School Foodservice Directors’ Perceptions and Concerns About Local Wellness Policy Development, Implementation, and Enforcement

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Please note that this study was published before the implementation of Healthy, Hunger-Free Kids Act of 2010, which went into effect during the 2012-13 school year, and its provision for Smart Snacks Nutrition Standards for Competitive Food in Schools, implemented during the 2014-15 school year. As such, certain research may not be relevant today.

ABSTRACT

Objectives
The purpose of this study is to examine the role of school foodservice directors in development and enforcement of local school wellness policies, their feelings about these roles, and perceived barriers.

Methods
Five focus groups were conducted with a total of 46 school foodservice directors in Pennsylvania.

Results
The majority of directors reported that they foresee themselves playing a lead role in wellness policy development. Concerns expressed about this role included limited knowledge about policy-writing and curriculum issues, a perceived lack of authority in their districts, and a desire not to be viewed as "food police." Some considered this role an opportunity to promote the school nutrition program, take credit for positive results, and control the structure of the policy development team to meet the best interests of the school nutrition program, a strategy that was considered critical. Identified barriers related to potential loss of funds for the school nutrition program and groups that rely on food-based fundraisers. Funding and time constraints were recognized as obstacles to incorporating additional nutrition and physical education in the curriculum. Eliciting buy-in from others in the school environment, especially administrators, and a perceived slow response by food manufacturers and processors to provide healthful food options also were identified as limitations. Concerns were expressed about policy enforcement because of the time commitment required and the need for administrators to assume this responsibility.

Application to Child Nutrition Professionals
School foodservice directors should be encouraged to take the opportunity to promote to the school community the benefits of participating in a school meals program and to explain the guidelines, standards, and funding constraints to which school nutrition programs are held. Directors could benefit from sharing sample policies and successful strategies. Education and marketing of the policy requirements to other audiences will be necessary to ensure widespread buy-in.
In search of solutions to the increasing rates of childhood obesity, attention has focused on school environments (USDA, 2000). Issues have been raised relating to the amount of nutrition and physical education offered in schools, the nutritional quality of foods offered; and the advertising of foods low in nutrient density in school settings. While a variety of government and education organizations have advocated nutrition policies to support healthy school nutrition environments (American Federation of Teachers, 2000; American School Food Service Association, 1993; Bogden, 2000; Centers for Disease Control, 1996), research suggests that few nutrition policies currently exist at the district level, especially comprehensive strategies related to setting nutrition standards for foods offered (Barratt et al., 2004; French et al., 2002; French et al., 2003; McDonnell et al., in press; Story et al., 1996; Wechsler et al., 2001). Issues concerning the enforcement of existing policies also have arisen (McDonnell et al., 2006).

The Child Nutrition and WIC Reauthorization Act of 2004 requires local education agencies that sponsor school meal programs to establish local wellness policies that address childhood obesity by the beginning of School Year 2006-07. At a minimum, the wellness policy is required to: 1) include goals for nutrition education, physical activity, and other school-based activities that are designed to promote student wellness; 2) include nutrition guidelines for all foods available on each school campus during the school day, with the objectives of promoting student health and reducing childhood obesity; 3) provide an assurance that guidelines for reimbursable school meals shall not be less restrictive than regulations and guidance issued by the Secretary of Agriculture; 4) establish a plan for measuring implementation of the local wellness policy, including designation of one or more persons responsible for ensuring that the school meets the local wellness policy; and 5) involve parents, students, representatives of the school food authority, the school board, school administrators, and the public during development of the school wellness policy (Child Nutrition and WIC Reauthorization Act, 2004).

State agencies that administer child nutrition programs are charged with monitoring compliance with this legislation and school foodservice directors have a stake in ensuring that the policies are appropriately developed and enforced in order to avoid sanctions for non-compliance. Reports, however, suggest that directors have little experience with policy development (French et al., 2003). The required components of the local wellness policy described above encompass issues related to foods offered in schools, school curriculum, and policy enforcement. While school foodservice directors have authority for foods offered through the school meal program, foods offered through other venues, such as student stores, fundraisers, school parties, and vending machines, are often the responsibility of multiple and varied groups within schools. The roles of school foodservice directors in relation to school curriculum and policy enforcement have not been reported.

Little is known about perceived and preferred role of school foodservice directors in the development of local wellness policies or their concerns about policy development, implementation, and enforcement. This study was undertaken to examine the role of directors in development and enforcement of local wellness policies, their feelings about these roles, and the barriers in developing, implementing, and enforcing a local wellness policy.

**METHODOLOGY**
Five focus groups were conducted with school foodservice directors in Pennsylvania to provide insight into their perceptions and barriers related to development, implementation, and enforcement of local wellness policies. A total of 46 directors participated. Each group ranged from five to 12 individuals. Each session lasted approximately 60 minutes and was conducted using standard recommended focus group protocols (Krueger & Casey, 2000). This study was approved by the Institutional Review Board of The Pennsylvania State University.

Recruitment occurred through e-mail contacts with school foodservice directors who had registered to attend mandatory training sessions for the Child Nutrition and WIC Reauthorization Act of 2004, which were sponsored and presented by the Pennsylvania Department of Education. The focus groups occurred prior to the component of the training sessions related to the local wellness policy provision of the law. A nominal financial incentive was provided for participation. A series of questions was developed that related to current nutrition policies, status of wellness policy development, perceived role of school foodservice directors in such policy development, the perceptions of others in the school environment about the local wellness policy requirements, barriers or concerns about local wellness policy development and implementation, and issues related to policy enforcement.

Each focus group was facilitated by a trained and experienced moderator, with one assistant moderator taking notes. Sessions were recorded to ensure complete collection of information. Focus group analysis followed procedures recommended by Kreuger and Casey (2000). After each focus group session, the moderator and assistant moderator discussed their impressions of the focus group comments. The session tapes were transcribed and an analyst reviewed the raw data to identify themes based on project objectives, as well as other areas of interest that emerged from the discussion. For each focus group transcript, descriptive statements were extracted to illustrate each theme. When this step was completed for each focus group, an analysis was conducted, by theme, to interpret and summarize findings. The procedure was duplicated by a second analyst to ensure the validity of results.

RESULTS AND DISCUSSION

The themes that emerged from the focus groups were related to policy status; the role of school foodservice directors in policy development; and barriers to policy development, implementation, and enforcement.

Wellness Policy Status
At the time of the focus groups (June 2005), none of the participants reported having existing school nutrition or wellness policies. Most were in varying stages of forming a wellness team, gathering resources and information, presenting their findings to administrators, and waiting to learn more about the requirement. A few participants speculated that the federal policy requirement might change and they, therefore, seemed reluctant to begin working toward meeting the requirement until they felt assured that it was in its final format.

Role of School Foodservice Directors
The majority of focus group participants reported that they foresaw themselves playing a lead
role in policy development. Among those participants who did not anticipate taking the lead, concerns were expressed about assuming this role. Their unease centered on their limited knowledge of policy-writing and curriculum issues, perceived lack of authority in their district, and desire not to be viewed as the "food police." The statements that follow below and throughout this article were selected as representations of some of the comments expressed about the role and perceptions of school foodservice directors in wellness policy development.

"I don't know enough about what already exists in my district, as far as classroom education [is concerned]. And I think it's going to be hard for me to get the respect of the educational staff to understand how important this is…"

"I sit on the committee. A school nurse is the chair. She has more teacher contact. This way I won't be the bad guy. Foodservice is just a small part of the affected areas."

Some participants who predicted they would be taking a lead role viewed this as an opportunity to promote their school foodservice program, take credit for positive results, and control the structure of the policy development team to meet the best interests of the school foodservice program.

"I think it's a wonderful opportunity. It really allows foodservice to step forward and shine and show the things we do."

Even among those school foodservice directors who predicted that they would take the lead in policy development, there was some anxiety expressed regarding this new responsibility. They voiced a need for resources, such as sample policies and lists of healthful food options for a la carte items and fundraisers. The following statement reflects one viewpoint.

"We're not used to inventing the wheel. We're used to going out and making a better wheel. And right now we're being asked to invent the wheel, and it's scary."

An important responsibility of taking the lead in policy development, as expressed by school foodservice directors, is the ability to choose team members. The consensus was that team membership should not be open to anyone interested, as it could result in recruiting people who are involved only because of special interests or who may want to make drastic, unrealistic changes that could be to the financial detriment of the school foodservice program. Focus group participants discussed the importance of screening wellness policy team members.

"I specifically made sure that I had people [on my team] that I knew were going to be allies of mine. I got a list of people that wanted [to join] and then I did my homework to find out their philosophy. I think now I've got a committee that's well-rounded…and we're going to pick out happy-mediums."

**Barriers to Policy Development and Implementation**

Barriers mentioned most related to funding. As has been reported, the majority of school foodservice directors are required to operate programs that are financially self-supporting (Probart et al., 2005). Participants discussed the pressure they feel to meet this financial
requirement and the demands of their student customers, and develop and implement a policy that addresses childhood obesity. They did not feel that their districts would provide financial support if they lost funds, and they believed their jobs would be threatened if revenue declined.

Funding issues unrelated to school foodservice programs also were mentioned. Each focus group raised the issue that the policy likely would result in the need for changes in current practices involving food fundraisers in school. Due to the amount of funds generated by these groups, the participants feared this would result in a resistance to change.

"Principal are very protective of their PTOs, and they get daggers in their eyes when they say, 'My PTO brings me $40,000 a year to provide services and materials for the district, which the general fund does not.' So, you have to have on strong body armor when you say, "This is what you're going to be selling."

Another issue related to funding and time constraints involved the education component of the wellness policy provision. Focus group participants observed that the policy requirement would result in the need to add physical education and nutrition education to the curriculum. Although they viewed this positively and considered it necessary to support the changes in food offerings, many doubted that their districts would allocate the necessary time and funds to increase these educational areas. The participants acknowledged that the current emphasis is on core curriculum subjects, and they expressed the concern that their districts would not be able to find time to add these additional components.

"I think 'No Child Left Behind' is a stumbling block, because they're saying you have to bring your test scores up, which means educators look at it as that means we need more time in the classroom, we need to work them harder in English and their Math. And that means something's got to suffer. And most of the time it's the related arts, the phys ed, the health."

Another barrier involved getting others in the school environment, especially school administrators, to grasp the multifaceted nature of the wellness policy requirement and understand the areas of the school environment that are likely to be impacted. Some school administrators were said to view this requirement as a "foodservice issue" and, therefore, likely would be unwilling to allocate attention, time, or personnel to fulfill the requirement.

"My superintendent, unfortunately, feels that it's up to me to do it. He doesn't even want community involvement, even though I told him it's part of the regulations."

"In my district, people have heard about it, but they seem to assume that it's the cafeteria that's doing all this. They don't realize that it's a regulation coming down that we're going to have to abide by."

The final major barrier mentioned was a perceived lack of responsiveness by food manufacturers and processors to provide healthful products at reasonable prices that are acceptable to students.

"The food industry has to jump on board. They're miles behind, aren't they? How many of you can find a whole grain hot dog roll or hamburger roll?"
Enforcement Issues
Many focus group participants expressed concerns about policy enforcement, which were, in part, based on a lack of enforcement of current policies. They felt that administrators, particularly principals, would have to take responsibility for regulation. However, they viewed enforcement as difficult because of the policy's reach into many different areas and administrators' lack of time to assume this responsibility. They also believed that if policies resulted in a loss of funds for schools, administrators would be even less likely to enforce them.

"My biggest concern is we can come up with a wonderful policy, but it's the buy-in that's going to be needed throughout the district and who's going to police that? Principals are going to look at it and say, 'I'm not going into the classroom and checking to see if so-and-so is eating cheese curls.' And obviously we're not, we don't have time to do it."

Participants assumed that the reach of the policy, extending to all foods available on the school campus, would make enforcement difficult. The nutritional value of foods available at school parties, in particular, was mentioned often as a sensitive and problematic policy area to control.

"Birthday parties. I don't want to go up to some little girl in Second Grade and say, 'Your mom can't bring in cupcakes, not unless they're made with whole grains.'"

CONCLUSIONS AND APPLICATIONS
The wellness policy provision of the Child Nutrition and WIC Reauthorization Act of 2004, while not mandating school districts' adoption of a specific policy, requires districts to develop, implement, and enforce a policy that addresses childhood obesity. Required components include issues related to nutrition education and physical activity, nutrition guidelines for foods offered in school, and plans for ensuring implementation and enforcement of the policy. Given the lack of current school nutrition policies, especially comprehensive plans that set nutritional standards for foods offered in schools, fulfilling this local wellness policy requirement will prove to be a challenging experience for the majority of schools and school districts affected (Barratt et al., 2004; French et al., 2002; French et al., 2003; McDonnell et al., in press; Story et al., 1996; Wechsler et al., 2001).

Due to the connection of the wellness policy requirement to the sponsorship of school meals programs and the potential for sanctions if the requirement is not met, school foodservice directors are likely to be involved in the policy development process. The literature suggests that directors have little experience in establishing school policies (French et al, 2003). As is the case with the introduction of new programs or initiatives into school environments, an analysis of the observations of key players involved and their perceived barriers to implementation can be useful in facilitating success. Although the opinions expressed by focus group participants do not necessarily represent those of the majority of their colleagues or peers and, therefore, cannot be generalized to a larger population, this study provides important insights into the perceptions of school foodservice directors related to the development, implementation, and enforcement of local wellness policies. Based on these findings, suggestions and recommendations can be made to facilitate the successful establishment of policies.
Virtually all school foodservice directors indicated that they would be part of the policy development process and most perceived that they would lead the process. However, they expressed varying degrees of comfort with this role. Some welcomed it as an opportunity to promote their programs. Others were too uncomfortable with their lack of knowledge of either curriculum issues or the logistics of policy development to take the lead. Some felt that they did not have the necessary level of authority in their districts for take a leading role, a finding that has been previously reported (McDonnell et al., 2004). A critical responsibility of the leader was identified as forming a policy development committee willing to take a moderate approach.

School foodservice directors should be encouraged to take this opportunity to promote to the school community the benefits of participating in school meals programs and to explain the guidelines and standards to which school meals are held. Important initial steps for directors in policy development would be to learn how this process works within his/her school district, include any team members who are required by the district, and understand the school board's timetable for policy review and adoption. Identifying allies or supporters, especially those with expertise in either curriculum issues or policy development, may help directors feel greater confidence about their involvement in this process. Directors could benefit from sample policies that have been compiled and made available through websites, such as the School Nutrition Association and the U.S. Department of Agriculture's Team Nutrition Program. Facilitating communication among directors --possibly through Internet "chatrooms," listservs, teleconferences, or web-based initiatives--during the policy development process may provide opportunities to share successful strategies and solutions for overcoming barriers.

The major barriers expressed by focus group participants were related to funding issues, including the potential loss of revenue through lower a la carte sales and elimination of food-based fundraisers, as well as the unlikelihood of increases in time devoted to nutrition education and physical education. The policy development process may require schools to make hard decisions about funding priorities. As part of this process, school foodservice directors should be prepared to explain the nature of funding for school meal programs that lead many to rely on a la carte sales to sustain their operations. Directors may benefit from suggestions for nutritious a la carte options that are acceptable to students, strategies for involving students in the decisions about food offerings, and pricing strategies to encourage nutritious food choices while maintaining revenue. Schools also could benefit from suggestions for successful non-food fundraisers and healthy classroom party refreshment options. Incorporating additional nutrition education and physical activity into school environments, given funding and time pressures faced by schools, may be accomplished by taking an interdisciplinary approach that includes nutrition concepts and physical activity into existing subject areas. Opportunities for promoting nutrition education and physical activity outside of the school day, such as in an after-school program, also should be explored.

Another barrier mentioned by the participating school foodservice directors was the lack of understanding about the wellness policy requirement by others in the school environment. While the support of administrators is vital to the success of the effort, some directors perceived that the policy requirement was viewed as a "foodservice issue," indicating little recognition of the policy's reach into other areas of the school. Opportunities exist to address this barrier at the federal, state, and local levels with education and awareness-building efforts, which would target
a variety of audiences, including parents, teachers, school nurses, and school administrators. Articles in professional association publications, presentations at professional association conferences and at PTO/PTA meetings, and targeted mailings are some strategies to reach out to these groups. The media also could play a role in this effort by reporting on the policy requirement.

Potential problems with policy enforcement were raised by each of the focus groups. Acquiring buy-in from a wide variety of individuals early in the policy development process may alleviate some enforcement concerns. Efforts to effectively communicate policy goals and requirements throughout the school environment will be necessary. Potential communication methods include articles in school newsletters, information included on the school breakfast/lunch menu, discussions at faculty and school board meetings, presentations for parent/teacher groups, and use of local media.

The establishment of local wellness policies provides an opportunity to promote child nutrition, but requires discussion at the local level among individuals representing a variety of backgrounds and interests in order to create a common vision for a healthy school nutrition environment. This study provides insights into the perceptions of school foodservice directors about wellness policy development, implementation, and enforcement. Based on the study results, the strategies suggested for facilitating the establishment of local wellness policies should allow directors to address childhood obesity through the school environment.

REFERENCES


**BIOGRAPHY**

**McDonnell**, **Weirich**, and **Probart** are, respectively, project coordinator, project manager, and associate professor at the Department of Nutritional Sciences at The Pennsylvania State University in University Park, PA.