nutrient standards for vending machines, school stores, à la carte lines, in-school fundraisers, and class parties by grade level of applicability are presented in **Appendix A**. Notably, a greater number of provisions met *Smart Snacks* on average for vending machines than for à la carte lines, and for both vending machines and à la carte lines as compared to school stores and in-school fundraisers.

District fundraiser exemption policies

Although state agencies are responsible for adopting fundraiser exemption policies that apply across all districts within their state,^{7,54} districts are allowed to adopt more restrictive policies within their individual wellness policies. For example, when issuing its policy of six exempt fundraising days per year, the Texas Department of Agriculture specifically stated that its rule provides a maximum limit on exemptions, and that districts may choose to adopt stricter standards.⁵⁵

At the start of school year 2014-15, only 1% of district policies allowed zero exemptions to *Smart Snacks* for fundraisers. Approximately 12% of districts specifically allowed some number of exempt fundraisers or exempt fundraising days at all grade levels.

Selected other competitive food and beverage provisions included in district wellness policies

Although most of the focus on competitive foods and beverages in district policies relates to *Smart Snacks* and the associated standards, districts have included other provisions in their wellness policies that are not formally required by Federal regulation. Table 10 presents some of these additional provisions. Highlights include:

- Approximately 12% of district wellness policies specifically required that all food and beverage contracts comply with the district nutrition standards (this is in addition to any memoranda of understanding or agreements that exist between the districts and their vendors).
- Similarly, only about 12-13% of district policies prohibited using food as a reward for good behavior or performance.
- Nearly 1 in 5 district policies required that free drinking water be made accessible throughout the school (and not just in the cafeteria or gymnasium).

Table 9. Percent of district policies for SFAs nationwide that met individual Smart Snacks nutrition standards across all venues, school year 2014-15

SMART SNACKS NUTRIENT STANDARD	PERCENT OF DISTRICT POLICIES for SFAs nationwide that met standard across vending machines, school stores, à la carte lines, and fundraisers
General competitive food standard	37-42%
≤ 35% of weight from total sugar	41-45%
≤ 35% calories from total fat	44-47%
Zero grams of trans fat	39-44%
< 10% calories from saturated fat	42-46%
≤ 230 mg sodium per item (snacks)	40-44%
≤480 mg sodium per item (entrees)	41%
≤ 200 calories per item (snacks)	40-44%
≤350 calories per item (entrees)	41%
Accompaniments included in the nutrient profile	37-42%
Low-fat or non-fat unflavored milk	42-48%
Non-fat flavored milk	37-41%
100% juice	43-49%
Plain water	39-43%
Beverage serving size	40-45%
Caffeine (ES/MS)	42-50%

Table 10. Selected other competitive food and beverage-related requirements by grade level of applicability, school year 2014-15

PROVISION	STRENGTH	ALL GRADES	ELEMENTARY	MIDDLE	HIGH
Nutrition guidelines for competitive foods & beverages	None	8%	6%	8%	8%
	Weak	27%	29%	25%	27%
	Strong	66%	65%	67%	65%
Nutrition guidelines apply to food & beverage contracts	None	83%	82%	82%	84%
	Weak	5%	5%	5%	5%
	Strong	12%	13%	12%	12%
Prohibits using food as a reward	None	62%	62%	62%	61%
	Weak	25%	25%	25%	27%
	Strong	13%	13%	13%	12%
Nutrition information for competitive foods and beverages	None	92%	92%	92%	93%
	Weak	3%	3%	3%	3%
	Strong	4%	4%	4%	4%
Requires free drinking water to be accessible throughout school	None	80%	80%	80%	80%
	Weak	1%	1%	1%	0%
	Strong	20%	19%	20%	20%
Bans fast food sales on campus	None	99%	99%	99%	99%
	Weak	1%	0%	1%	1%
	Strong	0%	0%	0%	0%

Due to rounding, some percentages may not sum exactly to 100.
Strong= required; Weak = encouraged/suggested; None= no policy.

MARKETING AND PROMOTION

What does the wellness policy final rule require?

Starting school year 2017-18, district wellness policies are required to restrict marketing to those foods and beverages that meet *Smart Snacks* nutrition standards. In addition, wellness policies must include evidence-based strategies for nutrition promotion.

The importance of marketing and nutrition promotion in schools

Marketing unhealthy food and beverages in schools generally undermines efforts of the school to provide a high-quality food environment. Most advertising of food and beverages to youth is for items that are high in fat, sugar and/or sodium.⁵⁶ Marketing on school campus can be found on posters, signs, vending machine fronts, in-school news commercials, and popular incentive programs. However, nutrition promotion of compliant foods and beverages can be a beneficial way to promote healthy eating.

How do district wellness policies measure up?

Although not yet formally required, some district policies have started to include language that addresses what items can be marketed on school campuses during the school day. Table 11 presents data on marketing provisions included in the district wellness policies by grade level as of school year 2014-15. Specifically, during the 2014-15 school year:

- Although not yet required to do so, 14% of district policies prohibited the marketing of unhealthy foods and beverages, while an additional 7% of district policies recommended not marketing unhealthy food and beverages.
- About one-quarter of district policies recommended that healthy choices be promoted, but only 7% of districts required nutrition promotion strategies such as healthy posters and pricing incentives.
- In-school marketing has a great impact on the overall nutrition environment and services pillar of the Whole School, Whole Community, Whole Child model.⁵⁷ Although no districts included the 2014 model by the start of school year 2014-15, 15% included language referencing its predecessor, the Coordinated School Health model.



WORKING ON WELLNESS: Marketing at school

Students are often overexposed to food and beverage advertisements during the school day, but easy steps can be taken to remove exposure to unhealthy foods and beverages. For instance, as schools comply with *Smart Snacks* sales in vending machines, policies can ensure that vending machine fronts only show foods and beverages that are allowed to be sold there. With over three-quarters of districts still lacking a policy that prohibited unhealthy marketing, this is a great area for districts to focus on during policy revision and update.

Table 11. Marketing provisions included in district wellness policies by grade level of applicability, school year 2014-15

PROVISION	STRENGTH	ALL GRADES	ELEMENTARY	MIDDLE	HIGH
CDC Whole School, Whole Community, Whole Child (WSCC); Coordinated School Health (CSH)	None	82%	82%	82%	82%
	Weak	3%	3%	3%	3%
	Strong: CSH model	15%	15%	15%	15%
	Strong: WSCC model	0%	0%	0%	0%
Marketing healthy choices	None	68%	68%	69%	66%
	Weak	26%	26%	25%	27%
	Strong	7%	6%	6%	8%
Restricted marketing	None	78%	78%	78%	80%
	Weak	7%	7%	7%	7%
	Strong	14%	15%	15%	13%

Due to rounding, some percentages may not sum exactly to 100.
Strong= required; Weak = encouraged/suggested; None= no policy.

STAKEHOLDER PARTICIPATION

What does the wellness policy final rule require?

In 2006, district wellness policies had to be developed with the input from six stakeholders (parents, students, food service personnel, district administrator, school administrators, and the public).³ The *Healthy, Hunger-Free Kids Act of 2010* required that these same stakeholders be permitted to participate in the *review and update* of local wellness policies as well and mentioned physical education teachers and school health professionals for the first time.⁴ Under the wellness policy final rule, a total of eight stakeholders (parents, students, food service personnel, district administrators, school administrators, the public, *physical education teachers*, and *school health professionals*) must be permitted to be involved in the *development, implementation, review, and update* of local wellness policies.⁵

The importance of stakeholder participation

A variety of stakeholder viewpoints and input can help add to the creation of a well-rounded wellness policy.^{58,59} A recurring theme in the USDA wellness policy toolkit is that everyone has a role to play in school wellness.⁴⁰

How do district wellness policies measure up?

Although not yet a Federal requirement, during the 2014-15 school year some districts were including all eight stakeholders in the development, review, and/or update of the local wellness policy. However, there were still many districts that fell short. Table 12 presents the extent to which district wellness policies addressed stakeholder involvement as of school year 2014-15. Specifically, during the 2014-15 school year:

- Stakeholder involvement in the *development* of the district wellness policy was addressed the most often. However, although this requirement has been in place the longest, 65% of districts still failed to meet the original six stakeholder requirements. Notably, 14% of districts were already including all eight key stakeholders in the development of their local wellness policy.
- Thirteen percent of district policies likewise required that the eight stakeholders in the wellness policy rule be included in the *review* of their local wellness policy.
- Stakeholder involvement in the *update* of the local wellness policy was addressed the least. Eight percent of district policies required all eight key stakeholders to be involved in the updating of the policy, 3% required only the original six stakeholders, and 15% either recommended stakeholder involvement or else mentioned the inclusion of at least one of the original six. Still, 74% of district policies failed to mention stakeholder involvement in the update of their local wellness policy at all.

WORKING ON WELLNESS: Stakeholder participation



Including all eight key stakeholders in the update of the local wellness policy is important as districts work on revising their text for the implementation of the final rule. In fact, preliminary analyses by the study team suggest that when physical education teachers are involved in the review and update of local wellness policies, the resulting physical education-related provisions in the policy are stronger.⁶⁰

Table 12. Stakeholder participation provisions included in district wellness policies by grade level of applicability, school year 2014-15

PROVISION	STRENGTH	ALL GRADES	ELEMENTARY	MIDDLE	HIGH
Required stakeholders involved in development of WP	None	45%	44%	44%	46%
	Weak	20%	21%	20%	19%
	Strong: Requires original 6 stakeholders	22%	21%	22%	22%
	Strong: Requires all 8 stakeholders	14%	14%	14%	13%
Identify methods to solicit input into WP development /revision	None	72%	71%	71%	75%
	Weak	11%	12%	11%	11%
	Strong	17%	18%	18%	14%
Ways to engage parents/community in WP development/ revision	None	59%	59%	58%	60%
	Weak	17%	17%	18%	17%
	Strong	24%	24%	24%	23%
Stakeholders involved in periodic review/ evaluation of WP	None	58%	58%	58%	59%
	Weak	23%	23%	23%	22%
	Strong: Requires original 6 stakeholders	6%	6%	6%	7%
	Strong: Requires all 8 stakeholders	13%	13%	13%	13%
Stakeholders involved in WP update	None	74%	73%	73%	76%
	Weak	15%	16%	16%	14%
	Strong: Requires original 6 stakeholders	3%	3%	3%	3%
	Strong: Requires all 8 stakeholders	8%	8%	8%	7%

Due to rounding, some percentages may not sum exactly to 100.
Strong= required; Weak = encouraged/suggested; None= no policy.

STAFF WELLNESS

What does the wellness policy final rule require?

Although staff wellness is not a required component under the final rule, staff wellness is included as an important part of the Whole School, Whole Community, Whole Child model developed by the CDC.⁵⁷

The importance of staff wellness

When staff model healthy behaviors during the school day, their students are more likely to also perform those healthy actions.^{61,62} Moreover, when school staff have opportunities to be physically active and have access to a wellness program, they are more productive, miss less work, and are better able to provide a support system for the success of their students.¹¹

How do district wellness policies measure up?

Although districts are not required to address staff wellness in their wellness policy, some have adopted provisions that encourage staff to be healthy role models and that create opportunities for staff to engage in physical activity and wellness programs. Table 13 highlights the extent to which district policies addressed staff wellness as of school year 2014-15. Notably,

- Districts included provisions that addressed staff as healthy role models in 37% of wellness policies.
- Over one-quarter of district policies addressed the creation of staff wellness programs. A slightly smaller percentage (18%) addressed providing physical activity opportunities for staff.

Table 13. Staff wellness provisions included in district wellness policies by grade level of applicability, school year 2014-15

PROVISION	STRENGTH	ALL GRADES	ELEMENTARY	MIDDLE	HIGH
PA opportunities for school staff	None	82%	82%	82%	82%
	Weak	10%	10%	10%	10%
	Strong	8%	8%	8%	8%
Staff wellness programs	None	73%	73%	73%	74%
	Weak	11%	12%	11%	11%
	Strong	15%	15%	16%	15%
Staff to role model healthy behaviors	None	63%	64%	62%	63%
	Weak	14%	14%	14%	14%
	Strong	23%	22%	23%	23%

Due to rounding, some percentages may not sum exactly to 100.
 Strong= required; Weak = encouraged/suggested; None= no policy.

IMPLEMENTATION, EVALUATION, AND REPORTING

What does the wellness policy final rule require?

The wellness policy final rule added multiple provisions aimed at increasing the transparency of wellness policies in the process of their adoption and implementation. Under the rule,⁵ districts must inform and update the public about the policy’s content and any updates. In addition, districts must conduct an assessment triennially and make the results of that assessment, including compliance, alignment with model wellness policies, and a description of progress made in meeting goals, available to the public. The wellness policy must also list one or more district officials responsible for ensuring compliance, essentially establishing wellness policy leadership.

The importance of implementing, evaluating, and reporting on wellness policies

Increased transparency and the ability for parents and the public to know and understand what is included in their district’s local wellness policy gives stakeholders the power to hold schools and districts accountable. Accountability is critical to successful wellness policy implementation.⁶³

How do district wellness policies measure up?

Roughly 84% of district wellness policies required districts to have a plan for implementing the local wellness policy—the minimum Federal requirement in 2006-07. However, as transparency becomes a vital component under the wellness policy final rule, there is plenty of room for district wellness policies to expand their provisions related to evaluation, implementation, and reporting. Data on the prevalence of specific evaluation and implementation and reporting provisions are presented in Tables 14 and 15, respectively. Policy highlights as of school year 2014-15 include:

- Over 83% of district policies included implementation plans.
- Only 19% of district policies required a plan for evaluation. Twenty-five percent required that an assessment be conducted triennially, while 41% required plans for revising the policy.
- Reporting was not often addressed. Only 26% of policies required a report to the public on wellness policy implementation. More often, 56% of policies simply required districts to report back to the school board.
- Public access to the district wellness policy is yet another area for improvement. Eighteen percent of district policies addressed posting the wellness policy publicly offline, and only 9% addressed making the wellness policy available online.

- Although reporting on progress towards meeting goals was seen more often than most (31%), other upcoming reporting provisions such as reporting on how the public can be involved and reporting on the official leading the team were not included in district wellness policies as of the 2014-15 school year.

WORKING ON WELLNESS: Health advisory committees



District and school level health advisory committees can be the backbone to a successfully drafted and implemented wellness policy, making wellness truly a team effort.⁴⁰ Committees can be stacked with required stakeholders and can meet regularly to assess and update the policy based on implementation within their schools. Nevertheless, only about 51% of districts required ongoing health advisory committees, 9% recommended committees, and 40% did not address their creation at all.

Table 14. Implementation and evaluation provisions included in district wellness policies by grade level of applicability, school year 2014-15

PROVISION	STRENGTH	ALL GRADES	ELEMENTARY	MIDDLE	HIGH
Measuring implementation	None	13%	14%	13%	13%
	Weak	3%	3%	3%	3%
	Strong	84%	83%	84%	84%
Plan for implementation	None	13%	14%	13%	13%
	Weak	3%	3%	3%	3%
	Strong	84%	83%	84%	84%
Ongoing health advisory committee	None	40%	41%	40%	40%
	Weak	9%	10%	10%	8%
	Strong	51%	50%	50%	52%
Body mass index (BMI) screening	None	69%	67%	70%	70%
	Suggested/ encouraged	18%	20%	17%	17%
	Req'd for only some grades	12%	12%	12%	12%
	Req'd w/o parent reporting	0%	0%	0%	0%
	Req'd w/ parent reporting	1%	1%	1%	1%
Plan for evaluation	None	29%	30%	29%	28%
	Weak	52%	50%	51%	54%
	Strong	19%	20%	20%	18%
Reporting on policy compliance and/or implementation	None	42%	42%	42%	42%
	Weak	20%	20%	20%	19%
	Strong	38%	37%	38%	39%
Triennial assessment of wellness policy	None	73%	73%	73%	73%
	Weak	2%	2%	2%	2%
	Strong	25%	25%	25%	25%
Plan for policy revision	None	51%	51%	50%	50%
	Weak	8%	9%	9%	8%
	Strong	41%	40%	41%	42%
Requires district to report to the state	None	99%	99%	99%	99%
	Weak	0%	0%	0%	0%
	Strong	1%	1%	1%	1%

Due to rounding, some percentages may not sum exactly to 100.
Strong= required; Weak = encouraged/suggested; None= no policy.

Table 15. Reporting provisions included in district wellness policies by grade level of applicability, school year 2014-15

PROVISION	STRENGTH	ALL GRADES	ELEMENTARY	MIDDLE	HIGH
Requires district to post wellness policy on website	None	91%	91%	90%	90%
	Weak	4%	4%	4%	4%
	Strong	5%	5%	5%	6%
Requires district to post wellness policy elsewhere (non-website)	None	82%	82%	81%	82%
	Weak	7%	6%	7%	7%
	Strong	12%	12%	12%	11%
Requires district to submit wellness policy to state	None	100%	100%	100%	100%
	Weak	0%	0%	0%	0%
	Strong	0%	0%	0%	0%
Requires district to report to public on WP implementation	None	73%	73%	72%	73%
	Weak	1%	1%	1%	1%
	Strong	26%	26%	27%	26%
Requires district to report to board on WP implementation	None	44%	44%	44%	43%
	Weak	1%	1%	1%	0%
	Strong	56%	56%	56%	56%
Requires district to report to the state on WP implementation	None	98%	99%	98%	98%
	Weak	0%	0%	0%	0%
	Strong	1%	1%	1%	2%
Requires district to report to other group/ other stakeholders	None	83%	84%	83%	83%
	Weak	1%	1%	1%	1%
	Strong	16%	15%	16%	16%
Requires district to report on food safety inspections	None	92%	92%	92%	92%
	Weak	1%	1%	1%	0%
	Strong	7%	7%	7%	8%
Requires district to report wellness policy compliance data	None	43%	43%	43%	44%
	Weak	1%	1%	1%	0%
	Strong	56%	56%	57%	56%
Requires district to report on school meal program participation	None	94%	94%	94%	95%
	Weak	2%	2%	2%	1%
	Strong	4%	4%	5%	4%
Requires district to report on nutritional quality of meal program	None	77%	77%	76%	78%
	Weak	4%	5%	5%	3%
	Strong	19%	19%	19%	19%
Requires district to report on competitive foods and beverages	None	83%	83%	83%	84%
	Weak	5%	5%	5%	4%
	Strong	12%	11%	12%	12%
Requires district to report on PE/PA requirements	None	94%	94%	94%	95%
	Weak	1%	1%	1%	1%
	Strong	5%	5%	5%	4%
Requires district to report aggregate fitness assessment results	None	96%	96%	95%	98%
	Weak	1%	1%	1%	1%
	Strong	3%	3%	3%	1%
Requires district to report on student BMI screening (in aggregate)	None	93%	93%	93%	93%
	Weak	1%	1%	1%	1%
	Strong	6%	6%	5%	6%

Due to rounding, some percentages may not sum exactly to 100.
Strong= required; Weak = encouraged/suggested; None= no policy.

PROVISION	STRENGTH	ALL GRADES	ELEMENTARY	MIDDLE	HIGH
Requires district to report on meeting WP goals/ progress	None	69%	69%	69%	68%
	Weak	2%	2%	2%	2%
	Strong	29%	29%	29%	30%
Requires district to report on summary of events	None	99%	99%	99%	99%
	Weak	0%	0%	0%	0%
	Strong	1%	1%	1%	1%
Requires district to report on official leading the team	None	100%	100%	100%	100%
	Weak	0%	0%	0%	0%
	Strong	0%	0%	0%	0%
Requires district to report on how the public can be involved	None	100%	100%	100%	100%
	Weak	0%	0%	0%	0%
	Strong	0%	0%	0%	0%
Requires district to report on other results, e.g., SHI	None	81%	81%	80%	82%
	Weak	4%	4%	4%	3%
	Strong	16%	15%	16%	16%

Due to rounding, some percentages may not sum exactly to 100.
 Strong= required; Weak = encouraged/suggested; None= no policy.



Scope and Intensity of District Wellness Policies

Overall, district wellness policies addressed 42% of all items evaluated as part of the [National Wellness Policy Study](#) and about one-third of all provisions were strong, i.e. definitively required and not simply encouraged/suggested (Figure 3 and Table 16). School meal provisions were most prolific and the strongest across the component areas. Evaluation and implementation provisions also were among the most comprehensive and strongest of all district wellness policy component areas; however, because other component areas were weak overall, the policies are essentially requiring evaluation and implementation of otherwise weak wellness policy provisions.

Figure 3. District wellness policy comprehensiveness and strength scores, all grades (as of school year 2014-15)

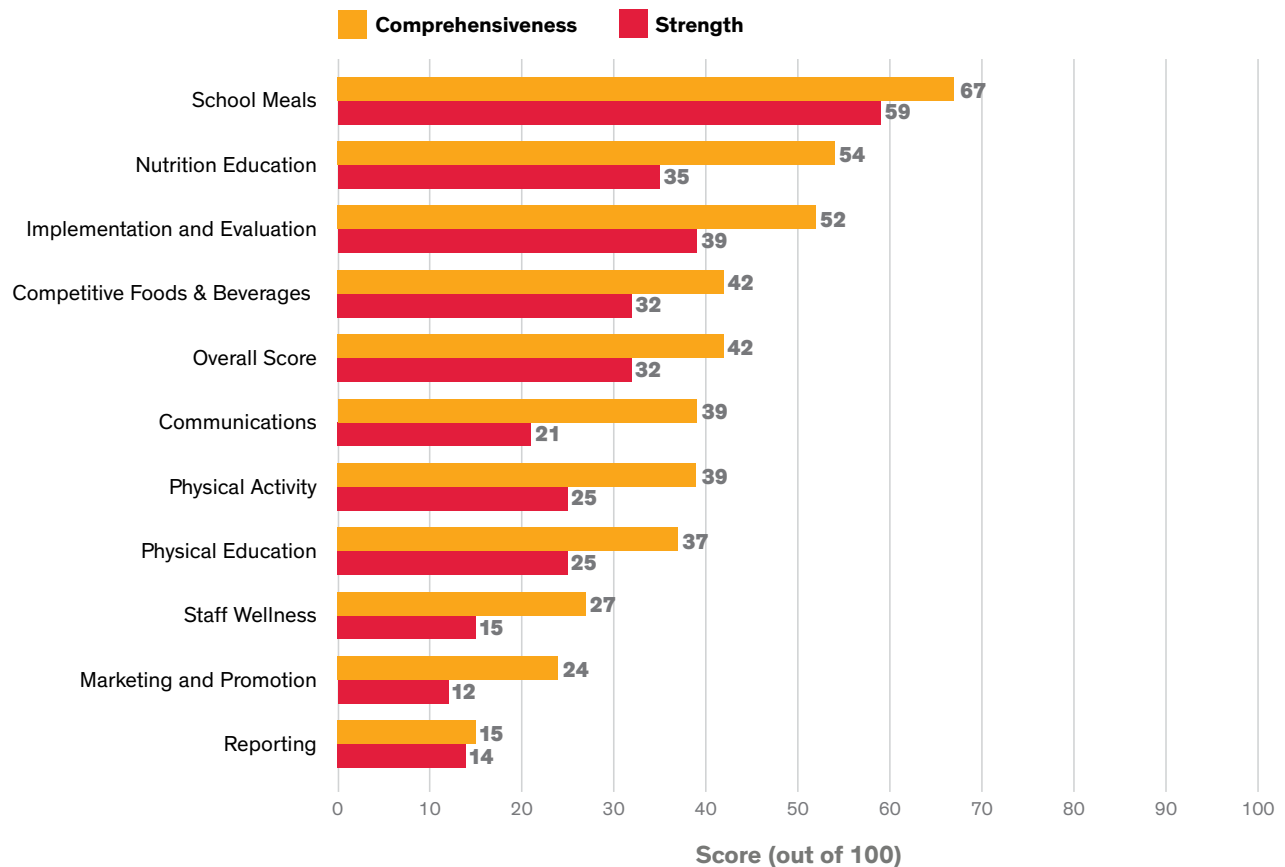


Table 16. District wellness policy comprehensiveness and strength by grade level of applicability, school year 2014-15

COMPREHENSIVENESS (OUT OF 100)	ALL GRADES	ELEMENTARY	MIDDLE	HIGH	SIG. DIFF.
Overall Score	42.20	43.76	42.10	40.26	.265
Nutrition Education	53.86	53.68	53.76	53.59	.997
Physical Education	37.09	38.63	37.34	34.39	.096
Physical Activity	38.90	38.71	39.31	37.65	.701
School Meals	66.67	66.06	68.13	67.20	.451
Competitive Foods & Beverages	42.32	45.05	41.72	39.32	.206
Marketing & Promotion	24.16	24.05	23.78	24.19	.987
Communications	39.02	39.18	39.02	36.81	.626
Evaluation & Implementation	52.00	52.18	52.37	52.38	.996
Reporting Requirements	15.36	15.42	15.70	15.02	.915
Staff Wellness	27.22	27.10	27.55	26.82	.977
STRENGTH (OUT OF 100)					
Overall Score	31.87	32.85	32.02	30.40	.531
Nutrition Education	34.85	35.03	34.73	33.84	.820
Physical Education	24.95	25.20	25.39	24.03	.631
Physical Activity	25.13	25.53	25.20	24.04	.645
School Meals	58.76	57.83	60.15	59.26	.309
Competitive Foods & Beverages	31.61	33.44	31.47	29.14	.479
Marketing & Promotion	12.25	12.04	11.98	11.92	.997
Communications	21.39	21.37	21.60	20.38	.840
Evaluation & Implementation	39.20	39.33	39.60	39.81	.980
Reporting Requirements	13.50	13.57	13.79	13.58	.985
Staff Wellness	15.40	15.15	15.73	15.34	.979

Significance levels: *p<.05 **p<.01 ***p<.001

SCOPE AND INTENSITY BASED ON DISTRICT CHARACTERISTICS

Appendix B presents detailed data on district wellness policy comprehensiveness and strength by district characteristics for all grades combined and for each grade level of applicability. Data are presented by:

- Predominant race/ethnicity of the students in the districts (Appendices B-1 through B-4),
- Free and reduced-price lunch participation rates (Appendices B-5 through B-8),
- Locale (Appendices B-9 through B-12),
- District size (Appendices B-13 through B-16), and
- Census region (Appendices B-17 through B-20).

Highlights from the assessment of the comprehensiveness and strength scores by district characteristics include:

Race/Ethnicity

- **Majority white** districts' wellness policies were consistently **more comprehensive** (overall, competitive food and beverages, evaluation and implementation, reporting) **and stronger** (overall, physical education, competitive foods and beverages, evaluation and implementation, reporting) than **mixed race** districts.
- **Majority Hispanic/Latino** districts addressed and **required more marketing and promotion**-related items in their wellness policies **than majority white** districts.

Free and Reduced-Price Lunch Eligibility

- **High FRPL districts' (low SES)** wellness policies were significantly **more comprehensive than low FRPL (high SES)** in the areas of **physical activity and physical education**.
- **High FRPL** districts' wellness policies were also **stronger than low FRPL** districts with regards to **marketing and promotion**-related provisions.

Locale

- **Suburban** districts had **more comprehensive competitive food and beverage** policies **than urban** districts.
- **Suburban** districts also had **stronger** wellness policies governing **physical education than urban** districts.
- **Suburban, rural, and township** districts' wellness policies all had **more required staff wellness-related** provisions **than urban** districts.

District Size

- **Smaller districts'** wellness policies addressed **fewer communication and stakeholder** provisions than large districts.
- The **marketing and promotion** provisions included in **smaller** districts' wellness policies were **weaker than** those of **larger** districts.

Region

- Overall, district wellness policies in the **Northeast** were significantly **less comprehensive and weaker than** the wellness policies for districts in the **West**.
- Wellness policies for districts in the **West** were **more comprehensive than all other regions** in the areas of **physical activity, physical education, and marketing and promotion**.



Working on Wellness: Opportunities Ahead

The new provisions of the wellness policy final rule will be required at the start of the 2017-18 school year. With an eye towards upcoming district wellness policy revisions, following are examples of items that may be considered by districts as they review and revise their policies in the months ahead and/or longer term:

- Add and strengthen language that implements evidence-based **nutrition education** within schools.
- Ensure provisions that address healthy food marketing, pricing structures to encourage healthy eating, and events such as taste tests are included in wellness policies to **promote good nutrition** practices.
- Support **physical activity** by including language that incorporates it into the school day—including physical activity breaks for all and recess for elementary school students.
- Make **physical education** time count, and ensure that policies require that students spend at least 50% of class time in moderate to vigorous physical activity.
- Include the specific details of the **school meal** and **Smart Snacks** nutrition standards within the text of the district policy itself to eliminate any confusion and doubt regarding what items may be served and sold during the school day.
- Go beyond state policy, and adopt a **fundraiser exemption** policy that supports the healthy eating environment created by Smart Snacks.
- Ensure that wellness policies restrict on-campus **marketing** to foods and beverages that may be sold during the school day. This includes posters, vending machines fronts, and incentive programs.
- Include all eight **stakeholders** in the wellness policy development, review, and update to create the strongest policy possible for students.
- Keep the public informed and make **transparency** an important part of strengthening wellness policies. School staff, students, and the public can better help implementation when they are well aware of the content and expectations of the district wellness policy.



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Appendices

Appendix A:

Competitive Food and Beverage Content Restrictions by Location of Sale and Provision In District Wellness Policies For Public School Food Authorities Nationwide, School Year 2014-2015

LOCATION OF SALE & PROVISION	PROVISION STRENGTH	ALL GRADES	ELEMENTARY SCHOOL	MIDDLE SCHOOL	HIGH SCHOOL	SIG. DIFF.
VENDING MACHINES						
General Smart Snacks requirement	None	56.23%	47.82%	60.63%	60.90%	<.001***
	Weak	2.68%	7.15%	0.31%	0.22%	
	Meets Smart Snacks: Not Defined	25.04%	24.26%	25.47%	25.43%	
	Meets Smart Snacks: Defined	10.08%	6.93%	11.22%	12.38%	
	Strong: Ban	5.98%	13.84%	2.37%	1.07%	
General competitive food standard	None	55.48%	46.34%	60.11%	60.71%	<.001***
	Weak	2.78%	7.40%	0.33%	0.24%	
	Strong: Does not define standard	25.10%	24.32%	25.54%	25.50%	
	Strong: Defines standard	10.09%	6.97%	11.22%	12.38%	
Nutrition standards for foods	None	29.51%	24.83%	31.44%	32.68%	<.001***
	Weak	27.61%	28.13%	27.71%	26.93%	
	Strong: < Smart Snacks	0.88%	0.79%	0.90%	0.98%	
	Strong: Meets Smart Snacks	35.42%	31.28%	37.09%	38.24%	
Regulates sugar content	None	35.54%	30.01%	37.60%	39.52%	<.001***
	Weak	14.21%	16.03%	13.06%	13.41%	
	Strong: < Smart Snacks	5.23%	4.89%	5.66%	5.14%	
	Strong: Meets Smart Snacks	37.29%	33.10%	39.39%	39.72%	
	Strong: Meets IOM	1.16%	1.00%	1.42%	1.05%	
	Strong: Ban	6.57%	14.97%	2.87%	1.17%	
Artificial sweeteners: food	None	89.02%	76.76%	94.90%	96.40%	<.001***
	Weak	2.83%	7.18%	0.47%	0.51%	
	Strong: No artificial sweeteners	1.79%	1.71%	1.76%	1.92%	
	Strong: Ban	6.36%	14.36%	2.87%	1.17%	
Regulates fat content	None	34.14%	28.38%	36.38%	38.19%	<.001***
	Weak	15.00%	16.30%	14.09%	14.53%	
	Strong: < Smart Snacks	3.43%	3.97%	3.30%	2.97%	
	Strong: Meets Smart Snacks	38.67%	34.84%	40.40%	41.11%	
	Strong: Meets IOM	2.18%	1.53%	2.97%	2.04%	
	Strong: Ban	6.57%	14.97%	2.87%	1.17%	
Limits trans-fat	None	41.99%	35.98%	44.43%	46.11%	<.001***
	Weak	11.90%	14.41%	10.96%	10.10%	
	Strong: Limits trans-fat	1.44%	0.83%	2.02%	1.51%	
	Strong: Meets IOM	1.04%	0.99%	1.03%	1.12%	
	Strong: Meets Smart Snacks	37.05%	32.82%	38.71%	40.00%	
	Strong: Ban	6.57%	14.97%	2.87%	1.17%	

LOCATION OF SALE & PROVISION	PROVISION STRENGTH	ALL GRADES	ELEMENTARY SCHOOL	MIDDLE SCHOOL	HIGH SCHOOL	SIG. DIFF.
Limits saturated fat	None	33.88%	28.97%	35.56%	37.56%	<.001***
	Weak	16.28%	16.39%	16.06%	16.40%	
	Strong: < Smart Snacks	4.18%	4.88%	4.45%	3.11%	
	Strong: Meets Smart Snacks	39.08%	34.79%	41.06%	41.76%	
	Strong: Ban	6.57%	14.97%	2.87%	1.17%	
Regulates sodium: snacks	None	41.37%	35.97%	43.36%	45.28%	<.001***
	Weak	13.21%	15.15%	12.38%	11.94%	
	Strong: < Smart Snacks	1.47%	1.16%	1.69%	1.58%	
	Strong: Meets Smart Snacks	35.83%	31.61%	38.01%	38.19%	
	Strong: Meets IOM	1.55%	1.14%	1.69%	1.84%	
	Strong: Ban	6.57%	14.97%	2.87%	1.17%	
Limits calorie content: snacks	None	46.23%	39.46%	49.42%	50.37%	<.001***
	Weak	6.98%	9.41%	5.49%	5.86%	
	Strong: < Smart Snacks	2.79%	2.69%	3.28%	2.38%	
	Strong: Meets Smart Snacks/IOM	37.43%	33.48%	38.94%	40.21%	
	Strong: Ban	6.57%	14.97%	2.87%	1.17%	
Accompaniments	None	55.23%	46.71%	59.52%	60.13%	<.001***
	Weak	3.22%	7.65%	0.86%	0.82%	
	Strong: Meets Smart Snacks	35.19%	31.28%	36.75%	37.88%	
	Strong: Ban	6.36%	14.36%	2.87%	1.17%	
Nutrition standards: ES/MS beverages	None	33.11%	29.61%	36.73%	--	<.001***
	Weak	16.65%	15.18%	18.18%	--	
	Strong: < Smart Snacks	8.07%	10.03%	6.04%	--	
	Strong: Meets Smart Snacks	34.00%	31.40%	36.69%	--	
	Strong: Ban	8.16%	13.77%	2.37%	--	
Nutrition standards: HS beverages	None	37.94%	--	--	37.94%	--
	Weak	22.43%	--	--	22.43%	
	Strong: Meets Smart Snacks	35.62%	--	--	35.62%	
	Strong: Meets IOM	2.94%	--	--	2.94%	
	Strong: Ban	1.07%	--	--	1.07%	
Artificial sweeteners: beverages	None	80.01%	67.29%	84.36%	89.57%	<.001***
	Weak	11.89%	17.28%	10.96%	6.83%	
	Strong: No artificial sweeteners	2.15%	1.65%	2.32%	2.52%	
	Strong: Ban	5.96%	13.77%	2.37%	1.07%	
Limits fat content of milk	None	39.98%	34.43%	42.21%	43.80%	<.001***
	Weak	12.02%	14.69%	11.08%	10.03%	
	Strong: Meets Smart Snacks/IOM	42.04%	37.11%	44.34%	45.09%	
	Strong: Ban	5.96%	13.77%	2.37%	1.07%	
Limits fat: flavored milk	None	45.76%	41.02%	48.19%	48.44%	<.001***
	Weak	12.84%	13.81%	12.67%	11.95%	
	Strong: Meets Smart Snacks/IOM	35.44%	31.39%	36.78%	38.54%	
	Strong: Ban	5.96%	13.77%	2.37%	1.07%	
Restrictions on juice	None	35.70%	30.52%	37.79%	39.25%	<.001***
	Weak	13.12%	12.68%	13.21%	13.52%	
	Strong: Requires 50-99% juice	1.91%	1.89%	2.49%	1.28%	
	Strong: Meets Smart Snacks	43.10%	40.52%	44.14%	44.88%	
	Strong: Ban	6.17%	14.39%	2.37%	1.07%	

LOCATION OF SALE & PROVISION	PROVISION STRENGTH	ALL GRADES	ELEMENTARY SCHOOL	MIDDLE SCHOOL	HIGH SCHOOL	SIG. DIFF.
Restrictions on water	None	36.79%	31.69%	38.95%	40.15%	<.001***
	Weak	20.55%	22.02%	19.88%	19.64%	
	Strong: Meets Smart Snacks	36.49%	31.90%	38.80%	39.13%	
	Strong: Ban	6.17%	14.39%	2.37%	1.07%	
Serving size limits: beverages	None	38.92%	33.38%	41.32%	42.55%	<.001***
	Weak	15.07%	16.50%	13.93%	14.71%	
	Strong: < Smart Snacks	1.09%	1.03%	1.41%	0.80%	
	Strong: Meets Smart Snacks	38.21%	34.54%	40.26%	40.10%	
	Strong: Meets IOM	0.75%	0.78%	0.71%	0.77%	
	Strong: Ban	5.96%	13.77%	2.37%	1.07%	
Limits caffeine: ES/MS	None	39.23%	34.25%	44.39%	--	<.001***
	Weak	10.54%	10.66%	10.41%	--	
	Strong: Meets Smart Snacks/IOM	41.76%	40.71%	42.84%	--	
	Strong: Ban	8.47%	14.39%	2.37%	--	
Limits caffeine: HS	None	80.79%	--	--	80.79%	--
	Weak	10.67%	--	--	10.67%	
	Strong: Meets IOM	7.46%	--	--	7.46%	
	Strong: Ban	1.07%	--	--	1.07%	

LOCATION OF SALE & PROVISION	PROVISION STRENGTH	ALL GRADES	ELEMENTARY SCHOOL	MIDDLE SCHOOL	HIGH SCHOOL	SIG. DIFF.
SCHOOL STORES						
General Smart Snacks requirement	None	60.48%	56.04%	62.89%	62.85%	<.001***
	Weak	2.68%	7.15%	0.31%	0.22%	
	Meets Smart Snacks: Not defined	24.88%	24.82%	25.35%	24.42%	
	Meets Smart Snacks: Defined	10.17%	7.08%	11.33%	12.38%	
	Strong: Ban	1.80%	4.91%	0.12%	0.13%	
General competitive food standard	None	59.93%	54.61%	62.81%	62.76%	<.001***
	Weak	2.78%	7.40%	0.33%	0.24%	
	Strong: Does not define standard	24.94%	24.88%	25.41%	24.49%	
	Strong: Defines standard	10.18%	7.11%	11.33%	12.38%	
Nutrition standards for foods	None	32.53%	28.03%	34.47%	35.48%	<.001***
	Weak	29.00%	32.87%	27.52%	26.27%	
	Strong: < Smart Snacks	0.83%	0.79%	0.82%	0.89%	
	Strong: Meets Smart Snacks	35.46%	32.32%	37.08%	37.23%	
	Strong: Ban	2.18%	5.99%	0.12%	0.13%	
Regulates sugar content	None	38.75%	33.97%	40.71%	42.01%	<.001***
	Weak	14.40%	18.53%	12.05%	12.30%	
	Strong: < Smart Snacks	5.50%	5.59%	5.72%	5.15%	
	Strong: Meets Smart Snacks	37.96%	34.60%	40.06%	39.46%	
	Strong: Meets IOM	1.21%	1.33%	1.34%	0.95%	
	Strong: Ban	2.18%	5.99%	0.12%	0.13%	

LOCATION OF SALE & PROVISION	PROVISION STRENGTH	ALL GRADES	ELEMENTARY SCHOOL	MIDDLE SCHOOL	HIGH SCHOOL	SIG. DIFF.
Artificial sweeteners: food	None	93.50%	85.82%	97.74%	97.54%	<.001***
	Weak	2.73%	7.09%	0.37%	0.41%	
	Strong: No artificial sweeteners	1.80%	1.72%	1.77%	1.93%	
	Strong: Ban	1.96%	5.38%	0.12%	0.13%	
Regulates fat content	None	37.38%	32.33%	39.52%	40.72%	<.001***
	Weak	15.32%	19.16%	13.08%	13.42%	
	Strong: < Smart Snacks	3.48%	4.16%	3.26%	2.94%	
	Strong: Meets Smart Snacks	39.42%	36.49%	41.14%	40.85%	
	Strong: Meets IOM	2.23%	1.87%	2.88%	1.94%	
	Strong: Ban	2.18%	5.99%	0.12%	0.13%	
Limits trans-fat	None	45.36%	40.32%	47.56%	48.63%	<.001***
	Weak	12.82%	17.68%	10.66%	9.71%	
	Strong: Limits trans-fat	1.49%	1.01%	1.99%	1.48%	
	Strong: Meets IOM	1.04%	0.99%	1.03%	1.12%	
	Strong: Meets Smart Snacks	37.11%	34.00%	38.64%	38.93%	
	Strong: Ban	2.18%	5.99%	0.12%	0.13%	
Limits saturated fat	None	36.54%	32.21%	38.22%	39.57%	<.001***
	Weak	17.66%	20.46%	15.99%	16.33%	
	Strong: < Smart Snacks	4.20%	5.07%	4.38%	3.02%	
	Strong: Meets Smart Snacks	39.43%	36.28%	41.29%	40.95%	
	Strong: Ban	2.18%	5.99%	0.12%	0.13%	
Regulates sodium: snacks	None	44.79%	40.69%	46.41%	47.64%	<.001***
	Weak	14.05%	17.95%	12.17%	11.71%	
	Strong: < Smart Snacks	1.62%	1.58%	1.69%	1.58%	
	Strong: Meets Smart Snacks	35.76%	32.32%	37.99%	37.18%	
	Strong: Meets IOM	1.61%	1.47%	1.62%	1.76%	
	Strong: Ban	2.18%	5.99%	0.12%	0.13%	
Limits calorie content: snacks	None	49.65%	44.27%	52.39%	52.72%	<.001***
	Weak	7.61%	11.96%	5.11%	5.45%	
	Strong: < Smart Snacks	3.10%	3.14%	3.52%	2.59%	
	Strong: Meets Smart Snacks/IOM	37.46%	34.64%	38.85%	39.12%	
	Strong: Ban	2.18%	5.99%	0.12%	0.13%	
Accompaniments	None	59.66%	54.86%	62.28%	62.19%	<.001***
	Weak	3.26%	7.76%	0.86%	0.82%	
	Strong: Meets Smart Snacks	35.12%	32.00%	36.74%	36.87%	
	Strong: Ban	1.96%	5.38%	0.12%	0.13%	
Nutrition standards: ES/MS beverages	None	38.12%	35.17%	41.16%	--	.003**
	Weak	17.82%	19.47%	16.12%	--	
	Strong: < Smart Snacks	7.21%	8.46%	5.92%	--	
	Strong: Meets Smart Snacks	34.30%	31.99%	36.68%	--	
	Strong: Ban	2.55%	4.91%	0.12%	--	

LOCATION OF SALE & PROVISION	PROVISION STRENGTH	ALL GRADES	ELEMENTARY SCHOOL	MIDDLE SCHOOL	HIGH SCHOOL	SIG. DIFF.
Nutrition standards: HS beverages	None	42.41%	--	--	42.41%	--
	Weak	19.90%	--	--	19.90%	
	Strong: Meets Smart Snacks	34.61%	--	--	34.61%	
	Strong: Meets IOM	2.94%	--	--	2.94%	
	Strong: Ban	0.13%	--	--	0.13%	
Artificial sweeteners: beverages	None	83.75%	75.32%	86.44%	90.30%	<.001***
	Weak	12.28%	18.06%	11.12%	7.04%	
	Strong: No artificial sweeteners	2.18%	1.72%	2.33%	2.53%	
	Strong: Ban	1.80%	4.91%	0.12%	0.13%	
Limits fat content of milk	None	43.57%	39.09%	45.33%	46.69%	<.001***
	Weak	12.29%	17.10%	10.24%	9.11%	
	Strong: Meets Smart Snacks/IOM	42.34%	38.90%	44.31%	44.06%	
	Strong: Ban	1.80%	4.91%	0.12%	0.13%	
Limits fat: flavored milk	None	49.06%	45.70%	50.88%	50.87%	<.001***
	Weak	13.81%	17.41%	12.23%	11.48%	
	Strong: Meets Smart Snacks/IOM	35.33%	31.98%	36.76%	37.53%	
	Strong: Ban	1.80%	4.91%	0.12%	0.13%	
Restrictions on juice	None	40.20%	35.81%	41.86%	43.33%	<.001***
	Weak	13.12%	16.92%	11.10%	11.06%	
	Strong: Requires 50-99% juice	1.97%	2.01%	2.53%	1.32%	
	Strong: Meets Smart Snacks	42.70%	39.75%	44.40%	44.16%	
	Strong: Ban	2.01%	5.52%	0.12%	0.13%	
Restrictions on water	None	41.37%	37.03%	43.12%	44.34%	<.001***
	Weak	19.91%	24.03%	17.97%	17.41%	
	Strong: Meets Smart Snacks	36.70%	33.43%	38.79%	38.12%	
	Strong: Ban	2.01%	5.52%	0.12%	0.13%	
Serving size limits: beverages	None	41.28%	37.01%	43.16%	44.04%	<.001***
	Weak	16.87%	20.90%	14.32%	15.13%	
	Strong: < Smart Snacks	1.09%	1.03%	1.41%	0.80%	
	Strong: Meets Smart Snacks	38.20%	35.37%	40.28%	39.12%	
	Strong: Meets IOM	0.76%	0.78%	0.71%	0.78%	
	Strong: Ban	1.80%	4.91%	0.12%	0.13%	
Limits caffeine: ES/MS	None	43.12%	39.10%	47.26%	--	<.001***
	Weak	12.63%	15.65%	9.52%	--	
	Strong: Meets Smart Snacks/IOM	41.39%	39.73%	43.10%	--	
	Strong: Ban	2.86%	5.52%	0.12%	--	
Limits caffeine: HS	None	82.64%	--	--	82.64%	--
	Weak	9.60%	--	--	9.60%	
	Strong: Meets IOM	7.63%	--	--	7.63%	
	Strong: Ban	0.13%	--	--	0.13%	

LOCATION OF SALE & PROVISION	PROVISION STRENGTH	ALL GRADES	ELEMENTARY SCHOOL	MIDDLE SCHOOL	HIGH SCHOOL	SIG. DIFF.
À LA CARTE LINES						
General Smart Snacks requirement	None	60.15%	58.99%	60.17%	61.43%	.006**
	Weak	0.48%	0.99%	0.26%	0.16%	
	Meets Smart Snacks: Not defined	25.23%	24.77%	25.90%	25.02%	
	Meets Smart Snacks: Defined	10.14%	7.02%	11.32%	12.38%	
	Strong: Ban	3.99%	8.23%	2.36%	1.01%	
General competitive food standard	None	59.03%	56.91%	59.60%	60.81%	.003**
	Weak	0.63%	1.38%	0.28%	0.18%	
	Strong: Does not define standard	25.29%	24.84%	25.96%	25.09%	
	Strong: Defines standard	10.15%	7.05%	11.32%	12.38%	
	Strong: Ban	4.89%	9.83%	2.85%	1.55%	
Nutrition standards for foods	None	31.42%	30.90%	30.84%	32.62%	.006**
	Weak	27.05%	26.27%	27.84%	27.08%	
	Strong: < Smart Snacks	1.20%	1.12%	1.19%	1.30%	
	Strong: Meets Smart Snacks	35.45%	31.88%	37.28%	37.46%	
	Strong: Ban	4.89%	9.83%	2.85%	1.55%	
Regulates sugar content	None	36.89%	36.37%	36.04%	38.41%	.010*
	Weak	15.02%	14.60%	15.36%	15.13%	
	Strong: < Smart Snacks	3.84%	3.66%	3.90%	3.98%	
	Strong: Meets Smart Snacks	38.08%	34.20%	40.43%	39.88%	
	Strong: Meets IOM	1.29%	1.37%	1.42%	1.05%	
	Strong: Ban	4.87%	9.79%	2.85%	1.55%	
Artificial sweeteners: food	None	92.99%	87.75%	95.29%	96.38%	<.001***
	Weak	0.86%	1.41%	0.52%	0.61%	
	Strong: No artificial sweeteners	1.36%	1.30%	1.34%	1.46%	
	Strong: Ban	4.78%	9.54%	2.85%	1.55%	
Regulates fat content	None	34.69%	33.94%	34.04%	36.24%	.019*
	Weak	16.42%	15.98%	16.70%	16.60%	
	Strong: < Smart Snacks	4.34%	4.59%	4.32%	4.09%	
	Strong: Meets Smart Snacks	37.34%	33.54%	39.20%	39.58%	
	Strong: Meets IOM	2.33%	2.12%	2.89%	1.95%	
	Strong: Ban	4.89%	9.83%	2.85%	1.55%	
Limits trans-fat	None	45.15%	44.09%	44.59%	46.94%	.011*
	Weak	9.92%	10.20%	10.24%	9.26%	
	Strong: Limits trans-fat	1.57%	1.13%	2.05%	1.54%	
	Strong: Meets IOM	1.04%	0.99%	1.03%	1.12%	
	Strong: Meets Smart Snacks	37.43%	33.75%	39.24%	39.59%	
	Strong: Ban	4.89%	9.83%	2.85%	1.55%	
Limits saturated fat	None	35.25%	35.00%	34.36%	36.49%	.006**
	Weak	18.11%	16.52%	18.88%	19.06%	
	Strong: < Smart Snacks	4.55%	5.27%	4.80%	3.48%	
	Strong: Meets Smart Snacks	37.20%	33.38%	39.12%	39.42%	
	Strong: Ban	4.89%	9.83%	2.85%	1.55%	

LOCATION OF SALE & PROVISION	PROVISION STRENGTH	ALL GRADES	ELEMENTARY SCHOOL	MIDDLE SCHOOL	HIGH SCHOOL	SIG. DIFF.
Regulates sodium: snacks	None	43.83%	43.49%	43.02%	45.09%	.009**
	Weak	11.40%	10.88%	11.73%	11.64%	
	Strong: < Smart Snacks	2.18%	2.12%	2.25%	2.18%	
	Strong: Meets Smart Snacks	36.03%	32.21%	38.45%	37.69%	
	Strong: Meets IOM	1.67%	1.47%	1.70%	1.85%	
	Strong: Ban	4.89%	9.83%	2.85%	1.55%	
Regulates sodium: entrées	None	48.94%	47.81%	48.42%	50.79%	.001**
	Weak	9.10%	9.18%	9.25%	8.84%	
	Strong: < Smart Snacks/IOM	0.62%	0.34%	1.22%	0.28%	
	Strong: Meets Smart Snacks/IOM	36.46%	32.85%	38.27%	38.54%	
	Strong: Ban	4.89%	9.83%	2.85%	1.55%	
Limits calorie content: snacks	None	49.03%	47.56%	49.06%	50.63%	.005**
	Weak	5.32%	5.19%	5.23%	5.58%	
	Strong: < Smart Snacks	2.97%	3.01%	3.40%	2.45%	
	Strong: Meets Smart Snacks/IOM	37.68%	34.08%	39.47%	39.80%	
	Strong: Ban	5.00%	10.15%	2.85%	1.55%	
Limits calorie content: entrées	None	56.25%	54.70%	56.41%	57.82%	.003**
	Weak	2.07%	2.51%	1.81%	1.85%	
	Strong: < Smart Snacks	1.07%	0.80%	1.36%	1.05%	
	Strong: Meets Smart Snacks	35.72%	32.16%	37.56%	37.73%	
	Strong: Ban	4.89%	9.83%	2.85%	1.55%	
Accompaniments	None	58.68%	57.25%	58.90%	60.05%	.008**
	Weak	1.03%	1.49%	0.81%	0.76%	
	Strong: Meets Smart Snacks	35.61%	32.04%	37.44%	37.64%	
	Strong: Ban	4.67%	9.22%	2.85%	1.55%	
Nutrition standards: ES/ MS beverages	None	38.32%	38.57%	38.07%	--	.037*
	Weak	14.56%	12.82%	16.35%	--	
	Strong: < Smart Snacks	7.25%	8.45%	6.01%	--	
	Strong: Meets Smart Snacks	34.53%	31.93%	37.21%	--	
	Strong: Ban	5.34%	8.23%	2.36%	--	
Nutrition standards: HS beverages	None	40.59%	--	--	40.59%	--
	Weak	20.23%	--	--	20.23%	
	Strong: Meets Smart Snacks	35.22%	--	--	35.22%	
	Strong: Meets IOM	2.94%	--	--	2.94%	
	Strong: Ban	1.01%	--	--	1.01%	
Artificial sweeteners: beverages	None	83.98%	78.31%	84.71%	89.55%	<.001***
	Weak	9.25%	11.17%	10.02%	6.27%	
	Strong: No artificial sweeteners	2.78%	2.29%	2.92%	3.17%	
	Strong: Ban	3.99%	8.23%	2.36%	1.01%	
Limits fat content of milk	None	42.84%	42.38%	41.93%	44.35%	.005**
	Weak	10.64%	10.74%	11.08%	10.04%	
	Strong: Meets Smart Snacks/IOM	42.53%	38.64%	44.63%	44.60%	
	Strong: Ban	3.99%	8.23%	2.36%	1.01%	
Limits fat: flavored milk	None	48.89%	49.56%	47.93%	49.19%	.005**
	Weak	11.44%	10.28%	12.42%	11.68%	
	Strong: Meets Smart Snacks/IOM	35.67%	31.92%	37.30%	38.12%	
	Strong: Ban	3.99%	8.23%	2.36%	1.01%	

LOCATION OF SALE & PROVISION	PROVISION STRENGTH	ALL GRADES	ELEMENTARY SCHOOL	MIDDLE SCHOOL	HIGH SCHOOL	SIG. DIFF.
Restrictions on juice	None	40.06%	39.67%	38.96%	41.71%	.002**
	Weak	11.06%	9.99%	11.63%	11.64%	
	Strong: Requires 50-99% juice	1.53%	1.56%	2.10%	0.86%	
	Strong: Meets Smart Snacks	43.13%	39.89%	44.95%	44.78%	
	Strong: Ban	4.23%	8.89%	2.36%	1.01%	
Restrictions on water	None	41.17%	40.69%	40.22%	42.72%	.002**
	Weak	17.52%	17.05%	18.04%	17.49%	
	Strong: Meets Smart Snacks	37.09%	33.36%	39.38%	38.77%	
	Strong: Ban	4.23%	8.89%	2.36%	1.01%	
Serving size limits: beverages	None	41.20%	40.67%	40.43%	42.62%	.016*
	Weak	14.31%	13.63%	14.29%	15.11%	
	Strong: < Smart Snacks	1.22%	1.41%	1.41%	0.80%	
	Strong: Meets Smart Snacks	38.52%	35.28%	40.79%	39.68%	
	Strong: Meets IOM	0.76%	0.78%	0.71%	0.78%	
	Strong: Ban	3.99%	8.23%	2.36%	1.01%	
Limits caffeine: ES/MS	None	43.38%	42.90%	43.89%	--	.031*
	Weak	9.71%	9.10%	10.35%	--	
	Strong: Meets Smart Snacks/IOM	41.23%	39.12%	43.41%	--	
	Strong: Ban	5.68%	8.89%	2.36%	--	
Limits caffeine: HS	None	81.33%	--	--	81.33%	--
	Weak	10.51%	--	--	10.51%	
	Strong: Meets IOM	7.15%	--	--	7.15%	
	Strong: Ban	1.01%	--	--	1.01%	

LOCATION OF SALE & PROVISION	PROVISION STRENGTH	ALL GRADES	ELEMENTARY SCHOOL	MIDDLE SCHOOL	HIGH SCHOOL	SIG. DIFF.
CLASSROOM PARTIES						
General Smart Snacks requirement	None	93.76%	93.30%	93.29%	94.78%	.005**
	Weak	0.61%	0.65%	0.83%	0.31%	
	Meets Smart Snacks: Not defined	0.43%	0.73%	0.51%	0.00%	
	Meets Smart Snacks: Defined	3.75%	1.33%	5.28%	4.82%	
	Strong: Ban	1.46%	3.99%	0.09%	0.10%	
General competitive food standard	None	93.94%	93.57%	93.56%	94.78%	.005**
	Weak	0.42%	0.38%	0.56%	0.31%	
	Strong: Does not define standard	0.43%	0.73%	0.51%	0.00%	
	Strong: Defines standard	3.75%	1.33%	5.28%	4.82%	
	Strong: Ban	1.46%	3.99%	0.09%	0.10%	
Nutrition standards for foods	None	70.70%	70.23%	70.38%	71.56%	.023*
	Weak	22.49%	22.60%	22.57%	22.26%	
	Strong: < Smart Snacks	0.73%	0.69%	0.71%	0.78%	
	Strong: Meets Smart Snacks	4.52%	2.38%	6.13%	5.18%	
	Strong: Ban	1.57%	4.10%	0.20%	0.22%	

LOCATION OF SALE & PROVISION	PROVISION STRENGTH	ALL GRADES	ELEMENTARY SCHOOL	MIDDLE SCHOOL	HIGH SCHOOL	SIG. DIFF.
Regulates sugar content	None	81.53%	81.09%	81.24%	82.33%	.028*
	Weak	11.56%	11.60%	11.57%	11.49%	
	Strong: < Smart Snacks	0.29%	0.28%	0.29%	0.31%	
	Strong: Meets Smart Snacks	4.51%	2.42%	6.17%	5.06%	
	Strong: Meets IOM	0.54%	0.52%	0.54%	0.58%	
	Strong: Ban	1.57%	4.10%	0.20%	0.22%	
Artificial sweeteners: food	None	97.32%	94.84%	98.70%	98.59%	<.001***
	Weak	0.39%	0.37%	0.38%	0.41%	
	Strong: No artificial sweeteners	0.73%	0.69%	0.71%	0.78%	
	Strong: Ban	1.57%	4.10%	0.20%	0.22%	
Regulates fat content	None	83.02%	82.92%	82.87%	83.30%	.067
	Weak	10.06%	9.76%	9.93%	10.52%	
	Strong: <Smart Snacks	0.44%	0.42%	0.43%	0.47%	
	Strong: Meets Smart Snacks	4.57%	2.47%	6.22%	5.13%	
	Strong: Meets IOM	0.35%	0.33%	0.34%	0.37%	
	Strong: Ban	1.57%	4.10%	0.20%	0.22%	
Limits trans-fat	None	85.82%	85.38%	85.35%	86.81%	.016*
	Weak	7.05%	7.10%	7.24%	6.78%	
	Strong: Limits trans-fat	0.00%	0.00%	0.00%	0.00%	
	Strong: Meets IOM	0.44%	0.42%	0.43%	0.47%	
	Strong: Meets Smart Snacks	5.13%	3.01%	6.77%	5.72%	
	Strong: Ban	1.57%	4.10%	0.20%	0.22%	
Limits saturated fat	None	78.09%	77.88%	77.72%	78.73%	.024*
	Weak	14.99%	14.81%	15.09%	15.09%	
	Strong: < Smart Snacks	0.39%	0.42%	0.43%	0.31%	
	Strong: Meets Smart Snacks	4.96%	2.79%	6.56%	5.65%	
	Strong: Ban	1.57%	4.10%	0.20%	0.22%	
Regulates sodium: snacks	None	74.17%	73.58%	73.85%	75.17%	.019*
	Weak	19.02%	19.25%	19.11%	18.65%	
	Strong: < Smart Snacks	0.00%	0.00%	0.00%	0.00%	
	Strong: Meets Smart Snacks	4.18%	2.05%	5.79%	4.82%	
	Strong: Meets IOM	1.07%	1.02%	1.05%	1.14%	
	Strong: Ban	1.57%	4.10%	0.20%	0.22%	
Limits calorie content: snacks	None	89.68%	89.46%	89.31%	90.31%	.016*
	Weak	3.37%	3.19%	3.46%	3.47%	
	Strong: < Smart Snacks	0.01%	0.01%	0.01%	0.01%	
	Strong: Meets Smart Snacks/IOM	5.37%	3.24%	7.02%	5.99%	
	Strong: Ban	1.57%	4.10%	0.20%	0.22%	
Accompaniments	None	93.62%	93.60%	93.59%	93.67%	.006**
	Weak	0.63%	0.25%	0.42%	1.30%	
	Strong: Meets Smart Snacks	4.18%	2.05%	5.79%	4.82%	
	Strong: Ban	1.57%	4.10%	0.20%	0.22%	
Nutrition standards: ES/MS beverages	None	84.09%	84.13%	84.06%	--	.003**
	Weak	9.47%	9.36%	9.58%	--	
	Strong: < Smart Snacks	0.48%	0.47%	0.49%	--	
	Strong: Meets Smart Snacks	3.89%	2.05%	5.79%	--	
	Strong: Ban	2.07%	3.99%	0.09%	--	

LOCATION OF SALE & PROVISION	PROVISION STRENGTH	ALL GRADES	ELEMENTARY SCHOOL	MIDDLE SCHOOL	HIGH SCHOOL	SIG. DIFF.
Nutrition standards: HS beverages	None	85.29%	--	--	85.29%	--
	Weak	9.49%	--	--	9.49%	
	Strong: Meets Smart Snacks	4.82%	--	--	4.82%	
	Strong: Meets IOM	0.31%	--	--	0.31%	
	Strong: Ban	0.10%	--	--	0.10%	
Artificial sweeteners: beverages	None	96.73%	94.29%	98.14%	97.93%	<.001***
	Weak	1.29%	1.21%	1.25%	1.41%	
	Strong: No artificial sweeteners	0.53%	0.50%	0.52%	0.56%	
	Strong: Ban	1.46%	3.99%	0.09%	0.10%	
Limits fat content of milk	None	88.50%	88.39%	88.21%	88.95%	.008**
	Weak	5.03%	4.77%	5.09%	5.25%	
	Strong: Meets Smart Snacks/IOM	5.01%	2.85%	6.61%	5.71%	
	Strong: Ban	1.46%	3.99%	0.09%	0.10%	
Limits fat: flavored milk	None	89.04%	88.90%	88.74%	89.52%	.011*
	Weak	5.32%	5.05%	5.38%	5.56%	
	Strong: Meets Smart Snacks/IOM	4.18%	2.05%	5.79%	4.82%	
	Strong: Ban	1.46%	3.99%	0.09%	0.10%	
Restrictions on juice	None	84.90%	84.45%	84.39%	85.97%	.008**
	Weak	8.74%	8.71%	8.91%	8.59%	
	Strong: Requires 50-99% juice	0.00%	0.00%	0.00%	0.00%	
	Strong: Meets Smart Snacks	4.90%	2.85%	6.61%	5.34%	
	Strong: Ban	1.46%	3.99%	0.09%	0.10%	
Restrictions on water	None	85.12%	84.76%	84.71%	85.96%	.008**
	Weak	8.91%	8.87%	9.07%	8.77%	
	Strong: Meets Smart Snacks	4.52%	2.38%	6.13%	5.18%	
	Strong: Ban	1.46%	3.99%	0.09%	0.10%	
Serving size limits: beverages	None	86.38%	86.14%	86.24%	86.81%	.012*
	Weak	7.69%	7.54%	7.59%	7.97%	
	Strong: < Smart Snacks	0.00%	0.00%	0.00%	0.00%	
	Strong: Meets Smart Snacks	4.18%	2.05%	5.79%	4.82%	
	Strong: Meets IOM	0.29%	0.28%	0.29%	0.31%	
	Strong: Ban	1.46%	3.99%	0.09%	0.10%	
Limits caffeine: ES/MS	None	89.56%	89.63%	89.49%	--	.004**
	Weak	3.77%	3.63%	3.91%	--	
	Strong: Meets Smart Snacks/IOM	4.59%	2.74%	6.51%	--	
	Strong: Ban	2.07%	3.99%	0.09%	--	
Limits caffeine: HS	None	95.78%	--	--	95.78%	--
	Weak	3.35%	--	--	3.35%	
	Strong: Meets IOM	0.78%	--	--	0.78%	
	Strong: Ban	0.10%	--	--	0.10%	

LOCATION OF SALE & PROVISION	PROVISION STRENGTH	ALL GRADES	ELEMENTARY SCHOOL	MIDDLE SCHOOL	HIGH SCHOOL	SIG. DIFF.
IN-SCHOOL FUNDRAISING						
General Smart Snacks requirement	None	61.87%	62.24%	61.93%	61.38%	.122
	Weak	0.20%	0.19%	0.25%	0.15%	
	Meets Smart Snacks: Not defined	23.67%	23.50%	24.25%	23.22%	
	Meets Smart Snacks: Defined	10.29%	7.03%	11.33%	12.82%	
	Strong: Ban	3.98%	7.03%	2.25%	2.43%	
General competitive food standard	None	61.39%	60.98%	61.88%	61.33%	.050
	Weak	0.30%	0.45%	0.27%	0.18%	
	Strong: Does not define standard	23.69%	23.52%	24.27%	23.24%	
	Strong: Defines standard	10.29%	7.03%	11.33%	12.82%	
	Strong: Ban	4.33%	8.02%	2.25%	2.43%	
Nutrition standards for foods	None	46.44%	46.27%	45.85%	47.28%	.056
	Weak	14.23%	14.18%	15.29%	13.12%	
	Strong: < Smart Snacks	0.68%	0.65%	0.67%	0.73%	
	Strong: Meets Smart Snacks	34.32%	30.88%	35.93%	36.43%	
	Strong: Ban	4.33%	8.02%	2.25%	2.43%	
Regulates sugar content	None	49.03%	48.70%	48.37%	50.12%	.121
	Weak	6.24%	6.58%	6.31%	5.79%	
	Strong: < Smart Snacks	3.49%	3.42%	3.76%	3.27%	
	Strong: Meets Smart Snacks	35.78%	32.05%	38.09%	37.44%	
	Strong: Meets IOM	1.14%	1.22%	1.22%	0.95%	
	Strong: Ban	4.33%	8.02%	2.25%	2.43%	
Artificial sweeteners: food	None	94.28%	91.06%	96.17%	95.85%	.007**
	Weak	0.05%	0.05%	0.05%	0.05%	
	Strong: No artificial sweeteners	1.56%	1.48%	1.53%	1.67%	
	Strong: Ban	4.11%	7.41%	2.25%	2.43%	
Regulates fat content	None	48.83%	48.51%	48.17%	49.90%	.077
	Weak	5.98%	5.55%	6.46%	5.95%	
	Strong: < Smart Snacks	1.39%	2.00%	1.23%	0.90%	
	Strong: Meets Smart Snacks	38.23%	34.97%	40.07%	39.89%	
	Strong: Meets IOM	1.24%	0.95%	1.83%	0.93%	
	Strong: Ban	4.33%	8.02%	2.25%	2.43%	
Limits trans-fat	None	51.01%	50.95%	50.49%	51.64%	.060
	Weak	8.60%	8.85%	8.98%	7.89%	
	Strong: Limits trans-fat	0.69%	0.25%	1.24%	0.58%	
	Strong: Meets IOM	0.20%	0.19%	0.20%	0.22%	
	Strong: Meets Smart Snacks	35.18%	31.74%	36.82%	37.24%	
	Strong: Ban	4.33%	8.02%	2.25%	2.43%	
Limits saturated fat	None	47.83%	47.71%	47.16%	48.70%	.029*
	Weak	7.94%	6.98%	8.57%	8.35%	
	Strong: < Smart Snacks	2.09%	2.86%	2.40%	0.89%	
	Strong: Meets Smart Snacks	37.81%	34.42%	39.63%	39.64%	
	Strong: Ban	4.33%	8.02%	2.25%	2.43%	

Significance levels: *p<.05 **p<.01 ***p<.001

LOCATION OF SALE & PROVISION	PROVISION STRENGTH	ALL GRADES	ELEMENTARY SCHOOL	MIDDLE SCHOOL	HIGH SCHOOL	SIG. DIFF.
Regulates sodium: snacks	None	55.00%	55.58%	54.59%	54.78%	.088
	Weak	4.50%	4.26%	4.66%	4.61%	
	Strong: < Smart Snacks	0.56%	0.29%	0.69%	0.75%	
	Strong: Meets Smart Snacks	34.58%	30.87%	36.81%	36.34%	
	Strong: Meets IOM	1.03%	0.98%	1.01%	1.10%	
	Strong: Ban	4.33%	8.02%	2.25%	2.43%	
Limits calorie content: snacks	None	53.33%	52.71%	53.35%	53.99%	.090
	Weak	3.86%	3.68%	3.85%	4.08%	
	Strong: < Smart Snacks	3.25%	3.54%	3.85%	2.25%	
	Strong: Meets Smart Snacks/IOM	35.24%	32.04%	36.69%	37.26%	
	Strong: Ban	4.33%	8.02%	2.25%	2.43%	
Accompaniments	None	61.76%	61.87%	61.96%	61.42%	.064
	Weak	0.15%	0.17%	0.19%	0.09%	
	Strong: Meets Smart Snacks	34.11%	30.93%	35.60%	36.07%	
	Strong: Ban	3.98%	7.03%	2.25%	2.43%	
Nutrition standards: ES/MS beverages	None	51.22%	51.43%	51.01%	--	.034*
	Weak	6.42%	4.89%	8.01%	--	
	Strong: < Smart Snacks	4.66%	6.11%	3.16%	--	
	Strong: Meets Smart Snacks	33.01%	30.53%	35.58%	--	
	Strong: Ban	4.68%	7.03%	2.25%	--	
Nutrition standards: HS beverages	None	51.45%	--	--	51.45%	--
	Weak	9.05%	--	--	9.05%	
	Strong: Meets Smart Snacks	34.90%	--	--	34.90%	
	Strong: Meets IOM	2.19%	--	--	2.19%	
	Strong: Ban	2.43%	--	--	2.43%	
Artificial sweeteners: beverages	None	89.21%	85.27%	90.24%	92.54%	.013*
	Weak	5.27%	6.22%	5.98%	3.43%	
	Strong: No artificial sweeteners	1.54%	1.48%	1.53%	1.61%	
	Strong: Ban	3.98%	7.03%	2.25%	2.43%	
Limits fat content of milk	None	53.92%	53.97%	53.59%	54.21%	.163
	Weak	4.05%	4.38%	4.28%	3.45%	
	Strong: Meets Smart Snacks/IOM	38.05%	34.62%	39.88%	39.91%	
	Strong: Ban	3.98%	7.03%	2.25%	2.43%	
Limits fat: flavored milk	None	54.91%	55.65%	54.55%	54.47%	.145
	Weak	6.87%	6.70%	7.54%	6.33%	
	Strong: Meets Smart Snacks/IOM	34.24%	30.61%	35.66%	36.77%	
	Strong: Ban	3.98%	7.03%	2.25%	2.43%	
Restrictions on juice	None	51.67%	51.62%	51.30%	52.13%	.113
	Weak	4.43%	3.43%	4.89%	5.05%	
	Strong: Requires 50-99% juice	1.24%	1.35%	1.64%	0.67%	
	Strong: Meets Smart Snacks	38.47%	35.95%	39.91%	39.73%	
	Strong: Ban	4.19%	7.65%	2.25%	2.43%	
Restrictions on water	None	51.48%	51.83%	51.16%	51.45%	.047*
	Weak	9.08%	8.36%	9.64%	9.26%	
	Strong: Meets Smart Snacks	35.11%	31.78%	36.95%	36.87%	
	Strong: Ban	4.33%	8.02%	2.25%	2.43%	

Significance levels: *p<.05 **p<.01 ***p<.001

LOCATION OF SALE & PROVISION	PROVISION STRENGTH	ALL GRADES	ELEMENTARY SCHOOL	MIDDLE SCHOOL	HIGH SCHOOL	SIG. DIFF.
Serving size limits: beverages	None	52.18%	52.62%	51.81%	52.08%	.170
	Weak	7.28%	6.68%	7.82%	7.36%	
	Strong: < Smart Snacks	0.99%	1.64%	0.93%	0.32%	
	Strong: Meets Smart Snacks	35.09%	31.56%	36.71%	37.30%	
	Strong: Meets IOM	0.48%	0.46%	0.47%	0.51%	
	Strong: Ban	3.98%	7.03%	2.25%	2.43%	
Limits caffeine: ES/MS	None	53.61%	53.09%	54.14%	--	.065
	Weak	3.93%	3.21%	4.67%	--	
	Strong: Meets Smart Snacks/IOM	37.47%	36.05%	38.93%	--	
	Strong: Ban	4.99%	7.65%	2.25%	--	
Limits caffeine: HS	None	86.48%	--	--	86.48%	--
	Weak	4.79%	--	--	4.79%	
	Strong: Meets IOM	6.30%	--	--	6.30%	
	Strong: Ban	2.43%	--	--	2.43%	
Fundraiser exemption	Not mentioned or no limits	86.59%	86.63%	86.38%	86.79%	.918
	Allows exemptions	12.44%	12.10%	12.50%	12.75%	
	No exemptions	0.97%	1.28%	1.12%	0.46%	
Limits on number of fundraisers that meet established nutrition standards	Not mentioned or no limits	96.00%	95.54%	95.51%	97.06%	.431
	Limits number of fundraisers that meet established nutrition standards	4.00%	4.46%	4.49%	2.94%	

Significance levels: *p<.05 **p<.01 ***p<.001

Appendix B:

Mean Comprehensiveness and Strength Scores of District Wellness Policies for Public School Food Authorities Nationwide by District Characteristics and Grade Level, School Year 2014-2015

Appendix B-1: Mean Comprehensiveness and Strength Scores of District Wellness Policies for Public School Food Authorities Nationwide by District Race/Ethnicity, All Grades, School Year 2014-2015

	MAJ. WHITE (≥66%)		MAJ. AFRICAN- AMERICAN (≥50%)		MAJ. HISPANIC/ LATINO (≥50%)		MIXED	
	SCORE	SIG. DIFF.	SCORE	SIG. DIFF.	SCORE	SIG. DIFF.	SCORE	SIG. DIFF.
COMPREHENSIVENESS (OUT OF 100)								
Overall Score	43.90	Referent	44.61	.882	43.02	.856	35.74	.004**
Nutrition Education	54.66	Referent	57.29	.690	55.91	.831	49.83	.192
Physical Education	37.92	Referent	38.62	.911	38.44	.918	33.56	.179
Physical Activity	38.90	Referent	39.73	.891	49.28	.070	34.86	.193
School Meals	67.04	Referent	65.23	.770	64.62	.662	67.99	.709
Competitive Foods & Beverages	44.77	Referent	46.29	.809	41.78	.605	33.13	.004**
Marketing & Promotion	22.25	Referent	19.99	.612	40.08	.001**	25.80	.346
Communications	37.90	Referent	42.86	.537	52.45	.058	36.70	.746
Evaluation & Implementation	54.34	Referent	61.54	.169	49.76	.421	43.05	.004**
Reporting Requirements	17.30	Referent	12.56	.098	16.50	.812	9.82	<.001***
Staff Wellness	27.96	Referent	26.18	.784	39.62	.077	20.37	.067
STRENGTH (OUT OF 100)								
Overall Score	33.30	Referent	35.29	.643	31.93	.762	26.36	.011*
Nutrition Education	35.40	Referent	41.57	.268	33.44	.683	31.48	.163
Physical Education	26.55	Referent	26.77	.955	23.29	.383	20.04	.004**
Physical Activity	25.41	Referent	25.53	.979	30.57	.240	22.10	.149
School Meals	58.62	Referent	57.57	.856	57.44	.810	61.28	.237
Competitive Foods & Beverages	33.64	Referent	36.55	.669	31.20	.699	23.69	.017*
Marketing & Promotion	9.24	Referent	13.48	.284	28.32	<.001***	15.03	.024*
Communications	20.62	Referent	26.94	.219	27.68	.139	19.84	.801
Evaluation & Implementation	41.20	Referent	50.97	.039*	37.63	.508	29.89	.001**
Reporting Requirements	15.17	Referent	12.12	.266	13.26	.510	8.84	<.001***
Staff Wellness	16.21	Referent	13.47	.666	20.42	.388	11.24	.120

Significance levels: *p<.05 **p<.01 ***p<.001

Appendix B-2: Mean Comprehensiveness and Strength Scores of District Wellness Policies for Public School Food Authorities Nationwide by District Race/Ethnicity, Elementary School, School Year 2014-2015

	MAJ. WHITE (≥66%)		MAJ. AFRICAN- AMERICAN (≥50%)		MAJ. HISPANIC/ LATINO (≥50%)		MIXED	
	SCORE	SIG. DIFF.	SCORE	SIG. DIFF.	SCORE	SIG. DIFF.	SCORE	SIG. DIFF.
COMPREHENSIVENESS (OUT OF 100)								
Overall Score	45.08	Referent	45.85	.907	47.80	.538	37.49	.010*
Nutrition Education	54.48	Referent	57.42	.710	57.51	.598	48.94	.146
Physical Education	39.58	Referent	40.29	.930	41.62	.696	34.12	.106
Physical Activity	39.37	Referent	36.00	.642	49.10	.083	33.97	.081
School Meals	66.01	Referent	68.39	.540	65.81	.969	66.76	.772
Competitive Foods & Beverages	46.80	Referent	48.01	.892	49.03	.662	36.77	.018*
Marketing & Promotion	22.45	Referent	18.12	.418	43.08	<.001***	24.61	.573
Communications	37.89	Referent	46.77	.259	55.14	.033*	35.74	.552
Evaluation & Implementation	54.80	Referent	59.62	.477	52.48	.682	42.01	.001**
Reporting Requirements	17.35	Referent	12.87	.174	17.09	.944	9.49	<.001***
Staff Wellness	27.99	Referent	23.03	.519	43.51	.018*	19.54	.035*
STRENGTH (OUT OF 100)								
Overall Score	34.45	Referent	36.68	.685	32.66	.708	26.73	.006**
Nutrition Education	35.78	Referent	41.49	.345	34.01	.725	30.96	.094
Physical Education	26.76	Referent	27.36	.902	24.87	.631	19.67	.002**
Physical Activity	26.19	Referent	23.52	.602	30.42	.356	22.43	.141
School Meals	57.26	Referent	60.70	.249	58.40	.796	59.65	.292
Competitive Foods & Beverages	35.88	Referent	38.55	.763	31.52	.516	24.72	.011*
Marketing & Promotion	9.16	Referent	12.86	.425	30.68	<.001***	14.24	.049*
Communications	20.30	Referent	29.40	.068	30.26	.040*	19.34	.748
Evaluation & Implementation	41.44	Referent	49.72	.143	39.08	.674	29.63	<.001***
Reporting Requirements	15.19	Referent	12.39	.378	13.70	.635	8.74	<.001***
Staff Wellness	16.05	Referent	11.00	.467	22.66	.205	10.59	.080

Significance levels: *p<.05 **p<.01 ***p<.001

Appendix B-3: Mean Comprehensiveness and Strength Scores of District Wellness Policies for Public School Food Authorities Nationwide by District Race/Ethnicity, Middle School, School Year 2014-2015

	MAJ. WHITE (≥66%)		MAJ. AFRICAN- AMERICAN (≥50%)		MAJ. HISPANIC/ LATINO (≥50%)		MIXED	
	SCORE	SIG. DIFF.	SCORE	SIG. DIFF.	SCORE	SIG. DIFF.	SCORE	SIG. DIFF.
COMPREHENSIVENESS (OUT OF 100)								
Overall Score	44.18	Referent	42.32	.781	44.25	.989	34.80	.002**
Nutrition Education	54.59	Referent	54.59	>.999	60.49	.260	48.71	.126
Physical Education	38.51	Referent	34.45	.581	42.62	.420	32.87	.085
Physical Activity	39.50	Referent	34.97	.569	56.19	.002**	34.48	.130
School Meals	68.00	Referent	68.36	.925	71.13	.457	68.80	.765
Competitive Foods & Beverages	44.85	Referent	43.20	.857	40.17	.465	31.72	.003**
Marketing & Promotion	21.95	Referent	15.67	.259	45.10	<.001***	25.35	.383
Communications	37.99	Referent	41.51	.588	57.72	.014*	36.05	.598
Evaluation & Implementation	54.84	Referent	56.70	.795	54.94	.985	42.54	.002**
Reporting Requirements	17.73	Referent	12.53	.159	17.90	.964	9.11	<.001***
Staff Wellness	28.54	Referent	21.37	.407	45.55	.009**	20.03	.038*
STRENGTH (OUT OF 100)								
Overall Score	33.71	Referent	33.33	.945	33.32	.931	26.17	.008**
Nutrition Education	35.59	Referent	37.46	.737	36.24	.896	30.57	.089
Physical Education	27.13	Referent	26.55	.916	26.00	.773	19.12	<.001***
Physical Activity	25.61	Referent	21.32	.416	35.05	.035*	21.88	.146
School Meals	59.49	Referent	62.01	.449	63.19	.310	61.99	.299
Competitive Foods & Beverages	33.99	Referent	32.93	.907	30.90	.635	23.61	.018*
Marketing & Promotion	9.16	Referent	11.41	.638	32.12	<.001***	14.61	.039*
Communications	20.46	Referent	29.81	.095	31.68	.021*	19.90	.852
Evaluation & Implementation	42.00	Referent	46.42	.418	40.91	.844	29.44	<.001***
Reporting Requirements	15.55	Referent	11.97	.314	14.35	.703	8.33	<.001***
Staff Wellness	16.63	Referent	12.77	.623	23.72	.185	10.96	.077

Significance levels: *p<.05 **p<.01 ***p<.001

Appendix B-4: Mean Comprehensiveness and Strength Scores of District Wellness Policies for Public School Food Authorities Nationwide by District Race/Ethnicity, High School, School Year 2014-2015

	MAJ. WHITE (≥66%)		MAJ. AFRICAN- AMERICAN (≥50%)		MAJ. HISPANIC/ LATINO (≥50%)		MIXED	
	SCORE	SIG. DIFF.	SCORE	SIG. DIFF.	SCORE	SIG. DIFF.	SCORE	SIG. DIFF.
COMPREHENSIVENESS (OUT OF 100)								
Overall Score	42.21	Referent	48.01	.273	31.81	.044*	34.22	.007**
Nutrition Education	54.95	Referent	56.91	.767	47.49	.217	50.39	.210
Physical Education	34.35	Referent	44.34	.198	31.21	.570	32.97	.668
Physical Activity	37.74	Referent	38.47	.852	43.38	.379	36.37	.671
School Meals	67.83	Referent	66.11	.833	61.83	.381	68.60	.789
Competitive Foods & Beverages	42.18	Referent	50.38	.241	27.42	.034*	29.87	.004**
Marketing & Promotion	22.33	Referent	28.53	.489	29.91	.134	28.66	.126
Communications	36.86	Referent	37.28	.955	36.94	.989	38.10	.747
Evaluation & Implementation	54.47	Referent	68.80	<.001***	38.82	.003**	44.92	.016*
Reporting Requirements	17.13	Referent	15.42	.559	8.10	<.001***	9.95	<.001***
Staff Wellness	27.42	Referent	37.14	.506	28.25	.878	21.83	.219
STRENGTH (OUT OF 100)								
Overall Score	31.81	Referent	38.05	.288	23.44	.061	26.00	.043*
Nutrition Education	34.86	Referent	38.84	.482	26.65	.065	31.07	.181
Physical Education	24.80	Referent	32.10	.079	18.16	.108	20.87	.120
Physical Activity	23.98	Referent	26.38	.529	28.42	.299	22.89	.619
School Meals	59.32	Referent	58.09	.873	55.42	.528	62.07	.283
Competitive Foods & Beverages	31.13	Referent	39.65	.366	19.92	.092	22.60	.051
Marketing & Promotion	9.32	Referent	17.84	.088	22.20	.007**	16.48	.012*
Communications	19.58	Referent	27.69	.196	20.65	.789	21.57	.555
Evaluation & Implementation	42.26	Referent	55.21	.005**	26.08	<.001***	31.12	.001**
Reporting Requirements	15.43	Referent	14.86	.841	7.22	.001**	8.91	.001**
Staff Wellness	15.16	Referent	25.64	.327	18.92	.443	11.96	.353

Significance levels: *p<.05 **p<.01 ***p<.001

Appendix B-5: Mean Comprehensiveness and Strength Scores of District Wellness Policies for Public School Food Authorities Nationwide by District Free/Reduced-Price Lunch Eligibility, All Grades, School Year 2014-2015

	LOW FRPL (HIGH SES)		MID FRPL (MIDDLE SES)		HIGH FRPL (LOW SES)	
	SCORE	SIG. DIFF.	SCORE	SIG. DIFF.	SCORE	SIG. DIFF.
COMPREHENSIVENESS (OUT OF 100)						
Overall Score	41.24	Referent	42.04	.817	42.91	.584
Nutrition Education	50.57	Referent	55.03	.148	55.45	.149
Physical Education	34.04	Referent	34.77	.813	41.59	.022*
Physical Activity	34.91	Referent	39.92	.066	41.67	.029*
School Meals	67.02	Referent	65.70	.618	69.04	.459
Competitive Foods & Beverages	42.26	Referent	42.72	.932	41.27	.824
Marketing & Promotion	22.84	Referent	21.77	.764	25.33	.521
Communications	35.04	Referent	37.90	.534	45.88	.030*
Evaluation & Implementation	48.28	Referent	52.02	.320	54.68	.106
Reporting Requirements	14.23	Referent	14.57	.887	16.58	.299
Staff Wellness	22.19	Referent	24.77	.510	33.37	.058
STRENGTH (OUT OF 100)						
Overall Score	30.84	Referent	31.43	.870	33.01	.493
Nutrition Education	34.42	Referent	35.27	.778	34.88	.873
Physical Education	23.83	Referent	23.77	.978	26.20	.355
Physical Activity	22.48	Referent	26.09	.114	25.51	.207
School Meals	58.89	Referent	58.14	.769	61.16	.364
Competitive Foods & Beverages	30.74	Referent	31.34	.919	32.07	.794
Marketing & Promotion	10.31	Referent	7.94	.306	17.02	.028*
Communications	19.87	Referent	18.61	.717	26.07	.113
Evaluation & Implementation	35.40	Referent	39.58	.287	42.22	.073
Reporting Requirements	12.77	Referent	12.91	.953	14.80	.345
Staff Wellness	11.14	Referent	13.35	.496	19.75	.052

Significance levels: *p<.05 **p<.01 ***p<.001

Appendix B-6: Mean Comprehensiveness and Strength Scores of District Wellness Policies for Public School Food Authorities Nationwide by District Free/Reduced-Price Lunch Eligibility, Elementary School, School Year 2014-2015

	LOW FRPL (HIGH SES)		MID FRPL (MIDDLE SES)		HIGH FRPL (LOW SES)	
	SCORE	SIG. DIFF.	SCORE	SIG. DIFF.	SCORE	SIG. DIFF.
COMPREHENSIVENESS (OUT OF 100)						
Overall Score	42.61	Referent	44.22	.663	44.82	.470
Nutrition Education	50.49	Referent	54.39	.223	55.99	.106
Physical Education	34.78	Referent	37.61	.416	43.11	.015*
Physical Activity	35.27	Referent	39.82	.097	41.73	.028*
School Meals	66.14	Referent	65.35	.742	68.84	.294
Competitive Foods & Beverages	44.75	Referent	46.24	.793	44.45	.949
Marketing & Promotion	23.68	Referent	22.25	.695	24.96	.745
Communications	35.07	Referent	38.46	.474	45.81	.034*
Evaluation & Implementation	48.40	Referent	52.51	.290	55.04	.093
Reporting Requirements	14.15	Referent	14.80	.794	16.79	.259
Staff Wellness	22.33	Referent	25.54	.419	32.83	.079
STRENGTH (OUT OF 100)						
Overall Score	31.98	Referent	32.92	.807	33.65	.611
Nutrition Education	34.93	Referent	35.19	.934	35.18	.931
Physical Education	23.43	Referent	24.72	.572	26.56	.231
Physical Activity	22.55	Referent	26.68	.087	25.97	.187
School Meals	57.78	Referent	57.51	.909	60.58	.234
Competitive Foods & Beverages	33.05	Referent	33.91	.892	33.18	.981
Marketing & Promotion	10.76	Referent	7.93	.237	16.53	.065
Communications	19.34	Referent	19.23	.977	25.62	.109
Evaluation & Implementation	35.77	Referent	39.56	.348	42.52	.079
Reporting Requirements	12.66	Referent	13.12	.850	14.97	.297
Staff Wellness	10.75	Referent	13.77	.353	19.44	.052

Significance levels: *p<.05 **p<.01 ***p<.001

Appendix B-7: Mean Comprehensiveness and Strength Scores of District Wellness Policies for Public School Food Authorities Nationwide by District Free/Reduced-Price Lunch Eligibility, Middle School, School Year 2014-2015

	LOW FRPL (HIGH SES)		MID FRPL (MIDDLE SES)		HIGH FRPL (LOW SES)	
	SCORE	SIG. DIFF.	SCORE	SIG. DIFF.	SCORE	SIG. DIFF.
COMPREHENSIVENESS (OUT OF 100)						
Overall Score	40.81	Referent	43.04	.547	42.55	.585
Nutrition Education	50.55	Referent	54.82	.181	55.81	.120
Physical Education	34.54	Referent	35.46	.781	41.77	.029*
Physical Activity	35.51	Referent	40.22	.109	42.51	.034*
School Meals	67.73	Referent	67.99	.916	71.13	.178
Competitive Foods & Beverages	41.18	Referent	43.70	.658	40.06	.814
Marketing & Promotion	22.69	Referent	22.28	.910	25.22	.535
Communications	35.12	Referent	38.79	.443	45.39	.039*
Evaluation & Implementation	48.39	Referent	52.94	.236	54.96	.097
Reporting Requirements	14.43	Referent	15.26	.746	16.90	.299
Staff Wellness	22.73	Referent	26.44	.368	33.47	.084
STRENGTH (OUT OF 100)						
Overall Score	30.62	Referent	32.67	.594	32.91	.488
Nutrition Education	34.47	Referent	35.33	.787	34.37	.970
Physical Education	24.35	Referent	24.53	.940	26.62	.398
Physical Activity	22.60	Referent	25.71	.213	25.88	.191
School Meals	59.43	Referent	60.23	.745	63.41	.093
Competitive Foods & Beverages	30.10	Referent	32.88	.657	31.34	.816
Marketing & Promotion	10.28	Referent	8.27	.406	16.72	.043*
Communications	19.40	Referent	19.66	.942	26.09	.095
Evaluation & Implementation	36.11	Referent	40.38	.300	42.13	.118
Reporting Requirements	12.96	Referent	13.50	.826	14.99	.370
Staff Wellness	11.30	Referent	14.55	.345	20.52	.048*

Significance levels: *p<.05 **p<.01 ***p<.001

Appendix B-8: Mean Comprehensiveness and Strength Scores of District Wellness Policies for Public School Food Authorities Nationwide by District Free/Reduced-Price Lunch Eligibility, High School, School Year 2014-2015

	LOW FRPL (HIGH SES)		MID FRPL (MIDDLE SES)		HIGH FRPL (LOW SES)	
	SCORE	SIG. DIFF.	SCORE	SIG. DIFF.	SCORE	SIG. DIFF.
COMPREHENSIVENESS (OUT OF 100)						
Overall Score	40.34	Referent	40.38	.992	37.69	.404
Nutrition Education	51.86	Referent	55.13	.291	52.35	.890
Physical Education	32.62	Referent	31.34	.651	37.61	.104
Physical Activity	35.45	Referent	38.76	.225	38.16	.400
School Meals	67.60	Referent	66.82	.784	68.72	.719
Competitive Foods & Beverages	40.59	Referent	40.09	.929	33.63	.144
Marketing & Promotion	22.76	Referent	21.68	.772	22.57	.965
Communications	33.85	Referent	37.55	.441	39.61	.226
Evaluation & Implementation	49.23	Referent	52.12	.453	53.46	.304
Reporting Requirements	14.46	Referent	14.37	.973	14.91	.852
Staff Wellness	21.43	Referent	24.66	.420	30.41	.202
STRENGTH (OUT OF 100)						
Overall Score	30.06	Referent	30.06	>.999	29.02	.755
Nutrition Education	34.54	Referent	35.12	.856	31.43	.289
Physical Education	23.28	Referent	22.54	.735	24.66	.602
Physical Activity	23.16	Referent	23.77	.777	25.04	.485
School Meals	59.12	Referent	59.35	.934	61.36	.439
Competitive Foods & Beverages	29.24	Referent	28.91	.957	25.68	.516
Marketing & Promotion	10.05	Referent	8.51	.533	14.36	.172
Communications	19.17	Referent	18.87	.933	23.12	.336
Evaluation & Implementation	36.49	Referent	40.32	.361	40.84	.288
Reporting Requirements	13.24	Referent	13.02	.930	13.82	.809
Staff Wellness	9.96	Referent	13.06	.353	20.33	.045*

Significance levels: *p<.05 **p<.01 ***p<.001

Appendix B-9: Mean Comprehensiveness and Strength Scores of District Wellness Policies for Public School Food Authorities Nationwide by Locale, All Grades, School Year 2014-2015

	URBAN (large- to mid-size city)		SUBURB		RURAL		TOWNSHIP	
	SCORE	SIG. DIFF.	SCORE	SIG. DIFF.	SCORE	SIG. DIFF.	SCORE	SIG. DIFF.
COMPREHENSIVENESS (OUT OF 100)								
Overall Score	36.33	Referent	45.22	.039*	41.30	.265	44.77	.088
Nutrition Education	50.35	Referent	54.38	.446	55.23	.358	52.50	.734
Physical Education	31.25	Referent	38.45	.147	37.89	.179	37.61	.249
Physical Activity	41.04	Referent	39.38	.750	38.16	.579	38.65	.699
School Meals	58.72	Referent	67.78	.112	67.91	.092	67.83	.108
Competitive Foods & Beverages	35.06	Referent	47.07	.023*	40.47	.335	46.11	.068
Marketing & Promotion	24.07	Referent	26.28	.655	22.61	.773	25.43	.831
Communications	41.05	Referent	44.18	.647	35.23	.392	40.76	.967
Evaluation & Implementation	47.08	Referent	52.42	.340	51.85	.393	55.04	.183
Reporting Requirements	11.81	Referent	15.87	.079	15.40	.183	17.02	.107
Staff Wellness	21.73	Referent	25.72	.434	27.80	.269	31.01	.128
STRENGTH (OUT OF 100)								
Overall Score	27.29	Referent	32.11	.205	31.85	.257	34.59	.110
Nutrition Education	33.21	Referent	36.70	.421	36.01	.528	31.42	.688
Physical Education	19.01	Referent	27.62	.006**	25.19	.044*	25.44	.096
Physical Activity	24.60	Referent	26.03	.695	24.18	.907	26.61	.700
School Meals	51.90	Referent	60.09	.109	59.71	.108	59.65	.139
Competitive Foods & Beverages	26.82	Referent	31.36	.398	31.10	.456	36.06	.144
Marketing & Promotion	13.22	Referent	12.49	.832	10.61	.394	15.01	.628
Communications	17.51	Referent	23.12	.144	20.26	.430	24.54	.073
Evaluation & Implementation	34.45	Referent	38.22	.462	41.20	.196	38.83	.419
Reporting Requirements	10.36	Referent	12.81	.246	14.32	.128	14.41	.146
Staff Wellness	7.58	Referent	15.73	.014*	16.13	.006**	18.40	.041*

Significance levels: *p<.05 **p<.01 ***p<.001

Appendix B-10: Mean Comprehensiveness and Strength Scores of District Wellness Policies for Public School Food Authorities Nationwide by Locale, Elementary School, School Year 2014-2015

	URBAN (large- to mid-size city)		SUBURB		RURAL		TOWNSHIP	
	SCORE	SIG. DIFF.	SCORE	SIG. DIFF.	SCORE	SIG. DIFF.	SCORE	SIG. DIFF.
COMPREHENSIVENESS (OUT OF 100)								
Overall Score	38.90	Referent	46.95	.063	42.68	.406	45.86	.193
Nutrition Education	50.96	Referent	54.52	.520	54.79	.491	51.93	.885
Physical Education	34.64	Referent	39.72	.333	39.29	.381	38.43	.537
Physical Activity	40.88	Referent	38.80	.697	38.31	.631	38.21	.685
School Meals	61.90	Referent	67.29	.297	66.50	.346	66.29	.399
Competitive Foods & Beverages	37.92	Referent	50.02	.024*	43.11	.369	48.56	.108
Marketing & Promotion	26.77	Referent	26.51	.961	22.37	.405	23.74	.657
Communications	44.51	Referent	45.40	.900	34.46	.151	40.38	.554
Evaluation & Implementation	48.52	Referent	53.41	.405	51.71	.589	54.17	.388
Reporting Requirements	12.70	Referent	15.88	.184	15.36	.338	16.68	.247
Staff Wellness	24.23	Referent	25.50	.811	27.26	.592	30.04	.378
STRENGTH (OUT OF 100)								
Overall Score	28.90	Referent	33.79	.209	32.44	.396	35.12	.207
Nutrition Education	33.39	Referent	36.73	.470	36.09	.565	31.92	.756
Physical Education	20.39	Referent	27.81	.026*	25.47	.119	24.81	.283
Physical Activity	24.04	Referent	26.14	.592	25.04	.799	26.89	.622
School Meals	54.67	Referent	59.19	.318	58.09	.420	57.76	.508
Competitive Foods & Beverages	28.62	Referent	34.46	.292	32.42	.527	37.52	.194
Marketing & Promotion	14.67	Referent	12.66	.578	10.17	.162	14.08	.880
Communications	19.53	Referent	23.89	.272	19.38	.966	24.38	.223
Evaluation & Implementation	35.14	Referent	38.65	.519	41.15	.280	38.38	.576
Reporting Requirements	11.08	Referent	12.81	.430	14.28	.235	14.19	.296
Staff Wellness	8.46	Referent	15.17	.048*	15.73	.024*	17.78	.098

Significance levels: *p<.05 **p<.01 ***p<.001

Appendix B-11: Mean Comprehensiveness and Strength Scores of District Wellness Policies for Public School Food Authorities Nationwide by Locale, Middle School, School Year 2014-2015

	URBAN (large- to mid-size city)		SUBURB		RURAL		TOWNSHIP	
	SCORE	SIG. DIFF.	SCORE	SIG. DIFF.	SCORE	SIG. DIFF.	SCORE	SIG. DIFF.
COMPREHENSIVENESS (OUT OF 100)								
Overall Score	37.77	Referent	45.09	.102	40.85	.509	43.89	.265
Nutrition Education	51.16	Referent	54.35	.594	54.83	.541	52.12	.892
Physical Education	31.72	Referent	39.04	.159	38.21	.210	36.54	.429
Physical Activity	43.87	Referent	40.00	.526	38.17	.349	38.74	.486
School Meals	63.79	Referent	68.36	.401	69.10	.302	67.99	.438
Competitive Foods & Beverages	35.92	Referent	46.47	.058	39.35	.564	44.85	.191
Marketing & Promotion	28.00	Referent	25.32	.639	22.24	.323	23.35	.521
Communications	43.48	Referent	44.83	.850	34.77	.219	39.86	.608
Evaluation & Implementation	47.55	Referent	53.38	.343	52.16	.457	54.21	.318
Reporting Requirements	12.65	Referent	15.97	.205	15.78	.298	16.78	.252
Staff Wellness	24.91	Referent	26.08	.838	27.89	.629	29.70	.494
STRENGTH (OUT OF 100)								
Overall Score	28.08	Referent	32.24	.291	31.98	.350	33.88	.249
Nutrition Education	31.55	Referent	36.51	.275	36.17	.320	31.38	.970
Physical Education	20.05	Referent	28.21	.023*	25.51	.122	24.90	.263
Physical Activity	25.10	Referent	26.20	.794	23.66	.730	27.54	.702
School Meals	56.85	Referent	60.75	.418	60.75	.387	59.89	.542
Competitive Foods & Beverages	27.04	Referent	31.31	.452	31.03	.507	34.83	.272
Marketing & Promotion	14.92	Referent	12.27	.474	10.39	.181	13.59	.741
Communications	20.15	Referent	23.46	.421	19.82	.931	24.23	.330
Evaluation & Implementation	33.13	Referent	38.80	.296	41.95	.114	38.64	.342
Reporting Requirements	10.76	Referent	13.03	.349	14.65	.182	14.28	.265
Staff Wellness	9.86	Referent	16.08	.090	16.20	.069	17.33	.198

Significance levels: *p<.05 **p<.01 ***p<.001

Appendix B-12: Mean Comprehensiveness and Strength Scores of District Wellness Policies for Public School Food Authorities Nationwide by Locale, High School, School Year 2014-2015

	URBAN (large- to mid-size city)		SUBURB		RURAL		TOWNSHIP	
	SCORE	SIG. DIFF.	SCORE	SIG. DIFF.	SCORE	SIG. DIFF.	SCORE	SIG. DIFF.
COMPREHENSIVENESS (OUT OF 100)								
Overall Score	30.95	Referent	42.99	.014*	39.03	.108	44.00	.016*
Nutrition Education	46.32	Referent	53.26	.231	54.96	.138	53.95	.252
Physical Education	29.11	Referent	33.87	.358	34.19	.325	37.42	.169
Physical Activity	35.86	Referent	38.80	.587	37.10	.818	38.45	.664
School Meals	51.82	Referent	67.81	.036*	68.68	.023*	69.71	.018*
Competitive Foods & Beverages	29.16	Referent	44.26	.015*	36.85	.235	43.95	.029*
Marketing & Promotion	19.75	Referent	26.46	.153	21.89	.660	28.63	.176
Communications	31.18	Referent	41.99	.062	34.52	.559	39.02	.162
Evaluation & Implementation	42.56	Referent	50.84	.161	52.78	.078	56.90	.021*
Reporting Requirements	9.29	Referent	14.41	.021*	15.15	.033*	17.63	.009**
Staff Wellness	16.94	Referent	24.04	.144	26.45	.082	34.11	.013*
STRENGTH (OUT OF 100)								
Overall Score	22.90	Referent	30.15	.094	30.29	.101	33.87	.028*
Nutrition Education	29.41	Referent	35.06	.177	35.40	.167	31.23	.672
Physical Education	19.39	Referent	24.68	.132	23.49	.242	26.41	.111
Physical Activity	22.49	Referent	25.97	.318	22.88	.906	25.29	.513
School Meals	45.79	Referent	59.91	.042*	60.51	.028*	61.43	.025*
Competitive Foods & Beverages	21.50	Referent	28.51	.262	28.49	.282	34.16	.071
Marketing & Promotion	10.54	Referent	11.91	.688	10.04	.870	16.40	.124
Communications	16.74	Referent	20.79	.339	19.46	.486	23.36	.121
Evaluation & Implementation	27.92	Referent	38.27	.035*	42.45	.004**	40.50	.017*
Reporting Requirements	7.87	Referent	12.78	.016*	14.40	.013*	14.90	.009**
Staff Wellness	10.31	Referent	14.43	.292	14.49	.254	19.97	.122

Significance levels: *p<.05 **p<.01 ***p<.001

Appendix B-13: Mean Comprehensiveness and Strength Scores of District Wellness Policies for Public School Food Authorities Nationwide by District Size, All Grades, School Year 2014-2015

	LARGE		MEDIUM		SMALL	
	SCORE	SIG. DIFF.	SCORE	SIG. DIFF.	SCORE	SIG. DIFF.
COMPREHENSIVENESS (OUT OF 100)						
Overall Score	43.16	Referent	44.94	.502	40.61	.399
Nutrition Education	57.49	Referent	53.01	.081	53.79	.234
Physical Education	39.30	Referent	35.86	.226	37.43	.559
Physical Activity	38.68	Referent	37.86	.729	39.82	.694
School Meals	69.65	Referent	67.28	.339	66.02	.146
Competitive Foods & Beverages	42.89	Referent	47.05	.305	39.62	.450
Marketing & Promotion	29.53	Referent	24.59	.190	22.82	.109
Communications	45.63	Referent	40.66	.273	36.90	.038*
Evaluation & Implementation	53.27	Referent	54.45	.745	50.85	.509
Reporting Requirements	12.66	Referent	16.79	.022*	15.36	.225
Staff Wellness	28.52	Referent	26.34	.600	27.65	.857
STRENGTH (OUT OF 100)						
Overall Score	31.62	Referent	32.39	.784	31.86	.937
Nutrition Education	35.78	Referent	34.45	.555	35.00	.766
Physical Education	25.46	Referent	25.50	.986	24.69	.742
Physical Activity	24.54	Referent	24.07	.793	26.03	.529
School Meals	59.22	Referent	58.91	.915	58.92	.914
Competitive Foods & Beverages	31.23	Referent	32.44	.792	31.45	.960
Marketing & Promotion	17.93	Referent	13.19	.118	10.35	.011*
Communications	23.00	Referent	21.19	.609	21.34	.609
Evaluation & Implementation	38.71	Referent	38.80	.981	39.96	.729
Reporting Requirements	11.05	Referent	14.84	.034*	13.46	.247
Staff Wellness	15.81	Referent	12.80	.299	16.82	.767

Significance levels: *p<.05 **p<.01 ***p<.001

Appendix B-14: Mean Comprehensiveness and Strength Scores of District Wellness Policies for Public School Food Authorities Nationwide by District Size, Elementary School, School Year 2014-2015

	LARGE		MEDIUM		SMALL	
	SCORE	SIG. DIFF.	SCORE	SIG. DIFF.	SCORE	SIG. DIFF.
COMPREHENSIVENESS (OUT OF 100)						
Overall Score	44.68	Referent	47.08	.341	41.78	.357
Nutrition Education	56.72	Referent	52.43	.107	54.01	.406
Physical Education	41.22	Referent	37.67	.241	38.78	.492
Physical Activity	38.55	Referent	37.00	.530	40.04	.615
School Meals	68.19	Referent	65.79	.332	66.14	.398
Competitive Foods & Beverages	45.65	Referent	51.20	.147	41.36	.337
Marketing & Promotion	30.11	Referent	24.10	.110	22.73	.088
Communications	45.85	Referent	40.29	.229	37.30	.048*
Evaluation & Implementation	53.56	Referent	54.73	.757	50.91	.485
Reporting Requirements	12.59	Referent	16.66	.026*	15.55	.208
Staff Wellness	29.35	Referent	25.87	.401	27.53	.712
STRENGTH (OUT OF 100)						
Overall Score	32.00	Referent	33.69	.547	32.80	.801
Nutrition Education	35.73	Referent	34.35	.549	35.42	.908
Physical Education	26.12	Referent	25.90	.923	24.74	.575
Physical Activity	24.53	Referent	23.42	.552	27.19	.309
School Meals	57.67	Referent	57.23	.877	58.61	.723
Competitive Foods & Beverages	32.05	Referent	35.22	.485	32.99	.844
Marketing & Promotion	18.14	Referent	12.62	.070	10.19	.010*
Communications	23.67	Referent	20.87	.426	21.35	.476
Evaluation & Implementation	38.92	Referent	38.50	.908	40.36	.701
Reporting Requirements	10.93	Referent	14.76	.035*	13.65	.215
Staff Wellness	16.28	Referent	12.59	.206	16.45	.961

Significance levels: *p<.05 **p<.01 ***p<.001

Appendix B-15: Mean Comprehensiveness and Strength Scores of District Wellness Policies for Public School Food Authorities Nationwide by District Size, Middle School, School Year 2014-2015

	LARGE		MEDIUM		SMALL	
	SCORE	SIG. DIFF.	SCORE	SIG. DIFF.	SCORE	SIG. DIFF.
COMPREHENSIVENESS (OUT OF 100)						
Overall Score	42.16	Referent	44.51	.402	40.91	.703
Nutrition Education	56.68	Referent	52.71	.126	53.97	.409
Physical Education	39.73	Referent	35.73	.171	38.05	.625
Physical Activity	39.00	Referent	37.99	.689	40.64	.623
School Meals	70.06	Referent	67.86	.391	68.33	.486
Competitive Foods & Beverages	40.86	Referent	46.29	.206	39.38	.752
Marketing & Promotion	30.22	Referent	23.82	.090	22.45	.078
Communications	45.85	Referent	40.13	.216	37.14	.043*
Evaluation & Implementation	54.01	Referent	53.77	.947	51.52	.508
Reporting Requirements	12.59	Referent	16.59	.030*	16.10	.148
Staff Wellness	29.35	Referent	25.85	.398	28.58	.880
STRENGTH (OUT OF 100)						
Overall Score	31.14	Referent	32.28	.694	32.46	.677
Nutrition Education	35.65	Referent	34.37	.580	34.85	.771
Physical Education	25.78	Referent	25.67	.961	25.29	.843
Physical Activity	24.74	Referent	24.41	.867	26.10	.636
School Meals	59.59	Referent	59.52	.981	61.17	.568
Competitive Foods & Beverages	30.19	Referent	32.15	.677	31.83	.731
Marketing & Promotion	18.25	Referent	12.55	.062	10.17	.010*
Communications	23.67	Referent	20.80	.416	21.89	.589
Evaluation & Implementation	38.88	Referent	38.36	.888	40.92	.588
Reporting Requirements	10.93	Referent	14.71	.038*	14.09	.162
Staff Wellness	16.28	Referent	12.64	.212	17.78	.680

Significance levels: *p<.05 **p<.01 ***p<.001

Appendix B-16: Mean Comprehensiveness and Strength Scores of District Wellness Policies for Public School Food Authorities Nationwide by District Size, High School, School Year 2014-2015

	LARGE		MEDIUM		SMALL	
	SCORE	SIG. DIFF.	SCORE	SIG. DIFF.	SCORE	SIG. DIFF.
COMPREHENSIVENESS (OUT OF 100)						
Overall Score	40.43	Referent	42.36	.493	39.09	.684
Nutrition Education	57.17	Referent	52.93	.095	53.38	.256
Physical Education	36.77	Referent	32.74	.152	35.20	.633
Physical Activity	37.29	Referent	37.92	.793	38.00	.812
School Meals	69.42	Referent	68.00	.581	66.60	.315
Competitive Foods & Beverages	38.99	Referent	42.88	.379	37.23	.715
Marketing & Promotion	27.76	Referent	24.66	.406	23.24	.326
Communications	42.79	Referent	39.04	.388	34.16	.032*
Evaluation & Implementation	51.79	Referent	53.52	.632	52.28	.898
Reporting Requirements	11.47	Referent	16.28	.005**	15.32	.116
Staff Wellness	26.39	Referent	25.81	.888	28.11	.759
STRENGTH (OUT OF 100)						
Overall Score	29.51	Referent	30.28	.790	31.15	.617
Nutrition Education	36.00	Referent	34.06	.385	33.19	.311
Physical Education	25.04	Referent	24.08	.680	23.91	.666
Physical Activity	23.98	Referent	24.34	.856	24.17	.937
School Meals	59.11	Referent	59.65	.856	59.55	.884
Competitive Foods & Beverages	27.84	Referent	28.77	.846	30.27	.628
Marketing & Promotion	16.88	Referent	12.87	.197	10.03	.032*
Communications	22.39	Referent	20.27	.555	20.23	.532
Evaluation & Implementation	37.27	Referent	38.66	.704	41.76	.246
Reporting Requirements	10.11	Referent	14.59	.009**	14.02	.088
Staff Wellness	16.03	Referent	12.19	.193	17.64	.693

Significance levels: *p<.05 **p<.01 ***p<.001

Appendix B-17: Mean Comprehensiveness and Strength Scores of District Wellness Policies for Public School Food Authorities Nationwide by Region, All Grades, School Year 2014-2015

	WEST		MIDWEST		SOUTH		NORTHEAST	
	SCORE	SIG. DIFF.	SCORE	SIG. DIFF.	SCORE	SIG. DIFF.	SCORE	SIG. DIFF.
COMPREHENSIVENESS (OUT OF 100)								
Overall Score	47.21	Referent	43.73	.339	39.75	.089	37.62	.017*
Nutrition Education	52.69	Referent	55.07	.567	54.02	.776	52.11	.905
Physical Education	44.94	Referent	36.47	.036*	34.93	.026*	34.29	.013*
Physical Activity	48.11	Referent	38.15	.011*	34.41	<.001***	38.59	.015*
School Meals	67.77	Referent	66.64	.755	67.57	.954	64.36	.414
Competitive Foods & Beverages	48.20	Referent	44.20	.412	39.48	.156	36.62	.045*
Marketing & Promotion	33.87	Referent	22.01	.015*	23.42	.028*	20.98	.008**
Communications	51.01	Referent	39.48	.056	35.57	.006**	32.03	.007**
Evaluation & Implementation	54.53	Referent	55.48	.830	49.52	.293	46.11	.072
Reporting Requirements	16.89	Referent	19.20	.396	11.67	.089	10.94	.036*
Staff Wellness	33.21	Referent	30.43	.669	20.91	.035*	23.47	.122
STRENGTH (OUT OF 100)								
Overall Score	37.42	Referent	33.41	.260	31.11	.149	24.43	<.001***
Nutrition Education	33.82	Referent	34.75	.761	31.22	.429	41.14	.116
Physical Education	28.77	Referent	25.92	.316	20.91	.006**	25.22	.215
Physical Activity	28.43	Referent	24.17	.206	24.41	.135	25.08	.252
School Meals	60.16	Referent	59.08	.742	58.25	.556	57.41	.479
Competitive Foods & Beverages	40.13	Referent	33.84	.237	31.14	.175	19.43	<.001***
Marketing & Promotion	22.13	Referent	7.73	<.001***	17.44	.241	5.65	<.001***
Communications	27.00	Referent	18.55	.075	25.73	.786	16.38	.034*
Evaluation & Implementation	40.76	Referent	39.54	.753	40.70	.989	35.28	.208
Reporting Requirements	13.61	Referent	17.61	.081	11.36	.426	7.54	.006**
Staff Wellness	17.49	Referent	15.30	.672	12.08	.174	17.92	.932

Significance levels: *p<.05 **p<.01 ***p<.001

Appendix B-18: Mean Comprehensiveness and Strength Scores of District Wellness Policies for Public School Food Authorities Nationwide by Region, Elementary School, School Year 2014-2015

	WEST		MIDWEST		SOUTH		NORTHEAST	
	SCORE	SIG. DIFF.	SCORE	SIG. DIFF.	SCORE	SIG. DIFF.	SCORE	SIG. DIFF.
COMPREHENSIVENESS (OUT OF 100)								
Overall Score	47.26	Referent	44.52	.477	44.43	.553	38.04	.030*
Nutrition Education	50.76	Referent	54.50	.388	55.21	.355	52.25	.766
Physical Education	45.08	Referent	38.25	.102	37.52	.142	35.40	.029*
Physical Activity	46.98	Referent	37.12	.015*	35.94	.003**	38.98	.042*
School Meals	66.18	Referent	66.56	.919	67.27	.757	63.03	.465
Competitive Foods & Beverages	49.05	Referent	45.35	.479	47.53	.820	37.17	.052
Marketing & Promotion	33.18	Referent	22.90	.042*	22.47	.030*	20.81	.014*
Communications	49.23	Referent	39.82	.134	36.53	.030*	32.85	.026*
Evaluation & Implementation	52.99	Referent	55.72	.559	50.09	.556	47.30	.232
Reporting Requirements	16.44	Referent	19.51	.287	11.73	.150	11.10	.075
Staff Wellness	32.38	Referent	30.96	.830	19.98	.036*	24.08	.195
STRENGTH (OUT OF 100)								
Overall Score	37.63	Referent	34.48	.400	32.54	.293	25.51	.001**
Nutrition Education	32.61	Referent	34.96	.460	32.28	.922	41.13	.076
Physical Education	28.02	Referent	26.32	.558	21.72	.041*	25.41	.379
Physical Activity	29.30	Referent	23.44	.125	26.42	.331	25.43	.234
School Meals	58.10	Referent	58.51	.902	57.95	.962	55.82	.567
Competitive Foods & Beverages	41.21	Referent	35.86	.341	33.36	.293	21.41	<.001***
Marketing & Promotion	21.46	Referent	8.03	.001**	16.80	.268	5.66	<.001***
Communications	26.37	Referent	18.20	.089	26.34	.994	16.89	.063
Evaluation & Implementation	40.00	Referent	39.43	.889	41.21	.800	36.19	.393
Reporting Requirements	13.31	Referent	17.83	.062	11.42	.527	7.74	.018*
Staff Wellness	16.74	Referent	15.25	.777	11.42	.186	18.38	.750

Significance levels: *p<.05 **p<.01 ***p<.001

Appendix B-19: Mean Comprehensiveness and Strength Scores of District Wellness Policies for Public School Food Authorities Nationwide by Region, Middle School, School Year 2014-2015

	WEST		MIDWEST		SOUTH		NORTHEAST	
	SCORE	SIG. DIFF.	SCORE	SIG. DIFF.	SCORE	SIG. DIFF.	SCORE	SIG. DIFF.
COMPREHENSIVENESS (OUT OF 100)								
Overall Score	47.39	Referent	44.09	.398	38.15	.057	38.99	.054
Nutrition Education	50.90	Referent	54.72	.389	54.23	.495	53.34	.622
Physical Education	44.90	Referent	36.87	.061	35.11	.050	35.24	.030*
Physical Activity	47.43	Referent	39.25	.061	34.34	.001**	39.97	.070
School Meals	67.98	Referent	67.82	.967	69.07	.771	67.50	.911
Competitive Foods & Beverages	48.82	Referent	44.46	.408	36.19	.065	37.77	.084
Marketing & Promotion	33.86	Referent	22.74	.031*	21.79	.015*	20.41	.008**
Communications	49.75	Referent	39.06	.093	36.64	.028*	33.22	.030*
Evaluation & Implementation	54.71	Referent	54.63	.987	49.82	.318	49.06	.221
Reporting Requirements	16.67	Referent	19.65	.310	11.76	.137	11.86	.126
Staff Wellness	33.04	Referent	31.73	.847	19.67	.027*	25.31	.241
STRENGTH (OUT OF 100)								
Overall Score	37.57	Referent	33.33	.272	31.06	.164	25.70	.002**
Nutrition Education	32.64	Referent	33.73	.735	31.83	.814	43.27	.026*
Physical Education	28.82	Referent	26.48	.441	20.94	.013*	26.70	.489
Physical Activity	27.59	Referent	25.04	.514	23.86	.230	25.53	.491
School Meals	60.15	Referent	60.39	.944	59.69	.894	60.29	.972
Competitive Foods & Beverages	40.60	Referent	33.27	.209	30.73	.164	20.53	.001**
Marketing & Promotion	21.81	Referent	7.75	<.001***	16.48	.211	6.16	<.001***
Communications	26.96	Referent	18.26	.077	26.41	.909	17.18	.063
Evaluation & Implementation	40.54	Referent	39.18	.740	41.05	.913	37.51	.496
Reporting Requirements	13.46	Referent	17.95	.069	11.45	.505	8.21	.032*
Staff Wellness	17.21	Referent	16.41	.882	11.08	.135	20.00	.600

Significance levels: *p<.05 **p<.01 ***p<.001

Appendix B-20: Mean Comprehensiveness and Strength Scores of District Wellness Policies for Public School Food Authorities Nationwide by Region, High School, School Year 2014-2015

	WEST		MIDWEST		SOUTH		NORTHEAST	
	SCORE	SIG. DIFF.	SCORE	SIG. DIFF.	SCORE	SIG. DIFF.	SCORE	SIG. DIFF.
COMPREHENSIVENESS (OUT OF 100)								
Overall Score	41.31	Referent	42.36	.793	38.06	.485	38.18	.482
Nutrition Education	46.86	Referent	55.72	.053	54.04	.150	52.94	.247
Physical Education	39.78	Referent	33.85	.177	33.28	.174	33.43	.154
Physical Activity	43.41	Referent	37.74	.191	33.72	.018*	39.57	.378
School Meals	66.59	Referent	66.39	.964	68.65	.634	67.17	.903
Competitive Foods & Beverages	41.50	Referent	42.11	.913	35.96	.407	36.70	.476
Marketing & Promotion	27.38	Referent	22.67	.372	26.09	.812	22.22	.308
Communications	39.23	Referent	37.88	.824	36.03	.576	33.80	.482
Evaluation & Implementation	50.12	Referent	55.30	.298	51.56	.787	48.65	.773
Reporting Requirements	10.96	Referent	19.57	<.001***	12.54	.567	11.60	.812
Staff Wellness	22.99	Referent	31.23	.198	23.66	.917	24.63	.790
STRENGTH (OUT OF 100)								
Overall Score	32.13	Referent	31.38	.846	31.62	.909	24.88	.055
Nutrition Education	29.67	Referent	33.94	.187	30.06	.911	42.92	.009**
Physical Education	25.96	Referent	24.95	.746	21.13	.120	25.21	.794
Physical Activity	26.11	Referent	23.04	.327	23.49	.368	25.72	.891
School Meals	60.19	Referent	58.84	.737	59.12	.784	59.76	.920
Competitive Foods & Beverages	33.03	Referent	30.36	.655	31.70	.845	19.23	.021*
Marketing & Promotion	15.00	Referent	7.77	.043*	19.26	.276	7.23	.029*
Communications	19.37	Referent	17.49	.688	26.47	.122	17.86	.769
Evaluation & Implementation	36.85	Referent	39.69	.506	42.38	.268	38.07	.800
Reporting Requirements	9.52	Referent	18.15	<.001***	12.21	.307	8.28	.570
Staff Wellness	11.29	Referent	16.50	.319	13.43	.623	18.81	.146

Significance levels: *p<.05 **p<.01 ***p<.001

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