



KIDS' SAFE & HEALTHFUL FOODS PROJECT

Health Impact Assessment: National Nutrition Standards for Snack and a la Carte Foods and Beverages. An HIA of the USDA's Rule-Making Process

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The Kids Safe and Healthful Foods Project

Purpose:

To advance administrative and legislative actions that improve the safety and healthfulness of foods sold in schools.



The History of Snack and a la Carte Food/Bev standards in Schools

- 1979 USDA set standards that “foods of minimal nutritional value” could not be sold in direct competition with school meals.
“COMPETITIVE FOODS”
- 1980’s – 2000’s: Significant proliferation of snack food availability....vending machines, school stores, snack bars, a la carte, fund raisers....
- 2004: Child nutrition reauthorization requires Districts to develop wellness policies that address the “entire” school and more districts start to tackle this issue in their schools.
- 2006: Industry commits to improving what they market and sell in schools and IOM publishes guidelines for what should be sold in the school environment.



History of Snacks in Schools part 2

- By 2010, 38 states have policies addressing competitive foods but their quality varies WIDELY.
- 2010 Healthy Hunger Free Kids Act (Child nutrition reauthorization again) requires USDA to update 1979 standards and make them applicable to ALL foods sold on school campuses throughout the whole school day.
- **2011 – 2012 Health Impact Assessment on potential national rule**
- In February USDA proposed updated standards
- Between February and April (60 days) they received 247,000 comments (over 97% of them supportive) on the comments.
- June 2013 USDA issued interim final rule

WHY DO AN HIA?

- Will these standards impact children's health?
- To what extent will they impact school budgets?



How do you do an HIA in advance of the policy being proposed?

Section 208 of the Healthy, Hunger-Free Kids Act

- The nutrition standards shall apply to all foods sold
 - i. outside the school meal programs;
 - ii. on the school campus; and
 - iii. at any time during the school day.
- The secretary is required to establish standards that are consistent with the most recent DGA (2010)
- The Secretary is also required to consider the following in drafting the guidelines:
 - i. authoritative scientific recommendations for nutrition standards;
 - ii. existing school nutrition standards;
 - iii. the practical application of the nutrition standards; and
 - iv. special exemptions for "infrequent" school-sponsored fundraisers



Competitive Foods HIA Process

- Extensive literature review of over 300 articles and publications
- Original empirical analysis of school financial data
- Extensive stakeholder interviews with academics, industry representatives, education leaders, students, and parents.
- Oversight, input, and review from advisory committee
- Peer reviewed by stakeholders and nationally recognized experts

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We began this HIA in the Summer of 2011 – pulling together the research team and the advisory committee to begin the initial scoping. In the end, the team reviewed more than 300 articles and publications on the topic, conducted original analysis of school financial data, and held countless interviews with stakeholders to produce this product. Additionally, the doc went through an external peer review process and was published in June 2012.

How was this process different from “traditional” HIAs?

- National in scope (to date most have been focused on the local or state levels)
- First HIA to be conducted on a federal rule-making process → had to learn as we went
- HUGE body of available research



Methods for Analysis of Impacts

- Comprehensive Lit Review
- Policy Scenarios:
 - Examined existing policies at the state level
 - Compared these to the Dietary Guidelines
- School Policy Analysis: Impact on Revenue
 - Original empirical analysis of school finances
 - Policy strength was compared against changes in revenues

Most comprehensive literature review of competitive foods to date, examining more than 300 published studies

Policy Scenarios: Because USDA had not yet proposed updated standards at the time of this study, the HIA examines a scenario in which items would be required to meet the DGAs

- Looked at existing state policies in 39 states and compared them to our policy scenario, ranking them into categories of no policy (0), weak (1), moderate (2), and strong (3)

School policy analysis: Impact on Revenue → the HIA conducted original empirical analysis to examine the relationship between snack and a la carte food and beverage policies and school-related finances at the state level – worked with an economist to do this

- State-year observations = an observational unit of analysis
- Revenue changes were also explored for states moving from no policy to a policy, or a weak policy to a stronger policy

The Health Determinate Pathway Summary





Key Questions and Findings

Diet and Nutrition:

- Will the updated standards affect the availability of snacks and drinks sold in schools, student purchases of these items, and student consumption?
- Will changes in student consumption of snacks and beverages sold in schools affect different chronic disease health outcomes?

FINDING: Student access to, purchase of, and consumption of unhealthy foods and beverages, and subsequently their risk for disease, decreases.



Key Questions and Findings

School Services and Impact on Revenue:

- Will updated nutrition standards affect students' participation in the school meal programs and thus school food service revenue?
- Will updated standards affect school-district or other types of revenue that pay for school services?
- If revenue changes occur, will they affect student health via changes to enrichment learning opportunities and school-supported physical activity?

FINDING: Districts would likely NOT see a decline in revenue.



Key Questions and Findings

Vulnerable Populations:

- How will vulnerable populations, such as those from lower income or minority families, be affected by the rule?

FINDING: Vulnerable populations would benefit from stronger nutrition standards for snack foods and beverages sold in schools.



Recommendation 1: USDA should establish nutrition standards for all foods sold regularly on school grounds outside of the school meal programs.

These standards should include:

- a requirement that schools sell items from the Dietary Guidelines for Americans list of “foods to encourage;”
- age-appropriate calorie limits for items sold individually (snacks: 100 calories for elementary, 140 calories for middle, and 180 calories for high school students; entrée items: 300 calories for elementary and middle and 400 calories for high school students);
- a maximum of 35 percent of total calories from sugar;
- maximum limits for fats (no more than 35 percent of calories from total fat, 10 percent of calories from saturated fat, and less than or equal to 0.5g of trans fat per serving); and
- incremental reductions in sodium, with a target time frame of 10 years, to achieve full alignment with the Dietary Guidelines for Americans.



Recommendation 2: USDA should establish nutrition standards for all beverages sold on school grounds.

At a minimum, these standards should:

- limit beverages sold in elementary and middle schools to only water, low-fat and fat-free milk, and 100 percent fruit juice in appropriate portions, and
- establish calorie and serving size restrictions for all beverages sold in high schools so as to ensure calories obtained from sugar-sweetened beverages during the school day are minimal.



Recommendation 3: USDA should adopt policies and practices that ensure effective implementation of the standards.

At a minimum, USDA should:

- provide technical assistance and training to schools and districts;
- provide clear guidance on how the terms *infrequent*, *school day*, and *school campus* as included in the Healthy, Hunger-Free Kids Act are to be addressed;
- ensure that nutrition standards are kept up to date with future iterations of the Dietary Guidelines for Americans; and
- collaborate with states and nongovernmental organizations to monitor the implementation of the standards.



Promising Practices

- Integration communication, and outreach
- Overarching implementation suggestions
- School food environment
- Food service implementation
- Vendor relationships
- Fund-raising



Challenges

- Translating HIA practice into a federal policy
- Project Management
- Research Gaps
- USDAs Timing



How Can You Get Involved with this HIA and Federal Policy?

1. Visit us at www.healthyschoolfoodsnow.org and sign up for alerts
2. Take note when USDA updates policy and offer comments to USDA. (Input does matter!)
3. Spread the word, tell your friends and colleagues, and garner support for continued improvements to the school nutrition environment.

Questions???



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