Codebook for Assessing State Nutrition Policies for Competitive Foods in Schools
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Codebook for Assessing State Nutrition Policies for Competitive Foods in Schools

Purpose

This codebook describes and defines the variables used to analyze and code state policies for competitive foods in schools as described in the Competitive Foods and Beverages in U.S. Schools: A State Policy Analysis. It is based on the Institute of Medicine's (IOM's) Nutrition Standards for Foods in Schools: Leading the Way Toward Healthier Youth and was developed and piloted by researchers at the Centers for Disease Control and Prevention (CDC). Each of the 13 IOM Standards was divided into variables to reflect the complexity of the standard. For example, IOM Standard 1 is divided into 3 variables, and IOM Standard 7 is divided into 11 variables. This process weighted Standard 7 more heavily than the other standards because it encompasses the majority of standards related to the nutritional quality of competitive foods. The process resulted in 33 variables; 28 were applicable to elementary and middle schools, and 32 were applicable to high schools.

Each of the variables was defined and coded based on the following general rating system, similar to the coding methodology used elsewhere.

0 = Variable not mentioned in state policy or is not required.
1 = Variable is mentioned in the state policy, but only partially meets the variable definition or does not apply to entire school campus or entire school day, or only a certain percentage of foods or beverages are required to meet the variable definition.
2 = Variable is mentioned and fully meets or exceeds the variable definition and applies to the entire school campus and the entire school day, or competitive foods are banned.

For this codebook, the word policy is used as an umbrella term encompassing a state law, regulation, or state board of education policy.

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IOM Standard 1

Dietary Fat: Snacks, Foods, and Beverages Meet Criteria for Dietary Fat per Portion as Packaged

1. No more than 35% of total calories from fat.
   
   **Definition:** Does the policy require that snacks, foods, and beverages have no more than 35% calories for dietary fat per portion as packaged?

   **Rating:**
   0 – Dietary fat content of snacks, foods, and beverages is not mentioned.
   1 – Partially meets standard if meets either of the following:
   - Limiting total fat content is mentioned, but no percentage provided, or percentage exceeds 35% from total calories from fat.
   - Limits amount of total fat by grams, or cutoff is required.
   - Percentage or cutoff is 35% but does not apply to all 3 categories (snacks, foods, and beverages). (Note: If the policy has a separate list of allowable beverages but does not apply nutrient standards [e.g., fat, calories], and nutrient standard only applies to foods, code as 2.)
   2 – Yes, meets or exceeds the standard of no more than 35% of total calories from fat for snacks, foods, and beverages.

2. Less than 10% total calories from saturated fat.
   
   **Definition:** Does the policy require snacks, foods, and beverages to have less than 10% of calories from saturated fat per portion as packaged?

   **Rating:**
   0 – Saturated fat content of snacks, foods, and beverages is not mentioned.
   1 – Partially meets standard if meets any of the following:
   - Limiting saturated fat content is mentioned, but no percentage is provided.
   - Exceeds 10% total calories from saturated fat.
   - Combines saturated fat and trans fat limits.
   - Limits amount of saturated fat by grams.
   - Limits saturated fat content to 10% but does not apply to all 3 categories (snacks, foods, and beverages). (Note: If policy has separate list of allowable beverages but does not apply nutrient standards [e.g., fat, calories], and nutrient standard only applies to foods, then code as 2.)
   2 – Meets or exceeds the standard of less than 10% of total calories from saturated fat for snacks, foods, and beverages.

   
   **Definition:** Does the policy require snacks, foods, and beverages to have zero trans fat per portion (<0.5 g per portion) as packaged?

   **Rating:**
   0 – Trans fat content of snacks, foods, and beverages is not mentioned.
   1 – Partially meets standard if meets any of the following:
   - Combines trans fat and saturated fat limits.
   - Limits trans fat in snacks, foods, and beverages but not at the level recommended by standard.
• Limits trans fat to zero grams per portion as packaged but does not apply to all 3 categories (snacks, foods, and beverages). (Note: If policy has separate list of allowable beverages but does not apply nutrient standards (e.g., fat, calories) and nutrient standard only applies to foods, then code as 2).

2 – Meets the zero trans fat (<0.5 g per portion) standard for snacks, foods, and beverages.

IOM Standard 2

Added Sugars: Snacks, Foods, and Beverages Provide No More Than 35% Calories from Total Sugars per Portion as Packaged

Exceptions to this standard are
• 100% fruits and fruit juices in all forms without added sugars.
• 100% vegetables and vegetable juices without added sugars.
• Unflavored nonfat or low-fat milk and yogurt.
• Flavored nonfat or low-fat milk with no more than 22 g of total sugars per 8-oz serving.
• Flavored nonfat or low-fat yogurt with no more than 30 g of total sugars per 8-oz serving.

4. No more than 35% calories from total sugars.

Definition: Does the policy require that snacks, foods, and beverages have no more than 35% of calories from total sugars per portion as packaged?

Rating:
0 – Sugar content of snacks, foods, and beverages is not mentioned.
1 – Partially meets standard if meets any of the following:
• Policy encourages limiting snacks, foods, and beverages high in added sugars but does not specify limits.
• Limits by grams (g) of sugar.
• Limits to no more than 35% from total sugars by weight.
• Limits to no more than 35% calories from total sugars but does not apply to all 3 categories (snacks, foods, and beverages). (Note: If policy has separate list of allowable beverages but does not apply nutrient standards [e.g., fat, calories], and nutrient standard only applies to foods, then code as 2).

2 – Meets the no more than 35% calories from total sugars standard for snacks, foods, and beverages.

IOM Standard 3

Calorie Limits: Snack Items Are 200 Calories or Less per Portion as Packaged and à la Carte Entrée Items Do Not Exceed Calorie Limits on Comparable National School Lunch Program (NSLP) Items

5. 200 calories or less for snack items.

Definition: Does the policy require snack items to have a calorie limit of 200 calories or less per portion as packaged?

Rating:
0 – Calorie limit of snacks is not mentioned.
1 – Partially meets standard if meets either of the following:
• Calorie limit of snacks is mentioned but is more than 200 calories.
• Recommends portion sizes of snacks.
• Mentions offering lower calorie snacks per portion as packaged without indicating a specific calorie level. (Note: If policy has separate list of allowable beverages but does not apply nutrient standards [e.g., fat, calories], and nutrient standard only applies to foods, then code as 2).

2 – Meets the 200 total calories limit or less per portion as packaged standard for snack items as portioned.

6. Calories for à la carte entrée items.

Definition: Does the policy require that à la carte entrée items not exceed the calorie content of the NSLP entrée items they are replacing? (This applies to whole servings, not half servings.)

Rating
0 – Calorie limit of à la carte entrée items is not mentioned.
1 – Partially meets if total calorie content of à la carte entrée items is mentioned but exceeds calorie content of a comparable NSLP entrée item, or if no reference to comparable NSLP entrée item is made.
2 – Meets the requirement of à la carte entrée items by not exceeding the calorie content of comparable NSLP entrée items.

IOM Standard 4

Sodium: Snack Items Meet a Sodium Content Limit of 200 mg or Less per Portion as Packaged or 480 mg or Less per Entrée Portion as Served for à la Carte

7. 200 mg of sodium or less for snack items.

Definition: Does the policy require snack items to have a sodium limit of 200 mg or less per portion as packaged?

Rating:
0 – Sodium limit for snack foods is not mentioned.
1 – Partially meets standard if policy mentions reducing sodium content of snacks, with no recommended level or a recommended level higher than 200 mg.
2 – Meets the 200 mg or less sodium content standard for snack items.

8. 480 mg of sodium or less for à la carte entrée items.

Definition: Does the policy require à la carte items to have 480 mg of sodium or less per entrée portion?

Rating:
0 – Sodium limit for à la carte entrée items is not mentioned.
1 – Partially meets standard if policy mentions reducing sodium content of à la carte entrée items, with no recommended level or a recommended level higher than 480 mg.
2 – Meets the 480 mg or less sodium content standard for à la carte entrée items.
**IOM Standard 5**

**Nonnutritive Sweeteners: Beverages Containing Nonnutritive Sweeteners Are Only Allowed in High Schools After the End of the School Day**

9. **Beverages containing nonnutritive sweeteners prohibited.**

   *Definition:* Does the policy prohibit beverages containing nonnutritive sweeteners (e.g., aspartame) in high school during the school day?

   **Rating:**
   - 0 – Nonnutritive sweeteners in beverages is not mentioned.
   - 1 – Prohibits nonnutritive sweeteners in beverages in elementary and middle school during the day or high school during the day.
   - 2 – Prohibits nonnutritive sweeteners in beverages in elementary, middle, and high school during the day and prohibits nonnutritive sweeteners in beverages after school in elementary and middle or after school in high school.

**IOM Standard 6**

**Caffeine: Foods and Beverages Are Caffeine-Free with the Exception of Trace Amounts of Naturally Occurring Caffeine-Related Substances**

10. **Caffeinated foods and beverages prohibited.**

    *Definition:* Does the policy require foods and beverages to be caffeine-free?

    **Rating:**
    - 0 – Banning caffeinated beverages or foods is not mentioned.
    - 1 – Partially meets standard if either foods or beverages are required to be caffeine-free.
    - 2 – Meets standard by requiring foods and beverages to be caffeine-free.

**IOM Standard 7**

**Foods and Beverages Offered in Schools: Foods and Beverages Offered During the School Day Are Limited to Those in Tier 1**

11. **Fruits and vegetables.**

    *Definition:* Does the policy require or encourage foods offered during the school day to include fruits and vegetables?

    **Rating:**
    - 0 – Offering fruits and vegetables during the school day is not mentioned.
    - 2 – Meets standard of requiring or encouraging fruits and vegetables during the school day.

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*a Tier 1 foods, which are for all students, are fruits, vegetables, whole grains, and related combination products, and nonfat and low-fat dairy products that are limited to ≤200 calories per portion as packaged and ≤35% of total calories from fat, <10% of total calories from saturated fats, zero trans fat (≤0.5 g per serving), ≤35% of calories from total sugars, and ≤200 mg sodium. À la carte entrée items meet the same fat and sugar limits. Tier 1 beverages are water without flavoring, additives, or carbonation; low-fat and nonfat milk in 8-oz portions, including lactose-free and soy beverages and flavored milk with no more than 22 g of total sugars per 8-oz portion; 100% fruit juice in 4-oz portions as packaged for elementary/middle school and 8-oz portions for high school; and caffeine-free, with the exception of trace amounts of naturally occurring caffeine substances.*
12. Whole grains.
   **Definition:** Does the policy require or encourage foods offered during the school day to include whole grains?

   **Rating:**
   0 – Offering whole grains during the school day is not mentioned.
   2 – Meets standard of requiring or encouraging whole grains during the school day.

   **Definition:** Does the policy limiting foods offered during the school day include nonfat and low-fat (1%) dairy products?

   **Rating:**
   0 – Offering nonfat or low-fat dairy products during the school day is not mentioned.
   1 – Allows 2% milk fat or higher dairy products as well as nonfat or low-fat (1%) dairy products.
   2 – Meets standard of limiting dairy products to nonfat or low-fat (1%) during the school day.

14. 100% fruit and vegetable juice.
   **Definition:** Does the policy limiting beverages offered during the school day include 100% fruit and vegetable juices with the following maximum portion sizes: 4 oz in elementary and 8 oz in middle and high schools?

   **Rating:**
   0 – Offering 100% fruit and vegetable juice is not mentioned.
   1 – Partially meets standard if meets any of the following:
   • Offers 100% fruit and vegetable juice but with portion sizes that differ from standard.
   • Only applies to one category (100% fruit juice or 100% vegetable juice).
   • Offers less than 100% fruit or vegetable juice with no added sweeteners.
   2 – Meets standard by limiting beverages to 100% fruit and vegetable juice (4 oz in elementary and 8 oz in middle and high schools.)

15. Nonfat or low-fat milk.
   **Definition:** Does the policy limiting beverages offered during the school day include low-fat milk or nonfat milk (8-oz portions; includes lactose-free and soy milk)?

   **Rating:**
   0 – Low-fat or nonfat milk is not mentioned.
   1 – Partially meets standard if meets any of the following:
   • Low-fat or nonfat milk required but does not specify portion size or mentions a portion size that is higher than 8 oz.
   • Allows whole milk or 2% milk along with nonfat or low-fat milk.
   2 – Meets standard of requiring beverages to include low-fat milk or nonfat milk in 8-oz portions.

16. Flavored milk.
   **Definition:** Does the policy limit flavored milk to low-fat or nonfat with no more than 22 g of total sugars per 8-oz portion?

   **Rating:**
   0 – Flavored milk is not mentioned.
1 – Partially meets standard if meets any of the following:
   • Low-fat or nonfat flavored milk required but does not specify portion size.
   • Allows more than 22 g total sugars in flavored milk.
   • Total sugars in flavored milk not specified.
   • Mentions a portion size that is higher than 8 oz.
   • Allows 2% or whole milk along with nonfat or low-fat flavored milk.

2 – Meets standard by requiring flavored milk to be low-fat or nonfat with no more than 22 g total sugars in 8-oz portions or bans flavored milk.

17. Prohibits regular (sugar-sweetened) soda.
   **Definition:** Does the policy prohibit regular sugar-sweetened soda throughout the entire campus all day?

   **Rating:**
   0 – Regular sugar-sweetened soda is not mentioned.
   1 – Partially meets standard if meets any of the following:
      • Limits regular soda (policy may also refer to soda as FMNV\(^b\)) by time or place specifications (beyond minimum USDA requirement\(^c\)), or a certain percentage of beverages can be regular soda.
   2 – Prohibits regular soda or FMNV throughout the entire school day on the entire campus.

18. Prohibits other beverages (other than soda and sports drinks) that contain added caloric sweetener (e.g., other sugar-sweetened beverages), such as juice drinks, teas, or energy drinks.
   **Definition:** Does the policy prohibit other sugar-sweetened beverages (not including regular sugar-sweetened soda and sports drinks) throughout the entire campus all day?

   **Rating:**
   0 – Does not mention or allows beverages with added caloric sweeteners at all times or allows fruit juice/drinks with less than 50% juice with added sweetener.
   1 – Partially meets standard if meets any of the following:
      • Limits beverages with added caloric sweeteners by time, place, or specific items but does not prohibit them.
      • Allows or restricts a certain percentage of beverages with added caloric sweetener.
      • Allows fruit juice/drinks with at least 50% juice.
   2 – Prohibits other beverages that contain added caloric sweetener throughout the entire school day on the entire campus.

19. Prohibits foods of minimal nutritional value (FMNV) all day throughout the school campus.
   **Definition:** Does the policy exceed the minimum USDA requirements for FMNV?

   **Rating:**
   0 – Maintains current minimum USDA requirement for FMNV.

\(^b\) Foods of minimal nutritional value.
\(^c\) U.S. Department of Agriculture's (USDA's) current requirement (7 CFR Part 210) is that all foods of minimal nutritional value are prohibited from being sold during meal period in the school food service area.
1 – Partially meets standard if meets any of the following:
- Prohibits FMNV to a specific amount of time before and after school meals.
- Prohibits sale of FMNV in certain places but not throughout the entire school campus.
2 – Prohibits FMNV during the entire school day and throughout the entire school campus.

20. **Limits foods to Tier 1 foods only during the school day (i.e., fruits and vegetables, whole grains, related combination products, and nonfat or low-fat dairy products).**

*Definition:* Does the policy limit foods available during the school day to Tier 1 foods only?

**Rating:**
- 0 – Does not mention limiting foods to Tier 1 only.
- 1 – Partially meets standard if meets any of the following:
  - Limits foods to water, low-fat/nonfat milk, and 100% fruit juice but does not meet IOM portion size or fat criteria.
  - Allows water with flavoring/carbonation/additives.
  - Allows caffeine.
  - Allows less than 100% fruit juice without added sugars.
- 2 – Meets standard by limiting all foods on school campus to Tier 1 foods only (i.e., fruits and vegetables, whole grains, related combinations, and nonfat or low-fat dairy products).
  (Note: Must meet other Tier 1 food standards for fat, calories, sugar, and sodium).

21. **Limits beverages to Tier 1 beverages only during the school day (i.e., water, low-fat/nonfat milk, 100% fruit juice).**

*Definition:* Does the policy limit beverages available during the school day to Tier 1 beverages only?

**Rating:**
- 0 – Does not mention limiting beverages to Tier 1 only.
- 1 – Partially meets standard if meets any of the following:
  - Limits beverages to water, low-fat/nonfat milk, and 100% fruit juice but does not meet IOM portion size or fat criteria.
  - Allows water with flavoring/carbonation/additives.
  - Allows caffeine.
  - Allows less than 100% fruit juice without added sugars.
- 2 – Meets standard by limiting all beverages on school campus to Tier 1 beverages only (i.e., water, low-fat/nonfat milk, and 100% fruit juice.) (Note: Must meet other Tier 1 beverage standards for fat, sugar, nonnutritive sweetener, and caffeine.)

**IOM Standard 8**

**Foods and Beverages Offered in Schools: Plain, Potable Water Is Available Throughout the School Day at No Cost to Students**

22. **Availability of bottled, tap, or fountain water at no cost.**

*Definition:* Does the policy require the availability of water at no cost throughout the school day?

**Rating:**
- 0 – Does not mention availability of water (bottled, tap, or from a fountain) at no cost throughout the school day.
- 1 – Partially meets standard if availability of water is mentioned but does not specify at no cost throughout the school day.
- 2 – Meets standard of requiring availability of bottled, tap, or fountain water at no cost throughout the school day.
23. **Carbonated, fortified, or flavored waters.**

   **Definition:** Does the policy prohibit carbonated, fortified, or flavored waters throughout the school day?

   **Rating:**
   - 0 – Does not mention availability of carbonated, fortified, or flavored waters.
   - 1 – Partially meets standard if prohibits either carbonated, fortified, or flavored waters or does not specify the time (i.e., throughout the day).
   - 2 – Meets standard by prohibiting carbonated, fortified, or flavored waters throughout the school day.

**IOM Standard 9**

**Foods and Beverages Offered in Schools: Sports Drinks Are Not Available in the School Setting Except When Provided by the School for Student Athletes Participating in Sports Programs Involving Vigorous Activity of More Than 1 Hour’s Duration**

24. **Sports drinks prohibited.**

   **Definition:** Does the policy prohibit sports drinks in the school setting? (Note: Sports drinks can also be referred to as isotonics or in terms of calories [e.g., 88 calories/8 oz].)

   **Rating:**
   - 0 – Does not mention prohibiting sports drinks.
   - 2 – Meets standard by prohibiting sports drinks in the school setting or is not on the list of allowable beverages. Exception occurs when made available by the school/coaches for student athletes participating in sports programs involving vigorous activities.

**IOM Standard 10**

**Foods and Beverages Offered in Schools: Foods and Beverages Are Not Used as Rewards or Discipline for Academic Performance or Behavior**

25. **Food and beverages used as reward.**

   **Definition:** Does the policy prohibit use of foods and beverages as rewards for behavior or academic performance?

   **Rating:**
   - 0 – Does not mention prohibiting the use of foods and beverages as rewards for behavior or academic performance.
   - 2 – Prohibits the use of foods and beverages as rewards for behavior or academic performance.

26. **Food and beverages used as discipline.**

   **Definition:** Does the policy prohibit the use of foods and beverages as discipline for behavior or academic performance?

   **Rating:**
   - 0 – Does not mention prohibiting the use of foods and beverages as discipline for behavior or academic performance.
   - 2 – Prohibits the use of foods and beverages as discipline for behavior or academic performance.
IOM Standard 11

Foods and Beverages Offered in Schools: Minimize Marketing of Tier 2 Foods and Beverages in the High School Setting

27. Tier 2 foods in low student traffic areas.

Definition: Does the policy require minimizing or limiting the marketing of Tier 2 foods by locating Tier 2 food and beverage distribution in low student traffic areas in high school?

Rating:
0 – Does not mention minimizing marketing of Tier 2 foods by locating Tier 2 food and beverage distribution in low student traffic areas in high school.
1 – Partially meets if policy mentions minimizing marketing of Tier 2 foods in high school without reference to a particular strategy.
2 – Requires minimizing marketing of Tier 2 foods by locating Tier 2 food and beverage distribution in low student traffic areas in high school.


Definition: Does the policy require ensuring that the exteriors of vending machines do not depict commercial products or logos or suggest that consumption of vended items conveys a health or social benefit in high school?

Rating:
0 – Does not mention that the exteriors of vending machines do not depict commercial products or logos or suggest that consumption of vended items conveys a health or social benefit in high school.
1 – Prohibits vending machine displays for any product that is not water, milk, or 100% juice in high school.
2 – Requires ensuring that the exteriors of vending machines do not depict commercial products or logos or suggest that consumption of vended items conveys a health or social benefit in high school.

IOM Standard 12

Foods and Beverages Offered in the After-School Setting: Tier 1 Snack Items Are Allowed After School for Student Activities for Elementary and Middle Schools. Tier 1 and Tier 2 Snacks Are Allowed After School in High School

29. After-school snacks: elementary and middle schools meet Tier 1.

Definition: Does the policy allow Tier 1 snack items after school for student activities in elementary and middle schools?

Rating:
0 – Does not mention types of snack items allowed after school for elementary or middle schools.
1 – Mentions after-school food and beverage standards but does not fully meet Tier 1 standards in elementary and middle schools.

Tier 2 foods and beverages are any foods or beverages for high school students after school. Tier 2 snack foods are those that do not exceed 200 calories per portion as packaged and ≤35% of total calories from fat, <10% of total calories from saturated fats, zero trans fat (≤0.5 g per serving), ≤35% calories from total sugars, and a sodium content of ≤200 mg per portion as packaged. Tier 2 beverages are noncaffeinated, nonfortified beverages with <5 calories per portion as packaged, with or without nonnutritive sweeteners, carbonation, or flavoring.
2 – Meets standard by allowing Tier 1 snack items after school for student activities in elementary and middle schools.

30. After-school snacks: high school meets Tier 1 and Tier 2.

   **Definition:** Does the policy allow Tier 1 and Tier 2 snacks after school in high school?

   **Rating:**
   0 – Does not mention types of snack items allowed after school in high school.
   1 – Mentions after-school food and beverage standards for high school but does not fully meet Tier 1 or Tier 2 standards.
   2 – Meets standard by allowing Tier 1 and Tier 2 snack items after school in high school.

**IOM Standard 13**

Fund-Raising During the School Day and After School

31. For on-campus fund-raising activities during the school day, Tier 1 foods and beverages are allowed for elementary, middle, and high schools.

   **Definition:** Does the policy encourage Tier 1 foods and beverages to be sold during on-campus fund-raising activities in elementary, middle, and high schools?

   **Rating:**
   0 – Does not mention foods and beverages for on-campus fund-raising activities.
   1 – Partially meets if policy encourages on-campus fund-raising activities to be limited to either Tier 1 foods only or Tier 1 beverages only or does not meet all Tier 1 or Tier 2 standards.
   2 – Encourages foods and beverages sold during on-campus fund-raising activities to include Tier 1 foods and beverages.

32. Tier 2 foods and beverages after school in high school.

   **Definition:** Does the policy allow Tier 2 foods and beverages after school in high school?

   **Rating:**
   0 – Does not mention fund-raising of foods and beverages after school in high school.
   1 – Partially meets if policy encourages fund-raising of foods and beverages to either Tier 2 foods only or Tier 2 beverages only or does not fully meet all Tier 2 standards after school in high school.
   2 – Encourages fund-raising of Tier 2 foods and beverages after school in high school.

33. Evening and community activities that include adults.

   **Definition:** Does the policy encourage limiting the sale of foods and beverages to Tier 1 and Tier 2 foods and beverages during evening and community events that include adults?

   **Rating:**
   0 – Does not mention types of foods and beverages available for sale during evening and community activities or does not mention fund-raising for evening and community events that include adults.
   1 – Partially meets if policy encourages either sale or fund-raising of Tier 2 foods only or Tier 1 foods only for evening and community events, but may not meet all Tier 1 or Tier 2 standards.
   2 – Policy encourages limiting foods and beverages sold to Tier 1 and Tier 2 foods and beverages during evening and community events.