

## **INVESTIGATING THE TRANSPARENCY AND ACCESSIBILITY OF HIGH SCHOOLS' SCHOOL WELLNESS POLICY DOCUMENTATION**

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### **ABSTRACT**

#### **PURPOSE/OBJECTIVES**

With the purpose of addressing childhood obesity, the U.S. Congress passed the Healthy Hunger Free Kids Act (HHFKA) 2010, which strengthened the mandate and regulations for schools to develop and implement school wellness policies (SWPs) to promote students' health. Transparency and accessibility of SWPs among schools and public communities are important and required for the development and effective implementation of SWPs.

#### **METHODS**

Websites of 135 high schools in one southern state were searched for the availability and accessibility of three School Wellness Policy (SWP) documents: (1) high school's SWP, (2) school health council (SHC) membership list and coordinator and, (3) implementation plan update.

#### **RESULTS**

Local SWP were located on 22 high schools' websites with 100 schools either posting or providing a link to the school district's SWP. For 13 schools, no SWP could be located on their website. School health council membership lists were located on 10 high schools' websites. However, no SHC membership list included all eight required members, and SWP implementation plans could not be located on any of the 135 high school or district website.

#### **APPLICATION TO CHILD NUTRITION PROFESSIONALS**

Findings show a lack of transparency and accessibility to high schools' SWP documents. Child nutrition professionals can be a leading facilitator in updating and educating school administrations on SWP requirements, as mandated by the HHFKA (2010). This may be an opportunity for a child nutrition professional to be a champion in efforts to address students' health and wellbeing within the school setting, both inside and outside of the cafeteria.

**KEYWORDS:** School Wellness Policy, High Schools, School Webpages

## INTRODUCTION

The passage of the Healthy Hunger Free Kids Act (HHFKA), (2010) strengthened school wellness policy (SWP) requirements established by The Child Nutrition and WIC Reauthorization Act of 2004. School wellness policy mandates include that local educational agencies (LEA) participating in the National School Lunch and/or Breakfast Programs are required to develop a local SWP that promotes the health of students and addresses problems of childhood obesity. If tailored to the unique needs of each LEA, school wellness policies (SWPs) present an opportunity to improve the health of each community. On July 29, 2016, the United States Department of Agriculture (USDA) Food and Nutrition Service (FNS) finalized regulations that included language to once again strengthen SWP implementation processes and increase transparency (USDA FNS, 2016).

A purposeful SWP has the required measurable standards, an assessment and implementation plan, and an evaluation report on the progress made toward a school environment that supports and promotes health (Turner et al., 2021). The periodic assessment of the effectiveness of a SWP is critical in measuring its progress and efficacy (Pitt et al., 2011). One step in measuring SWP involvement is the requirement that state agencies review LEAs at least every three years. As part of the review, the following documentations are required:

- “A copy of the current Local School Wellness Policy.
- Documentation demonstrating the Local School Wellness Policy has been made available to the public.
- Documentation of efforts to review and update the Local School Wellness Policy, including an indication of who is involved in the update and methods the district uses to make stakeholders aware of their ability to participate.
- The most recent assessment on the implementation of the Local School Wellness Policy.
- Documentation demonstrating that most recent assessment on the implementation of the Local School Wellness Policy has been made available to the public” (USDA FNS, 2016).

Federal regulations require that SWP information must be communicated to the public along with documentation of the school’s efforts to develop, implement, and evaluate their SWP. The purpose of our research was to investigate schools’ websites as a venue for providing public access to SWP documents required for public viewing including the SWP, school health council (SHC) and coordinator, and SWP implementation updates.

## METHODS

### Participants

Using a purposeful sample, the first high school listed on the district website, excluding specialized schools (i.e., alternative, career and technical, math and science), was selected from all of the 135 school districts in one southern state. High schools were specifically selected for this study because, on average, they have the largest number of students (National Center for Education Statistics, 2018) to be impacted by SWPs. It is also in high school when health education curricula is incorporated and designed to meet the National Health Education Standards (Centers for Disease Control and Prevention [CDC], 2019). These standards include

overarching concepts such as the comprehension of health promotion and the prevention of disease to support good health.

**Data Collection**

Researchers searched school websites for the following information: (a) high school’s SWP, (b) SHC and coordinator, and (c) a progress report on SWP implementation. All SWPs were identified as either local, meaning customized to represent each school’s unique needs, or as a general district SWP.

One researcher and two research assistants searched selected high schools’ main websites. If documents were not found on the main school website, the search continued chronologically beginning with child nutrition/foodservice link, health or nursing link, school website search function, and Google search engine. If all three documents were found, the search was completed. If any of the three documents were not found on the high school’s website, then the search and search procedures transferred to the school district’s website. Even though documents found on the school district’s website may not have been customized to the high school, there was an effort to understand if high schools had access to SWP documents in which to reference. Data on documents found for each school was entered into an excel spread sheet for descriptive analysis. The University Institutional Review Board deemed the study exempt.

**RESULTS AND DISCUSSION**

**School Wellness Policy Search**

Tables 1 and 2 indicate the number of SWP documents that were found and where they were located on the school’s website. The results from searching each of the 135 high school’s website revealed that 22 high schools had their own local SWP for view on their website. For 113 high schools, a local SWP could not be located. However, for 100 high schools, a district SWP or a link to a district SWP was found, leaving 13 high schools with no reference to any SWP located on their school website. Language included in the federal regulation requires LEAs to provide publicly accessible SWPs, and other related documentation (USDA, 2016). However, LEAs are allowed the flexibility to determine the most effective ways to inform their communities of the availability of SWP documents. All 135 high schools had their own designated website, which has become a common tool used for communicating, connecting, and engaging with students, teachers, parents, and the community (Taddeo & Barnes, 2016).

**Table 1.** *Results of SWP Document Search of High Schools’ Websites*

Sites	SWP Document	SHC Committee	SWP Implementation Update
	n (%)	n (%)	n (%)
High School	22 (16)	10 (8)	0 (0)
School District	100 (74)	22 (16)	0 (0)
Not Found	13 (10)	103 (76)	135 (100)
Total	135 (100)	135 (100)	135 (100)

**Table 2.** *High Schools' Website Location for SWP Documents*

Site	High School's SWP (N=135)
	n (%)
Main Page	5 (4)
Food Service/Child Nutrition	7 (5)
School Board Policy	3 (2)
Other	7 (5)
District's Website	100 (74)
Not Found	13 (10)

The majority of high schools (74%) hosting their district's SWP and not their local SWP, may be perceived as a lack of ownership and adoption of the policy. Because the needs of students can be significantly different among individual schools, it is justifiable to require each school to have a customized SWP. While locally developed policies have been shown to be stronger and more comprehensive than template-based policies (Smith et al., 2012), customizing all policies may not be feasible in, for example, small schools with multiple grades, such as K-12<sup>th</sup>.

### **School Health Council Search**

The search for the SHC membership resulted in 32 lists were located and all were included in the school's SWP document with ten of the 32 membership lists including identifiable SHC members. Out of the ten membership lists, seven included names and positions, two included names only, one included positions only, and none included all eight required SWP committee members (school board member, school administration, health teacher, physical activity teacher, school food authority, student, parent, and community member) as mandated by HHFKA (USDA, 2016). School health councils have shown to be impactful in developing and implementing SWPs and having a variety of member positions offers different perspectives. Providing contact information for the SHC coordinator is important in offering transparency of SWPs. The federal language strongly encourages having contact information for the school official(s) responsible for oversight of SWPs placed on schools' websites for means of contact by the public (USDA FNS, 2016).

Having a SWP coordinator is the first step in developing a customized and strong SWP. An active SHC, with engagement in implementation of SWPs, is associated with having a positive role in reducing obesity (Au et al., 2018). Assigning an employee(s) to assure compliance with SWP standards may be a financial challenge for schools since funding has been identified as one of the barriers to SWP implementation (Schuler et al., 2018). Seeking grants that support SWPs may be needed if schools or districts do not have adequate funds (Sánchez et al., 2012).

### **Implementation Updates**

This research shows that SWP implementation updates could not be located for any of the high schools or school districts when searching their websites. Practices facilitating higher implementation success are schools with active SHCs that meet over four times per year, have key personnel on the SHC, especially students and parents, and have a mechanism in place for informing the public (Hager et al., 2016; Profili et al., 2017). Lack of an easily accessible implementation plan may indicate that schools are not aware of the requirement for an updated

implementation plan, are aware and have not completed a plan, or have completed an implementation plan but are not aware of the directive to make the plan accessible to the public. A SWP implementation plan helps all constituents visualize a school's progress and areas needing improvement regarding the enactment of SWPs. However, there is no direction in the federal regulations to guide schools on how exactly policies should be evaluated and when left to school discretion, many districts identify a lack of dedicated resources (such as staff, funding, time) as a main barrier to completing the SWP implementation and assessment (LeGros et al., 2019).

Among the limitations of this study was a small sample size, only high schools were reviewed and the study was conducted in one state. Therefore, the findings are not generalizable. While a variety of terms were used in hopes of capturing all SWP documents, schools may have different terms than used in this study.

## CONCLUSIONS AND APPLICATIONS

The SWP guides school districts' efforts to establish a school environment that promotes students' health and well-being. Assessing the policy's efficacy in order to evaluate implementation and progress is equally as important as having the policy itself. As stated in HHFKA, any LEA participating in the National School Lunch Program is required to establish a SWP with required content, ensure a school health council is established and participatory in the development and updates of the SWP, and periodically assess and disclose compliance to the public (USDA FNS, 2016). The statewide SWP guide was developed to correspond with the CDC's Whole School, Whole Community, Whole Child, ten-component model with Nutrition Environment & Services as one of the 10 components (CDC, 2021). However, for the schools in this study, it is the responsibility of the district child nutrition director (CNP) to provide the documentation for implementation, compliance, and evaluation for all schools in their district. For most of the SWP components, the requirements are not related to school meal services and are beyond the CNP directors' authority. Recognition and acknowledgment by school administration is needed in that ultimately the LEA is the responsible party for compliance with SWP regulations, not any one school's department.

As one of the members of the school community, child nutrition professionals can take action in moving forward transparency of local schools' SWP documents by:

- reading and understanding the SWP requirements stated in HHFKA,
- investigating their school's website and evaluating transparency of required SWP documents and their accessibility,
- having and/or continuing discussions with state agencies of the need to provide support and guidance to LEAs on their responsibility for ensuring transparency of SWPs,
- playing a leading role in educating school administrations on SWP requirements, providing readily available and free SWP resources from state child nutrition offices and professional child nutrition organizations,
- offering to place the required SWP documents on the school's child nutrition website,
- championing the need for establishing a standardized webpage for all schools within a school district, which has a specific tab or link allowing SWP documents to be readily accessible and viewed by all,

- confirming there is a coordinator who is responsible for SWPs and required documents and that the coordinator’s school contact information is easily accessible,
- ensuring that a school food authority employee has a place on the SHC,
- reaching out to the coordinator and SHC to share available resource links to assist in the evaluation process, such as:
  - USDA-Food and Nutrition Services and Institute of Child Nutrition assist schools in development of SWPs with many free resources (theICN.org)
  - Team Nutrition, designed to assist programs with training and technical support to promote healthy eating (USDA, 2019).
  - The CDC supports schools by providing necessary SWP resources and trainings, which can be easily accessed through their websites (CDC, 2020).
  - At the national level, the School Nutrition Association, is a national professional organization that provides many resources, including SWP development and implementation tools to assist child nutrition program directors and school personnel (School Nutrition Association, 2022)
  - At the state level, the child nutrition office and state school nutrition associations

Future research could include a qualitative approach through focus groups or interviewing methods with key school personnel to identify possible solutions and eliminate barriers for SWP document transparency and accessibility. Inquiries may be:

1. What are the individual school’s barriers to providing accessibility to the SWP documents?
2. What are the best ways to communicate with the school community?
3. Where would be the most advantageous placement of SWP documents on a school’s website for ease of access to policy information?
4. What additional pieces of information related to SWP would the school community find helpful?
5. What, if any, are the repercussions for non-compliance with SWP regulations? And
6. What role does school administration play?

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