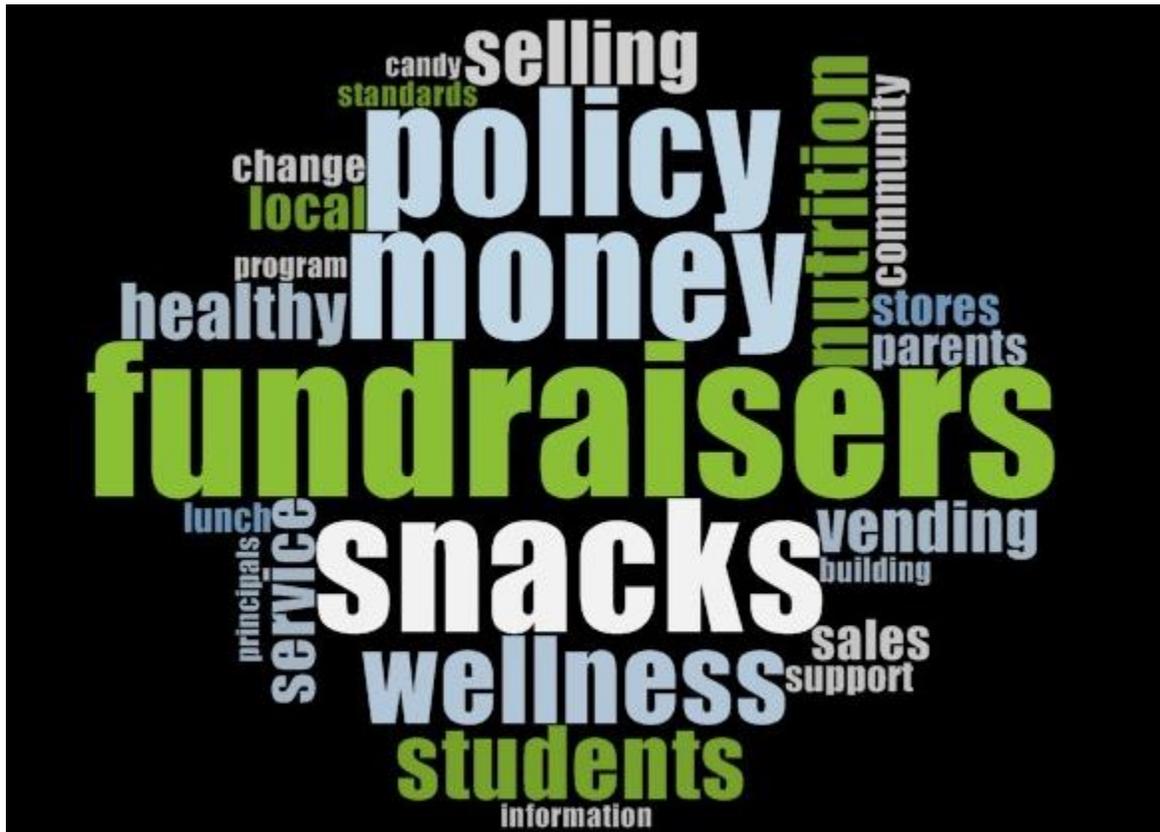


School Fundraising Policies and Practices: A Shifting Landscape



Lindsey Turner, PhD

Kathleen Mullen, MA

Initiative for Healthy Schools

College of Education

Boise State University

SeAnne Safaii-Waite, PhD, RDN, LD

Department of Foods and Nutrition

School of Family and Consumer Sciences

University of Idaho

School Fundraising Policies and Practices: A Shifting Landscape

Acknowledgements:

This project was funded by Healthy Eating Research, a national program of the Robert Wood Johnson Foundation. We would like to thank the many stakeholders who made time to participate in the interviews for this project, and who trusted us with their stories, concerns, insights, and recommendations.

We would like to thank our advisory committee for providing guidance on the methods and conclusions for this project:

Whitney Meagher; Pew Charitable Trusts

Margo Wootan, DSc; Center for Science in the Public Interest

Tracy Fox, MPH, RD; Food, Nutrition & Policy Consultants, LLC

Peer review was provided by:

Stephanie Joyce, MS, RD, SNS; Alliance for a Healthier Generation

Monica A.F. Lounsbury, PhD; University of Nevada, Las Vegas

Karen Webb, PhD, MPH, BSc; Nutrition Policy Institute, Division of Agriculture and Natural Resources, University of California



Suggested Citation:

Turner L, Mullen K, and Safaii-Waite, S. *School Fundraising Policies and Practices: A Shifting Landscape*. Boise, ID: Initiative for Healthy Schools, College of Education, Boise State University; July, 2016.

TABLE OF CONTENTS

	PAGE
ACKNOWLEDGEMENTS	2
TABLE OF CONTENTS	3
INTRODUCTION	4
<i>Figure 1: State Fundraising Exemption Policies</i>	5
METHODS	5
Case Selection	6
Interview Procedures	7
RESULTS	7
Change Happens...Slowly	7
Wellness Policies Paved the Way for Smart Snacks	8
The Purposes and Magnitudes of School Fundraising Revenues Vary Widely	9
What Happens to Schools and Students When Fundraising Revenue Declines?	10
How Fundraisers Compete with School Nutrition Programs: It is Important to Look at the Whole Picture	11
Are there Loopholes and Workarounds? Timing, Location, and Other Shifts	12
How are Funds Being Raised?	13
<i>Vending machines</i>	13
<i>School stores</i>	14
<i>Other foods at meals and after school</i>	14
District-Level Child Nutrition Professionals are Trapped in the Middle	15
Implementation Champions: It Takes Courage and Commitment to Do the Right Thing	16
School-Level Leadership from Administrators is Essential	17
Clear Guidance is Still Needed	18
How Many Exemptions? There is Not a Clear Consensus, but there are Benefits to Zero-Exemption Policies	19
CONCLUSIONS AND PRACTICAL APPLICATIONS	20
The Good News: Many Schools and Organizations are Successfully Adjusting	21
<i>Additional Fundraising Resources</i>	21
Food Service Departments can be Allies but Not Enforcers	21
Policy Monitoring, Evaluation, and Reporting	22
Limitations of This Work and Directions for Future Studies	22
What's Needed Next	23
REFERENCES	24–25
APPENDICES	26–31

*“How do you change the culture in a school? You don’t just say ‘we’re changing everything.’ You have to work on it, it takes time. You have to build that relationship with the principal, and make sure the principal is on board. And the parents. And you slowly start to shift toward healthy choices for our kids that might help them. You start talking about test scores, you know... most principals want to hear about that, right? And you want to have less discipline problems...
... So let’s start working in that direction.”*

– A state PTA leader

INTRODUCTION

Consumption of high-calorie nutrient-poor foods has been linked to adverse health outcomes in childhood, including an increased risk of childhood obesity.¹ Between one-third to one-half of children’s and adolescents’ daily energy intake occurs at school,^{2,3} and school practices are associated with children’s dietary behaviors and weight outcomes.⁴⁻⁶ Fundraisers on campus can be problematic nutritionally because, historically, sugary baked goods, candies, and sugar-sweetened beverages have often been sold at fundraising events.⁷⁻⁹ Consumption of ‘empty calories’ are major contributors to childhood obesity¹⁰ and school-wide nutrition practices such as food-related fundraising may be associated with obesity among students.¹¹

The past decade (2006–2016) brought about a variety of changes in school food environments. Following the requirement that school districts develop wellness policies, which took effect as of the start of the 2006–07 school year, districts have increasingly addressed fundraising practices in their local wellness policies.¹² School nutrition also became an increasing focus of national policy efforts following passage of the Healthy, Hunger-Free Kids Act in 2010 and the ensuing Smart Snacks in School nutrition standards that went into effect in July 2014.

The USDA’s Smart Snacks standards specify the portion sizes and types of beverages and foods that may be sold to students on school campuses during the school day, outside of meals and other federally-reimbursable child nutrition programs. However, Smart Snacks allow states to establish an exemption policy whereby non-compliant items may occasionally be sold for fundraising purposes.¹³ Determining the number of allowable exemptions is left to each state’s agency overseeing child nutrition programs, and currently there is much variability in how states address this issue. Although many states adopted a zero-exemption policy—in other words, requiring all products sold on campus during the school day through fundraisers to meet the Smart Snacks nutrition standards—others have allowed exemptions. Among states that allow exemptions, there is considerable variation in the number of exemptions allowed. For example, some exemptions last only one day, for few days each year, whereas some states

allow multiple exemptions, each lasting for several days. Furthermore, in some of the states where the child nutrition agency adopted a zero-exemption policy, lawmakers have used state-level legislation to permit exemptions. Because this policy is new and many states are still determining how to proceed, the state-level landscape is changing quite rapidly. Figure 1 shows which states had a zero-exemption policy and which allowed any exemptions, as of December 1, 2015.^{14,15}

Figure 1: State Fundraising Exemption Policies



Thus far, it is unclear whether—and how—the Smart Snacks provision regarding fundraising may have impacted school practices, including the impact on student access to empty calories, the financial impact on schools, challenges with implementation, and factors that may have facilitated schools’ success with transitioning away from food-oriented fundraising. Therefore, the goal of this project was to examine the impact of Smart Snacks standards on fundraising practices in districts and schools in a sample of states that do allow, and do not allow, Smart Snacks fundraiser exemptions. Project objectives were to: describe the reported impact of changes in fundraiser policies on school fundraising practices; examine challenges with implementation; identify factors associated with successful implementation of healthier practices; and examine variations in perspectives by stakeholder groups, and across states allowing fundraiser exemptions as compared to states with zero-exemption policies.

METHODS

Initially, this project was conceptualized as utilizing a series of case studies in districts and schools that were experiencing both successes and challenges in fundraising; however, the initial recruitment experiences revealed that many potential stakeholders were unwilling to publicly disclose information about fundraising practices in their schools and/or districts. Therefore, the methodology was revised, instead utilizing a series of interviews¹⁶ with purposively-sampled key stakeholders to confidentially and candidly explore not only the facilitators of success in avoiding food-related fundraisers, but also challenges and costs. To facilitate candor and sharing of sensitive financial information—such as the amount of money raised by various fundraising strategies—respondents were guaranteed confidentiality for this study. The project was approved by the Institutional Review Board at Boise State University. Below is a brief overview of the methods for this project, with additional technical details included in Appendix A.

Given one of the goals of this project being the gathering of information about implementation successes—as well as challenges—the sample was purposively selected to include schools and districts experiencing varying degrees of success with Smart Snacks implementation. Data collection involved 37 semi-structured telephone interviews with key stakeholders at the state, district, and school levels across the country. The interviews were conducted in: a) states with zero-exemption policies (i.e., all fundraisers held on campus during the school day must meet Smart Snacks standards); and b) states with non-zero exemption policies (i.e., some number of exemptions are allowed). Hereafter, states are referred to as either “zero-exemption states” or “exemption states.”

Participants were from the Northwest, Midwest, Southwest, and Southeast; elementary, middle, and high schools; public, private and charter schools; rural to urban settings; small and large districts; and schools with a wide range of student socio-demographic characteristics. All schools participated in the United States Department of Agriculture (USDA) meals programs and were subject to Smart Snacks.

Case Selection

A three-stage sampling procedure was used, first identifying states, then districts within those states, and then schools within those districts. Using the map shown in Figure 1, the research team targeted several zero-exemption states and exemption states, with the latter varying widely in the number of exemptions allowed. These states were selected based on our ability to leverage personal connections to schedule state-level background interviews with a representative of the state child nutrition agency to obtain background context about the state’s exemption policy. Ultimately, three states and the District of Columbia were included in the “zero-exemption” group, and five states were included in the “exemption” group. Appendix B shows the states in which interviews were conducted for this project.

State-level interviews provided background, context, and information for understanding state policy provisions. Thereafter, we sought to identify a selection of school districts within those states that were either doing well or experiencing challenges with improving school nutrition practices. Strategies for identifying such districts included media searches and informal requests for suggestions from our professional networks. Efforts were made to include districts/schools with a variety of demographic characteristics, from across all regions of the United States. The design used a purposeful sample, involving maximum variation sampling^{17,18} to ensure inclusion of schools with a wide range of variation in fundraising practices.

Recruitment efforts began with sending emails to the food service director (FSD) in target districts. After completion of FSD interviews, we turned to recruitment of school-level respondents within those districts. Sometimes, this was facilitated by a personalized email introduction or recommendation from the FSD to school-level stakeholders to participate in an interview, but in some cases, the selection of school-level stakeholders was based entirely on the willingness of participants to respond to our recruitment emails. A total of 37 interviews were conducted between September and November of 2015. The process of recruiting and

scheduling interviews was discontinued after recurring themes were noted in the transcripts, and after several examples of both successes and challenges were identified. Participants included diverse stakeholders, such as state-level child nutrition directors; district-level leadership; district FSDs; school-level leadership; and parents or leaders of local, regional, or state parent-teacher organizations. Appendix C shows connections among interviewed stakeholders within districts.

Interview Procedures

The telephone interviews lasted between 15 minutes and 80 minutes, averaging approximately 30 minutes each. Interviews were audiotaped and then transcribed verbatim for coding. The first author, who conducted the interviews, read all transcripts to ensure transcription accuracy. Coding used an iterative approach to identify themes that occurred across multiple interviews, whereby all interviews were reviewed by the second author, and then the first and second author developed a series of codes to capture major themes. Then the third author independently coded all interviews using those codes, and comparisons were made to confirm reliability. An iterative process was used, with additional review of interviews by all authors when additional themes emerged to ensure that illustrative quotes in this report are representative of the themes identified.

RESULTS

This report focuses on key themes that emerged through the interviews, including barriers and challenges, and ways of addressing them. The results demonstrate that successful implementation of fundraising exemption policies is clearly associated with having champions who are committed to student wellness.

Overall, interview results revealed that many schools have made great strides in improving the school nutrition environment. As will be described subsequently, however, this change has sometimes come at a cost to schools and school districts. With continuing declines in state funding to school districts, school finance has been—and will continue to be—a crucial concern for educators. For most of the schools participating in this project, fundraising provides essential financial support for student educational services. Therefore, it is crucial to identify funding solutions that meet the very real financial needs of K-12 educational systems in this country, but that also support student health.

Change Happens... Slowly

Our sample deliberately included schools and districts located in states that might have had an early start on implementation as a result of existing state-level zero-exemption policies and other state laws, or strong district wellness policies regarding fundraising. The sample also included districts that were later adopters of change—in some cases, quite reluctantly. Regardless of whether the state-level approach to fundraising is a zero-exemption or an

exemption policy, nearly all schools needed to make changes. Many schools in exemption states went from unrestricted fundraising to having some limits, even in states with very lenient interpretation of the standards.

A key finding from the interviews is that even where districts and schools have been working on wellness for some time, changes can be slow to be implemented, accepted, and institutionalized. But many stories illustrate the successes that are possible over time, with commitment and patience. As implementation science scholars¹⁹ have noted, one key to successful program implementation is patience—that is, taking a long-term view rather than a shorter-term view. This approach allows time to overcome the reductions in staff productivity and costs that occur while an intervention is being put into place.

As one FSD who has been very successful in promoting nutrition district-wide and is well-respected by other school-level stakeholders explained:

“We try to encourage folks. This is not something that happened overnight. We’ve just continued to kind of improve every year, I think, in different aspects and it hasn’t always been easy. I’ve had to have some difficult conversations. But I think that if everybody focuses on what’s best for the student and the child, I think that changes those conversations drastically.”

Another FSD noted that patience and perseverance were essential:

“I’ve asked someone too, you know, are you getting pushback? They said that, yeah, they were getting pushback at first, but again, some of the dust has settled, and people are learning a little bit more. One school...they were doing donuts in the morning, they were doing [ice cream] every Thursday, and those have stopped. And, well, that’s good. See, that, that to me is progress. Even if it’s a little slower than we want it to be, it’s still good.”

And another FSD added the notion of having the right people in place:

“It starts with having the right people in place and then moving on to the point where you get the policies in place. And then, as long as the policies are being followed for a certain amount of time, then it becomes a cultural change. You know, where it just becomes who we are.”

Wellness Policies Paved the Way for Smart Snacks

For several years prior to the Healthy, Hunger-Free Kids Act and the ensuing Smart Snacks standards, all schools participating in USDA meals programs were required to have local wellness policies with goals for student nutrition. Although there was no formal requirement for these district-level policies to address fundraising, some local wellness policies did include provisions limiting fundraising that involved selling foods and/or beverages to students. Generally, however, most were written as recommendations rather than requirements.

Although there is some evidence that such policies are associated with healthier school-level practices,²⁰ many schools with district policy recommendations did not actually limit food-related fundraising. Nevertheless, several respondents noted that their wellness policy had been helpful in getting a head start on Smart Snacks implementation.

As one FSD noted of the district's schools:

"They've done a pretty good job. I mean they're not perfect [laughs]. A few things slipped through but I should tell you ... they're doing pretty well following it. But prior to this we had one of the most restrictive wellness policies that you've probably come across [laughs]. In regards to snacks and vending and that kind of thing. So it wasn't a huge adjustment for our district because we pretty well locked it down with our wellness policy before that."

This was also the case for schools in states that did allow exemptions, where wellness policies at the district level helped to start the conversation about implementing healthier practices. The successes from these districts illuminate the importance of allowing sufficient time for implementing policy changes such as Smart Snacks. In some cases, stakeholders voiced concerns that a more-lenient state policy on fundraising could result in a return to food-related fundraising among schools that had already successfully shifted to healthier approaches. Several stakeholders described the continuing importance and value of a local wellness policy as a strategy to prevent unhealthy items from returning to campus through more-lenient state policies that allow exempted fundraisers.

The Purposes and Magnitudes of School Fundraising Revenues Vary Widely

A key goal of this project was to understand more about the impact of fundraising changes on school revenues, including whether food-related fundraisers are actually profitable, or whether they may pose a risk to student health with very little fiscal benefit to schools, stakeholder groups, and/or students. The literature available on fundraising revenues is very limited, and perhaps with good reason. The results of this project suggest that revenues vary dramatically from school to school, and depend on a variety of variables such as community socioeconomic factors, demographics, school resources, and the historical expectations for programming at the school. This is the case both for food-related fundraisers, as well as alternative strategies (e.g., fun runs, flower sales, direct donation requests). Across states and districts, education budgets also vary widely, leaving some districts with profound shortfalls and limited resources, whereas others need to raise funds only for travel and discretionary activities that might be considered a luxury in some of the more disadvantaged districts. Therefore, it is very challenging to compare fundraising revenues in any meaningful way across districts without making inappropriate judgments as to "need" or the "value" of education-related programming.

As one school-level PTA leader/parent explained:

“Some schools, some PTAs raise a hundred thousand dollars a year and some raise three. [Laughs] There's just...you know, it could change every year. I mean last year our PTA raised \$35,000. This year they've raised, um, like \$1,000.”

What Happens to Schools and Students When Fundraising Revenue Declines?

The impact on school programming is, in some cases, quite profound. Economically, the nationwide recession and other state-level cuts in funding have significantly impacted school budgets in ways that are proving to be very challenging to school systems. As one principal explained:

“Even our state budget is decreasing, the amount that we are getting is decreasing. It just feels like everything is decreasing when expectations are higher than ever before.”

In some cases, the district is able to help with additional funding, but that appears to be the exception. As a district-level stakeholder noted about changes in fundraising:

“...it impacted our program school-wide greatly, so the district is now having to supplement our student programs... and so field trips and DECA [business club] and debate teams, those kind of things, sport things, they no longer are able to support themselves, so that's having to come out of district funds.”

But in many districts these funds are not available, and school programs suffer. As described by one school principal:

“Our city, when we were making that change and losing revenue from vending, actually gave additional money to activities, to offset it that first year. I don't know specifically what year that was. The middle school never got anything. Now, our state and our city and our school district are strapped. Actually, our high school activities are not getting any district funding for travel.”

Respondents reported a variety of ways in which funds are used to support education-related activities. These include basic and necessary educational supplies in some schools (e.g., notebooks, teaching tools); educational field trips; sports-related activities, travel, and uniforms; and travel and conferences for other clubs and organizations. Several respondents indicated that they now need to ask students and parents to pay more for these activities; in higher-income communities this is a viable option, but in lower-income or mixed-income communities this disproportionately places a burden on economically-disadvantaged families. At several schools, fundraising was described as a way to provide “scholarships” that can be used discreetly to provide economically-disadvantaged students the same opportunities that many of their classmates are able to access.

A particularly poignant insight was provided by a middle school principal:

“A lot of the families, a lot of these students, under no fault of their own, were counting on the school, or ended up counting on the schools, for a lot of their day-to-day needs. And so, that’s what a lot of that money went to, being able to pay the \$50 fee for a student to rent an instrument because the family couldn’t come up with it. So, having that extra money, like for an [assistant] for a classroom, or so that we can do some of those things to help give some of these kids a chance... so that we’re not taking it out of the teacher’s pocket.”

In some cases, the financial costs have been too difficult to bear and administrators decide that it isn’t feasible to implement changes. One respondent in a zero-exemption state described a case of deliberate policy non-compliance:

“Some schools have looked to find alternate ways, and other schools have said, ‘well, as long as nobody’s looking, we’re just going to keep doing what we’re doing to make the money that we need to make to make our programs run.’ ”

How Fundraisers Compete with School Nutrition Programs: It is Important to Look at the Whole Picture

In 2012, a health impact assessment considered the potential impact of such national standards for snack foods on food service revenues: a comprehensive review of studies conducted up to that point concluded that enforcing strong nutrition standards could be financially viable for school districts, partly due to increases in school meal participation.²¹ One fairly common fundraising strategy has been the sale of branded fast foods in the cafeteria by student groups (i.e., purchasing pizza and re-selling by the slice with a markup on price), and such strategies diverted students away from participating in school meals programs. Therefore, one potential consequence of limiting the frequency of food-related fundraising events during the school day—or restricting them entirely in zero-exemption states—could be to increase student uptake of school meals. Paid participation in meal programs is important for the financial security of school nutrition departments. While more studies of meal participation rates are needed, several stakeholders in this project mentioned that their meal participation rates had increased in the past year.

Another issue impacting meal choices at the secondary level is whether students are able to leave campus during the school day. According to 2014 data, nearly all US elementary schools and a majority of middle schools maintain a closed campus, but 28 percent of high schools allow students (in at least some grades) to leave campus.²² One FSD who was very critical of all HHFKA changes claimed that the standards haven’t improved anything, because “the kids just walk down the street to buy a candy bar at the store.” Although additional questioning revealed that only students in 12th grade were able to leave campus at this district’s schools, the issue of open campuses clearly emerged as a crucial influence on students’ lunchtime purchasing behaviors at many schools. Where schools had been engaged in fundraising-types of sales during lunch periods (e.g., selling branded pizza), or there had been a school store/snack bar

selling items that now are subject to Smart Snacks standards, some schools have seen students choosing to go off campus to purchase such items.

This was the case in both zero-exemption states as well as exemption states where vending machines are now limited. As described by a school-level stakeholder:

“If they [can] get off campus, they’re going off campus. They’re just going to [street name], just like fast food heaven, and all the way up and down it which is just 2 blocks down from the school there’s just everything.”

Although open campus provisions typically only pertain to secondary schools, similar issues were evident with morning fundraising approaches in elementary schools. Several respondents in an exemption state indicated that the sale of fast food items at breakfast had previously provided a substantial amount of revenue for local schools and districts. In some cases, these sales occurred daily or weekly and were considered “tradition” by parents and students.

With the Smart Snacks limits, fewer days are allowed for such fundraising, making it less likely that sales will occur on a daily basis. While they do appear to still be occurring weekly in some places, there is a provision in one state’s rules that an exemption fundraiser cannot occur 30 minutes prior to until 30 minutes after the end of meal service anywhere on the school campus. In other words, if school breakfast is served from 8:00–8:30 a.m., an exempted fundraiser cannot occur between 7:30 and 9:00 a.m. There has been pushback, but having this as an official policy seems to have helped with enforcement. However, two workarounds appear to have emerged. One is that the sale of these products is marketed as being “sold to parents.” The food is sold in the drop-off line to the parents, who then hand the food to their child. Technically this is not prohibited. At other schools, the decision has been made to not participate in the School Breakfast Program, and to sell fast food instead. This issue appears to warrant additional attention, given that it represents a frequent “competition” to school meal programs.

Are there Loopholes and Workarounds? Timing, Location, and Other Shifts

To compensate for reduced revenues from food-related fundraising during the school day, some schools have shifted to events held off-campus or after the school day. The Smart Snacks guidelines limit fundraising that occurs from midnight before until 30 minutes after school is dismissed for the day.²⁴ In this definition of school day, fundraising activities held prior to school (i.e., sales of breakfast foods, coffee, hot chocolate) are covered by Smart Snacks, but after-school activities are not covered if they occur after the 30 minute delay.

One principal started by describing a variety of ways in which school groups were successfully shifting away from food-related fundraising, but then paused and admitted:

“...but, um [pause], you know, I would say that for the most part they're just having those types of [food-related] fundraisers at a different time.”

Another principal admitted:

“[There are] ways in which we are not meeting it—there has historically been a fundraiser for ice cream sales on Fridays...I think that some people would like to interpret that as a gray area because the students are taking it and immediately leaving school, but it’s certainly within the half an hour.”

How are Funds Being Raised?

The types of on-campus food and beverage-related fundraising activities that have been used to generate revenue for schools and associated clubs and student groups vary considerably across schools and districts. However, nearly all respondents spontaneously mentioned the broader topic of the Healthy, Hunger-Free Kids Act (HHFKA) and the ensuing changes to school meals and à la carte lines, as well as other venues where foods and beverages had been sold on campus such as vending machines and student-led stores. Although the topic of the current project is fundraising, it is impossible to adequately address this topic without considering the broader policy actions stemming from HHFKA and Smart Snacks standards, such as the change in revenues from implementing other elements of Smart Snacks (e.g., in vending machines, school stores, and snack bars), and all stakeholders perceived these issues as inextricably related.

Vending machines

Vending machine changes as a result of Smart Snacks standards—and, in some cases, pre-existing state laws or other policies—have certainly impacted revenues. In many cases, however, these changes long preceded Smart Snacks. Several principals described decreases of 30 to 40 thousand dollars in vending revenues per year from the early 2000s to the current school year. This represented a substantial portion of the discretionary funds available to school leadership. As one principal noted:

“In the aspect of finances and fundraisers, the biggest um, I guess, the ‘pot of money’ that at the high school we had to use for whatever, for whatever we wanted, was not tagged for any one particular thing, was what we called it ‘vending money.’ It was the school’s share of the food that was sold in the vending machine.”

Principals were aware of drops in their discretionary funds from vending. However, none mentioned concern for the financial implications that vending might have on the school meal program (e.g., lowered meal participation rates due to students spending lunch money at vending machines instead of the school lunch line). Furthermore, other research has found that there can actually be increases in vending revenues as a result of switching to healthier products in vending machines.²⁴ Indeed, several of the stakeholders interviewed for this project indicated that students seemed willing to purchase bottled water and healthier beverages from vending machines, although hard data were not available on sales volumes by product type.

School stores

School stores have also been impacted by Smart Snacks standards. One FSD described how the student-run store in one of the high schools previously sold large candy bars and other items that were not compliant. At that school there was an estimated 90 percent drop in revenue the first year of Smart Snacks, and many replacements have not sold well in the short-term. However, as of the time of the interview, revenues were up again, although only back to about 30 percent of where they were in terms of revenue prior to Smart Snacks. At several high schools, stakeholders indicated that student-run school stores or snack bars regularly sell coffee drinks, and there has been a learning curve because of limits on sweeteners and milk/creamers. Because Smart Snacks standards for these venues are still quite new, there is much learning still occurring in terms of how to meet the standards while also providing products that students enjoy and will continue to purchase.

Other foods at meals and after school

The sale of foods (most often pizza—either brand name or from local restaurants) in the cafeteria at lunchtime was another common fundraiser. Although the amounts varied considerably based on school size and other factors, it was often a noticeable loss in terms of revenue. As one principal described:

“Our 5th graders were the ones that sold [fast food] in our school and that was one of their main sources of fundraising. They did it once a week, or once every other week. Um, so they didn't do it as much as some of the other schools did, but they would bring in, probably, \$400 every time they sold it.” That was their profit...we're not a large school by any means. So imagine that at a high school, you know, thousands of students, um, and staff, you know, a lot more staff as well. And they would do it, you know, they would do it weekly, if not multiple times a week.”

Another principal described a similar change:

“What this school has done historically is there used to be [brand-name] pizza every Friday after school, and a different team of teachers would sell it, and that would be their fundraiser for field trips for the year. All of that has stopped.”

In several elementary schools, fundraising approaches involved the sale of popcorn during lunch or after the school day. In some cases, these schools had switched to Smart Snacks compliant products, whereas others had discontinued the popcorn. This was the case at a school where the popcorn had been donated by a local movie theater but was not Smart Snacks compliant, so those proceeds had been sacrificed. However, one respondent indicated that the popcorn sales revenue was quite minimal:

“We had a couple of elementary schools that did popcorn sales once a week to the kids. It's really not even like that was even that big of a fundraiser, as much as just covering their costs.”

In many cases, respondents also perceived that candy-related sales on campus yield very little money in the grand scheme of things. A superintendent who is attempting to transition to community-wide physical activity-related fundraising events remarked:

“It’s low hanging fruit, and it doesn’t really generate very much money. And it seems like we have kids spending time trying to sell a candy bar, to make 50 cents, and you have the same people being asked to buy a candy bar. And it does not generate the revenue that you would hope that it would. Whereas what we hear from people is that they would be a lot happier and a lot more willing to contribute to a cause that was effective-based, and that’s what we would...that’s what we’re hoping to do.”

District-Level Child Nutrition Professionals are Trapped in the Middle

Almost universally, all district FSDs indicated concerns about their role with regard to monitoring and enforcement of these new policies. For most, this was not a role that they wanted, and many noted that it simply is not possible given the size of their district and the responsibilities already involved in running a food service program. As an FSD noted:

“It’s like we would have to be the food police, going out, picking out what everyone is doing, but that’s impossible.”

Although most FSDs were already having conversations with building-level leaders about other elements of Smart Snacks (e.g., school stores), fundraisers have extended the conversations to an area of school practice that goes beyond meals and nutrition and impacts school finance. Some FSDs were stridently resentful of having to implement such rules and felt that the government—at any level—had no business specifying nutritional standards for schools. However, the majority of FSDs were highly committed to child nutrition and wanted to help improve fundraising practices. Nevertheless, many raised concerns about the challenges of being put in the role of enforcer for fundraising, which adds considerably to the scope of their role.

For example, many FSDs raised concerns regarding their state-level administrative reviews and the fact that they can be held accountable for non-compliance if fundraising violations are found. FSDs want to avoid findings of non-compliance as this can potentially result in penalties or financial losses for their programs, but they have often had very little leverage or ability to change building-level practices outside of the cafeteria. Moreover being placed in the role of “watchdog” can jeopardize their collaborations with schools.

As one FSD explained:

“There are times that I still kind of feel that way [being the food police] a little bit. Unfortunately, the accountability piece for the wellness policy and for keeping—even though it’s posted on our website, and there’s a link on school nutrition that specifically goes to that to make sure that it’s out there—we still haven’t really probably communicated that as well as we should. When those little issues come up, then I do tend to have to play that role a little bit. I try to do it diplomatically.”

School-level leaders are also cognizant of the importance of collaborating with the district's food service department. A principal described the importance of a healthy working relationship with the FSD:

“One thing is, I’ve always had good relationships with our food service people, and so we always worked together, and I think that’s a biggie... the district food service person who’s in charge of making sure everyone is in compliance... ultimately it’s the principal and the district superintendent, but it is still the food service people that are supposed to monitor it... so I think there’s definitely that relationship-building, that has to come about. Because if you’re in direct conflict or competition with them you’re going to have a hard time.”

As this last quote shows so clearly, when FSDs are seen as the monitors, it can damage collaboration.

That said, however, several stakeholders used the phrase “toothless” to describe the policy, meaning that there are relatively minimal consequences of non-compliance. Some FSDs noted that if they are to be responsible for this aspect of Smart Snacks, it would sometimes help to have more leverage with principals who are highly resistant. The choice of whether to rely on enforcement consequences versus positively-motivated collaboration is clearly dependent on the specific context of the school and the school-level leaders, and is something that could be addressed via local wellness policies moving forward. Having the discretion as to whether to use incentives or consequences may prove to be a useful tool for FSDs. Nevertheless, it is also important to note that fundraising is typically a school-level practice, but the responsibility for providing guidance, oversight and/or enforcement falls to the district's food service program, creating a disconnect between these administrative levels in educational systems.

Implementation Champions: It Takes Courage and Commitment to Do the Right Thing

Research in the field of implementation science has unambiguously demonstrated the importance of leadership in “making change happen.” As noted elsewhere,¹⁹ leadership can come from individuals in many roles, with varying degrees of effectiveness. Opinion leaders can help to exert influence because of their status, authority, and credibility. External change agents can help through providing technical assistance and expertise. However, to truly make change happen, it seems that *champions* are needed. Much evidence supports the truism that an intervention ‘either finds a champion or dies.’^{17,25} As noted by Damschroeder and colleagues, champions actively work to overcome the resistance that an intervention can create as it is being introduced to an organization, and a defining characteristic of champions is “their willingness to risk informal status and reputation because they believe so strongly in the intervention.”^{19,26}

This was clearly the case in the current project, whereby many schools appeared to be successful in implementing healthier practices, in some cases despite some significant pushback from students, parents, and other stakeholders, because there was a champion in place. As one school-level stakeholder who was the leader of the student group running the school store noted:

“Believe me I’m not a popular person with the kids (laughs). It’s like, ‘What happened to this?’ And I’m like, ‘No, you guys, you can’t...get rid of that whipped cream...’”

One principal described the factors associated with school successes:

“So, I’d probably say it’s multi...a multi-pronged approach, I think. We did that, and it was also being reinforced by those advocacy groups that are in the schools. And then you had a wellness champion in every school who really believed in wellness, and was also communicating it with whoever is best communicating at their individual school... that would probably be the best thing.”

School-Level Leadership from Administrators is Essential

Many of the decisions about whether to implement healthier strategies occur at “the building level”—that is, at the school site. A key theme that emerged from these interviews was the crucial impact of school-level leadership from the principal in establishing healthy fundraising practices. School principals need not be the implementation champions themselves, but their support for the champion—and for the cause—is essential. As the building-level leader, the principal holds the power to make executive decisions about which fundraisers will or will not be allowed during the school day. Parent organizations such as parent-teacher-organizations (whether affiliated or not with national groups such as the PTA), booster clubs, and “room parents” at the classroom level sometimes have autonomy in planning fundraising activities that occur off campus. But events held on campus and during the school day typically are approved by the administration.

Sometimes it is difficult to pass up financially lucrative arrangements, but a strong commitment from the school principal can make the difference. One principal described the decision not to allow fast food sales on campus even though it could have been allowable as a fundraiser.

“My PTO president had spoken with one of the representatives there [at a fast food restaurant] who offered [food item] to sell in the morning to our parents as they were leaving for work, and she asked me...it would have been a profit-maker for her, but I just felt like that was kind of opposed to our school nutrition program. And in addition to that, for drop off and the congestion that it might have created, and so I said no. And she was good with that. She understood. We work very closely together to really find out what’s best for our kids in our setting.”

Several principals echoed these sentiments about the importance of leadership, and how their personal values align with their commitment to student wellness. For example, one principal described the switch to a physical-activity based fundraising strategy:

“I think it's worth doing, but I have a biased opinion because I already believe in being healthy, you know what I'm saying? I don't think we should sacrifice by giving our kids sodas to make a little money. I think you should find a different way.”

School administrators also need support from above—that is, from their district administrators and their school boards. A champion principal at a school that already had strong nutrition standards noted that the state’s interpretation of Smart Snacks was more lenient than the current school policy, which created a risk of backsliding, but:

“...[the superintendent] allowed me to go ahead and really update our board wellness policy to have the language in it that said there'd be no exempted food fundraisers on campus during the school day as defined by Smart Snacks. The board approved it and was very supportive of it, and basically said when it was presented to the school board, they're like, 'We're absolutely not going to take a step back!'”

Clear Guidance is Still Needed

Guiding frameworks from the field of implementation science¹⁹ highlight the three key elements that are essential for an organization to be ready for implementation success: 1) leadership engagement (commitment, involvement, and accountability) at many levels; 2) available resources (including money, training, education, and time); and 3) access to information and knowledge. The current study found all elements to be crucial for success. With regard to training resources and access to information, principals and FSDs indicated that there is still much to be learned about the Smart Snacks rules and what can be done for fundraising. As described by a principal:

“There's been, I think, a fair amount of confusion on if fundraisers that are not, um, consumed on campuses - if those are forbidden - which they are not - um, but you know if you're selling cookie dough and it's not consumed on campus it's just flowing through the campus, is that forbidden? Or do you have to use an exemption for that? And if it's okay today, is there a round two or round three [of policy] that is going to take that away? So I would say there is still a fair amount of confusion about that.”

Many state-level respondents also recognized that this has been an evolving process, with questions at many levels. Assistance to district FSDs as well as building-level stakeholders has been ongoing, and having additional guidance from the USDA has been helpful. However, having documents that can be distributed to schools, and the professional sharing of lessons learned will be crucial. As a state-level director in an exemption state explained:

I think we're going to be learning a lot this year... we're making a lot of notes and as we, when we rewrite this, these are thing that we're going to have to address, whether it's in

FAQ or some other method, but as we work through these weird situations, we're going to have to keep refining this."

How Many Exemptions? There is Not a Clear Consensus, but there are Benefits to Zero-Exemption Policies

With the patchwork of state policies regarding school fundraisers, it could be tempting to conclude that uniform standards might simplify the school fundraising landscape. However, the very goal of this provision of HHFKA was to allow state-level agencies the freedom to develop policies that work best for their local context. Indeed, a phrase that was heard several times during this project was "local control," as respondents articulated the importance of considering local norms and preferences while establishing a policy. This approach is well-aligned with lessons learned in program implementation. As implementation scientists have noted, "without adaptation, interventions usually come to a setting as a poor fit, resisted by individuals who will be affected by the intervention, and requiring an active process to engage individuals in order to accomplish implementation."¹⁹ The option for local control has allowed each state some measure of adaptation for this policy intervention.

In setting the state-level policy, many state agencies engaged in informed decision-making through consultation with FSDs, principals, parents, and health advocates. A few states have been very lenient in their interpretation of what constitutes "occasional" fundraising, but those states are the exception rather than the norm. At this point, 21 states have adopted zero-exemption policies, and many others have attempted to establish a balanced approach to fundraising.

One issue considered in analysis of these data is whether schools in zero-exemption states are "doing better" than schools in exemption states. With the limited sample size, it is impossible to make such broad generalizations with any validity, but it seems safe to say that there are many schools in exemption states that are minimizing exempt fundraisers although it is not required; and, conversely, there are many schools in zero-exemption states that should have—but have not—implemented healthier practices.

Although there is some confusion about the standards in exemption states, there has also been confusion in zero-exemption states—on many of the same topics (e.g., timing, location, distribution of candy at school for sale off campus). However, there do appear to be some benefits to zero-exemption policies, in terms of the clarity of the rules; although such policies may be harder to actually implement at the school level in terms of compliance, the *process* of implementation itself may be simplified.

The process of developing the state-level policies provided information on stakeholder preferences, with several state directors indicating that they had consulted with district food service directors either formally, such as through a survey, or informally through conversations.

Several respondents described the potential benefit of a zero-exemption policy, in terms of not having to decide how to allocate coveted exemptions:

“One of the complaints was if you set it at two per week how does someone choose who gets those two coveted slots? You have to choose this group this week and that group next week. And, how do you keep it fair and all of those types of questions. When it was zero, it was fair across the board.”

Some respondents perceived that there is also support among school administrators for a zero-exemption policy. As a state-level respondent in a state that does allow exemptions noted:

“There are a lot of administrators, who, I hear from them... ‘I’d rather there weren’t fundraisers because, you know, they’re disruptive during the school day.’ So I think there’s a lot of support for limiting food fundraisers.”

However, there were also several respondents who perceived strong advantages to having some exemptions. In one state that had previously did not allow any exemptions, but now does, a stakeholder indicated that schools had initially struggled to adjust to the limits. When asked whether it was likely that some schools would continue to use food-related fundraising, the respondent replied:

“...(hesitantly) ummm... yes. I think that they will, I think that some never stop. So, my hope is by having a way to be compliant that since maybe they weren’t before, maybe now they will comply with the allowed number. I mean, my hope is that’s the silver lining... yes, maybe they have a couple. But maybe they limit it, where before it was like ‘in for a penny, in for a pound, if we’re going to break the rules.’ ”

Some reactions were mixed. In a state where the policy was restrictive but has changed and now allows some exemptions, a respondent indicated:

“It’s an even spread across the board. Some are going, ‘Yay! We can do this again!’ and even misunderstanding and thinking they can do more than they really can and then we have to educate them. Then the other ones are like, ‘No! Why are you all doing this? This is a terrible health decision.’ ”

CONCLUSIONS AND PRACTICAL APPLICATIONS

Given the detrimental effects of junk food on children’s health and academic outcomes, efforts to reduce exposure to empty calories during the school day via Smart Snacks standards have enormous potential to benefit students. This project sought to understand more about potential changes in school fundraising practices in the early phase of this policy intervention. Several key themes emerged, regarding next steps and areas for continued action. One key conclusion is that this is still a new intervention, and it is crucial that sufficient time be allowed for the implementation of Smart Snacks standards, without jumping to premature conclusions about the value or feasibility of such changes.

The Good News: Many Schools and Organizations are Successfully Adjusting

Although fundraising changes have been challenging, there is considerable good news, and many schools have successfully been able to shift to other strategies and raise substantial amounts of money with non-food-related fundraising. Although the amount of money raised through these approaches varies widely depending on school and community factors (e.g., socioeconomics, school size, amount of volunteer engagement), in some cases the revenues are quite substantial, and there are additional non-financial benefits such as community engagement and connectedness. What works at one school may not work elsewhere, but as success stories accumulate, viable alternatives can be implemented. As one principal noted:

“I think first year is always the worst, so as years have gone by, the disgruntlement of the whole thing has decreased. But, as a whole, we're definitely trying to be creative now in how we have to do certain kinds of fundraisers, if we even do them at all.”

Additional Fundraising Resources

United States Department of Agriculture

Includes multiple links to a variety of resources developed by national, state, and municipal agencies:

<http://healthymeals.nal.usda.gov/healthyfundraising>

Alliance for a Healthier Generation

Multiple resources:

https://www.healthiergeneration.org/take_action/schools/snacks_and_beverages/fundraisers/

Center for Science in the Public Interest

Fact Sheet: <http://www.cspinet.org/nutritionpolicy/fundraiserfactsheet.pdf>

Sweet Deals: School Fundraising Can Be Healthy and Profitable:

<http://www.cspinet.org/new/pdf/schoolfundraising.pdf>

Sweet Deals, Summary: http://cspinet.org/new/pdf/sweet_deals_one-pager.pdf

Eat Smart Move More NC

Toolkit for Healthier Fundraising:

<http://www.eatsmartmovemorenc.com/SchoolFundraisingTIkt/SchoolFundraisingTIkt.html>

National PTA

Overview of strategies: <http://www.pta.org/fundraising>

Food Service Departments can be Allies but Not Enforcers

A clear message in these interviews was that food service professionals at the district level are trapped in the middle. In many cases, they have neither the capacity nor the desire to be the enforcers of policies involving fundraising. In larger districts it is simply not possible to monitor all schools, and in smaller districts it jeopardizes collaborative relationships if the FSD is tasked with enforcement and imposing penalties. While a few FSDs were philosophically opposed to any policy intervention, the clear majority of these stakeholders were highly committed to

doing the right thing for students, including minimizing unhealthy fundraising practices. Empowering FSDs to provide technical assistance and support to school-level champions will likely be more productive than tasking these individuals with enforcement, or penalizing an entire district's food service program if some building-level non-compliance is found during administrative review.

Policy Monitoring, Evaluation, and Reporting

In zero-exemption states, there is no need for reporting on fundraising exemptions. But in exemption states, various approaches have been used to track how those exemptions are applied. In most cases, the principal is responsible for tracking building-level allocation of exemption days. This adds to an already long list of responsibilities for administrators, and may be best delegated to another stakeholder who is engaged in school wellness activities. Given the overlap between fundraising monitoring and other elements of wellness policy monitoring, there are likely to be good synergies by having one person at the school level designated to monitor all such practices. As USDA finalizes the revised local wellness policy guidelines, it is likely that additional components regarding monitoring and reporting will be included. This is likely to be a crucial element in promoting policy implementation at the building level. However, schools must have the freedom to identify the right person to be the local-level champion and policy monitor. Most FSDs indicated that they are committed to student wellness, but have limited resources for activities beyond the basic scope of their responsibilities. Therefore, creating and sustaining collaborative groups that include district-level FSDs as well as building-level stakeholders will continue to be valuable. In very large districts, area/regional subcommittees may be needed.

Limitations of This Work and Directions for Future Studies

This study was inherently limited by the controversial nature of the topic, which often provokes strong opinions about food, “time-honored traditions” such as bake sales, the role of government regulation, and school finance. With the intent of this study focused on obtaining information about both implementation successes *and* failures, it was deemed to be more important to protect respondent confidentiality than to share information that may help to generalize results to other school settings. Nevertheless, we heard many respondents say that they need specific guidance—and in some cases, more-intensive support—to be successful in transitioning to non-food fundraisers. Some respondents indicated that trying to make the shift involved learning a lot of tough lessons along the way about what *didn't* work, in terms of fundraising. Detailed and identifiable case studies of success stories would be helpful for school administrators, teachers, and parent/student groups to learn more about the *what* and *how to* of successful non-food fundraising. In addition, students are a key stakeholder group that should be involved in studies of fundraising practices, particularly the leaders of student groups at the middle-school and high-school level; due to limitation in scope and human subjects restrictions, students were not included as stakeholders in this project. A diversity of stakeholders (e.g., parent PTO leaders, teachers, school administrators, and district-level

administrators and food service directors) were deliberately included in this small-scale study, but larger studies with homogeneous samples of stakeholders would allow for more confidence that the sentiments reflected here are common among each of those groups.

What's Needed Next

Several respondents indicated that the *process* of roll-out for Smart Snacks and associated fundraising limits could have been done better, and marketed better to K-12 educators. Message-testing would be helpful to identify the arguments that are most effective in promoting changes in fundraising practices; however, emphasizing the academic benefits of good nutrition may help to maximize the value to educators. As noted above, additional guidance from state agencies will be useful in helping school-level stakeholders develop fundraising strategies that balance student health and financial considerations. State agencies, advocates, and parent/community groups need to remain aware of potential workarounds such as regularly selling sugary items as being “for parents,” when the real intent is for them to be given to students, and the ways in which such strategies counteract the “spirit of the law” and compromise student health. Engaging school-level perspectives in decision-making at the district and state levels also appears to be crucial for helping to consider a variety of issues relevant for policy changes in educational settings. Finally, families and community members must be engaged in efforts to improve children’s health, not only in the school setting, but also during out of school time.

Overall, the lessons learned from this project are highly consistent with lessons learned from implementation of many other types of interventions—whether policy or programmatic interventions—that time, patience, champions, and collaboration across multiple levels are all key elements to success.

REFERENCES

1. Institute of Medicine. *Accelerating Progress in Obesity Prevention: Solving the Weight of the Nation*. Washington, DC: National Academies Press; 2012.
2. Briefel RR, Wilson A, Gleason PM. Consumption of low-nutrient, energy-dense foods and beverages at school, home, and other locations among school lunch participants and nonparticipants. *Journal of the American Dietetic Association* 2009;109(2):S79-S90.
3. Poti JM, Slining MM, Popkin B. Solid fat and added sugar intake among US children: the role of stores, schools, and fast food, 1994-2010. *American Journal of Preventive Medicine* 2013;45(5):551-559.
4. Sanchez-Vaznaugh EV, Sanchez BN, Baek J, Crawford PB. 'Competitive' food and beverage policies: are they influencing childhood overweight trends? *Health Affairs* 2010;29(3):436-446.
5. Taber DR, Chriqui JF, Perna FM, Powell LM, Chaloupka FJ. Weight status among adolescents in states that govern competitive food nutrition content. *Pediatrics* 2012;130(3):437-444.
6. Taber DR, Chriqui JF, Powell L, Chaloupka FJ. Association between state laws governing school meal nutrition content and student weight status: implications for new USDA school meal standards. *JAMA Pediatrics* 2013;167(6):513-519.
7. Fox MK, Gordon A, Nogales R, Wilson A. Availability and consumption of competitive foods in US public schools. *Journal of the American Dietetic Association* 2009;109(2:Suppl):S57-S66.
8. Caparosa SL, Shordon M, Santos AT, Pomichowski ME, Dzewaltowski DA, Coleman KJ. Fundraising, celebrations, and classroom rewards are substantial sources of unhealthy foods and beverages on public school campuses. *Public Health Nutrition* 2013;17(6):1205-1213.
9. O'Toole TP, Anderson S, Miller C, Guthrie J. Nutrition services and foods and beverages available at school: results from the School Health Policies and Programs Study 2006. *Journal of School Health* 2007;77(8):500-521.
10. U.S. Department of Agriculture and U.S. Department of Health and Human Services. *Dietary Guidelines for Americans 2010*. 7th ed. Washington, D.C.: U.S. Government Printing Office, 2010.
11. Kubik MY, Lytle LA, Story M. Schoolwide food practices are associated with body mass index in middle school students. *Archives of Pediatrics & Adolescent Medicine* 2005;159(12):1111-1114.
12. Chriqui JF, Resnick EA, Schneider L, et al. *School District Wellness Policies: Evaluating Progress and Potential for Improving Children's Health Five Years after the Federal Mandate. School Years 2006-07 through 2010-11*. Volume 3. Chicago, IL: Bridging the Gap Program, Health Policy Center, Institute for Health Research and Policy, University of Illinois at Chicago; 2013.
13. U.S. Department of Agriculture, Food and Nutrition Service. 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. *Federal Register* 2013;78(125):39067-39120.
14. National Association of State Boards of Education. *State School Health Policy Database*. 2015. Available at: http://www.nasbe.org/healthy_schools/hs/bytopics.php?topicid=3115
 15. Piekarcz E, Chriqui JF, Lin W. *Smart Snacks Fundraiser Exemptions*. Chicago, IL: National Wellness Policy Study, Institute for Health Research and Policy, University of Illinois at Chicago; 2015 (forthcoming online).
 16. Maxwell JA. 1996. *Qualitative Research Design: An Interactive Approach*. Thousand Oaks, CA: Sage.
 17. Guba EG, Lincoln YS. 1989. *Fourth Generation Evaluation*. Newbury Park, CA: Sage.
 18. Miles MB, Huberman AM. 1994. *Qualitative Data Analysis: An Expanded Sourcebook* (2nd edition). Thousand Oaks CA: Sage.
 19. Damschroeder LJ, Aron DC, Keith RE, Kirsch SR, Alexander JA, Lowery JC. Fostering implementation of health services research findings into practice: a consolidated framework for advancing implementation science. *Implementation Science* 2009;4:50.
 20. Turner L, Chriqui JF, Chaloupka FJ. Healthier fundraising in US elementary schools: associations between policies at the state, district, and school levels. *PLoS ONE* 2012;7(11):e49890.
 21. Kids Safe and Healthful Foods Project. *Health Impact Assessment: National Nutrition Standards for Snack and a la Carte Foods and Beverages Sold in Schools*. 2012. 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>
 22. US Department of Health and Human Services, Centers for Disease Control and Prevention. *Results from the School Health Policies and Practices Study 2014*. 2015. Available at: http://www.cdc.gov/healthyyouth/data/shpps/pdf/shpps-508-final_101315.pdf
 23. United States Department of Agriculture. *Smart Snacks Nutrition Standards and Exempt Fundraisers*. April 17, 2014. Available at: <http://www.fns.usda.gov/healthierschoolday/tools-schools-focusing-smart-snacks>
 24. Brown DM, Tammineni, SK. Managing sales of beverages in schools to preserve profits and improve children's nutrition intake in 15 Mississippi schools. *Journal of the American Dietetic Association* 2009;109(12):2036–2042.
 25. Schon DA. Champions for radical new inventions. *Harvard Business Review* 1963;41:77-86.
 26. Maidique MA. Entrepreneurs, champions and technological innovation. *Sloan Management Review* 1980;21:59-76.
 27. Rollnick S, Miller WR. What is motivational interviewing? *Behavioural and Cognitive Psychotherapy* 1995;23:325-334.

APPENDICES:

Appendix A: Project Methods

Appendix B: States Sampled

Appendix C: Summary of Interview Groups

Appendix A: Project Methods

Case Selection

We used a three-stage sampling procedure, first identifying states, then districts within those states, and then schools within those districts. Using the map shown in Figure 1, we targeted several zero-exemption states and several exemption states, with the latter varying widely in the number of exemptions allowed. We leveraged our professional and personal connections to request interviews with representatives at each of these states’ child nutrition departments, and conducted interviews with either the director or other staffer(s) responsible for supervising the fundraiser exemption decision-making process. The state-level interviews provided background context and information for understanding state policy provisions. Three states and the District of Columbia were included in the “zero-exemption” grouping, and five states were included in the “exemption” group. Appendix A shows the states in which state-level interviews were conducted for this project.

During state-level interviews, we asked respondents to suggest a few districts known to have had successes or challenges implementing Smart Snacks fundraising provisions. Many respondents expressed concern about nominating ‘struggling’ districts, so we used additional approaches, including media searches and personal communications with local contacts known to the researchers. After identifying districts, recruitment emails were sent to the FSD. After completion of FSD interviews, we turned to recruitment of school-level respondents in those districts. A total of 37 interviews were conducted between September and November of 2015 (see Figure 2). Participants included a diversity of stakeholders, such as district-level leadership (superintendents, area directors, business managers), district FSDs, building-level leaders (principals, leaders of student clubs), and parents or leaders of local, regional, or state-level PTAs. Interviews with three state/regional PTA leaders provided additional contextual information relevant to this project. Appendix B shows connections among interviewed stakeholders within districts.

Figure 2: Number of interviews, by stakeholder type

Stakeholder	Number of Interviews
STATE LEVEL	
State Child Nutrition Director	9
DISTRICT LEVEL	
SFA/District Food Service Director	11
Superintendent/Director	3
BUILDING-LEVEL	
Principal	6
Teacher/Staff	3
Parent/PTA	2
OTHER KEY STAKEHOLDERS	
State/Regional PTA	3
TOTAL	37

Although we initially intended to prepare case studies of identifiable school districts, it quickly became evident that fundraising is a polarizing topic, and many respondents expressed concerns about being publicly identified. This made recruitment challenging. Therefore, we guaranteed confidentiality to district and school-level participants. This allowed for more candid disclosure of information that was valuable for understanding policy implementation; although this comes with the trade-off of a lessened ability to describe local contextual factors (which may risk re-identification of districts), obtaining candid information and protecting respondent identity was held to be paramount.

The resulting sample included a number of schools and districts experiencing success with Smart Snacks implementation, as well as some facing challenges. Participants represented states in the Northwest, Midwest, Southwest, and Southeast; elementary, middle, and high schools; private and charter schools; highly rural to highly urban settings; very small and very large districts; and a wide range of student socio-demographic characteristics. All schools participated in USDA meals programs and are subject to Smart Snacks standards. Because fundraising practices tend to vary considerably across elementary and secondary school levels—with elementary fundraising coordinated by parents, and secondary fundraising often led by student groups—efforts were made to interview parent leaders at the elementary level, as well as student club leaders (teachers) at the secondary level. Study participants presented a rich diversity of opinions and experiences, which offer many insights into the policy implementation process.

The Interviews

This study was approved under expedited review by the Institutional Review Board at Boise State University. A waiver of written documentation of informed consent was approved, with the elements of consent to be covered prior to beginning the interviews. All interviewees gave verbal consent to participate and to have the interview audiotaped. Participants were informed that neither their name nor the name of their relevant school, district, and/or organization, would ever be publicly released.

All interviews were conducted by the principal investigator, who was trained as a clinician and has several years of experience with formal interviewing protocols. The interviewer relied on techniques from an interactional style used in motivational interviewing²⁷ which is a non-directive technique designed to elicit information about sensitive topics through a non-judgmental client-centered stance. Key strategies involved are: Open-ended questions; Affirmations and acceptance; Reflective statements; and Summaries (OARS). Together, the OARS strategies can create a non-judgmental setting which allows for the interviewer to elicit information that may, in other circumstances, remain unstated due to participants' concerns about judgment or negative consequences. Indeed, this series of interviews was able to evoke unexpectedly candid acknowledgements about policy non-compliance, pushback, relationships with other key stakeholders, and needs for additional resources. Interviews were audiotaped, and then transcribed verbatim for coding.

Interview Questions

The semi-structured interview was designed to elicit information on several topics. The following questions were developed as a guide for the interview, but were not necessarily asked in this order, not were all respondents able/willing to provide responses to all questions:

Please can you tell me about the types of strategies that your school currently uses for fundraising?

PROBES:

- Bake sales, etc (on-site)
- Direct sales of products (door-to-door, etc.)
- Ice cream social/pizza night/etc (on-site)
- Sponsored nights at local restaurants
- Physical activity-related events (walk-a-thon, dance-a-thon, hoops challenges)

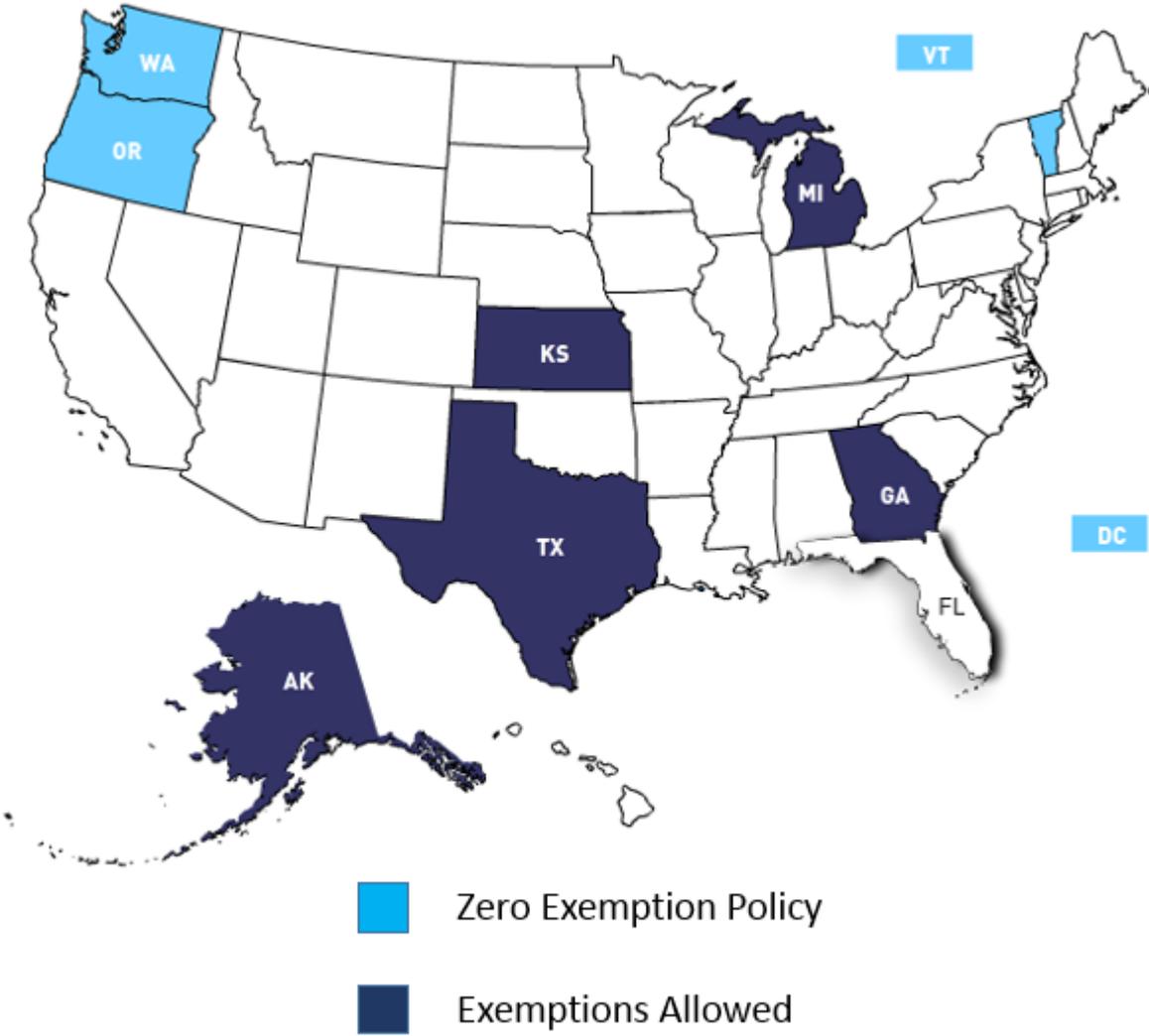
About how much revenue would you estimate is generated, overall, each year, from these strategies?

In what ways have your school fundraising strategies changed—if at all—in the past few years?

What types of reactions have you seen as a result of changes in fundraising practices? (complaints from parents/students, successes/accomplishments)

To what extent are other stakeholders involved in determining the types of strategies that your school/district uses for fundraising? (parents, students, teachers, community members)

Appendix B: States in which state-level interviews were conducted, and in which districts and school-level respondents were recruited.



Appendix C: Summary of interview groups and connections among stakeholders within school districts/systems (grey boxes indicate stakeholders within the same district/system), at both the district/system level, and the school/building level. The state in which each interview group was located is not indicated here, in order to protect confidentiality.

