





SMART SCHOOL FOODS

Issue Brief:

Implementing "Smart Snacks in Schools" Nutrition Standards

The U.S. Department of Agriculture's "National School Lunch Program and School Breakfast Program: Nutrition Standards for All Foods Sold in School as Required by the Healthy, Hunger-Free Kids Act of 2010; Interim Final Rule issued June 28, 2013" updated nutrition standards for competitive foods in school. These updated standards, commonly called "Smart Snacks in Schools," went into effect on July 1, 2014. This issue brief describes the potential impact of Smart Snacks on school revenue, student health and academic achievement, current efforts to support effective implementation, key areas of continued debate including fundraisers, and makes recommendations for how states, school districts, schools, and communities can support full implementation of the standards. Given the actions taking place across the country at the state level to set standards for fundraisers, the second part of this Brief addresses fundraising issues in detail.

Part 1: Smart Snacks—Potential Impact

Background

The Healthy, Hunger-Free Kids Act of 2010¹ (P.L. 111-296) directed the U.S. Department of Agriculture (USDA) to update nutrition standards for all foods and beverages sold to students outside of school meal programs throughout the school campus and school day, to align with current dietary guidelines. In 2013, the USDA issued an interim final rule updating nutrition standards for these foods (often called "competitive foods" because they compete with school meals for students' dollars). Foods and beverages that must comply with the Smart Snacks standards include those sold through vending machines, cafeteria a la carte lines, school stores, snack bars, and fundraisers. The Smart Snacks standards went into effect on July 1, 2014 and reflect the most significant updates to federal standards for foods and beverages sold outside of the school meal programs since 1979.

The Smart Snacks standards complement recently strengthened USDA nutrition standards for federally funded school lunch and breakfast programs. These school meal standards went into effect at the beginning of the 2012-2013 school year and call on schools to serve more fruits and vegetables, substitute regular grains with whole grain-rich items, serve only fat-free and low-fat milk; reduce sodium, saturated fat, and *trans* fat; and meet the nutrition needs of students within their calorie limits.² Schools are allowed to phase in implementation of the meal standards over time, and must meet all of the standards by the 2022-2023 academic year. (Smart Snacks Standards were to be in place with no phase in period by July 1, 2014.) Together, the school meal standards and Smart Snacks standards support consistently healthier school nutrition environments and nutrition messaging across the school campus and

throughout the school day - from the classroom to the cafeteria to the hallway vending machines and school stores.

Potential Impact of Smart Snacks Standards

Children may consume a significant proportion of their daily calories--up to 50 percent--at school.³ For many children, school breakfast and lunch may be the only meals they eat all day. Approximately half of all elementary school students, nearly three quarters of middle school students, and nearly all high school students have access to competitive foods. Fully 40 percent of children consume one or more competitive foods on a typical school day, with most of these being low-nutrient and energy dense foods.^{4,5} The evidence clearly substantiates the need for strong nutrition standards for all foods sold in schools. Healthy school foods support the academic potential and health of *all* students by increasing participation in school meals and ensuring food they access in other places on school campuses are healthy. And given that Smart Snacks apply to all schools equally – regardless of income or other demographics, strong standards can directly address persistent disparities in academic performance, childhood obesity rates, and overall health. Even better, schools across the country are demonstrating that strong nutrition standards can be implemented with minimal, if any, impact to school revenue.

Academic Performance

Healthier school food environments support the fundamental mission of schools. Research suggests that providing students with healthy foods at school helps ensure students are healthy, focused, and ready to learn in school and in the future. Though limited, studies suggest that children's cognition, behavior, and learning are impacted by nutritional status or feelings and perceptions of hunger.⁶ Participation in school meals—particularly school breakfast—seems to mitigate some of these negative consequences, especially for the most vulnerable students, and is associated with better academic outcomes. 7,8 Research also shows that diets inadequate in fruits, vegetables, and dairy products are associated with lower grades among students. 9,10,11 In particular, student participation in the USDA School Breakfast Program—which is guided by strong nutrition standards—is associated with higher grades and standardized test scores, lower absenteeism, and better performance on cognitive tasks. 12,13,14 One study also found that the National School Lunch Program has a significant impact on educational achievement and outcomes. 15 In addition, anecdotal evidence suggests improvements in children's behavior and education outcomes when the school food environment is improved. Healthy school foods might also improve the diets of the most vulnerable students, which, in turn, might positively impact their academic outcomes. Greater participation in school meals—particularly for foodinsecure children—may contribute to improved health and better focus while in school. 16 Finally, some evidence suggests that promoting healthier options and creating a positive dining environment can improve learning-related behavior. 17,18

Student Health

In addition to academic benefits, strong school nutrition standards support better student health. Considering students may consume a significant proportion of their daily calories at school, promoting healthier options in all school venues is critical to supporting student health. Recent studies show that students who have access to healthy foods are less likely to gain weight, suffer from tooth decay, or develop a chronic illness. Stronger nutrition standards support efforts to address childhood obesity and chronic disease. Today, nearly one third of U.S children are overweight or obese, putting them at increased risk of preventable diseases like diabetes, heart disease, and certain cancers, as well as high blood pressure, high cholesterol, asthma, low self-esteem, and depression. Certain groups of children have a higher burden of overweight and obesity, including children with disabilities and other chronic conditions, as well

as Hispanic children and non-Hispanic Black children.^{21,22,23} Research suggests the increase in child weight observed between 1988 and 2002 may have been prevented by an average reduction of only 110-165 calories per day. *This is the difference between providing an elementary school student an apple rather than a candy bar.*²⁴ These chronic conditions-- dental caries, diabetes, asthma-- disproportionately affect vulnerable youth who also tend to have poorer academic outcomes, such as low-income, Hispanic, and black non-Hispanic youth. A recent Health Impact Assessment concluded that these youth in particular would benefit from reducing unhealthy competitive food options in schools.²⁵

School Revenue

School leaders often worry that the switch to healthier foods and beverages will cause them to lose revenue. However, research shows that after implementing healthier nutrition standards for snacks and a la carte items, schools tend to experience either no change or an increase in overall school food revenue—mainly through increased school meal participation. A Health Impact Assessment conducted by the Robert Wood Johnson Foundation and the Pew Charitable Trusts found that, although in some cases, school districts experienced initial declines in revenue after strengthening nutrition standards, over time, the negative impact on revenue could be minimized—and in some cases reversed—by implementing a number of strategies. Possible strategies may include promoting healthful foods with labels and motivational signs near point of sale, lowering the price of foods like fruits, vegetables and low-fat snacks, involving students in taste-testing and other food selection activities, and creating attractive displays for healthier items can increase sales. Research

Implementing Smart Snacks

Schools are making significant progress in implementing Smart Snacks. Many schools across the country had already begun improving food and beverage options before the Smart Snacks standards went into effect and were well on their way to meeting the updated standards. These schools are finding that students are learning to eat and enjoy the new options without significant losses to overall revenue.³⁰ Parents support the changes too; in a recent survey, 72 percent of parents expressed support for national nutrition standards for snacks sold in school.³¹ While it is hard to predict the impact of updated standards on the community and industry, the combination of updated standards for Smart Snacks and school meals, along with improvements to the local wellness policies, could result in increased awareness across the community on the importance of creating a healthy school environment. In addition, reformulation of products by the food and beverage industries may result in healthier products in other retails places across the community and the country.

States play a critical role in supporting the efforts of schools to ensure healthy food and beverage options are available for all students. Most states recognize this, and are either maintaining their own strong policies that meet or surpass the federal rule, or are updating their policies to align with the updated standards. In fact, 26 states already had policies in place that fully or partially met one or more of the Smart Snacks provisions prior to July 2014. It is critical that, in cases where existing state policies are stronger than the USDA standards, that these strong provisions be maintained.

Recommendations

States should establish—or maintain—the strongest nutrition standards for all foods and beverages sold on school campuses. States play a critical role in supporting—not undermining—the efforts of schools to offer healthy foods and beverages. Establishing strong nutrition standards at the state level not only supports the fundamental mission of schools, but

also supports student health, equity, and is good business. As previously described, prior to Smart Snacks implementation, over half of states had already enacted policies that addressed nutrition standards for school foods. These actions should continue, and should support the spirit of Smart Snacks and the efforts of schools to create healthy food environments.

Parents and communities should support schools in ensuring only healthy foods and beverages are sold. Parents overwhelmingly support strong school nutrition standards. In a national poll, 72 percent of parents favor nutrition standards for school meals and school snacks. Parents, other caregivers, and community partners can play a key role in promoting healthy school foods by participating in School Wellness Councils, advocating for healthy food or non-food fundraisers, and working with PTAs to ensure that parent leaders understand and embrace the importance of healthy food options campus-wide. They can also support schools in ensuring Smart Snacks standards are fully implemented across the school campus.

Advocates should continue to communicate at the state and local levels the importance of strong nutrition standards. Advocates at the local and state level play a critical role in communicating with schools and state departments of education and agriculture about the important role they play in ensuring strong nutrition standards are implemented. A variety of resources exist to help advocates communicate their message and effectively mobilize support to ensure the strong standards the USDA has developed are implemented and maintained in every state.

Resources

A wide variety of resources are available to assist schools in fully implementing the Smart Snacks nutrition standards. A sampling of key resources is listed below.

- Voices for Healthy Kids Competitive Foods Toolkit: A toolkit for advocates designed to help coalitions educate their communities on ways to improve the nutritional quality of competitive foods in schools.
- <u>Tools for Schools: Focusing on Smart Snacks webpage</u> (USDA): Includes a wide variety
 of resources including information about the Smart Snacks requirements,
 implementation tools, and strategies to encourage children to make healthier snack
 choices.
- <u>Smart Snacks webpage</u> (Alliance for a Healthier Generation): Includes information and resources to support implementation of Smart Snacks including the <u>Alliance Product</u> <u>Navigator</u>, the <u>Alliance Smart Snacks Calculator</u>, the <u>Smart Snacks Food Inventory</u>, and the Smart Snacks Beverage Inventory.
- <u>Kids' Safe & Healthful Foods Project website</u> (Pew Charitable Trusts): *Provides nonpartisan analysis and evidence-based recommendations on policies that affect the safety and healthfulness of school foods.*
- <u>A PTA's Guide to Smart Snacks in School</u> (National PTA and Pew Charitable Trusts): Provides information for local PTAs on background and successful implementation of Smart Snacks guidelines.

^{1 42} U.S.C. § 1779(b).

² U.S. Department of Agriculture, Food and Nutrition Service. "Nutrition Standards in the National School Lunch and School Breakfast Programs; Final Rule." 7 CFR Parts 210 and 220. Federal Register / Vol. 77, No. 17 / Thursday, January 26, 2012. Available at: http://www.gpo.gov/fdsys/pkg/FR-2012-01-26/pdf/2012-1010.pdf. Accessed 11-18-2014.

- ³ U.S. Department of Agriculture, Food and Nutrition Service. "Smart Snacks in Schools' Nutrition Standards Interim Final Rule Questions and Answers." Available at: http://www.fns.usda.gov/cnd/governance/legislation/allfoods_qanda.pdf. Accessed 3-19-2014.
- ⁴ Fox M, Gordon A, Nogales R, and Wilson A. Availability and Consumption of Competitive Foods in US Public Schools. *J Am Diet Assoc.* 2009; 109:S57-S66.
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- ⁶ The Pew Charitable Trusts, 2012. "Health Impact Assessment: National Nutrition Standards for Snack and a la Carte Foods and Beverages Sold in Schools." Available at: http://www.pewtrusts.org/en/research-and-analysis/reports/2012/06/01/hia-national-nutrition-standards-for-snack-and-a-la-carte-foods-and-beverages-sold-in-schools. Accessed 10-23-2014.
- ⁷ Cook J and Jeng K. "Child Food Insecurity: The Economic Impact on our Nation. 2009. A report on research on the impact of food insecurity and hunger on child health, growth and development commissioned by Feeding America and The ConAgra Foods Foundation." Available at: http://www.nokidhungry.org/sites/default/files/child-economy-study.pdf. Accessed 12-19-2014.
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²⁶ CDC. "Implementing Strong Nutrition Standards for Schools: Financial Implications." Available at: http://www.cdc.gov/healthyyouth/nutrition/pdf/financial_implications.pdf. Accessed 10-22-2014.

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²⁹ National Education Health Information Network. "Healthy Rewards: Selling healthy snack foods and beverages can be profitable." Available at: http://www.neahin.org/assets/pdfs/healthyrewards_neahin.pdf. Accessed 3-19-2014.

³⁰ Robert Wood Johnson Foundation, 2014. "Success Stories: Smart Snacks in Schools." Available at:

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Part 2: Smart Snacks—Implementing Healthy School Fundraisers

Background

Fundraisers are one component of the overall school nutrition environment and provide an important revenue source for clubs, athletic teams, student government, parent teacher organizations, and other school groups. In a 2012 survey by Bridging the Gap, 80 percent of middle and high schools allowed junk foods or soft drinks to be sold through fundraisers.³⁴ The Smart Snacks standards require all fundraisers held on the school campus during the school day to meet the same nutrition standards as all other foods and beverages sold to students. However, the rule also grants states the authority to establish a maximum number of "infrequent, exempt" fundraisers each school year that do not need to comply with the standards. Specifically, Section 210.11(b)(4) of the interim final rule specifies that that such specially exempted fundraisers must not take place more often than the frequency specified by the State agency. As outlined in the interim final rule, if a state agency does not specify the exemption frequency, the State agency is electing to establish a policy that no fundraiser exemptions may be granted. As noted in the preamble to both the proposed and interim final rules, it is expected that State agencies will ensure that the frequency of such exempt fundraisers on school ground during the school day does not reach the level which would impair the effectiveness of the Smart Snacks requirement.³⁵ Many states are choosing to maintain strong standards. As of October 21, 2014, the National Association of State Boards of Education reports that at least 31 states are choosing not to allow any exempt fundraisers, 36 and approximately 12 others have opted to allow just a few exempt fundraisers per year. However, a number of states are choosing to allow a high number of fundraisers that do not meet Smart Snack standards. Such actions undermine the positive efforts happening in school cafeterias and across the campus and are inconsistent with the intent of the Healthy, Hunger-Free Kids Act and the Smart Snacks regulation.

The Reality of School Fundraisers

School fundraisers are no longer about parent-led bake sales. The reality is that these types of sales now make up a very small percentage of school-based fundraising. School-based fundraising has become a lucrative industry, with the majority of fundraiser sales featuring products from fundraising companies. In fact, the Association of Fundraising Distributors and Suppliers estimates that these companies help schools raise \$1.4 billion per year.³⁷

Although some of these companies offer non-food products such as magazine subscriptions, novelty items and gift wrap, food is one of the most popular fundraising sales items from these companies. Candy and confections comprise 25% of all sales, and other less healthy food items sold include frozen entrees, cheese and meat products,^{38,39} as well as gift certificates and products from fast-food companies. While these unhealthy fundraisers raise money for schools, they compromise the health of students and adults in the community and undermine policies, practices, and messages about healthy eating that school leaders and parents work hard to promote. At the same time school staff are working hard to provide students with healthy choices during meals and for snacks, students are being

asked to sell unhealthy foods to their peers, families, and community. This not only sets up an unfair dichotomy in which students must reconcile conflicting messages, but it also does not support efforts by schools to offer healthy foods and beverages in all venues throughout the school campus, as required by the Smart Snacks nutrition standards.

Implementing Healthy Fundraisers

Schools do not need to give up on fundraising altogether. In fact, healthy or non-food fundraisers can still raise money while reinforcing good nutrition and healthy habits. While data is still emerging on the impact of healthier snack food and beverage policies on fundraising revenue,⁴⁰ schools across the country are demonstrating that *healthy fundraisers can be just as—or even more profitable—as unhealthy ones.* ⁴¹ Many of the fundraising companies who offer unhealthy food products also offer non-food products and many additional resources exist that offer ideas for healthy and non-food fundraisers. Schools across the country are holding healthy fundraisers and are raising a lot of money. For example, the After-Prom Committee in one high school in Windsor, Colorado holds a fruit sale every year, and in 2012 sold nearly 12 tons (960 boxes) of fruit and raised almost \$8,000. An elementary school in Marietta Georgia held a "Boosterthon Fun Run & Roll" that raised \$37,000. And one middle school in Long Beach, California held a Teacher Jog-A-Thon that raised \$17,000.

Recommendation

States should not allow any exempt fundraisers and should ensure schools, school-based organizations including PTAs and others have access to resources highlighting healthy food and non-food fundraising options. Since school fundraisers are one component of an overall, consistent healthy school nutrition environment, state decision-makers should support—not undermine—the efforts of schools, parents, and community partners to implement healthy fundraisers. State support for no/minimal exempt fundraisers supports the academic potential and health of all students. By sharing resources to help schools implement healthy and non-food fundraisers, states also demonstrate their commitment to helping school groups continue to raise funds through this revenue stream.

Resources

A wide variety of resources are available to assist schools, school-based organizations including PTAs and others to promote healthy food and non food fundraisers. Some key resources are listed below.

- <u>USDA "Healthy Fundraising" webpage</u>: Includes a variety of resources from USDA, states, school districts, and advocates that provide tips and ideas for implementing successful healthy fundraisers.
- <u>Voices for Healthy Kids Competitive Foods Toolkit:</u> A toolkit for advocates designed to help coalitions educate their communities on ways to improve the nutritional quality of competitive foods in schools.
- <u>"Sweet Deals: School Fundraising Can Be Healthy and Profitable"</u> (Center for Science in the Public Interest): This report provides useful resources for principals, PTA leaders, school clubs, and parents; contains contact information for 60 companies that provide schools with healthy fundraising programs; and includes a dozen brief case studies of schools that have improved the nutritional quality of foods and beverages sold in school without losing revenue.
- <u>Fundraisers webpage</u> (Alliance for a Healthier Generation): *Includes information and resources* to support implementing healthy fundraisers, raising revenue, and raising support for making healthy changes in schools.
- <u>Support Healthier Snacks and Beverages in Schools webpage</u> (National Alliance for Nutrition and Activity): *Shares a variety of resources, fact sheets, infographics, reports, and other resources*

related to Smart Snacks implementation, cost and financial implications, healthy fundraisers, and more.

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