

P/PM 150's implementation in Ontario

**Food for thought:
P/PM 150's implementation in Ontario**

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Author's Declaration

I hereby declare that I am the sole author of this thesis. This is a true copy of the thesis, including any required final revisions, as accepted by my examiners. I understand that my thesis may be electronically available to the public.

Abstract

Educational ministries have sought to address the increasing obesity rates across the world and promote optimal childhood health, growth, and intellectual development, by implementing school nutrition policies. In 2011, the Government of Ontario (Ministry of Education) implemented in an initiative: the *School Food and Beverage Policy* (P/PM 150). Although P/PM 150 is well intentioned, there remains a gap between what this policy states and the way in which it is being executed – resulting in unplanned and unexpected outcomes. To examine this divide and have another perspective on P/PM 150’s execution, the following research question was addressed: How is Ontario’s *School Food and Beverage Policy* (P/PM 150) being implemented in secondary schools by school boards and the Ministry of Education? This qualitative case study therefore explores the implementation of P/PM 150 from the perspective of school board supervisory officers¹ in Ontario. Data collected from interviews as well as from P/PM 150 related content on the Ontario Ministry of Education, school board, and school websites/social media pages, were examined through a pragmatic lens.

Thematic coding (using NVivo 10) was employed to analyze the interview data, whereas document and content analyses were used to examine the online content. A second coder analyzed a sample of websites and interview transcripts to ensure inter-rater reliability. Upon examining the interview transcripts, seven main themes emerged: 1) supervisory officer roles; 2) the importance of communication; 3) monitoring strategies; 4) P/PM 150 barriers and facilitators; 5) the policy’s impact on pedagogy; 6) the P/PM 150 mindset; and 7) recommendations for promising practices. When analyzing the Ministry, school board, and individual school websites and social media pages, much of the content pertained to 1) the policy’s subject matter (i.e., its layout, the policy’s associated resources, etc.); 2) its administrative procedures; 3) the procedures’ and P/PM 150’s review processes; 4) the policy’s implementation process (e.g., training, monitoring, etc.); 5) promoting P/PM 150; and 6) the policy’s outcomes (e.g., nutrition education and partnerships). These findings may be of potential interest to the Government of Ontario (Ministry of Education), school boards, teachers, and policy designers in other sectors, such as health.

¹ Supervisory officers are P/PM 150 consultants/facilitators within a school board. Furthermore, supervisory officers are senior personnel of a school district that consist of assistant superintendents, superintendents, associate directors, and directors of education.

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Table of Contents

Author’s Declaration.....	ii
Abstract.....	iii
Acknowledgments.....	iv
Table of Contents.....	v
List of Figures & Tables.....	xiii
List of Acronyms.....	xiv
Chapter 1: Introduction.....	1
Educational Nutrition Policies.....	2
Relevance & Implications.....	5
Orientation of the Study.....	6
Chapter 2: Current Research.....	9
Body Mass Index (BMI) & Child Food Intake.....	9
Factors Influencing Child Food Intake.....	10
Socioeconomic Status.....	10
Diet & Physical Activity.....	11
Environments: Community, Home, School.....	11
School Food Consumption Programs.....	13
Policy Research & Development.....	14
Education Policy Research & Development.....	18
Policy Implementation Research.....	19
History of Policy Implementation Research.....	20
Theories & Frameworks of Policy Implementation Research.....	20
Education Policy Implementation.....	21
History of Education Policy Implementation.....	21
Theories & Frameworks of Education Policy Implementation.....	22
Analytical Framework.....	23
Effective Framework.....	25
Flexible & Actionable Framework.....	28
The Role of Supervisory Officers.....	31
School Nutrition Policies.....	33

International School Nutrition Policies.....	34
Australia & New Zealand.....	34
Europe.....	36
The United Kingdom.....	37
United States.....	38
Canadian School Nutrition Policies.....	40
NOURISHING Framework.....	40
Health Strategy & CSH Framework.....	41
The Provinces: Policy Content.....	43
New Brunswick.....	43
Prince Edward Island.....	44
British Columbia.....	44
Manitoba.....	44
Québec.....	45
Nova Scotia.....	45
Newfoundland and Labrador.....	46
Yukon.....	46
Northwest Territories.....	47
Nunavut.....	47
Alberta.....	48
Saskatchewan.....	49
Ontario: P/PM 150.....	50
Concluding Comments.....	52
Chapter 3: Implementation: P/PM 150 & Other School Nutrition Policies.....	54
P/PM 150’s Implementation.....	54
Theories & Frameworks.....	54
The Interactions.....	56
Monitoring its Implementation.....	56
Re-evaluating P/PM 150.....	58
School Nutrition Policy Implementation.....	58
Ontario Auditor General & Vending Machine Data.....	59

Supervisory Officers’ Perceptions of Nutrition Policies.....	59
Student Perceptions.....	60
School Staff Perceptions.....	62
Parent Perceptions.....	66
Food Service Purveyors.....	68
School Nutrition Policy & Implementation: The Gap.....	71
Facilitators.....	72
Stakeholder Involvement.....	72
Implementation Committee.....	73
Resources & Facilities.....	74
Barriers.....	74
Stakeholder Involvement: Lack Thereof.....	74
Revenue Loss.....	75
Competitive Foods.....	75
Policy Restrictions & Interpretation.....	76
Resources & Facilities: Lack Thereof.....	76
Bridging the Gap: Promising Practices.....	77
Whole-School Approach.....	77
Financial Resources.....	78
Curriculum Linkage.....	78
Communication Strategy.....	79
Regulated Monitoring.....	79
Policy Design.....	79
Concluding Comments.....	80
Chapter 4: Study Rationale, Objectives, Research Questions, and Theory &	
Framework.....	82
Study Rationale.....	82
Objectives & Research Questions.....	84
Theory & Framework.....	87
FHS & CSH Models.....	87
The Flexible & Actionable Framework.....	88

Smart Policy Design.....	88
Inclusive Stakeholder Engagement.....	89
Conducive Context.....	90
Coherent Implementation Strategy.....	91
Why Use It?	91
Chapter 5: Research Methodology.....	94
Study Design.....	94
Qualitative Method.....	94
Case Study.....	94
Thematic Analysis.....	96
Participants.....	97
Recruitment Strategies.....	99
Data Collection.....	100
A. Interviews.....	100
Interview Protocol: Those Involved.....	101
B. Online Content.....	101
Data Analysis.....	102
A. Analysis of Interviews.....	102
B. Analysis of Online Content.....	104
Study Rigour.....	106
Ethical Considerations.....	107
Ethics Review Board.....	107
Anonymity & Confidentiality.....	107
Assessment of Risks.....	107
Chapter 6: Interview Analysis.....	109
Section 1: Supervisory Officer Roles.....	109
P/PM 150's Development.....	109
The Revisional Process.....	111
The Importance of Communication.....	112
P/PM 150's Genesis.....	112
The Meetings.....	112

Promoting P/PM 150.....	115
Stakeholder Conversations.....	116
P/PM 150 Today.....	118
The Meetings: Lack Thereof.....	118
Promotions: Lack Thereof.....	120
Stakeholder Conversations.....	120
Monitoring: Forms or No Forms? That is the Question.....	121
Accountability Forms: Then & Now.....	122
Other Monitoring Strategies.....	125
Principals' & Supervisory Officers' Observations & Conversations.....	125
School Council Monitoring.....	127
Monitoring vs Competing Priorities.....	128
The Ministry's Monitoring: Lack Thereof.....	129
Section 2: P/PM 150 Barriers: The Collateral Damage.....	131
The Consequences of Policy Timing & Restrictions.....	131
Revenue Loss.....	131
The Consequences of Restaurant Proximity.....	136
Stakeholder Interest: Lack Thereof.....	138
Parents' Lack of Support.....	139
Food Service Providers' Lack of Support.....	140
Students' Lack of Support.....	141
School Staff's Lack of Support.....	142
P/PM 150 Facilitators: The Positive Outcomes.....	144
The Theory.....	144
P/PM 150: The Launching Pad.....	145
Stakeholder Interest.....	148
School Boards & Ministry Support.....	148
School Staff Support.....	149
Food Service Providers' Support.....	151
Parents' Support.....	152
Community Support.....	152

Section 3: P/PM 150 Affected Pedagogy.....	153
Curriculum & Classroom.....	153
Leading By Example.....	155
P/PM 150: The Mindset.....	156
Taking Time.....	156
Mindset vs Monitoring.....	157
Cultural/Societal Paradigm Shift.....	157
Section 4: The Supervisory Officers' Recommendations.....	159
Redesigning P/PM 150.....	159
Umbrella Policy & Curriculum.....	159
Flexible Policy.....	160
The Ten-Day and 80/20 Rules.....	161
Implementing P/PM 150.....	162
Re-emphasizing P/PM 150.....	162
Promoting P/PM 150.....	163
Monitoring P/PM 150.....	164
Concluding Comments.....	166
Chapter 7: Online Content Analysis.....	168
Communicating P/PM 150: A Detailed Policy.....	168
Introduction, Layout, & Content.....	168
Resources & Tools.....	170
Communicating Related Procedures.....	171
P/PM 150 and Related Procedures: The Review Process.....	175
P/PM 150's Implementation.....	176
Replace the Old and Communicate the New.....	176
Stakeholder Training.....	176
Monitoring: A Facet of the Implementation Process.....	177
Promoting P/PM 150.....	179
P/PM 150: The Outcome.....	180
Nutrition Education.....	181
The Partnerships Formed.....	182

Concluding Comments.....	183
Chapter 8: Discussion.....	185
Smart Policy Design.....	186
Logic & Justification.....	186
Feasibility.....	188
Revisions.....	190
Inclusive Stakeholder Engagement.....	191
Responses & Reactions.....	191
Beliefs, Interests, & Motivations.....	194
Capacity.....	198
Identification.....	199
Conducive Context.....	201
Institutional Setting.....	201
Policy Complementarities.....	205
Societal Trends & Shocks.....	207
Coherent Implementation Strategy.....	209
Objectives & Tools.....	210
Task Allocation & Accountability Mechanisms.....	211
Communication & Engagement.....	215
Resources.....	217
Data & Monitoring.....	218
Timing.....	221
Concluding Comments.....	221
Chapter 9: Conclusion.....	224
Study Limitations.....	228
Participants.....	228
The Interview.....	229
The Framework.....	229
Future Research.....	230
References.....	233
Appendix A Education Policy in Europe.....	280

Appendix B Canadian School Nutrition Policies.....	281
Appendix C Three Types of Nutrition Guidelines/Policies.....	285
Appendix D The Nutrition Standards.....	286
Appendix E Monitoring Forms.....	287
Appendix F Ontario Regional Map.....	293
Appendix G Number of Rural, Suburban, and Urban Secondary Schools per School Board...	294
Appendix H Number of Schools in High- and Low-Income Neighbourhoods.....	296
Appendix I Supervisory Officer Interview Questions.....	298
Appendix J Integrated Inquiry: Interview Question Development.....	300
Appendix K Online Content Assessment Tool.....	301
Appendix L Ethics Approval.....	303
Appendix M Active Consent Form.....	305
Appendix N Assessment & Evaluation Tools.....	308

List of Figures & Tables

- Figure 1.0** **Thesis Outline: Linking the Study’s Objectives to the Literature Review, the Study’s Findings, & Discussion**
- Figure 2.0** **Analytical Framework**
- Figure 3.0** **Effective Framework**
- Figure 4.0** **Flexible & Actionable Framework**
- Figure 5.0** **NOURISHING Framework**
- Figure 6.0** **CSH Model**
- Figure 7.0** **FHS Framework**
- Figure 8.0** **Pragmatism and this Case Study**
-
- Table 1.0** **Definitions of the Four Dimensions**
- Table 2.0** **KT Definitions and Related Concepts**
- Table 3.0** **Facilitators and Barriers to School Nutrition Policy Implementation Identified in the Literature**

List of Acronyms

P/PM 150	<i>School Food and Beverage Policy</i>
BMI	Body Mass Index
CSH Model	Comprehensive School Health Model
HLS	Pan-Canadian Healthy Living Strategy
SES	Socioeconomic Status
KMb	Knowledge Mobilization
AASA	American Association of School Administrators
ANGCY	<i>Alberta’s Nutrition Guidelines for Children and Youth</i>
SBP	School Breakfast Program
JRC	Joint Research Centre of the European Commission
EU	European
NSLP	National School Lunch Program
IOM	Institute of Medicine
JCSH	Joint Consortium for School Health
KT	Knowledge Translation
SSHRC	Social Sciences and Humanities Research Council
PEI	Prince Edward Island
MELS	Ministère de L’Éducation, du Loisir et du Sport
BC	British Columbia
NWT	Northwest Territories
APPLE	Alberta Project Promoting Active Living and Healthy Eating
FHS Framework	Foundations for a Healthy School Framework
COVID-19	Corona Virus Disease-2019
OCDSB	Ottawa-Carleton District School Board
SNP	Student Nutrition Programs
TV	Television
SNP	School Nutrition Program
PAR	Participatory Action Research
CCPN	Canadian Cardiovascular Pharmacist Network

QSR	Qualitative Analysis Software
PIC	Parent Involvement Committee
CLL	Catholic Learning of Leadership
OPH	Ottawa Public Health
PD	Professional Development
SO	Supervisory Officer
VP	Vice-Principal
CTV	Canadian Television Network
TDSB	Toronto District School Board
ECDSB	Essex County District School Board
CCP	Closed Campus Policies
NWAC	Native Women's Association of Canada

Chapter 1: Introduction

One: Simple One-Pan Wonders is Jamie Oliver's² most recent cookbook. Published in 2022, it provides families and time-pressed professionals with simple, budget-friendly recipes for meals that are “nourishing, flavoursome, and vibrant,” expresses Penguin Publishing (2022). Although Jamie Oliver claims that he is on a mission to instruct families around the world on how to eat healthier foods and live healthier lives, there is much controversy surrounding his campaign. Is he vested in promoting health and wellness in children, given the controversies surrounding so-called nutritious sauces he used from an industrial park (Fromson, 2011) or for his unrealistic view of poverty in Britain (McCormack, 2021)? Despite all this controversy, Oliver says that children should be taught about food (Oliver, 2022). Penguin Publishing (2022) even mentions that his latest book would “make a great first cookbook for students heading off to university.”

Oliver's passion to promote healthy eating derives from the increasing BMI (Body Mass Index)³ rates across the world. Obesity rates have more than doubled in the past thirty years and there has been a steady increase since the late 1970's (Brennan et al., 2014; Ogden et al., 2006). Cross-sectional studies reveal that 1 in 6 children have obesity due to a lack of access to healthy enriching diets and exercise (Kass, et al., 2014; Laitsch, 2009; Vanderlee et al., 2014). Adolescents are consuming an alarming rate of high sodium-sugar-fatty foods. In 2009-2010 in-school self-reported surveys were distributed to 10,188 youth (ages 13-18), indicating that 80% of youth consume at least 1 sugar-sweetened beverage a day and 44% consume 3 or more (Vanderlee et al., 2014). Not only are students' physical health being threatened, but their emotional health as well. Studies reveal that poor body-image has resulted in bullying and depression (Laitsch, 2009). Thus, obesity has affected students both emotionally and physically (Laitsch, 2009). They have become quite sedentary physically and intellectually (Bass & Eneli, 2015).

Consequently, governments (including the Government of Canada) are employing policies and frameworks to address the obesity epidemic. The Government of Canada created a

² Jamie Oliver is an award-winning chef, and health activist. He promotes cooking fresh, delicious food from scratch (Oliver, 2010).

³ High BMI (Body Mass Index) and obesity are used interchangeably throughout this thesis.

Framework for Action whereby health and/or health promotion/healthy living ministers must collaborate on three strategies: 1) making childhood overweight and obesity a collective priority for action; 2) coordinating efforts on policy's concerning environments, early action, and nutritious foods; and 3) measuring and reporting on collective progress (Government of Canada, 2012).

Educational Nutrition Policies

Healthy eating promotes optimal childhood health, growth, and intellectual development (Dietitians of Canada, 2004). According to the Government of Ontario, Ministry of Education (2010), “[g]ood health is a prerequisite for good learning (p. 1). Since health and education are interrelated, obesity has greatly impacted the education system as Story et al. (2009) say, “[s]chools cannot achieve their primary mission of education if students are not healthy” (p. 72). Consequently, education officials have realized that schools are an ideal setting for health promotion interventions (Ashe & Sonnino, 2013; Coleman et al., 2012; Hutchinson & Seagard, 2010). Across the world, education nutrition policies have been implemented to encourage healthy eating, improve diets among youth and their body mass indices (Critch, 2020). One such memorandum is the *School Food and Beverage Policy* (P/PM 150), which was released by the Government of Ontario, Ministry of Education (Canada) in the Fall 2010. The said ministry collaborated with the Ministry of Health and other ministries and consultants associated with youth and nutrition (T. Jardin, personal communication, February 25, 2021) when designing this memorandum. Ministry of Education officials hosted numerous meetings with its collaborators to discuss the policy's framework and its many facets. P/PM 150 was indirectly⁴ based on the CSH (Comprehensive School Health Framework) and the HLS (Pan-Canadian Healthy Living Strategy) – which are thoroughly discussed in Chapters 2 and 3. Conversations among the collaborators ensued not only about these frameworks/strategies, but about how the policy would be written, disseminated, monitored, etc. Once the policy was written, there were meetings to discuss revisions (e.g., clarifying terms, stakeholder roles, etc.). Once the policy was complete, it was disseminated to each Ontario public school board. Supervisory officers within each school

⁴ When developing and implementing P/PM 150, the Government of Ontario, Ministry of Education employed the Foundations for a Healthy School (FHS) model (detailed in Chapter 2) which incorporates most facets from the CSH and HLS frameworks/strategies (Government of Ontario, Ministry of Education, 2016). Hence, P/PM 150 indirectly reflects the CSH model.

board were responsible for communicating P/PM 150 to their designated principals to ensure that the memorandum was understood, and that proper monitoring and completion of forms occurred.

P/PM 150 outlines nutritional standards for beverages and food sold in Ontario's public elementary and secondary schools. It utilizes Canada's Food Guide nutrition standards. The policy's nutrition standards for food are divided into six groups (the first four food groups are from Canada's Food Guide): Meat and Alternatives; Milk and Alternatives; Grain Products; Vegetables and Fruit; Mixed Dishes; Miscellaneous Items. Beverages are divided into two groups: Elementary Schools; Secondary Schools. P/PM 150 emphasizes that healthier foods/beverages – those high in essential nutrients and low in trans fats, sodium, and sugar – must be offered in larger quantities than nutritionally inadequate foods. As a result, the Government of Ontario (Ministry of Education) created the "80/20 rule". This rule ensures that nutritional products comprise at least 80% of all food and beverage choices (i.e., "sell most"), while products with slightly higher amounts of fat, sugar, and/or sodium constitute no more than 20% of all product choices (i.e., "sell less"). There are certain foods that cannot be sold in any school venue, program, or event; for example, deep-fried, confectionery products and high sugar-content beverages are forbidden (i.e., "not permitted for sale") (see Appendix D for more details).

To discern which category a specific food or beverage fits into, stakeholders must: 1) compare the policy's Trans Fat Standards with the total fat and trans fat amounts on the product's Nutrition Facts table; 2) identify the group/sub-group in the nutrition standards that the product fits into; and 3) compare the product's Nutrition Facts table and ingredient list with the nutrition criteria in the policy's nutrition standards. It must be noted that the information on a Nutrition Facts table is based on serving size and not package size. If the package size is different from the serving size, the nutrition criteria must be calculated in proportion to the package size. For example, if the serving size on the Nutrition Facts table is 400 ml, but the package size is 800 ml, stakeholders would have to multiply the nutrition criteria by 2 to determine whether the product fits into one of the following categories: "Sell Most," "Sell Less," or "Not Permitted for Sale." The reason certain foods are not permitted is "that when nutritionally inadequate food and beverages are available and promoted at school every day, even along with healthier food and beverages, it becomes increasingly difficult for students to have a healthy diet" (Dietitians of Canada, 2004, p. 1).

To calculate the 80/20 rule, stakeholders must also discern the difference between a food choice and many food choices. A food choice “is a specific type of food that is offered for sale [e.g., an apple] ... five apples of the same variety (e.g., five Empire apples) are not considered five food choices” (Government of Ontario, Ministry of Education, 2010, p. 9). A beverage selection is a specific type of beverage that is offered for sale. For example, a 1% plain milk is one beverage choice. There are many helpful tips, illustrations, and tables within the policy’s resource guide to help stakeholders make choices and calculate the 80/20 rule (Government of Ontario, Ministry of Education, 2010).

The P/PM 150 resource guide also provides exceptions to the policy. Unhealthy food/beverages may be consumed if they are offered in schools at no cost, sold in staff rooms, or sold during field trips (off school premises). Moreover, students can transport, from home, unhealthy foods as part of their lunch. The Government of Ontario, Ministry of Education (2010, 2011) realizes that it is important to “treat” students. As a result, P/PM 150 includes a “Special Day Events” module, wherein students are exempt from the nutritional rule. In other words, schools may have up to ten “Special” days where school cafeterias, vending machines, tuck shops, catered lunch programs, bake sales, sport events, etc., may sell “inadequate” products.

Although many nutrition policies across the world, including P/PM 150, differ so greatly and are well intentioned, there remains a gap between what they state and the way in which they are being executed (Hanning et al., 2019; Kennedy et al., 2020; Taylor et al., 2011). Moreover, not all their goals are being met (Agron et al., 2010; Levay et al., 2020; Valaitis et al., 2013). This is due to institutional and socio-structural factors, policy timing, stakeholder⁵ interests, as well as a lack of comprehension (Gray, 2015; Moore et al., 2010; Vine & Elliott, 2013). Studies on P/PM 150 reveal the policy’s implementation and its impacts. Murray et al. (2017) and Vine and Elliott (2013) claim that the implementation process involves many stakeholders (including principals, teachers, food service providers, etc.). Principals are responsible for communicating to stakeholders (including parents), while teachers communicate to students (Valaitis, 2015). Monitoring the policy’s execution is also part of the implementation process (Burd, 2015; Gray, 2015; Habayeb, 2013).

⁵ Stakeholder is used to express a person (administrator, teacher, student, parent, etc.) or local community business that is involved and may have a concern or interest in education.

Some researchers claim that P/PM 150 has many strengths (Orava et al., 2017; Valaitis, 2015; Vine & Elliott, 2013). For example, it encourages healthy eating and promotes healthy lifestyles through food programs/activities/events, cafeteria signage, assemblies, promotional posters and where cafeterias supply nutritious foods, while many teachers/principals model healthy eating (Orava et al., 2017; Valaitis et al., 2013). Although this is the case, multiple barriers exist: cost of nutritious food (Gray, 2015; Valaitis et al., 2013; Vine et al., 2014); insufficient cafeteria space (Vine et al., 2014); time constraints and P/PM 150's quick implementation (Chaleunsouk & Kutsyruba, 2014; Valaitis, 2015; Vine et al., 2014); students' rights are being constrained (Valaitis et al., 2013); revenue loss (Kretzel, 2012; Lysyk, 2013; Valaitis et al., 2013); policy related misunderstandings (Valaitis, 2015); strict guidelines (Valaitis, 2015; Vine & Elliott, 2013); no effective monitoring strategy (Lysyk, 2013); and there is a lack of stakeholder compliance (Orava et al., 2016; Vine et al., 2017). Multiple studies (Hanning et al., 2019; Jensen et al., 2012; Valaitis, 2015, etc.) also reveal students leaving campus or bringing fast-food lunch to school as a result of the policy's healthy food protocols. The policy itself also has limitations. The Office of the Auditor General (2015) claims that the policy should prohibit the distribution of unhealthy food and beverages (not just the selling of food/beverages) in schools. Other limitations within the document concern the policy's detail/complexity associated with the 80/20 rule (Chaleunsouk, 2012; Valaitis, 2015) and P/PM 150's inconsistent messages (Chaleunsouk, 2012). Because of these types of barriers to successful policy execution, researchers have identified a need for promising and best practices⁶ for school nutrition policy design and implementation (Mendelson, 2007).

Relevance & Implications

This qualitative case study explores the implementation of P/PM 150 from the perspective of supervisory officers⁷ in Ontario. Furthermore, it examines the policy's implementation using Ministry, school board, and individual school online content. In so doing, this thesis examines: 1) supervisory officers' roles and responsibilities designing and/or implementing P/PM 150 (i.e., how

⁶“Promising practices” denotes a policy with some scientific research or data showing positive outcomes, that has not necessarily been replicated and implemented multiple times in similar contexts. Whereas the term “best practices” denotes policies which have demonstrated desired changes using multiple implementations, the ability to be replicated, and the potential to be adapted and employed multiple times (Smith et al., 2015).

⁷ To reiterate, supervisory officers are P/PM 150 consultants/facilitators within a school board. Furthermore, supervisory officers are senior personnel of a school district that consist of assistant superintendents, superintendents, associate directors, and directors of education.

they communicate the policy – its objectives, tools, and task allocation – to other stakeholders, and how they monitor its execution, etc.); 2) how the Ministry of Education, schools boards, and schools communicate the policy; and 3) the perceived consequences of P/PM 150 (e.g., barriers, facilitators, pedagogy, curriculum, stakeholder mindsets) that hinder or aid policy implementation among various school contexts.

This thesis builds on what is already known about nutrition policies in schools. Moreover, it contributes to the few studies on P/PM 150. In turn, it seeks to reveal the ways in which supervisory officers and policy makers within the Government of Ontario (Ministry of Education) can strengthen P/PM 150's execution as well as the implementation and sustainability of other school nutrition policies. At the level of public health, research findings may be used to help drive future health promotion initiatives, especially ones based on Viennet & Pont's (2017) framework and the CSH model. The study and its corresponding interview protocol were designed employing a pragmatic lens. This lens extends to the way in which data are analyzed. However, to ensure that this research addresses pragmatism's notion of "what works" and "best practices," I employed Viennet and Pont's (2017) flexible and actionable framework.

Orientation of the Study

This study is presented in nine chapters, beginning with a detailed review of current literature on educational nutrition policy, including P/PM 150 (Chapters 2 and 3). In so doing, it describes: i) BMI and factors contributing to child food intake; ii) school food consumption; iii) policy and implementation research more broadly, and education policy and implementation more specifically; iv) an overview of international and national school nutrition policies – the frameworks and strategies guiding them, etc.; v) stakeholders' perceptions of common facilitators and barriers of policy implementation; and vi) recommendations for promising practices. A description of my methodology follows (Chapter 4 and Chapter 5). The study rationale, objectives, research questions, as well as the theory and framework are presented in Chapter 4, wherein I detail Viennet and Pont's (2017) education policy implementation framework and how it relates to a pragmatist epistemology. Chapter 5 specifically concerns the research methods employed in this study as the following are described: i) the participants, sampling, and recruitment strategies, as well as the regions in which the participants' work, and the school contexts with which they interact/oversee; ii) the data collection methods (i.e., the

interview protocol and website/document references); iii) how the data were analyzed; and iv) a description of the data sources.

Thereafter, I delve into the results, which are separated into two chapters. Chapter 6 explores the supervisory officers' perceptions of P/PM 150's implementation within their corresponding school board. They draw upon their knowledge and opinions related to the policy and its implementation (including its execution within various socioeconomic and geographical contexts). Furthermore, they draw upon their knowledge and opinions related to monitoring and assessing P/PM 150's implementation, as well as the factors influencing implementation (including perceived facilitators and barriers). Chapter 7 details the content located on the Ministry, school boards', and individual schools' websites, as well as their social media pages. This chapter also reveals any associations with and/or similarities and differences to the supervisory officers' experiences.

Following these results is Chapter 8 in which I relate the findings to literature. Viennet and Pont's (2017) framework was integrated in Chapter 8 to frame the discussion and interpret the findings. Figure 1.0 (see below) illustrates the organization of this thesis and how the study's objectives are linked to the literature review, the study's findings, and discussion. Lastly, Chapter 9 is the conclusion of this thesis as I describe the limitations pertaining to the participants, data collection tool, and framework. I also ask questions regarding the findings and whether certain limitations drastically affected the results. To close, implications for the Government of Ontario (Ministry of Education), regional school boards, Ontario secondary schools, the regional public health unit, and school public health nurses were also discussed.

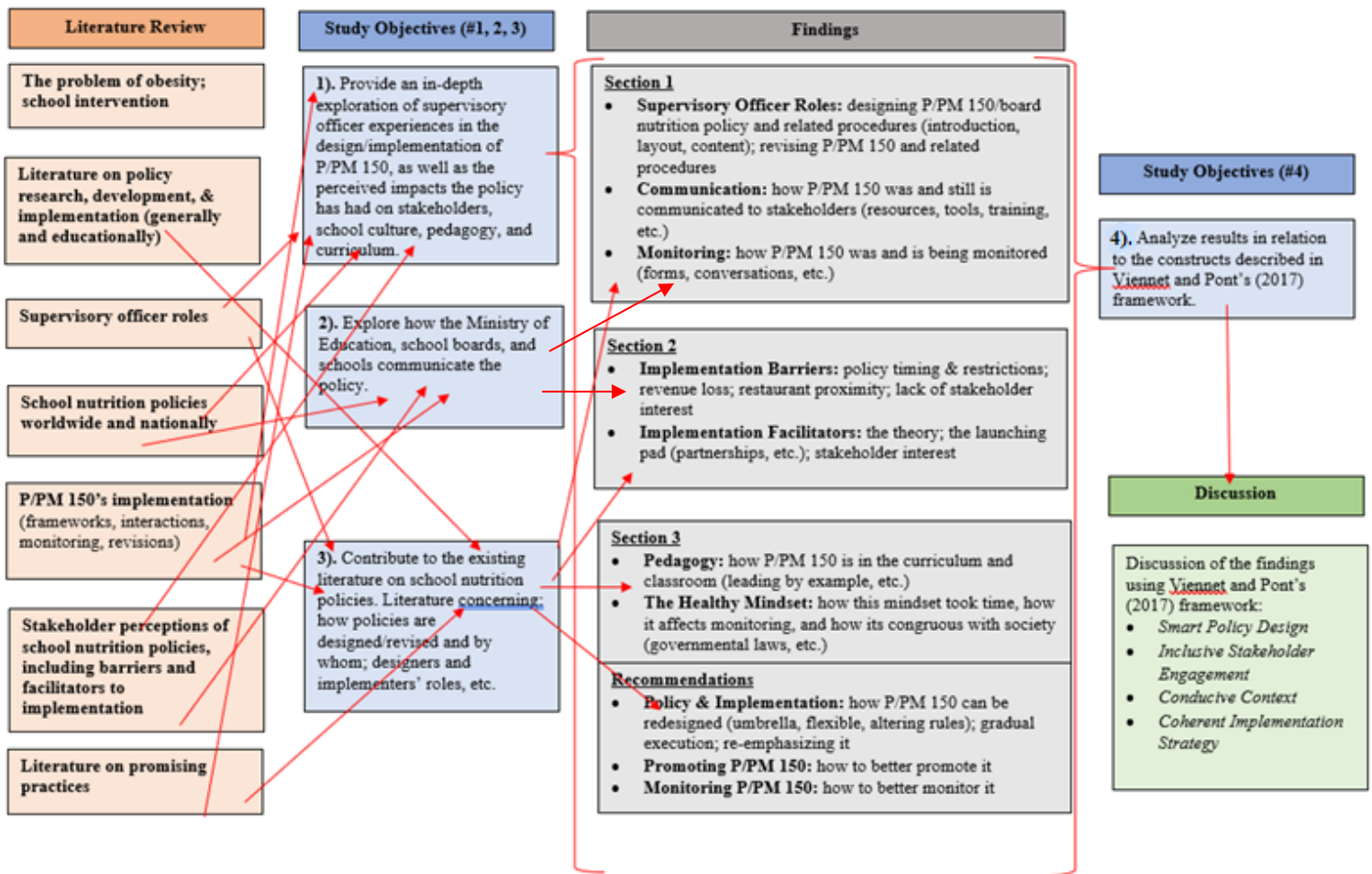


Figure 1.0
Thesis Outline: Linking the Study's Objectives to the Literature Review, the Study's Findings, and Discussion

Chapter 2: Current Research

Since my research question concerns P/PM 150's implementation by school boards (specifically supervisory officers' perceptions of its execution), it is necessary to review policy research more broadly, and more specifically, the educational policy implementation literature. Moreover, I examine the design of school nutrition policies and their association with BMI and child food consumption. In so doing, I discuss international and national (Canadian) school nutrition policies. Consequently, I inspect Ontario's *School Food and Beverage Policy* (P/PM 150). Before delving into policy research, childhood obesity and its relation to school, is explored.

Body Mass Index (BMI) & Child Food Intake

Body mass index (BMI)⁸ rates in both adults and children have increased worldwide. In the USA, BMI has tripled in children and adolescents since the 1970's (Centers for Disease Control and Prevention, 2021). In Canada, BMI has increased 2.5 times since the late 1970's (PHAC & CIHI, 2011). Obesity Canada (2022) claims that the high prevalence of people with obesity in adult and adolescent populations may be attributed to a combination of environmental influences, hereditary factors, emotional health, lack of sleep, medical problems, low energy expenditure, and high caloric intake. According to the 2009-2011 Canadian Health Measures Survey, approximately one third of children between the ages of 5 and 17 were classified as overweight (19.8%) or obese⁹ (11.7%) (Roberts et al., 2012). This is because such children and adolescents consume foods that are high in fat and sugar, with few nutrients. Roth (2022) says, "fast-food, candy, and soft drinks are common culprits ... convenience foods, such as frozen dinners, salty snacks, and canned pastas, can also contribute to unhealthy weight gain." Braithwaite and colleagues (2014) conducted a study measuring BMI of 72, 900 children (17 countries) and 199, 135 adolescents in 36 countries. There was a correlation between high BMI and frequent or very frequent fast-food consumption. Many children either travelled to fast-food restaurants or had parents who brought fast-food home. The school environment also plays a

⁸ Rather than overly using the term "obesity," Meadows and Daniëlsdóttir (2015) suggest that the best practice in research, publishing, and healthcare is to use neutral terms/phrases (e.g., this person has a high weight, or this person has obesity, etc.). Hence, "BMI" is used more often than "obesity."

⁹ This term is used in this context since Robert et al. (2012) used it in their study.

role in child food intake as children spend much time at school. If schools sell junk food to students, they contribute to high BMI in students (Espejo, 2014). Espejo (2014) also notes that when school administrators ban soda machines in schools, children and adolescents are less likely to have obesity.

There are long-term health effects of people (including children and adolescents) with obesity, such as cardiovascular disease, type 2 diabetes, asthma, osteoarthritis, hypertension, certain cancers, hormone dysregulation, digestive issues, and an increased risk of mortality (Healthy Kids Panel, 2013). Not only can it affect people physically, but mentally and socially (Healthy Kids Panel, 2013; Vafiadis, 2021). Consequently, there has been an increasing economic burden. In Canada, the economic burden of high BMI's increased from \$3.9 billion to \$4.6 billion between 2000 and 2008 and is expected to continue increasing (Healthy Kids Panel, 2013; PHAC & CIHI, 2011). To reverse this epidemic/pandemic, it is important to understand the factors influencing child food intake.

Factors Influencing Child Food Intake

Many factors influence food consumption. Such factors include genetics, one's social status, culture, behaviour, and environment (Public Health Agency of Canada, 2012; Scaglioni, et al., 2018). People are heavily influenced by their surroundings. If their environment promotes junk food, many people will subject themselves to what is advertised (Mandal, 2019). Brennan et al. (2014) say that one's behaviour (dietary patterns and physical activity) is heavily influenced by minute, cumulative environmental changes. Since there have been so many small environmental changes in the world, there has been a dramatic increase in BMI rates (Wang et al., 2012). Social status can be linked to one's culture and traditions (Dittmann, 2016). If it is traditional or culturally acceptable to pursue whatever career one desires, one will have the freedom to select a career, whether it is high or low-paying. If people have a low-paying career, they may have difficulties purchasing expensive foods, which are often nutritious; they may find themselves purchasing more inexpensive foods which are often high in fat, sugar, and salt (Castro & Kalolo, 2018).

Socioeconomic Status

Socioeconomic status (SES) is associated with child food intake. The National Health and Nutrition Survey (2005-2008) reveals low-income children and adolescents as more likely to

be overweight and obese than those from higher income families (Ogden, Lamb, et al., 2010). In 2007-2008, the Canadian Health Survey also depicted a relationship between high BMI rates and low-income; however, this finding was only observed in females (PHAC & CIHI, 2011). When examining students within school districts, a similar result was found. Coffield et al. (2011) state that children within school districts with high SES consumed more fruits and vegetables than children from low-SES school districts.

Diet & Physical Activity

Children with sedentary-like behaviour (i.e., sitting and not exercising) are more likely to consume unhealthy foods compared to those who engage in daily physical activity (PHAC & CIHI, 2011). Canada's physical activity levels in children and youth have been rated a D- which is much lower than the findings from other countries (Active Healthy Kids Canada, 2014).

Not only do many children refrain from exercise, but they also consume unhealthy foods – resulting in people with obesity. Studies indicate a decline in the quality of children and adolescent's diets since the 1970's (OSNPPH School Nutrition Workgroup, 2012; Public Health Agency of Canada, 2012). Many youth are consuming non-nutrient dense foods, such as cookies, cakes, and deep-fried French fries, rather than nutrient-dense foods (e.g., vegetables, fruits and milk) (Sahoo et al., 2015). Liberali and colleagues (2020) claim that the intake of foods high in sugar, sodium and fat, rather than fibre, is a growing concern. In addition to these unhealthy foods, children and adolescents are consuming sweetened beverages at an increased rate (Briefel et al., 2013; Liberali et al., 2020). These sweetened beverages (soft drinks, chocolate milk, etc.) are replacing other drinks that are high in nutrients such as plain milk and natural fruit juice. Milk contains such nutrients as calcium, vitamin A, phosphorus, and riboflavin whereas fruit juice contains vitamin C and folate. Within Canada, Vanderlee et al. (2014) conducted a study comprised of 10,000 youth ages 13 to 18. The findings indicate a high percentage of youth (80%) consuming at least one sugar sweetened beverage the day before participating in this survey. The survey also indicates 44% of youth drinking 3 or more sugar sweetened beverages prior to completing the survey.

Environments: Community, Home, School

Another factor influencing child food intake is the environment in which children and adolescents live. Since youth spend time within community and neighbourhood settings, the

food they see advertised and the types of food their peers consume, affect their dietary habits (Chung et al., 2021; Gubbels, 2020). Many restaurants offer unhealthy selections which are advertised in communities on billboards, posters, etc. Advertisements are also prevalent on television, the internet, and radio. Since many restaurants advertise unhealthy foods and beverages, and many neighbourhood children consume foods high in fat, sodium, and sugar, one's community affects BMI rates (Mandal, 2019). According to Woodruff et al. (2010), when youth purchased food at a restaurant or take-out establishment, many consumed unhealthy foods (those high in sugar, fat, and sodium). A study conducted in London, Ontario, examined neighbourhood food environments and their proximity to schools. It revealed that 60% of schools were surrounded by three or more fast-food outlets within walking distance (He et al., 2012). Moreover, the findings suggest that students who were within less than one kilometer from convenient stores and fast-food restaurants, were more likely to consume unhealthy foods at least once a week (He et al., 2012). Leatherdale et al. (2011) also examined fast-food restaurants and their relation to BMI. Using logistic regression, their study affirmed that students eating foods from restaurants surrounding their school, were more likely to be overweight than students whose school environment was not surrounded by fast-food outlets. The more restaurants surrounding a school, the more likely students will purchase food from them. Other studies indicate how urbanization¹⁰ within a community may affect child food consumption (Harvard School of Public Health, 2022). Other structural and societal factors (e.g., more drive-through restaurants, lack of sidewalks, two parents working, less time for cooking, etc.) may also contribute to high BMI (Neporent, 2012; Terry, 2016).

Another environment influencing child food consumption is one's home. Parents play an important role in shaping their child's eating habits. They determine what foods and beverages to purchase for the home and are responsible for ensuring their children eat that which is supplied. Moreover, they act as role models for healthy eating (Briefel et al., 2013; Duke Medicine, 2013). Duke Medicine (2013) claims that parents with low physical activity levels and poor¹¹ eating habits are likely to have children with the same habits. Coffield et al. (2011) furthers, saying that children who have a mother with obesity¹² were more prone to have it too.

¹⁰ This refers to the type of community: urban, suburban, or rural.

¹¹ "Poor eating" is the consumption of foods high in fat, sugar, and salt, on a regular basis.

¹² Kyle and Puhl (2014) as well as Wittert et al. (2015) claim, "person-first" terms such as "obese person" should not be used, but rather non-stigmatizing language (e.g. "person with obesity").

Another study revealed many children and adolescents consuming sweetened beverages within the home environment (Briefel et al., 2013). Even though this is the case, Seaman (2020) says that families who eat dinner together, consume better quality foods than those who do not.

Children and adolescents are not only influenced by their home environment, but by their school (Tugault-Lafleur & Black, 2017). Students spend much of their time at school, being influenced by food in vending machines, cafeterias, food programs, and fundraisers (Rovner et al., 2011; Tugault-Lafleur & Black, 2017). Moreover, they are influenced by their teachers. Teachers are role models for healthy behaviours (University of Maryland Extension, 2020). Caparosa et al. (2013) claim that school staff should promote healthy eating, as classroom rewards, fundraising, and celebrations all in the form of junk food, contribute to high BMI rates.

The community, home and school all affect children and adolescent food consumption. Since children and youth spend most of their day-time at school for ten months of the year, schools have become a venue for addressing the increasing BMI rates. This is accomplished through strategies, policies, and programs.

School Food Consumption Programs

On average, students (age 4 to 18) within Canada and the United States spend at least 5 hours of instructional time in school a day, excluding recess and scheduled intervals (Ed100, 2020; Statistics Canada, 2018b). Children and adolescents in Ontario spend at least 194 days a year in school (Government of Ontario, Ministry of Education, 2020). Within this time, they consume just over one third of their daily food at school (Coffield et al., 2011; French et al., 2002; Orava, et al., 2015). Since students spend much of their waking hours at school, educational systems have an opportunity to influence health and well-being (Driessen et al., 2014; Peterson & Fox, 2007). Moreover, schools are a prime location for nutrition interventions as they: 1) offer opportunities to reach numerous children; 2) are a social environment wherein students learn healthy eating habits through social interactions; 3) are a setting in which teachers provide guidance and opportunities for students to practice food safety and nutritional eating; 4) are a venue for educating children on nutrition which can lead to improvements in healthy eating

behaviours; and 5) enable various stakeholders¹³ within the school community to offer multiple avenues of influence (e.g. teachers students, parents) (Aldinger & Jones, 1998).

McKenna (2010) says that schools should create policies outlining nutrition standards and school food programs. These policies should also detail contracts with local food producers and ensure that all foods offered in schools reflect updated nutritional regulations/elements. It is also suggested that schools offer resources, such as health counselling, to instruct parents and school staff on nutritional behaviour. The Ontario Society of Nutrition Professionals in Public Health also provides guidelines for schools. It created a working group to aid schools in healthy eating initiatives. This group provides information and resources on food and nutrition policies. It also desires to educate school staff on nutrition so that they can be positive role models for healthy eating. Moreover, the group discusses the importance of nutrition education for students and ways that schools can provide healthy, reasonably priced, and culturally appropriate food choices. It also preaches the importance of providing school nutrition programs and allergy-safe environments (OSNPPH School Nutrition Workgroup, 2004).

Schools are encouraged, and in many places mandated, to promote healthy eating through nutrition initiatives. Consequently, educational systems have been examining research on policies and implementation.

Policy Research & Development

Policy research is defined as the charting of various approaches and specifying possible differences in the cost, effect and intention of multiple rules and regulations comprising a policy. It also seeks to aid in the solution of fundamental problems and in the advancement of major social institutions and memoranda (Etzioni, 1978; Eliadis, 2004; Embrett & Randall, 2014). For policy makers to write effective memoranda, they should consider the theoretical aspects of policy writing outlined by scholars, while simultaneously addressing public needs. They should construct documents comprised of instruments (i.e., regulations and programs) designed to consider the goals of the social unit.¹⁴ Moreover, when writing policy, they should consider: 1) what must be outlined in specific memoranda; 2) relative associated costs of the policy; and 3) the effects on other values of the social unit. Regarding the first point, policy makers should

¹³ Stakeholder is used to express a person (administrator, teacher, student, parent, etc.) or local community business that is involved and may have a concern or interest in something.

¹⁴ Social unit refers to the institution that requires the policy.

understand the goals a social unit desires to achieve. Once these goals are recorded, there are details outlining how to reach these intended objectives. To ensure success of meeting these goals, numerous policies include accountability measures¹⁵ (Deber, 2014).

According to Springer et al. (2017), not only must a policy maker consider measurability, but attempt to understand the reality behind requiring a memorandum. Unfortunately, some policy makers tend to assume what the nature of reality is within a social unit, and they are reluctant to thoroughly examine – through data – the intricate problems that must be addressed through a policy (Etzioni, 1978; Springer et al., 2017). One of the only times policies tend to be re-evaluated is when assumptions underlying policy formulation significantly deviate from reality.

Although this is the case, policy makers should attempt to write memoranda solely based on reality and not assumptions. This can be accomplished when policy researchers use theoretical frameworks based on policy/implementation research. Moreover, when researchers clearly communicate with policy makers, memoranda can be based on reality and not assumptions. For example, if a memorandum must consider elements that are subject to change (i.e., income, new workplace positions, etc.), then it is a policy researcher's responsibility to alert the document maker of these societal or social-units' alterations (Etzioni, 1978; Springer et al., 2017). Moreover, it can be addressed when those involved in the policymaking process are both insiders – to the policymaking organs – and outsiders. The latter are citizens and often comprise policy researchers (Pinto, 2012; Springer et al., 2017). Pinto (2012) states that meaningful citizen participation in policy formulation is essential to achieving a fair and democratic policy.

Involving insiders and outsiders to the policymaking process is an aspect of knowledge mobilization (KMb) (see Table 2.0 for key terminology associated with KMb). The Social Sciences and Humanities Research Council (2020) defines KMb as:

The reciprocal and complementary flow and uptake of research knowledge between researchers, knowledge brokers and knowledge users – both within and beyond academia – in such a way that may benefit users and create positive impacts within Canada and/or internationally, and ultimately, has the potential to enhance the profile, reach and impact of social sciences and humanities research.

¹⁵ Although many policies have accountability measures, in practice accountability has proven to be quite difficult to achieve (Deber, 2014).

The knowledge generated between researchers, knowledge brokers, and knowledge users, can help inform policy, especially when knowledge translation (KT) is employed (see Table 2.0 for a definition of KT). Amanda Cooper, founder of RIPPLE¹⁶ (Research Informing Policy, Practice and Leadership in Education), provides a program to help researchers articulate the value of their research beyond academia to broader society (Cooper et al., 2018). Policy makers, and researchers within many fields (especially medicine and education), realized the importance of “evidence” as the driving force behind day-to-day decision-making and practices (Grimshaw et al., 2012). One must use evidence to inform practice; one must understand the process of moving evidence into action (Grimshaw et al., 2012).

Table 2.0 KT Definitions and Related Concepts

Term	Definition
Knowledge translation	<i>“A dynamic and iterative process that includes synthesis, dissemination, exchange and ethically sound application of knowledge to improve the health of Canadians, provide more effective health services and products and strengthen the health care system. This process takes place within a complex system of interactions between researchers and knowledge users, which may vary in intensity, complexity and level of engagement depending on the nature of the research and the findings, as well as the needs of the particular knowledge user” (Graham & Tetroe, 2009, page. 46).</i>
Knowledge mobilization	<i>“The reciprocal and complementary flow and uptake of research knowledge between researchers, knowledge brokers and knowledge users—both within and beyond academia—in such a way that may benefit users and create positive impacts within Canada and/or internationally, and, ultimately, has the potential to enhance the profile, reach and impact of social sciences and humanities research” (Social Sciences and Humanities Research Council, 2020).</i>
Knowledge transfer	A one-way flow of knowledge from knowledge creators (e.g., researchers) to knowledge users (e.g., general public, service providers, key decision makers). The tenets of which answer the questions posed by Lavis and colleagues (2003): <ul style="list-style-type: none"> • What is the message? • Who is the target audience? • Who is the messenger? • How should the message be communicated? • What is the outcome?
Knowledge exchange	<i>“Collaborative problem-solving between researchers and decision-makers that happens through linkage and exchange. Effective knowledge exchange involves interaction between decision-makers and researchers and results in mutual learning through the process of planning, producing, disseminating, and applying existing or new research in decision-making” (Canadian Institutes of Health Research, 2016).</i>

To write policy that is based on reality/“evidence,” all policy makers should engage in

¹⁶ RIPPLE is a program of research, training, and KMB that focuses on ways to improve linkages between research, policy, and practice.

research, collecting data collaboratively with researchers. Even once a memorandum is complete, trial runs in real-life situations should be undertaken to test how well the policy's goals are met. Some policy makers engage in trial runs, enabling them to determine the results (successes or failures) of their memorandum. These strategies, however, take time and money, and may cause psychological tensions (Springer et al., 2017). Time, budget appropriations and emotional consequences, are all present even when policy makers must re-examine¹⁷ their documents. As a result, many are reluctant to frequently review policies to ensure they are aligning with societal change (Springer et al., 2017). Furthermore, due to time and costs, numerous policy makers refrain from practical research engagement, and solely write policies based on research publications; that is, articles, books, stenciled reports, and papers presented at conferences. These are the most widely utilized modes of communication between researchers and policy makers (Springer et al., 2017)

Policy makers widely use publications, read political editorials, pay attention to polls, and are responsive to public opinion (e.g., letters to public officials). However, sometimes it is even difficult for them to keep up with rapidly growing research literature. Many policy makers scan the literature, focusing more on searchable scientific, quantitative method articles rather than qualitative ones (Brennan et al., 2014). This is the case in BMI-related policy/program making (Brennan et al., 2014; Committee on Obesity Prevention Policies for Young Children et al., 2011; Leeman et al., 2011). Brennan and colleagues (2014) claim that program makers have partially reviewed BMI-related intervention strategies that have been studied. Consequently, such social units as hospitals, schools, and other child-care institutions have had to rely on childhood BMI research that has not been systematically reviewed and “has focused more on assessing the internal validity of study results than on evaluating the...feasibility, or sustainability of intervention effects” (Brennan et al., 2014, p. 1).

Policy makers should also consider the effects a policy has on other values of the social unit (Deber, 2014). For example, many stakeholders may not value health and nutrition; consequently, there could be resistance to a nutrition-related policy. Not only must the values of

¹⁷ Policy designers are encouraged to evaluate and re-evaluate policies (Knill & Tosun, 2017). In so doing, they engage in a five-stage cyclical process: 1) agenda setting; 2) policy formulation; 3) policy adoption; 4) policy implementation; and 5) evaluation. Once a policy is evaluated, the designers must then return to the agenda setting stage to discern whether any alterations to the policy must be made. If alterations are necessary, then the designers continue to step 2, and so forth (Knill & Tosun, 2017).

the social unit be considered, but the beliefs of those outside the institution, within the community, who may be affected by the policy. In summary, policy makers must construct a memorandum, addressing the social institution's goals and the many ways of attaining those goals (i.e., through monitoring, etc.). This must be done by considering any associated costs of the policy, and by employing the theoretical aspects of policy writing (i.e., using 'what works'), which is revealed through qualitative and quantitative data. Moreover, policy writing should be collaborative, involving policy researchers and other policy stakeholders. Once a policy is written, it should be tested in real-life situations to discern the reality of 'what works' and whether it affects stakeholders' values.

Education Policy Research & Development

To improve student social development and academic performance, as well as the way educational institutions are managed, many policy researchers and makers have focused on education memoranda. For decades these memoranda were solely developed based on theory and assumptions (Honig, 2009a). At the turn of this century education departments across North America issued calls for evidence-informed approaches to educational improvement. This focus on evidence-informed practices marks a significant evolution in education policymaking (Honig, 2009a). Consequently, it is likely one will identify specific interventions that may improve student learning (Honig, 2009a).

Not only do education policy researchers and makers focus on evidence-informed practices but they realize the importance of democratic approaches to policymaking. Ella Flagg Young was the first to propose including teachers' voices in the policy making process (Hendry, 2011). This contrasted the traditional educational hierarchy within the school system and the bureaucratization of schools. Young and numerous other women argue that educational policies should not solely be controlled by experts, but incorporate stakeholders' perspectives and input (Hendry, 2011). Moreover, since schools contribute to creating democratic societies, democratic approaches to policy production are essential (Pinto, 2012). Consequently, the contemporary policymaking process is one of inclusion whereby stakeholders (i.e., students, parents, principals, teachers, etc.) can participate in policy formulation. This inclusion strategy helps achieve equity in policy processes (Pinto, 2012). Although many of Ontario's (Canada) policy reform processes include several structures and forums for citizen involvement, the opportunities for citizen

participation and open exchanges of ideas are limited (Pinto, 2012). Unfortunately, the government takes an elitist-type approach to Ontario's curriculum policies; policy actors are invited to participate based on 'who they know,' resulting in educational elites being 'hand picked' to engage in writing teams and in stakeholder consultations (Pinto, 2012).

In so doing, the makers have been and continue to establish rules and regulations. These often address specific needs of a child, including what they learn and the way in which they are being taught (Schneider & Ford, 2009).

These regulations address educational issues pertaining to governance, finance, curriculum, and other sociological factors. Addressing sociological factors, especially those concerning race and ethnicity, has been challenging for most policy makers. Mickelson (2009) says, "[t]he institutional basis of racial stratification in education remains the single most urgent challenge facing educational policy makers, students, and their parents" (p. 253).

Although this factor has been difficult to manage, policy makers encounter other problems related to biases. Historically speaking, policy research has been biased toward quantitative studies, thus influencing the way writers develop memoranda (Pinto, 2012; Rosen, 2009). If quantitative studies are deemed more credible than qualitative ones, the former will shape education policies. Even though this is the case, more scholars are understanding the value and reliability of qualitative research. As a result, policy makers have slowly begun altering their attitudes (Leung, 2015). Consequently, education policy research indicates that many policy makers use qualitative studies to formulate memoranda (Honig, 2009a; Potterton & Malin, 2020). It must be noted, however, that education policy research may not be important at all in relation to policy; it is only one factor that may influence policy.

Policy Implementation Research

Policy implementation is known as the coupling of policies through mechanisms, resources, and relationships, to program action. It includes both technical and relational aspects (Hardee et al., 2012). From a health care perspective, Nilsen (2015) defines implementation as "the scientific study of methods to promote the systematic uptake of research findings and other EBP's [evidence-based practices] into routine practice to improve the quality and effectiveness of health services and care" (p. 54). Hardee et al. (2012) claim that policy implementation identifies the institutions responsible for execution and ensures these institutions "have the

capacity for implementation and that the relations among institutions are conducive for collaboration” (p. 1).

History of Policy Implementation Research

Researchers have recognized the importance of policy implementation science since the 1960’s and early 70’s. It is important to understand how and why interventions and policies are executed (Nilsen et al., 2013). In the early 70’s, researchers focused on addressing the problem of implementation through analytical efforts: policy implementation focused more on comprehending implementation failure (i.e., the factors leading to unsuccessful memoranda). Although this is the case, research also revealed that the individual implementer is the most meaningful unit or actor of analysis and should therefore be a part of the policy designing process (Bardach, 1977; Murphy, 1971). Moreover, the designing process should include more incentives and clearer instructions for leaders who are implementers. Thus, by the 1980’s, researchers focused more on the factors/variables that could affect implementation rather than the pass-failure mentality/system/notion (Nilsen et al., 2013). Such factors pertain to the goals, targets and tools of a policy, and the people who are involved in designing and implementing the policy (Nakamura & Smallwood, 1980). The goals of the policy refer to the contents of the intervention itself and the analytical process in which it is implemented. Targets concern the critical role of individuals (stakeholders) at the local level where implementation occurs, while tools concern the federal mandates and incentives that assert top-down command-and-control relationships in hierarchical systems – such as hospitals, political arenas, schools, etc. (Honig, 2006). Another important factor which was considered by researchers in the 80’s was the context in which a policy was executed. Nakamura and Smallwood (1980) believed that knowledge could be deepened when the main features of political and bureaucratic settings within which policy proposals – are or are not implemented – are analyzed.

Theories & Frameworks of Policy Implementation Research

To better understand implementation processes, mechanisms, and outcomes, as well as communicate implementation research more clearly, researchers employ theories and design frameworks (Antwi & Kale, 2014; Durlak & DuPre, 2008; Kotter & Schlensinger, 2008). One such framework is Aarons et al.’s (2011) conceptual model of evidence-based practice implementation in public service sectors. It illustrates implementation as a four-stage process.

Implementation models help researchers and implementers identify factors that either facilitate or impede the implementation process. This, in turn, affects implementation outcomes (Durlak & DuPre, 2008; Nilsen, 2015; Peters et al., 2013).

Education Policy Implementation

There are various definitions of education policy implementation (Fullan, 2015; Haddad & Demsky, 1995; Honig, 2006). It has been traditionally described as a technical stage of the policy process in which the decisions policy makers have made are executed by educators and administrators (Datnow & Park, 2009). More recent definitions recognize the complexities associated with the growing educational systems, expressing that implementation is a collaborative process involving policy makers and stakeholders (Honig, 2006). Implementation is therefore the intricate process of policy makers and stakeholders creating coherent, practical policy goals (promising practices) which are translated into desired changes (policy outcomes and daily practices) (Mason, 2016; Nilsen et al., 2013). Honig (2006) says that successful implementation is a product of the interaction among people, particular policies, and places. Ng-A-Fook et al. (2015) further, emphasizing the relational complexities and multidirectional aspects of implementation, especially in relation to knowledge mobilization (KMb).¹⁸

One of the most recent definitions of policy implementation adapts existing ones, attempting to be more comprehensively meaningful to policy makers: “Education policy implementation [is] a purposeful and multidirectional change process aiming to put a specific policy into practice and which may affect an education system on several levels” (Viennet & Pont, 2017, p. 6). Although there is no consensus among scholars pertaining to a specific definition on implementation, there is an agreement that implementation is the process of putting into action desired objectives or goals (O’Toole, 2000).

History of Education Policy Implementation

Education policy approaches and research findings have evolved since the field formally began in the 1960’s when the United States federal government became more involved in various policy arenas (Honig, 2009a). The government began allocating funds for special education-

¹⁸ Knowledge mobilization is “the reciprocal and complementary flow and uptake of research knowledge between researchers, knowledge brokers and knowledge users – both within and beyond academia – in such a way that may benefit users and create positive impacts within Canada and/or internationally” (SSHRC, 2020).

related resources. This funding led to the creation of policies addressing the needs of underprivileged groups at the elementary and secondary levels. The government also issued contracts for the evaluation of these policies. The evaluations often focused on whether these memoranda “worked”¹⁹ by examining whether local implementers (principals, teachers, etc.) executed the policies as designed (Supovitz, 2008). Thus, by the late 60’s and early 70’s, research on implementation of education policies was underway. The implementation of redistributive programs (those that required government funding or services to underprivileged groups) led to complications at various points in the policy process as cutbacks had to be made and state and local governments were responsible for helping distribute funds (Honig, 2006). Due to the policies’ vague language, these officials – now responsible for distributing funds – misinterpreted and began resisting compliance (Honig, 2009a; Pressman & Wildavsky, 1984; Supovitz, 2008). Many implementers argued that “policy makers would improve implementation if they provided clearer instructions to implementers” (Honig, 2009a, p. 334). Consequently, the federal government focused on reforming, innovating, and redistributing policies at local levels. Implementation became more complex. Due to this complexity, studies focused on addressing the problem of implementation through analytic efforts (Pressman & Wildavsky, 1973). They focused on the dynamics of execution processes that might help explain failure or success of certain approaches or provide significant information for education policy makers (Supovitz, 2008). Consequently, those involved in the policy process began asking, what works or what is implementable?

Theories & Frameworks of Education Policy Implementation

For researchers to understand implementation processes, mechanisms, and outcomes – more thoroughly – they employ theories and frameworks. Such theories include (but are not limited to): complexity theory, organizational learning theory, and critical race theory (Honig, 2009a).

Complexity theory is significant in educational policy implementation since educational systems are intricate organizations, consisting of multiple, interacting, dynamic interdependent factors (Radford, 2006). These organizations do not move linearly toward improvement but

¹⁹ This refers to the success of a policy’s implementation. Success concerns how well all the goals of the policy are met (Government of Canada, 2016; Supovitz, 2008).

rather evolve “in and out of various states of equilibrium at which performance outcomes may not show improvement but [remain] essential for [the organization’s] stability and ongoing change and possible future improvements” (Honig, 2009a, p. 339).

Theories of organizational learning may also be considered since educational change involves instruction (Cohen, 1982). Changes in the educational system occur as one learns what works or what does not. The knowledge and information that derives from this learning is then used by decision-makers, that is, policy designers and implementers, for organizational improvement. These individuals participate in a complex process of learning where they must: a) search for information; b) store and encode or exploit that information; and c) distribute that information to a broader range of organizational members. When encoding, policy makers and implementers must discern how to integrate new information into organizational rules (Honig, 2009a).

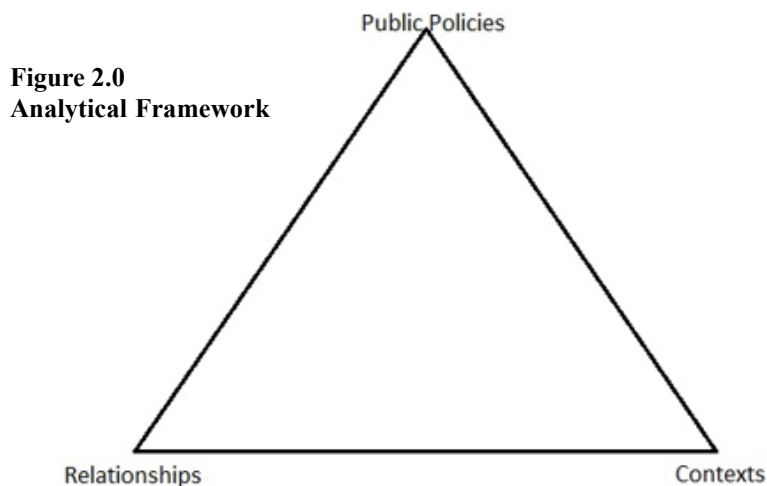
Since the educational system is comprised of people with varying cultural backgrounds, policy makers and implementers may consider critical race theory. Critical race theory concerns the notion that racism is a normal feature of life that is detected in educational institutions, even in ones that promise to address the disadvantaged. It also pertains to the idea that due to its prevalence, racism has become virtually invisible, although existent (Delgado, 1995; Ladson-Billings, 1998). Due to these notions concerning race, Honig (2009a) claims how significant it is for legal and social inquiry to continue uncovering the manifestations of racism and their influences on implementation.

Education researchers can follow such theories as critical race, organizational learning theory, and/or complex theory. These can help researchers and implementers not only understand the process more thoroughly, but these theories can help them identify factors that either facilitate or impede the implementation process (Durlak & DuPre, 2008; Nilsen, 2015; Peters et al., 2013). Education policy frameworks also aid researchers in understanding implementation processes, mechanisms, and outcomes. Furthermore, they help researchers communicate implementation research more clearly. The following education models are a few examples of the many frameworks educators utilized since the 1980’s.

Analytical Framework.

Questions about the working order of a policy and implementation led to educational researchers developing an analytical framework in the shape of a triangle. This model considers

the importance of *public policies*, *contexts*, and *relationships* interaction (Honig, 2009a; Nakamura & Smallwood, 1980) (see Figure 2.0). Concerning the first dimension (*public policies*), knowledge can be deepened when types of policies (their goals, targets and tools) are examined. These goals often pertain to helping students reach basic minimum standards through programs. Targets refer to school staff who must ensure that basic standards are being met, while policy tools concern the federal mandates and incentives that assert top-down command-and-control relationships in hierarchical education systems (Honig, 2006). In some school districts staff communities may be reinforced by certain mandates whereas such mandates in other school settings are unnecessary (Coburn & Stein, 2006).



(Honig, 2009a; Nakamura & Smallwood, 1980)

McDonnell and Elmore (1987) claim that distinguishing policies by their “instruments” or tools helps the implementation process as incentives, capacity building, and mandates can motivate stakeholders to be invested in the policy and its implementation process. When a policy is being written, it is also important to write in the vernacular so that stakeholders understand what they must implement. Moreover, it is important to discern the educational impact of policies in other sectors – health care, social services and community development (Anyon, 2006).

Regarding the second dimension (*contexts*), it is important to be aware of the place or local context in which a policy must be implemented. Urban school districts especially “have particular political and institutional resources for implementation that mark them as a distinct subset of districts” (Honig, 2009a, p. 337). Consequently, an education policy designer has to

consider the race and class-based tensions within local districts and even particular schools (Dumas & Anyon, 2006). Policy makers and researchers also must consider the interdependencies between the school and its urban or rural surrounding area. The last dimension (*relationships*), concerns all those involved in the implementation process (i.e., Education Ministry officials, supervisory officers, teachers, parents, students, etc.). Nakamura and Smallwood (1980) emphasize the need for local implementers to be included in the policy designing process. In the 70's, there were ongoing efforts to engage in more participatory educational policymaking whereby the government promoted citizen engagement and involvement in policy processes (Baiocchi, 2001; Button & Mattson, 1999; Weeks, 2000). Clune (1983) expresses the extent to which policy implementation was a negotiated process whereby the federal government, states or provinces, and local school districts must continuously collaborate to discern the terms of policy compliance. Teachers, principals, and supervisory officers were encouraged to shape implementation processes and outcomes (Honig, 2009a). Pinto (2012) says that including these stakeholders in the process created a more democratic and fair memorandum. As a result, the policy's outcomes were more widely accepted as legitimate (Pinto, 2012). Furthermore, citizen participation in policy processes, including implementation, resulted in better policy outcomes as citizens feel invested in the policymaking and execution process (Pinto, 2012).

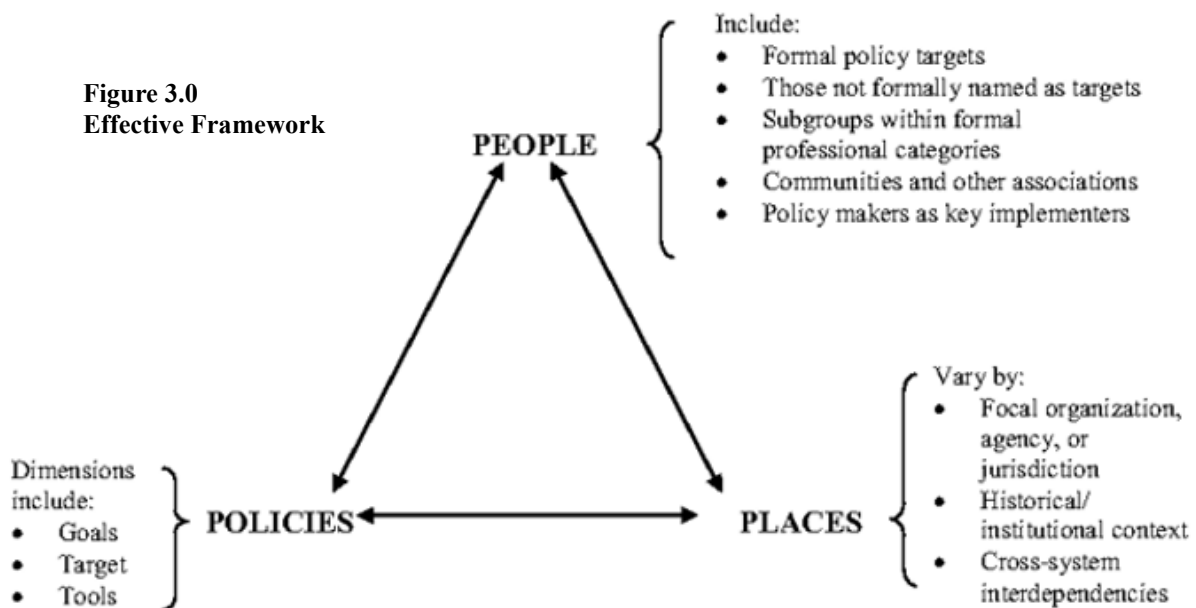
By the 1980's, Nakamura and Smallwood's *public policies-contexts-relationships* framework was utilized. Moreover, unlike theories and models from the 1970's, a distinction was made between implementation and outcomes. Researchers began documenting the trends of implementation inconsistency across schools and the impacts of the associated policies. It was determined that school boards were implementing policies; however, due to inconsistencies concerning the execution of these memoranda, outcomes within schools were quite poor (Odden, 1991). This focus on implementation variability and small reliable impacts was the focus in the late 80's and throughout the 90's.

Effective Framework.

Contemporary education policy implementation research builds upon the aforementioned interaction of *public policies*, *contexts*, and *relationships*. Honig (2006) designed an education policy implementation framework based on emerging societal and educational complexities. Rather than asking, what works or what is implementable? She asks, what will work for whom,

where, when, and why?²⁰

Like Nakamura and Smallwood’s (1980) model, Honig (2006) expresses that the education policy implementation process is influenced by policies, context(s) and relationships; however, she integrates “places” in lieu of context and “people” for relationships. Thus, “implementability and success are the product of interactions between *policies*, *people*, and *places*” (Honig, 2006, p.2) (see Figure 3.0 for framework). Like her predecessors, she explains what is meant by these three dimensions; however, she expands upon the former one – *policies*. When designing a memorandum one must consider the demands specific policies place on implementers. Moreover, unlike her predecessors, Honig (2006) claims that a policy’s goals have altered from students reaching basic minimum standards to ensuring all students achieve high standards through large-scale change initiatives which must be executed in a reasonable time. Studies express that memoranda with *goals* related to teacher-student relationships, classroom subject matter and the classroom context, create different execution challenges than policies pertaining to such peripheral factors as course schedules, staff meetings, seating arrangements and so forth (Elmore, 1996; Lee & Smith, 1995).



Honig (2006), p. 14

Furthermore, policy targets move beyond school staff to people and organizations at

²⁰ Honig (2009a) claims that this approach helped to address some implementation problems since policy execution is a locally situated and contingent process.

school, district, state/provincial and federal levels, as well as those comprising families, neighbourhoods and youth or health agencies. These targets can shape the mobilization of other stakeholders who are either for or against implementation (Hess, 2002; Honig, 2009a; Malen, 2006). Target groups can be quite extensive, and they can influence the way in which a policy is implemented (Honig, 2009a). For example, local restaurants or food distributors' compliance to education food policies will affect how nutrition memoranda are executed within schools (Vine & Elliott, 2013).

Unlike Nakamura and Smallwood's (1980) model, Honig (2006) claims that policy tools no longer solely reflect top-down command relationships; some reinforce traditional control models (sanctions, high stakes, etc.) while others depart from them with capacity building, systems change, learning and community. It is interesting to note that although Honig does not explicitly mention how a policy's design can be "actionable" or accessible, she expresses the importance of having a clear, actionable (feasible) and reliable policy for effective implementation: "[P]rimary audiences for implementation information...demand clear, actionable, and reliable information that can guide their decisions especially in complex policy arenas" (Honig, 2006, p. 3).

Concerning *people*, rather than classifying the relationships that exist within policy-related contexts, Honig argues the need for considering participants in implementation, as well as their knowledge and beliefs toward policy demands. Moreover, it is crucial to understand their experiences and identities – race and cultural backgrounds – as all these elements shape the implementers' decisions during policy execution. Thus, it is important for policy designers to consider these aspects when examining those that influence student learning: government, local school districts, supervisory officers, principals, teachers, neighbourhoods, families, etc. Honig's (2006) framework also alters Nakamura and Smallwood's (1980) context dimension (which she calls *places*) by solely focusing on the settings that help shape what people – policy makers, implementers, and others – can and will do. Thus, Honig (2006) breaks away from her predecessors' model and asks that policy designers consider more nuanced, contingent, rigorous, and theory-based explications of *how* implementation unfolds.

Honig (2006) created an intricate framework which likely unfolded because of the complexities associated with policy execution. By the 1980s and early 90s governments began designing and implementing more policy initiatives; there was an emphasis on having state or

provincial educational agency leaders and staff designers and implementers of policy (Fuhrman et al., 1988). There was also an exploration of how school-based professionals (including supervisory officers, principals, and teachers) shaped implementation processes and outcomes (McLaughlin, 1991). Moreover, the research literature concerning education policy implementation grew as studies revealed education and social systems as becoming more complex; students' experiences in school highly depended upon conditions in their neighbourhoods, families and peer groups. For this reason, Honig (2006) includes the *people* and *places* dimensions in her framework with their corresponding explanations.

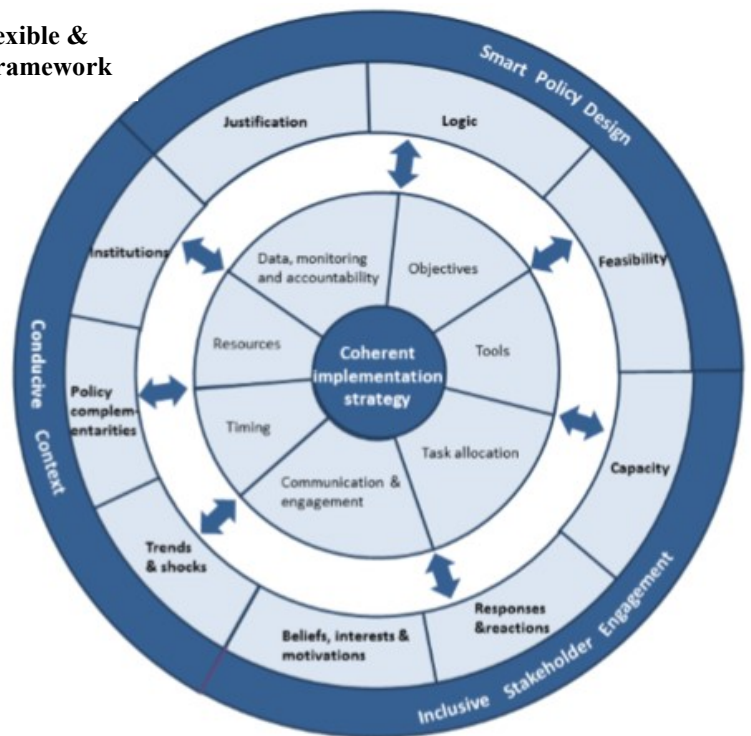
Studies also began revealing the interconnectedness of policies, people and places as well as their multidimensional aspects. For example, one multidimensional element with the *places* dimension concerns diverse communities.

Flexible & Actionable Framework.

One of the most contemporary up-to-date implementation conceptual frameworks is Viennet and Pont's (2017) flexible and actionable one. They adapt their predecessor's model to reflect more recent education policy research concerning "flexibility" (Fullan, 2015). Rather than creating a three-dimensional model (*policies, places, and people*), Viennet and Pont (2017) propose a four-dimensional

overarching one comprised of the determinants or dimensions: *smart policy design, inclusive stakeholder engagement, a conducive institutional and societal context, and a coherent implementation strategy to reach schools* (from now on abbreviated) (see Figure 4.0 for framework). The former pertains to the way a policy is framed, the suggested logic addressing the problem at hand and the possible solution(s). Thus, similar to Honig's model depicting *policies*, there must exist goals and targets for successful

Figure 4.0 Flexible & Actionable Framework



Viennet and Pont (2017), p. 7

implementation. These goals can be large-scale, aiming to change professional practice. They are also related to time – a reasonable timeline for effective implementation to take place. The target groups also resemble Honig's.

Viennet and Pont, however, remove Honig's (2006) tools concept when describing policy design and add a new one – causal theory or theory of change. This underpins the policy as it expresses how and why the memorandum change takes place. Furthermore, Viennet and Pont (2017) only discuss the theory of a policy with its corresponding goals and targets, while Honig's (2006) *policies* dimension blends the memorandum with the implementation strategy. Honig combines the two as they are considered parts of the policy statute – i.e., the decisions that frame the goals, targets and tools, and structural relationships (Honig, 2006). Moreover, the first determinant concerns whether the policy's solution is feasible, that which Honig only briefly alludes to when mentioning the importance of having an actionable memorandum.

Regarding Viennet and Pont's (2017) *stakeholder* dimension, education policies are executed by organizations and individuals, making them central to the implementation process. Their interaction with other people and their own personalities (policy interests, motivations and beliefs) also influence implementation. Similar to Honig's (2006) model describing *stakeholders*, this determinant includes people at varying (local, district, provincial, federal) levels – i.e., those inside and outside the formal education system. Moreover, it emphasizes the importance of policy designers considering how and why stakeholders respond (or not) to policy demands.

Viennet and Pont's (2017) third determinant, *context*, pertains to the institutional setting in which the policy is executed; this setting is comprised of the informal (i.e., a local school's collaborative culture) and formal (i.e., governance system) social constraints that regulate the implementation process. For example, the way in which teachers and principals collaborate in a school – promoting a policy or not – affects education policy implementation. The governance system in Ontario, Canada, is the Ministry of Education coupled with district supervisory officers and school principals. They are responsible for monitoring and making decisions pertaining to the policy. Other policies within or outside educational institutions may also be considered as these may hinder or facilitate implementation.

The final determinant, *implementation strategy*, concerns the operational plan that guides the process to ensure effective policy execution (Viennet & Pont, 2017). This plan provides

specific details concerning who is supposed to execute what, and who is responsible in case a given step of the implementation goes wrong. Moreover, it outlines objectives, implementation timing, pace, task allocation, communication, and accountability measures – tools to measure policy compliance and instruments encouraging stakeholders to implement the policy. Like Honig’s description, these instruments can be in the form of top-down command-and-control mechanisms and/or capacity-building and school-community partnerships to achieve the policy objectives.

It is therefore evident that Viennet and Pont (2017) adopt Honig’s (2006) *policies-places-people* dimensions, but replace these terms with *smart policy design-a conducive institutional, policy and societal context-inclusive stakeholder engagement*. Furthermore, their explanations of *policy design* and *context* vary slightly from Honig’s. The addition regarding causal theory that Viennet and Pont make when describing *policy design* is beneficial as it expresses how and why the policy change takes place. Along with goals and targets, causal theory is also crucial to understanding the challenges associated with implementing policy as well as those shaping the process (Viennet & Pont, 2017).

Like Honig, they claim that *context* pertains to the setting (school and neighbourhood) in which the policy is implemented. However, unlike her, these authors discuss informal and formal settings. Moreover, it is noticeable that Viennet and Pont (2017) add a fourth dimension (*a coherent implementation strategy to reach schools*) to Honig’s model since contemporary research (Barber, 2008; Fullan, 2015) expresses the extent to which implementation strategies are action-oriented, and ought to be flexible to cope with the unexpected. It is interesting to note that Viennet and Pont (2017) extract Honig’s description of tools within her *policies* determinant and integrate it in their *implementation strategies* dimension. Moreover, they add policy monitoring not only to their fourth determinant but allude to it when describing *context*.

Concerning the fourth dimension, differentiating between policies and implementation strategies is useful as it separates a policy’s theoretical underpinnings (the policy’s theory of change) from the operational (action-oriented) plan explaining how to make the memorandum happen in effect. Viennet and Pont (2017) state, “[it] highlights strategic determinants of the implementation process that could be overlooked otherwise” (p. 37).

It is therefore evident that education policy implementation research has altered over time as it has adapted to the complexities associated with the dynamic and complex educational

system. Even though this is the case, for many decades this type of research has considered the important interactions among policies (the ways they are written, etc.), places (school contexts, etc.), and people (those involved in the implementation process).

The Role of Supervisory Officers

Supervisory officers²¹ are key mediators of policy implementation and influence their outcomes (Burch & Spillane, 2004; Honig, 2009a). Beckwith et al. (2013) argue that these officers play a critical role in developing and executing successful school health initiatives. Supervisory officers help design nutrition policy by collaborating with policy makers; that is, the government and educational ministries (Honig, 2009a). They provide feedback on the policy's effectiveness after it has been implemented. Supervisory officers also design local or district health-related programs or initiatives based on the government's federal/nation-wide nutrition policy. Such initiatives may be in the form of free healthy snacks, health-promotional assemblies, health-related murals, and nutritional-related activities and field trips (Orava et al., 2017). These board officials also play a critical role implementing nutrition policies as they must evaluate, monitor, update, and report on the memorandum (Asada et al., 2016; Government of Ontario, Ministry of Education, 2010). Moreover, they are responsible for effectively engaging their staff, as well as coordinating and delegating implementation tasks (Asada et al., 2016). In larger districts, however, monitoring and reporting of these memoranda are mainly the responsibility of local school professionals or assistant supervisory officers (Asada et al., 2016). Within Ontario, supervisory officers meet with the local school principal(s) to discuss the policy's execution, ensuring that all nutritional products are prepared, served, and stored according to Ontario's Regulation, "Food Premises" (Government of Ontario, Ministry of Education, 2010). The Government of Ontario (Ministry of Education) recommends that school boards also create an "Implementation Committee" comprised of school board members, principals, school staff, students, parents, food service providers, and/or public health staff. This committee may "conduct a board-wide needs assessment, develop an implementation plan, provide regular updates to school board staff, and plan and/or coordinate training for school principals" (Government of Ontario, Ministry of Education, 2010, p. 47).

²¹ Supervisory officers are affiliated with school boards. They are directors of education, superintendents of education, facilitators, or consultants.

When supervisory officers adopt the “school health model,”²² the successful execution of nutrition memoranda increases. This model has strengthened health policies in American schools and provided greater access to services for students, staff, and families. Moreover, it has increased community-school collaboration (Beckwith et al., 2013). The implementation process of Nova Scotia’s nutrition policy was successful as board officials enabled “[s]chools ... to adapt their cafeterias, vending machines and fundraisers to comply with the province’s new legislation” (Kretzel, 2012).

Health related policies are also strengthened when supervisory officers act as mentors to help develop competitive²³ food policies. By being a mentor, supervisory officers alter the way in which a policy is implemented (Beckwith et al., 2013). They are both insiders (implementers) and outsiders (designers) to the policy process, and as such, they have much sway in how a policy is executed. When supervisory officers collaborate with principals within school districts, they can help transform a weak policy into a strong one. For example, the American Association of School Administrators (AASA) worked with ten urban school districts to shift from serving traditional breakfast to offering breakfast in classrooms and kiosks. This made breakfast more accessible to students. Beckwith et al. (2013) claim that had this shift only been the responsibility of the districts’ food services teams, it is likely that this shift would not have been as successful. A supervisory officer is often required to hold stakeholders (such as food service teams) accountable. Supervisory officers’ support in adopting and implementing school nutrition initiatives is also demonstrated in a study involving Alberta’s Nutrition Guidelines for Children and Youth (ANGCY) in Alberta, Canada. ANGCY’s successful outcomes were mainly due to support from school district officials as these school administrators helped facilitate the adoption and implementation of this initiative (Quintanilha et al., 2013).

Supervisory officers have also been involved in developing other health related initiatives. O’Malley et al. (2018) study reveals how superintendents helped to develop memoranda regarding mental health needs of school-aged youth by listing resources for addressing these needs. A study conducted over two decades ago indicates the extent to which supervisory officers promoted policies outlining health-promoting activities and sources (such as

²² This model targets individual groups (school principals, staff, parents, etc.) to provide programs and/or services that support health policies (Beckwith et al., 2013).

²³ “Competitive” refers to educational policies developed for schools with foods and beverages that fall outside of what is served through federally reimbursed school meal programs (Sanchez-Vaznaugh et al., 2010).

stress management programs, healthy cafeteria menus, and smoke-free school policies) in Missouri public schools. The quality of these programs – perceived by school district superintendents – ranged from “average” to “exemplary” (Cox et al., 1997). Supervisory officers also reported that the quality of nutrition-related programs and the acceptance of changes improved over time (Asada et al., 2016). Moreover, not only did supervisory officers have many roles during the policy’s implementation, but many other stakeholders: the government, teachers, parents, and community service providers (Asada et al., 2016). It is therefore evident that school board officials play a key role in developing and executing policies, even if a policy’s intended outcomes are not always reached.

Summarizing, educational policy implementation is a complex process wherein theories and frameworks are utilized. It is a process in which policies, people, and places interact in various ways (Honig, 2009a; Ng-A-Fook et al., 2015). Some of these interactions occur among policy makers and implementers – local, provincial and federal actors – as they collaborate to shape the design and execution of memoranda (Datnow, 2006). Supervisory officers are one of the many stakeholders involved in the process as they help design and execute memoranda. They play a critical role in the execution process of an educational policy as they influence staff, promote the policy, as well as evaluate, monitor, update, and report on the memorandum.

School Nutrition Policies

As schools continue to be identified as a key environment through which child health behaviours can be adapted, formed, and sustained, school nutrition policies have become increasingly popular within Canada and internationally (Jaime & Lock, 2008; McKenna, 2010; Perez-Cueto et al., 2012).

Schools across Australia, New Zealand, Europe, the United Kingdom, and North America, employ school nutrition policies to educate students about nutritional foods and help address the increasing BMI rates in the said regions (Laitsch, 2009; Vanderlee et al., 2014). In general, these nutrition policies outline nutritional standards for beverages and food sold in public elementary and secondary schools. Despite such nutritional standards, there is considerable variation across the world in terms of school feeding practices, programs, policies,

and implementation. There is no consensus regarding what the “best”²⁴ practices are (Mendelson, 2007). Internationally, policies differ in terms of their nutrition criteria (i.e., food-based, nutrient-based, limits on salt, sugar, fat, etc.), what foods the criteria apply to (i.e., cafeteria, vending machines, foods brought into the school) policy strictness (i.e., mandatory vs voluntary policies), and process of policy development and implementation by supervisory officers (Valaitis, 2015).

International School Nutrition Policies

Australia & New Zealand.

Many school nutrition policies are offered across Australia. In 2011, the Department of Health of the Australian Government released the National Healthy School Canteens guidelines to encourage healthy eating at school (The Department of Health, 2013). These guidelines are comprised of a national food categorization system for canteens, monitoring, and evaluation framework, as well as training materials for school staff. The guidelines are voluntary. Consequently, each state can decide to implement all, some, or none of the guidelines (The Department of Health, 2013).

Currently, all the states in Australia implement a school nutrition guideline that applies a “traffic light” system. Foods that must be sold most often are identified as “green,” while foods to sell less often are “yellow” and non-permitted or banned foods are classified as “red.” Many states ban “red” foods from being sold in all school venues, including vending machines, canteens, fundraising activities, school assemblies and celebrations, etc. The Western Australia state implements the “Healthy Food and Drink” policy which applies to vending machines, canteens, classroom rewards, field trips and school camps. (Pettigrew et al., 2012a). Moreover, the “Smart Choices: Healthy Food and Drink Supply Strategy” within New South Wales and Queensland applies to all situations where food is supplied (i.e., tuck shops, canteens, fundraisers, etc.). These states, coupled with others, also use the Australian FOCiS (Federation of Canteens in Schools) criteria as a benchmark for their own nutrition guidelines. The FOCiS is a non-for-profit organization representing school canteens nationally. It conducts a National

²⁴ Mendelson (2007) discusses what “best” practices are in relation to educational nutrition policies. It is important to mention his view as this term is still used in educational circles (Dave & Cullen, 2018; Phulkerd et al., 2017). That said, it must be noted that “promising” practices is a term used later in this chapter in relation to nutrition policies, specifically P/PM 150.

Product Registration Program whereby food and beverages are assessed based on the most up-to-date national nutrition policy guidelines. Although this is the case, some of the states do not use the FOCiS and they refrain from applying the “traffic light” system in all school venues. Furthermore, two states allow sale of “red” foods and beverages for one or two days per term, rather than eliminating these types of foods completely.

It must be noted that school food policies across Australia also include provisions and guidance on school breakfast/lunch programs, advertising, and curriculum. Concerning the School Breakfast Programs (SBP), schools must offer foods in compliance with the policy’s nutritional standards. In many states, it is recommended that schools contribute to health education (through these programs), whereby students learn the origins of foods and can have the opportunity to consume culturally significant foods (Ichumar et al., 2018). Since most of these policies state that schools are to reflect a holistic “whole school approach” to healthy eating (Department of Education, 2022), schools are required to advertise nutrition in schools and educate students about healthy eating/nutrition through school curriculum and events (Pettigrew et al., 2012a).

Unlike Australia, New Zealand no longer has a national food program (Kedgley, 2013; Utter et al., 2009). In 2007, a clause was written in the National Administrative Guidelines requiring all schools in New Zealand to encourage healthy eating and dismissing unhealthy foods. Due to a change in government, only a year later, the healthy school guidelines were removed as most schools did not make the necessary nutritional changes from 2007 to 2008 (Kedgley, 2013; Utter et al., 2009). Consequently, New Zealand no longer has a national nutrition policy. Although this is the case, many stakeholders voiced their concerns and in 2012 the New Zealand Ministry of Health developed guidelines for healthy eating which are recommended to organisations (Huggins, 2019). Since then, the country has also offered provincial nutrition milk and fruit programs, and other health promoting initiatives (Manaakitia A Tatou Tamariki Children’s Commissioner, 2013). To help with these programs’ implementation, the government released “Guidelines for School Programmes,” describing the “best” practices for developing school nutrition programs (Manaakitia A Tatou Tamariki, Children’s Commissioner, 2014). This led to the New Zealand Ministry of Education developing guidelines for healthy school food programmes in 2014 (Huggins, 2019). Although the guidelines are voluntary and not all schools have implemented the guidelines or developed

nutrition policies (Vandevijvere et al., 2017), many stakeholders support healthy eating in schools. For example, projects, such as Project Energize, have been created where “energizers” – stakeholders – access regional and local school nutrition initiatives to help them create more effective health-related policies. These stakeholders also support and promote school and community gardens (Mrkusic, 2012).

Europe.

According to the Joint Research Centre of the European Commission (JRC), the European Commission and Member States developed a national school nutrition policy, the *EU (European) Action Plan on Childhood Obesity 2014-2020* (European Commission, 2015). Thirty countries (including Norway and Switzerland) implement this policy (see Appendix A for table of all countries). Most of their policies emphasize the consumption of healthy foods over less nutritious ones. More than 75% of the countries implementing these policies also have standards concerning portion sizes, while approximately 65% of these countries have nutrient-based standards. A few countries also emphasize the need to eliminate all unhealthy food and beverages on school premises (Storcksdieck genannt Bonsmann et al., 2014), while others prohibit the consumption of soft drinks. Moreover, vending machines are restricted in over 50% of the EU countries.

Fifty-two percent of these policies are mandatory, while 47% have voluntary guidelines. Belgium has separate standards for two of its regions (Wallonia and Flanders) which are both voluntary. To help improve the implementation of their policies, the JRC encourages knowledge exchange among policy stakeholders. They do this by ensuring that everyone has access to what these policies state and how they are being implemented. Allowing access can foster stakeholder dialogue and therefore increase the effectiveness of these policies (Storcksdieck genannt Bonsmann et al., 2014).

Like Australia, many of these nutrition policies state that schools must or should employ a holistic view to healthy eating. For example, students should not only be served nutritious meals, but they should learn about healthy eating through school curriculum, events, and programs (such as breakfast/lunch programs). Moreover, schools should/must²⁵ ensure to advertise nutrition through message boards, posters, online media pages, etc. (European

²⁵ Some policies use the term “must,” while others say “should” or “may.”

Commission, 2019). The European Commission (2019) says that school settings “should be free from all forms of marketing of foods high in saturated fats, trans-fatty acids, free sugars, or salt.”

The United Kingdom.

The United Kingdom has compulsory nutritional standards for its four countries: England, Scotland, Wales, and Northern Ireland. The countries’ policies, however, and the way they are executed, differ (Adamson et al., 2013; Moore et al., 2010; Storcksdieck genannt Bonsmann et al., 2014). England’s policy, “Turning the Tables,” was executed in 2006, although the guidelines were written in 2001. This policy includes food and nutrient based standards for school lunch and foods other than lunch. It also prohibits unhealthy foods and beverages provided to students off school premises, such as on school field trips. As part of this policy, England offers free school meals for children (Adamson et al., 2013; Moore et al., 2010). These meals, however, must follow the nutrition standards outlined in the “Turning the Tables” policy.

Rather than offering free school meals to all children, Scotland’s policy, “Hungry for Success” (2003), spawned a program whereby free school meals are only offered to students who are eligible. Eligibility is based mainly on family income level (Valaitis, 2015). In 2014, the Scottish government developed a program based on the policy’s food and nutrient standards which covers all food and beverages provided in schools throughout the day. The government began the program “Beyond the School Gate” which encourages students to remain at school during the lunch period. Moreover, it suggests how schools and community stores can play a part in offering healthy choices within and outside the school environment (Adamson et al., 2013; Moore et al., 2010)

Wales’ school nutrition policy, “Appetite For Life (A4L) Action Plan,” was developed in 2001 and executed in 2006. Originally, this policy only promoted healthy options and did not prohibit unhealthy ones. Once revised, it now introduces nutrient based standards at lunch and other standards throughout the school day. It restricts the consumption of “less” healthy food and beverages – those high in sugar, salt, and fat. The policy’s implementation period was the longest (2007-2013) compared to the other countries (Adamson et al., 2013; Moore et al., 2010).

The Northern Ireland Department of Education released “Catering for Healthier Lifestyles” in 2001, which was fully executed in 2007 (Adamson et al., 2013; Moore et al., 2010). Similar to Wales’ policy, the “Catering for Healthier Lifestyles” had its weaknesses. Originally, the policy’s food-based standards only applied to school lunch. Currently, its

standards apply to all food and beverages offered in schools and it restricts foods and beverages that are “less” healthy (i.e., those that are high in fat, sugar and salt) (Adamson et al., 2013).

The nutrition policies developed within the United Kingdom have all been tweaked, either to include more nutrition-related programs, or to apply more/different nutritional standards. They all mention the importance of taking a whole-school approach to nutrition. For example, unhealthy foods/beverages should not be advertised within schools or on school/school boards social media/websites. Moreover, breakfast/lunch programs must follow school policy protocols and teachers should integrate health education in the classroom (Ballam, 2019). With the guidance of key stakeholders, experts, assessments, and evaluations of school environments, each policy has been improved (Adamson et al., 2011; Education and Training Inspectorate, 2010; Spence et al., 2013). This reinforces the notion that the development and implementation of school nutrition policies is a meticulous and ongoing process, involving an exchange of ideas and support from many stakeholders (European Commission, 2015; Viennet & Pont, 2017).

United States.

The ongoing developmental and implementational process of school nutrition policies extends to the United States. In 1946, the Federal government developed the National School Lunch Program (NSLP) which offers all primary and secondary school students the option to eat school provided nutritional foods (Food Research and Action Center, 2015). This program has been subsidized by the government since its genesis through the US Department of Agriculture (Hirschman & Chriqui, 2013) and offers free meals, reduced priced-meals or fully-priced meals depending on household income (Crepsinek et al., 2009; Hirschman & Chriqui, 2013). Many studies indicate the positive nutritional impacts this program has had on students, including their consumption of key nutrients, milk, and vegetables, and the reduction of sugars and fats (Crepsinek et al., 2009; Cullen et al., 2006; Gleason & Suitor, 2001). Consequently, students’ energy levels have been higher, and their academic performance and school attendance have improved (Taras, 2005).

In 1966, the national School Breakfast Program (SBP) was introduced in addition to the lunch program. The breakfast program was similar in terms of protocols (how one pays for meals) and food categories (Crepsinek et al., 2009; Hirschman & Chriqui, 2013). It too has had positive impacts on students’ health. However, both the NSLP and SBP have been revamped

since their genesis as evaluations and assessments indicated the extent to which these programs were not being properly/effectively implemented (Valaitis, 2015). School meals had a higher percentage of fat (>30%) and saturated fat (>10%) than the US Dietary Guidelines for Americans recommendations published in 1990. As a result, the government issued the *School Meals Initiative for Healthy Children* in 1995. This policy includes specific standards for fat and saturated fat, as well as for protein, vitamins A and C, calcium and iron. The NSLP specifically, must provide students with one-third or more of their Recommended Daily Allowance for specific nutrients. Compliance with the standards would be evaluated every five years (Crepsinek et al., 2009; Hirschman & Chriqui, 2013). After 6 years of implementing the *School Meals Initiative for Healthy Children*, students continued eating high sodium and low fibre school lunches contrary to the 2005 dietary guidelines (Crepsinek et al., 2009).

This policy only concerns foods being offered during school breakfast and lunch hours. Consequently, students were able to purchase less-nutritional foods from vending machines and canteens outside the cafeterias (Bergman et al., 2010). The most common competitive foods consumed by students included: desserts and low nutrient-density snacks (53% of all children who consumed competitive foods), cookies, cakes and brownies (12%), candy (18%), salty snacks (22%) and beverages other than milk or juice (46%) (Caparosa et al., 2013; Fox et al., 2009).

Since students continued eating unhealthy foods at school, the *Child Nutrition WIC Reauthorization Act* was implemented in 2004 (Valaitis, 2015). It required all schools participating in the national school lunch program to adopt a wellness policy – with strict standards pertaining to vending machines and canteens – by the 2006/2007 school year (Centers for Disease Control and Prevention, 2012; Hirschman & Chriqui, 2013). Although some of the local school wellness policies, created by the state or district, yielded positive results (Turner et al., 2012), many were weak overall and nutritional effects were modest (Belansky et al., 2010; Boles et al., 2011; Hirschman & Chriqui, 2013). The developmental and implementational aspects of these policies were inconsistent (Valaitis, 2015). Consequently, the US Congress passed the *Healthy, Hunger-Free Kids Act* in 2010, requiring the creation of federal nutrition standards for foods offered in vending machines and canteens within primary and secondary schools. By October 2010, none of these state policies met the federal standard recommendations set by the Institute of Medicine (IOM) (Centers for Disease Control and

Prevention, 2012; Hirschman & Chriqui, 2013). Although school nutrition policies have significantly improved throughout the decades, there is much room for refinement. For example, very few school food policies take a holistic approach to nutrition whereby they ask schools to promote nutrition through posters and nutrition-related school events. Only some policies include guidance and provisions related to curriculum (Beckwith et al., 2016).

Canadian School Nutrition Policies

Like the United States, each province/territory is responsible for developing its own nutrition policies (The Working Group, 2013; Fung et al., 2013; Masse et al., 2013) (See Appendix B for a table summarizing the provincial nutrition policies). Although this is the case, most jurisdictions use a consultative process with key health, community, and government stakeholders in the development of their policies. Before detailing the content and implementation plans of Canadian school nutrition policies, it is necessary to first describe what many of these policies are based upon and where they stand in relation to the nutrition field.

NOURISHING Framework.

The nutrition field is vast and complex as there are many governments and nongovernmental institutions designing and implementing nutrition-related policies. To address the continuously evolving field of nutrition-related memoranda, as well as promote healthy diets, and reduce obesity across the world, the World Cancer Research Fund International developed a policy framework that can be globally used. This framework (known as NOURISHING) is comprised of three domains: *Food Environment*, *Food System*, and *Behaviour Change Communication* (see Figure 5.0). Research indicates that each domain is important in influencing what and how people eat (World Cancer Research Fund International, 2022). Across these three domains are ten evidence-informed policy areas that governments should

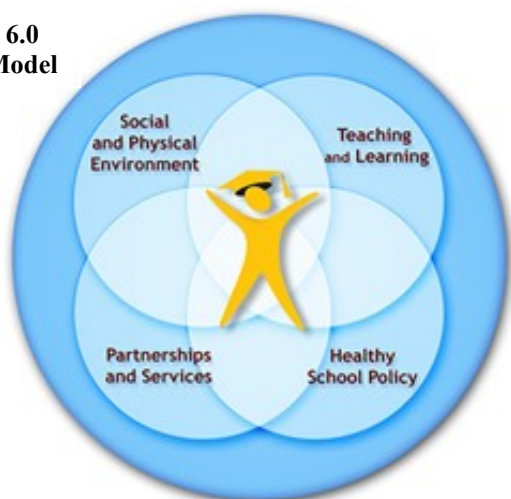


follow. Within the first domain (*Food Environment*), there are six policy areas that focus on nutrition label standards and regulations, healthy food standards, a holistic approach to nutrition, restricting food advertising, and the use of economic tools, incentives, and rules. Within the second domain (*Food System*), there is one policy area. This area focuses on utilizing the food supplier and other stakeholders to ensure coherence with health. Within the third domain (*Behaviour Change Communication*), there are three policy areas. These concern educating stakeholders about nutrition, providing them with nutrition-related skills, informing people about nutrition through public awareness, and providing nutrition advice/counselling in health care settings. To implement effective policies, governments should “implement policy actions from all of the ten policy areas” (World Cancer Research Fund International, 2022). These policy areas, however, should be adapted to address regional, national, or local contexts and populations. These policy areas have been adopted and adapted by governments and ministries. For example, the Canadian Federal, Provincial, and Territorial (F/P/T) Ministers of Health and Ministries of Education adopted many of the NOURISHING policy areas to create the healthy strategy and the Comprehensive School Health (CSH) framework.

Health Strategy & CSH Framework.

The Joint Consortium for School Health (JCSH) was first developed in 2004 and was endorsed in 2005 by the integrated Pan-Canadian Healthy Living Strategy set by the Federal, Provincial, and Territorial (F/P/T) Ministers of Health and Ministries of Education (Pan-Canadian Joint Consortium for School Health, 2010; Public Health Agency of Canada, 2010). The Pan-Canadian Healthy Living Strategy (HLS) was developed to reduce health disparities and improve health outcomes – that which the NOURISHING framework also emphasizes. The

Figure 6.0
CSH Model



HLS focused on an improvement of physical activity, healthy weights, and nutritional eating (Public Health Agency of Canada, 2010). With the help of the JCSH, the Pan-Canadian Healthy Living Strategy was utilized by stakeholders from multiple sectors to develop school-based nutrition policies, programs, and practices (Public Health Agency of Canada, 2010).

To produce effective health-related policies, the Pan-Canadian JCSH commissioned the formation of the Comprehensive School Health (CSH) model (see Figure 6.0) which was first published in 2010 (Veugelers & Schwartz, 2010) and updated in 2015 (Pan-Canadian Joint Consortium for School Health, 2010, 2015). This model was based upon the Bronfenbrenner Social Ecological Framework (1994) and recognizes the many factors (social, cultural, political, and economical) that affect a Canadian school environment. The CSH model recognizes that “healthy students learn better and achieve more” (Murray et al., 2007, 2010; Pan-Canadian Joint Consortium for School Health, 2015; Stewart-Brown, 2006).

This framework is comprised of four dimensions: *Social and Physical Environments*, *Teaching and Learning*, *Healthy School Policy*, and *Partnerships and Services*. These are detailed in the table below.

Table 1.0 Definitions of the Four Dimensions (Pan-Canadian Joint Consortium for School Health, 2015)

When We Say	We Mean
<i>Social and Physical Environment</i>	The social environment is: <ul style="list-style-type: none"> • The quality of the relationships among and between staff and students in the school. • The emotional well-being of students. • Influenced by relationships with families and the wider community.
	The physical environment includes: <ul style="list-style-type: none"> • The buildings, grounds, play space, and equipment in and surrounding the school. • Basic amenities such as sanitation and air cleanliness.
<i>Teaching and Learning</i>	<ul style="list-style-type: none"> • Resources, activities and provincial/territorial curriculum where students gain age-appropriate knowledge and experiences, helping to build the skills to improve their health and wellbeing.
<i>Healthy School Policy</i>	<ul style="list-style-type: none"> • Management practices, decision-making processes, rules, procedures and policies at all levels that promote health and wellbeing, and shape a respectful, welcoming and caring school environment.
<i>Partnerships and Services</i>	Partnerships are: <ul style="list-style-type: none"> • The connections between the school and students’ families. • Supportive working relationships within schools (staff and students), between schools, and between schools and other community organizations and representative groups. • Health, education and other sectors working together to advance school health.
	Services are: <ul style="list-style-type: none"> • Community and school based services that support and promote student and staff health and wellbeing.

These four dimensions must interact with each other in order for intended health behaviour change to likely occur (Fung et al., 2012; Fung et al., 2013). Thus, the dimension *Healthy School Policy* is not a standalone measure capable of enacting behaviour change on its own. Rather, policy requires support from all aspects of the school environment: *Social and Physical*, *Teaching and Learning*, as well as *Partnerships and Services*.

The Provinces: Policy Content

The HLS and CSH frameworks were employed when many provincial/territorial Ministry officials collaborated with other key researchers and stakeholders to develop province-wide school nutrition policies and/or guidelines. Most of the policies and/or guidelines are discussed below as they were accessible; however, other provinces/territories had limited information available. Consequently, not all policy facets are described for each province/territory.²⁶ See Appendix B for a summary of the available policy information.

New Brunswick.

Three decades ago, New Brunswick released *Policy 711: Healthier School Food environment*. It was updated in the following years: 2005, 2008, and 2018 (Department of Education and Early Childhood Development, 1991). It outlines the requirements for nutritional foods served in public schools. It mandates that anything sold and promoted at school, including foods in vending machines, must be of maximum and moderate nutritional value. In 2008, the *Healthier Eating and Nutrition in Public Schools: A Handbook for Policy 711* was developed by the New Brunswick Department of Education (2008). The document supplements the nutritional requirements in *Policy 711* and “provides additional information on healthier foods to be served in schools, fundraising alternatives with products that are compatible with *Policy 711*, as well as information for the support and promotion of healthy eating” (p. 1). It emphasizes the minimum requirements for nutritional foods within both elementary and secondary public schools. Furthermore, it suggests prices and mandates that adequate time and space be given to students for eating. Like many of the other province’s, this policy handbook has three food and beverage categories: “Maximum Nutritional Value”; “Moderate Nutritional Value”; and “Minimal Nutritional Value.” These categories are based on the Canada’s Food Guide and focus on nutrients, sugar, fat, and salt. These standards apply to all food and beverages offered and sold in vending machines, cafeterias, canteens, and hot lunch programs. It must be noted that items of minimum nutritional value are forbidden when fundraising or when using food as a reward (New Brunswick Department of Education, 2008).

²⁶ Note that many provincial nutrition policies are detailed, providing guidance and provisions on school breakfast/lunch programs, marketing/advertising, curriculum, etc. However, due to limited space, the facets described below mostly concern what can be sold in schools.

Prince Edward Island.

The PEI Healthy Eating Alliance engaged in KT when collaborating with researchers and school officials to implement the province's school nutrition policy (PEI Healthy Eating Alliance, 2007). The *PEI School Nutrition Policy* was developed in March 2005, and it encourages healthy food and beverage choices within elementary and secondary schools and through education programs. Similar to all the other provincial guidelines and/or nutrition policies, this outlines specific food categories: "Serve Most Often"; "Serve Sometimes"; and "Serve Least Often." It also lists nutrient values related to fat, salt, caffeine, and sugar. Moreover, the document bans the sale of carbonated soft drinks, energy drinks, and fruit beverages that are not 100% juice. Although it was released in 2005, it was not adopted by all PEI school boards until April 2011 (Government of Prince Edward Island, 2016). Since the amalgamation of school boards in 2012, the *PEI School Nutrition Policy* continues to be adopted and monitored by the school district/school board (Eastern School District, 2006; PEI Healthy Eating Alliance, 2005)

British Columbia.

In November 2005, the *Guidelines for Food and Beverage Sales in BC Schools* were released by the Ministry of Education and the Ministry of Health (Healthy Families BC, 2013; Masse et al., 2007). These guidelines pertain to all food and beverages offered in schools, including meal programs, fundraisers, cafeterias, canteens, vending machines, and so forth. Pre-packaged beverages and food are placed in the following categories: "Sell Most (at least 50% of selections); "Sell Sometimes" (up to 50% of selections); and "Do Not Sell." These categories are based upon the amount of sodium, sugar, fat, and nutrients within foods and beverages. It was mandated that all public schools must implement the guidelines, beginning in 2008. Although implementation in all school districts was mandatory, currently the guidelines are not a legislated requirement by the government. As a result, the guidelines are not supported with a compliance and enforcement program (Healthy Families BC, 2013). The policy was revamped in 2013 to reflect new policy and nutrition research.

Manitoba.

Published by the provincial government in 2006, the *Guidelines for Foods Served at School* explains all the foods and beverages that can be offered within the school environment. Similar to British Columbia's policy, the standards suggest the foods and beverages that must be

available most often, and occasionally and/or rarely. However, it does not mention a “No Sell” category. Moreover, unlike BC’s policy, these guidelines provide food portion recommendations. The guidelines were expected to be fully implemented by the 2006/07 year for primary, and 2007/08 year for secondary schools and were created for mandatory district food policies (see Appendix C for more details). It is interesting to note that these guidelines would aid local schools in creating their own programs based on the standards within the provincial policy (Healthy Child Manitoba, 2006). In 2014, the guidelines were updated. They are now known as *Moving Forward with School Nutrition Guidelines* (Manitoba Healthy Food in Schools, 2014).

Québec.

In 2007, the Ministère de L’Éducation, du Loisir et du Sport (MELS) developed a framework policy entitled *Going the Healthy Route at School*. This was designed to assist elementary and secondary schools create an environment that encourages healthy eating and physical activity. Based on the Canada Food Guide, the framework policy addresses such topics as breakfast programs, foods and beverages containing sweeteners, special events and fundraising, the availability of chocolate in schools, food donations, etc. Although *Going the Healthy Route at School* provides special recommendations and guidelines for promoting healthy eating, it is the responsibility of the school boards in Québec to use this document when implementing their own nutrition policies (Central Québec School Board, 2008; McKenna, 2013).

Nova Scotia.

The *Food and Beverage Standards for Nova Scotia Public Schools* was established in 2006 by the Ministry of Education and Department of Health Promotion and Protection. Although it was released in 2006, full implementation was not expected until June 2009. The policy’s main goal is to promote healthy, safe, and affordable food and beverages within elementary and secondary schools. It expresses the need to educate students nutritionally so that they can make healthy nutritional decisions. Furthermore, it encourages community involvement and the need for supportive healthy environments (Education and Early Childhood Development, 2020). It is also based upon the Canada’s Food Guide and nutrition criteria, especially limiting caffeine and salt. These limitations are evident when examining the policy’s three categories: “Maximum Nutrition”; “Moderate Nutrition” (cannot provide more than 2x/week, or <30% of

choices offered); and “Minimum Nutrition.” The policy also addresses space and time where students eat, pricing, nutrition role modeling, fundraising, food as a reward, and food advertising.

Newfoundland and Labrador.

The Government of Newfoundland and Labrador released in 2006 the *Provincial School Food Guidelines for Caterers and Administrators*. It was updated in 2008,²⁷ reflecting the updated Canada’s Food Guide. Like the other provincial policies, this one emphasizes the need for elementary and secondary students to eat healthily. It also advertises the importance of students receiving quality information about healthy food choices. Based on the Canada’s Food Guide and the School Milk Program, it provides specific nutrition criteria for fat, sugar, sodium, fibre, iron, and calcium. Moreover, it provides a list of food and beverages that can be sold or served in school cafeterias, vending machines, and canteens. These foods and beverages are placed in one of two categories: “serve most” and “serve moderately.” It also includes specific guidelines for mixed dishes. The *Provincial School Food Guidelines for Caterers and Administrators* is mandatory and is to assist schools in the development of district school policies (McKenna, 2013; Newfoundland & Labrador, 2009).

Yukon.

Yukon’s *School Nutrition Policy (Policy 1025)* was published in 2008. It was designed to promote healthy food choices in a safe and culturally suitable manner within both elementary and secondary schools. Since many First Nations, Inuit, and Métis students attend Yukon public schools, it seemed appropriate to not only use the Canada’s Food Guide but address the Traditional Yukon Food Guide. Consequently, this policy outlines nutrition from both these guides and describes the First Nations culture, heritage, and language. It also addresses food safety, food storage, and allergies (Yukon Education, 2008). Since this is a territory-wide policy, it suggests that every school “develop their own school-based nutrition policy and guidelines” (Yukon Education, 2008). In 2010, Yukon’s nutrition policy was revamped, suggesting that child-care centres and schools promote healthier eating through healthy fundraising, and nutritional options within vending machines and school cafeterias. Moreover, it required that competitive pricing of healthy options should be advertised (Ministry of Health and Social Services, 2010).

²⁷ Although it was updated, it is only a recommended guideline. See Appendix C for details on mandatory versus recommended nutrition provincial guidelines/policies.

Northwest Territories.

The Breakfast Club of Canada (2019) says that all Canadian provinces and territories have a nutrition policy and/or guidelines, including the Northwest Territories. *Northwest Territories Healthy Foods in Facilities* was developed in 2006 and was adapted from the nutritional guidelines within British Columbia (NWT Healthy Foods in Facilities Working Group, 2006). These guidelines promote healthy food and beverage selections in health and social services facilities. All nutritionally related food and beverages should be within vending machines, cafeterias, meetings and special events. Within the guidelines, individual foods are categorized into appropriate groupings according to nutrient content. There are four categories: “Choose Most”; “Choose Sometimes”; “Choose Least”; and “Not Recommended.” That which is in the former category is nutritional as these foods have much fibre, and/or 2 g or more of iron than the foods within the other categories. That which is listed in the latter category consists of calories exceeding 400 with a fat content of 15 g or more, sugars exceeding 28 g, sodium more than 450 mg, etc. Similar to Yukon, these guidelines recognize the commonly used traditional foods within the territories.

Nunavut.

In 2007, the Ministry of Health and Social Services published, *Nutrition in Nunavut: A Framework for Action*. Its primary goal is to promote nutritional eating in Nunavut. In order to achieve this goal, the nutrition program addresses food security, malnutrition, prioritizes access to food services, promotes healthy eating in territorial-funded domains, educates people (including students) within Nunavut about healthy choices, addresses the Inuit Employment Plan, and mentions the importance of institutions (including elementary and secondary school boards) developing nutrition policies and guidelines (Government of Nunavut Department of Health and Social Services, 2007). The document mentions the importance of healthy menu choices and school food programs (Government of Nunavut Department of Health and Social Services, 2007). Although this framework to action is helpful in establishing goals and recommendations, it does not provide specific examples of menus, nutritional categories (such as the ones listed above) or other nutritionally related information that is often described in guidelines. Moreover, there is limited information about the Nunavut Food Security Coalition’s (2014) goal about creating school food guidelines for all Nunavut schools. I could not locate any information on whether this coalition was able to achieve its goal.

Currently, information on Nunavut's potential school nutrition policies is limited. The focus in Nunavut revolves around school nutrition programs and not policies. One such program is, 'Drop the Pop,' which was established in 2003. It encourages students to eat healthily during nutrition month. This program is annual and has resulted in increased knowledge about good eating habits and local school nutrition policies (Arsenault, 2019; Public Health Agency of Canada, 2012).

Alberta.

Alberta's provincial government released the *Alberta Nutrition Guidelines for Children and Youth* (ANGCY) in 2008 (Alberta Government, 2012; Downs et al., 2012; Quintanilha et al., 2013). Similar to the other provinces, the document is intended to promote nutritional eating in a healthy school environment where students can make healthy food choices. Unlike many other provincial guidelines, its focus extends beyond elementary and secondary schools to childcare facilities and recreation/community centres. In other words, this guideline was designed to not only help children and youth learn about and eat nutritional foods via school, but via the community. The ANGCY was developed based on ten guiding principles: 1). Individuals and organizations requested guidance in creating healthy environments; 2). Current evidence of what constitutes a healthy diet is used; 3). Translates nutrition studies into practice; 4). Adopts the Canada's Food Guide; 5). Intended to promote and achieve optimal health; 6). Intended to promote and achieve healthy weights; 7). Includes practical implementation strategies; 8). Addresses the cultural diversity within Alberta, including the First Nations, Métis and Inuit cultures; 9). Considers the role a family plays in a child's life; and 10). Encourages the support of nutritional selections at events and facilities that children and youth attend.

These principles guide the food rating system. This system is similar to British Columbia's, Manitoba's, New Brunswick's, and PEI's as it contains three categories: "Choose Most Often"; "Choose Sometimes" (<3 times per week in school settings); and "Choose Least Often" (should not be served in schools nor in childcare settings). The ANGCY also suggests the use of local food vendors and recommends various food prices. Further, it provides guidelines for policy development and implementation. Although it provides guidelines, unlike many of the other provincial nutrition policies, Alberta's school nutrition guidelines are voluntary (Godin et al., 2019).

Since the ANGCY was designed not only for schools but for community/recreational centres and childcare facilities, it is important to mention an intervention program solely focusing on schools. The Alberta Project Promoting Active Living and Healthy Eating in schools (APPLE) was designed to support elementary schools in socioeconomically disadvantaged areas within Alberta. APPLE helps schools implement a customized comprehensive school health (CSH) plan (see section above for CSH details) to improve physical activity and healthy eating among students. It helps insert wellness concepts into the school culture (Schwartz et al., 2010). APPLE Projects entail promoting healthy habits through school curriculum, extracurricular activities, health-related policies, and student nutrition programs (Fung et al., 2012). Although this is the case, the intervention program “does not require the school to implement any specific health programming or policies” (National Cancer Institute, 2020). Staff members meet with a school health facilitator – an external member of the school community, funded by the provincial government – to contribute to the program implementation (Roberts et al., 2015). Nutrition-related and wellness initiatives are selected from staff and school community members based on a topic that are meaningful and relevant to the needs of the school (Roberts et al., 2015).

School principals play a significant role when implementing APPLE. They advocate for school change and held stakeholders accountable to change by monitoring APPLE (Roberts et al., 2015). Due to stakeholders’ involvement and support in this project, early outcomes of APPLE demonstrate improvements to physical activity, nutritional eating habits, and body weights of students compared to non-APPLE schools (Fung et al., 2012).

Saskatchewan.

To promote nutritious food and the importance of efficient economical food services, the Ministry of Education developed the *Nutrition and Food Safety Guidelines for Saskatchewan Schools* (Saskatchewan Ministry of Education, 2009). This guide assists elementary and secondary schools in the development and implementation of mandatory school nutrition policies. In order to help the implementation process, it is expected that school boards within Saskatchewan collaborate with schools, students, parents and communities (McKenna, 2013; Saskatchewan Ministry of Education, 2012). They are to follow the recommended guidelines that are based on the Canada Food Guide and the Healthy Foods for My School by the Saskatchewan Ministry of Health. Within this guide there are two categories, “Choose Most

Often” and “Choose Sometimes.” Within these categories is a list of foods that a school can sell or offer free of charge. Much of this type of food is in cafeterias, vending machines, staff rooms, and in fundraisers (Saskatchewan School Boards Association, 2009).

Ontario: P/PM 150.

The Government of Ontario, Ministry of Education (2010) in collaboration with the Ministry of Health and other ministries and consultants associated with youth and nutrition (T. Jardin, personal communication, February 25, 2021) created a memorandum entitled *School Food and Beverage Policy* (P/PM 150). It was indirectly²⁸ based on the CSH (Comprehensive School Health Framework) and the HLS (Pan-Canadian Healthy Living Strategy) – mentioned above. The CSH model recognizes the many factors (social, cultural, political, and economical) that affect a Canadian school environment. It also depicts the ways policy, context, stakeholders, and teaching/learning interact.

The policy’s development began in 2008 when the Government of Canada motivated the Ontario Public Board of Health to collaborate with school boards and schools to encourage healthy eating. When designing this memorandum, Ministry of Education officials hosted numerous meetings with its collaborators (Ministry of Health; Ministry of Children, Community and Social Services; Ministry of Agriculture, Food and Rural Affairs; and The Nutrition Standards for Schools Committee) to discuss the policy’s framework and its many facets (T. Jardin, personal communication, February 25, 2021). Conversations among the collaborators ensued not only about potential frameworks/strategies, but about how the policy should be written, disseminated, monitored, etc. Once the policy was written, there were meetings to discuss revisions (e.g., clarifying terms, stakeholder roles, etc.).

The policy was released in October 2010 asking all public and Catholic schools to comply with its nutrition standards. School boards were to ensure that all schools be in full compliance by September 1st, 2011. P/PM 150 outlines nutritional standards for beverages and food sold in Ontario’s public and Catholic elementary and secondary schools. It utilizes Canada’s Food Guide nutrition standards and emphasizes that healthier foods – those high in

²⁸ When developing and implementing P/PM 150, the Government of Ontario, Ministry of Education employed the Foundations for a Healthy School (FHS) model (detailed below) which incorporates most of the CSH framework facets (Government of Ontario, Ministry of Education, 2016). Hence, P/PM 150 indirectly reflects the CSH model.

essential nutrients and low in trans fats, sodium, and sugar – must be offered in larger quantities than nutritionally inadequate foods. As a result, the Ontario Ministry created the “80/20 rule”. This rule ensures that nutritional products comprise at least 80% of all food and beverage choices, while products with slightly higher amounts of fat, sugar, and/or sodium constitute no more than 20% of all product choices. There are certain foods that cannot be sold in any school venue, program, or event; for example, deep-fried, confectionery products and high sugar-content beverages are forbidden (see Appendix D for more details). The reason certain foods are not permitted is “that when nutritionally inadequate food and beverages are available and promoted at school every day, even along with healthier food and beverages, it becomes increasingly difficult for students to have a healthy diet” (Dietitians of Canada, 2004, p. 1).

Inadequate products, however, may be consumed if they are offered in schools at no cost, sold in staff rooms, or during field trips. Moreover, students can transport, from home, unhealthy foods as part of their lunch. The Ontario Ministry (2010, 2011) realizes that it is important to “treat” students. As a result, P/PM 150 includes a “Special Day Events” module, wherein students are exempt from the nutritional rule. In other words, schools may have up to ten “Special” days where school cafeterias, vending machines, tuck shops, catered lunch programs, bake sales, sport events, etc., may sell “inadequate” products.

When comparing the content of all the provincial nutrition policies, there are variations in school nutrition criteria and standards. Although this is the case, all the nutrition policies aim to improve the consistency of the availability of nutritious foods and beverages in primary and secondary schools. Furthermore, all guidelines extend to every type of food service within schools. Most policies or guidelines in Canada are similar in terms of categorization of food: as either “Sell/choose, most, or items of maximum nutritional value”; “Sell/choose less, or items of moderate nutritional value”; “Sell least often/not for sale, or items of minimum nutritional value” (Leo, 2007). The Canada Food Guide also serves as a basis for all nutrition policies in Canada (Federal, Provincial, Territorial Group on Nutrition Working Group, 2013). It is interesting to note that both Saskatchewan and Nova Scotia specifically detail the provision of affordable foods so as to ensure prices are close to the cost of nutritional foods. Moreover, only seven provinces and one territory (Ontario, Manitoba, British Columbia, Saskatchewan, New Brunswick, Prince Edward Island, Nova Scotia, and Yukon) have mandated policies, while the remaining three (Newfoundland and Labrador, Québec, and Alberta) employ voluntary guidelines.

Summarizing, many provincial school food policies directly or indirectly employed the Pan-Canadian Healthy Living Strategy (HLS) and/or the CSH framework to reduce health disparities and improve health outcomes. Not only do the provincial nutrition policies aim to improve the consistency of the availability of nutritious foods and beverages in primary and secondary schools, but the international ones as well. Most food policies are also based on national, provincial, territorial, or state nutritional standards. Despite such nutritional standards, there is considerable variation across the world in terms of school feeding practices, programs, policies, and implementation.

Concluding Comments

Policies are designed and implemented to address an institutional need. Policy makers must design a memorandum, addressing the social institution's goals and the many ways of attaining those goals (i.e., through monitoring, etc.). This must be done by considering any associated costs of the policy, and by employing the theoretical aspects of policy writing (i.e., using 'what works'), which is revealed through qualitative and quantitative data. Furthermore, policy and implementation should be based on evidence-based practices. Policy writing and implementation should also be collaborative, involving policy researchers and other policy stakeholders. Once a policy is written, it should be tested in real-life situations to discern the reality of 'what works' and whether it affects stakeholders' values. When a policy is implemented, stakeholders must consider the complexities associated with the execution process. This process has been discussed and studied by researchers for many decades, yielding such theories as complexity, organizational learning, and critical race. Moreover, researchers have designed conceptual frameworks: Aaron's (2011) conceptual model of evidence-based practice, Honig's (2006) framework, and Viennet and Pont's (2017) flexible and actionable one, to name a few.

Educational systems have been designing and implementing policies for decades. Recently, these systems worldwide have recognized the increasing BMI rates among children. There are many factors influencing BMI: socioeconomic status, diet and physical activity, and students' surrounding environment. To address the problem of obesity among children and adolescents, educational systems have developed policies. Although these school nutrition policies vary in terms of design and implementation, most food policies are based on national,

provincial, territorial, or state nutritional standards. Moreover, they all have a similar goal: aiming to instill a healthy mindset in students by improving the consistency of the availability of nutritious foods and beverages in primary and secondary schools.

Chapter 3: Implementation: P/PM 150 & Other School Nutrition Policies

Since my research question concerns P/PM 150's implementation by school boards (specifically supervisory officers' perceptions of its execution), it is necessary to describe the implementation of Ontario's *School Food and Beverage Policy* (P/PM 150). Moreover, I detail the policy's impact on students, school staff, parents, community food service providers, and supervisory officers. I also reveal ways of improving its implementation.

P/PM 150's Implementation

This thesis focuses on the implementation of Ontario's P/PM 150. Consequently, this section explores the strategy used to execute the policy and the complexities surrounding implementation. P/PM 150's execution was a complex process wherein theories and frameworks were utilized. It was a process in which policy design, policy implementation, people, and places interacted in various ways (Honig, 2009a; Ng-A-Fook et al., 2015; Viennet & Pont, 2017). Some of these interactions occurred among policy makers and implementers – local and provincial actors. Moreover, it was a process of examination and policy evaluation.

Theories & Frameworks

The policy's development and implementation were indirectly based on the Pan-Canadian Healthy Living Strategy (HLS) and the Comprehensive School Health (CSH) framework (see above section entitled "Canadian School Nutrition Policies" for more details). The Government of Ontario (Ministry of Education) drew from them to develop a revised resource (logic model)²⁹ that supports the integration and execution of comprehensive school health across schools and school boards. The model entitled Foundations for a Healthy School (FHS) is intended to support the "integration of healthy school policies, programs, and initiatives into school and school board planning and implementation processes" (Faculty of Education, 2020; Government of Ontario, Ministry of Education, 2016). To support the execution of CSH, the Ministry identified 5 key areas for focus described within the FHS framework (Government of Ontario,

²⁹ This resource (also known as a framework) is an example of a logic model. Logic models are graphics that present the "shared relationships among the resources, activities, outputs, outcomes, and impact for your program" (Centers for Disease Control and Prevention, 2018).

Ministry of Education, 2019) (see Figure 7.0)

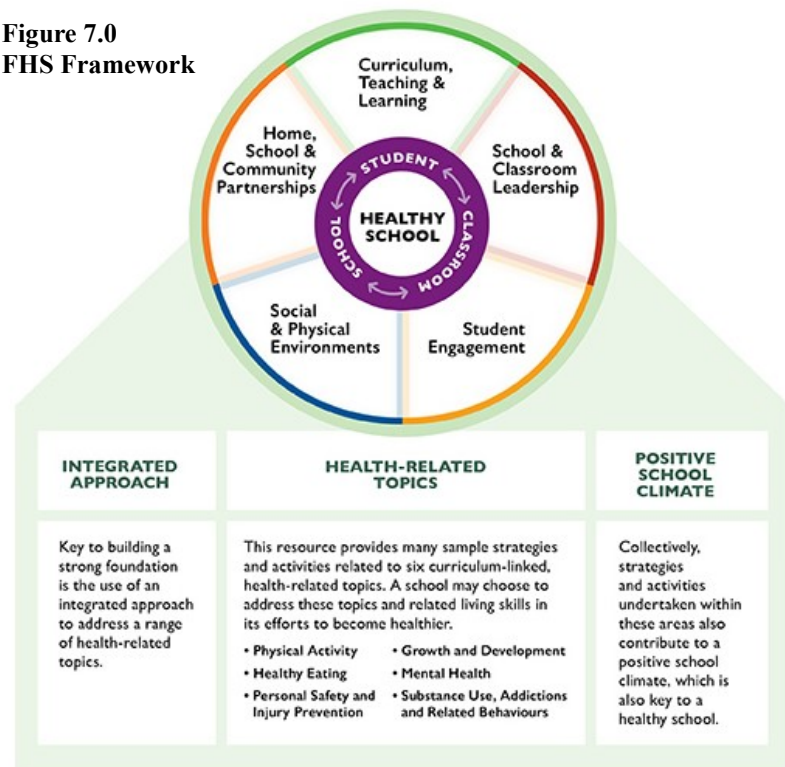
The *Curriculum, Teaching and Learning* dimension pertains to learning programs founded on the provincial curriculum. This includes teaching/learning resources, strategies, and assessment/evaluation practices. The *School and Classroom Leadership* dimension concerns developing a positive classroom and school environment. This is accomplished by addressing the school community’s needs and identifying its priorities and goals. The *Student Engagement* dimension refers to opportunities for students to be active promoters of and contributors to

healthy living. *Social and Physical Environments* concerns the continuous support for the development and maintenance of positive relationships within the school community. Furthermore, it considers how the learning environment is being influenced by the school and its surrounding premises. Lastly, the *Home, School and Community Partnerships* dimension pertains to the engagement and coordination of services, resources, and

expertise that are available within and outside of the school and local community (Faculty of Education, 2020).

When P/PM 150 was first implemented in 2011, Ministry officials wanted to ensure that staff educated students on nutritional behaviour (*Curriculum, Teaching & Learning*). Moreover, they desired staff and students to promote and support the policy (*School & Classroom Leadership; Student Engagement*). They also hoped that schools offered nutritional food and beverages in cafeterias, vending machines, etc., while ensuring students had sufficient eating space within the school and respected these spaces as well as the people implementing the policy (*Social & Physical Environments*). Furthermore, Ministry officials desired the support of the

Figure 7.0
FHS Framework



policy from parents and other stakeholders, such as food service providers and local restaurants (*Home, School & Community Partnerships*).

The Interactions

For implementation to occur, many stakeholders interacted. The policy was developed by policy advisors from the Government of Ontario (Ministry of Education), in collaboration with: i) public health nutritionists from the Ministry of Health; ii) advisors from the Ministry of Children, Community and Social Services; iii) representatives from the Ministry of Agriculture, Food and Rural Affairs; and iv) advisors from the Nutrition Standards for Schools Committee (a sub-committee of the Ministry's Healthy Schools Working Table that included such representatives from education as board and school administrators, and representatives from the health and food industry sectors). All these stakeholders discussed the policy and the implementation process at local levels (T. Jardin, personal communication, February 25, 2021). Interaction among ministry officials, supervisory officers, and school principals transpired as P/PM 150 was employed at the local school level. The officers of each school board within Ontario communicated with their designated principals to ensure that the memorandum was understood and that proper monitoring and completion of forms occurred. Principals were responsible to communicate the policy to staff, parents, and food service providers (Murray et al., 2017; Vine & Elliott, 2013), while school teachers' responsibilities consisted of communicating and educating the students on P/PM 150's rules and regulations. In some instances, school assemblies were held to communicate P/PM 150 to students (Valaitis, 2015). Meetings were held with staff to ensure that vending machines would be stocked with appropriate foods and beverages. Cafeteria managers were also introduced to this policy and many interacted with food providers to ensure that policy compliant foods were being brought in and sold (Burd, 2015; Habayeb, 2013; Orava et al., 2017).

Monitoring its Implementation.

To ensure schools are complying with P/PM 150, school boards (supervisory officers) and health food administrators (local school principals or Implementation Committee members³⁰), must monitor its implementation. School boards demand regular updates from

³⁰ School staff, parents, school board officials, etc., designated to monitor P/PM 150. Committee membership may also be comprised of local community partners (Government of Ontario, Ministry of Education, 2010).

principals. These updates are generally in the form of documents that may or may not require a signature from the principal or another food administrator. Such forms include, the “School Inventory of Food and Beverages Offered for Sale,” “School Assessment,” and the “Letter of Compliance” (Appendix E). The first two documents are in a checklist format. The former checklist is divided into three categories (Venue, Program, and Event with their corresponding sub-categories) and the principal/food administrator must indicate whether food and beverages are offered for sale in these categories (sub-categories). Within the “School Assessment” form, the principal/food administrator must provide information about their school and whether the venues (cafeteria, tuck shop, etc.), programs and events, offer food and beverages that comply with the 80/20 rule. The “Letter of Compliance” details who the food service provider is and whether they are complying with the 80/20 rule. Once completed, these documents must be submitted to the school board (Government of Ontario, Ministry of Education, 2010).

Other documents must also be completed; however, rather than by the principal these are by the cafeteria food service provider and school caterers. Once completed, these must be submitted to the school board. School boards must also comply with Ontario’s “Trans Fat Standards” and ensure that all products must be prepared, served, and stored according to Ontario’s Regulation, “Food Premises” (Government of Ontario, Ministry of Education, 2010).

The Government of Ontario (Ministry of Education) recommends that school boards also create an “Implementation Committee” comprised of school board members, principals, school staff, students, parents, and food service providers or public health staff. This committee may “conduct a board-wide needs assessment, develop an implementation plan, provide regular updates to school board staff, and plan and/or coordinate training for school principals” (Government of Ontario, Ministry of Education, 2010, p. 47).

Although school boards are responsible for tracking their corresponding schools, principals are obligated to ensure all staff, parents and students are aware of, understand, and abide by P/PM 150 (Government of Ontario, Ministry of Education, 2010). Furthermore, they must assess what is being sold and communicate their policy compliance to the school board. Although principals are encouraged to initiate an Implementation Committee at the local school level, it is not necessary. The principal may wish to track all nutritional food and beverage products on his or her own, provide updates to school staff, as well as host information sessions (Government of Ontario, Ministry of Education, 2010).

This monitoring is extremely significant as it helps hold school boards and local schools accountable. Moreover, it creates a form of standardization which ensures that numerous Ontario students (children and youth) are subject to the same healthy standards, and thus a healthier lifestyle. It is this lifestyle that is very beneficial: Barbara Mintz (2014) claims, “[h]ealthy lifestyle equals healthy, happy children” (p. 20).

Re-evaluating P/PM 150

Part of the implementation process is to examine and re-examine P/PM 150 (the memorandum itself) and its implementation (T. Jardin, personal communication, February 25, 2021). After examining P/PM 150’s initial implementation in 2011 and its supports, it was important for the University of Waterloo research team to move beyond exploratory research and help schools strengthen their approaches to CSH and FHS through knowledge translation activities. Consequently, the team divulged results – alongside recommendations – to schools through a school feedback report. In relation to the CSH and FHS, the reports arose within their *Partnerships*³¹ dimension and aimed to strengthen all CSH and FHS dimensions to support P/PM 150 implementation and student health (Orava, 2016). In other words, the purpose of the workshop report was to develop a research/evaluation agenda for school nutrition policy research in Canada (S. Vranas, personal communication, February 10, 2021).

The P/PM 150 memorandum was scheduled to be re-evaluated for the first time in 2020. However, due to the COVID-19 pandemic, the Ministry of Education postponed its revision (S. Vranas, personal communication, February 10, 2021). The focus of the Ministry’s expert panel was to revise P/PM 150 to include the updated Canada’s Food Guide, although other matters may have been discussed (S. Vranas, personal communication, February 10, 2021).

School Nutrition Policy Implementation

It is evident that principals and school board officials play a key role in monitoring P/PM 150’s implementation. However, there is very little data on supervisory officers’ perceptions of it, and its facilitators and barriers. The officers’ perceptions will help us understand more about policy implementation and potentially address the gap between policy and practice. Consequently, it is important to study how P/PM 150 is being perceived by supervisory officers

³¹ This is an abbreviation: the CSH dimension is called *Partnerships and Services* whereas the FHS dimension is known as the *Home, School and Community Partnerships*.

such as, but not limited to, superintendents. Due to the limited studies on the officers' perceptions of P/PM 150, however, I examine other stakeholders' views of it. Moreover, I highlight literature on the perceptions of other school nutrition policy implementation. Before so doing, it is necessary to first discuss the impact research rather than the perceptions of impact.

Ontario Auditor General & Vending Machine Data

Congruous with this thesis research project, several evaluations of P/PM 150 transpired in various regions across the province. For example, in a review with Hamilton-Wentworth District School Board, Trillium Lakelands School Board, and York Catholic District School Board, the Ontario Auditor General expressed that there is no effective monitoring strategy to ensure that food and beverages sold in schools are compatible with P/PM 150 (Lysyk, 2013). Vending machines and cafeteria menus were examined to discover that the foods offered within these three school boards did not meet nutritional standards (Lysyk, 2013). There was a decrease in cafeteria revenues (between 25% and 45%) and vending machine revenues (70% to 85%) during the first year of P/PM 150's implementation.

Vine et al. (2017) gathered data from both Ontario and Alberta secondary schools' vending machines to ascertain provincial nutrition policy compliancy. Since most vending machines were from Ontario secondary schools and their products were compared to P/PM 150's vending machine guidelines, it is appropriate to discuss this study. This three-year longitudinal study reveals that the proportion of schools with policy-compliant snacks sold in vending machines in Ontario decreased between Year 1 (25%) and Year 3 (22%), while the proportion of schools with non-compliant snacks vending machines increased by 10% between Year 1 (67%) and Year 3 (76%). Regarding vending machine beverages, the proportion of schools selling policy-compliant drinks in vending machines in Ontario declined between Year 1 (31%) and Year 3 (6%). It is evident there was a decline over time in the proportion of schools selling compliant foods and beverages, and an increase in selling some non-nutritional foods. Thus, according to this study, most secondary schools in Ontario remain non-compliant with respect to the machine contents (Vine et al., 2017).

Supervisory Officers' Perceptions of Nutrition Policies

Within West Virginia, superintendents said that the quality of nutrition education and guidelines were either "good" or "excellent" (Frost et al., 2009). In a nation-wide study

conducted in the United States, school board members expressed a high level of confidence in how well their nutrition policies (their development, implementation, and evaluation) reflected “best practices.”³² However, many noted that to improve the implementation process, there is a need for more school wellness policy tools and trainings for school staff, parents, and school board members. Training or technical assistance on topics related to developing, implementing, and monitoring/evaluating a wellness policy, may help improve the execution of a policy (Agron et al., 2010; Asada et al., 2018). For this to occur, there must be adequate funding from the federal government to fund facilities to carry out their district’s wellness plan (Agron et al., 2010). Brown et al. (2004) claim that many school board members care about students’ health; however, competing priorities – such as academic achievement and test scores – limit the extent to which nutrition issues are addressed at board meetings.

In 2005 school boards within Nova Scotia experienced a new cafeteria legislation, wherein cafeterias were mandated to sell more nutritional products. School officials said that the transition was smooth. However, unlike P/PM 150, their policy was implemented in stages, as Doug Hadley, spokesperson for the Halifax Regional School Board, states, “[s]chools were given years to adapt their cafeterias, vending machines, and fund raisers to comply with the province’s new legislation” (Kretzel, 2012).

In summary, many studies reveal supervisory officers’ experiences with school-health related initiatives in a variety of districts; however, very little is known about their perceptions of nutrition policies, including P/PM150.

Student Perceptions

Unlike the superintendent literature, a handful of studies reveal adolescents’ perceptions of P/PM150’s implementation within Ontario schools (Gray, 2015; Valaitis et al., 2013; Vine et al., 2014). Students believe that Ontario’s school nutrition policy is not being executed properly as many students often consume unhealthy foods at home and at school when self-monitoring (Gray, 2015; Jensen et al., 2012). This might be due to their lack of knowledge of basic

³² Although the study mentioned “best practices,” this thesis uses the term “promising practices” in relation to educational nutrition policy, specifically P/PM 150. This is because the term “promising practices” denotes a policy with some scientific research or data showing positive outcomes, that has not necessarily been replicated and implemented multiple times in similar contexts. Whereas the term “best practices” denotes policies which have demonstrated desired changes through the use of multiple implementations, the ability to be replicated, and the potential to be adapted and employed multiple times (Smith et al., 2015).

nutritional facts. For example, Gray's (2015) study found that they do not know how to apply healthy eating skills, and they feel they have insufficient knowledge to make healthy food choices. Moreover, their desire to eat unhealthy foods – according to Ontario's nutritional standards – may be due to some cultural barriers as a version of the Canada Food Guide used to develop P/PM 150 is based on traditional Western European foods and groupings that are deemed "healthy." Barnidge and colleagues (2013) say that cultural barriers present a problem within the United States, especially within small rural schools that are implementing nutrition policies. Many Western European foods consumed by Americans may confuse and frustrate students who come from non-Western backgrounds; they may feel uncertain as to how their own cultural food fits into food classification. According to a study examining First Nations students in Alberta, Canada, healthy foods that align with their policy's standards were not always readily available at school. This frustrated many students, thus becoming a barrier to policy implementation (Gillies et al., 2018).

Gray (2015) also claims that a school's environment can discourage healthy eating behaviours as the cost of nutritious food offered at school is quite high. Consequently, students leave school premises to eat at local convenient stores and fast-food restaurants. To avoid eating healthier foods supplied by vending machines or school cafeterias, students also bring unhealthy snacks and beverages from home (Jensen et al., 2012). If the cost of healthy foods was lower, and students were able to help plan cafeteria menu options, design nutrition assessment procedures, and act as nutrition advocates, then school nutrition policies may be more effective (MacLellan et al., 2010).

Valaitis et al. (2013) and Vine et al. (2014) also note that secondary students recognize the high prices of compliant food for sale in Ontario schools. As a result, they too travel off-campus during their lunch hour. Moreover, adolescents from two school boards with representation from high- and low-income neighbourhoods claim that their proximity to external, nonpolicy-compliant sustenance (i.e., fast-food restaurants, convenience stores, and vending machines in community recreation centres) act as a local barrier to healthy eating (Vine et al., 2014). Other barriers identified by students include limited designated eating spaces, speed of implementation, and time constraints. Within Vine et al.'s (2014) study, students complained there was insufficient cafeteria space in which to eat lunch as the entire student body consumed

food during the same time-period. At another school, where the library was originally deemed an acceptable eating location, renovations prohibited students from using that space.

Those expressing the negative impact of P/PM 150 also mention the sudden aspect of its implementation. Many students feel they were not provided with enough notice or warning to adjust to the policy (Valaitis, 2015). Time constraints are another barrier to successful policy execution. It takes time and energy to make a healthy lunch. As a result, students are more inclined to quickly grab a wrapped Pop-Tart or Rice-Krispy square as they rush out the door (Vine et al., 2014). Furthermore, over 50% of North American households have two parents working (Bureau of Labour Statistics, 2020; Uppal, 2015). Consequently, there is limited time for families to prepare home cooked meals and model healthy eating (Savage et al., 2007). Valaitis (2015) and Valaitis et al. (2013) mention another barrier: students feel their rights are being constrained. Many students believe that schools should not be controlling their eating habits. Moreover, they believe they are mature enough to make their own decisions and consume what they desire. Students also claim that it does not seem just that the Ministry of Ontario desires to remove “all” junk foods from the cafeteria or vending machine selections. Consequently, they feel that P/PM 150 limits the variety of foods that schools can supply (Valaitis, 2015).

School Staff Perceptions

Like students’ experiences with nutrition policies (including P/PM 150), principals, vice principals, teachers and cafeteria managers identified local-level barriers to policy implementation. Such gaps between what the policy states and how it is being executed are identical to the ones listed above: the high cost of food for sale and the proximity of internal and external food environments (Lysyk, 2013; Taylor et al., 2011; Vine & Elliott, 2013). Within Prince Edward Island schools, principals also claimed that the lack of cafeteria space was a barrier to implementation because schools did not have the proper equipment nor staff to prepare healthy food choices (Taylor et al., 2011). Unlike these principals’ experiences, school personnel within Ontario expressed there was sufficient space for students to prepare and eat as there was an adequate number of chairs and tables for student meals. They also mentioned there were enough water fountains, as well as sufficient time to eat lunch, socialize with friends and clean up (Orava et al., 2017).

Furthermore, teachers and cafeteria managers expressed a loss of revenue generation. Schools experience a loss in cafeteria revenue when students dislike or are disinterested in purchasing new or unfamiliar food supplied by the school (Agron et al., 2010; Valaitis et al., 2013). Since the implementation of nutrition policies within the United States, school districts have lost revenue (Agron et al., 2010). Schools within Canada, specifically Prince Edward Island and Ontario, have also suffered a significant loss (Kretzel, 2012; Taylor et al., 2011). The Ottawa-Carleton District School Board (OCDSB) mentions there has been a loss of approximately \$1 million in cafeteria sales. The Toronto District School Board (TDSB) estimated a loss of \$1.2 million, while the Essex County District School Board (ECDSB) in Windsor lost \$95,000 in revenue. These losses are quite detrimental as revenues support local schools. For example, Toronto school cafeterias finance cafeteria maintenance and infrastructure, while Ottawa-Carleton food earnings pay for students' extra-curricular activities (e.g., field trips, team equipment). Lost revenue has been detrimental enough that some school cafeterias faced closure (Kretzel, 2012).

School staff also believes that nutrition policies send mixed messages and have restrictive guidelines. One secondary school teacher explained that “diet pop is a healthy alternative [listed in P/PM 150] ... and on one hand we are saying ‘don’t drink pop’, but ‘oh that’s okay, you can drink diet pop” (Valaitis, 2015, p. 124). Because P/PM 150’s nutrition standards and nutrition criteria are strict, narrow, and somewhat confusing, it is difficult to understand what policy-compliant food is. Moreover, P/PM 150’s strict nature makes it difficult to access policy-compliant food, consistent with nutrition criteria and standards, available to sell in cafeterias (Valaitis, 2015; Vine & Elliott, 2013). Furthermore, strict guidelines limit food choices (Taylor et al., 2011) and de-emphasize many culturally significant and traditional foods, such as bannock or wild game (Murray et al., 2017). Strict policy guidelines also deter secondary students from eating the cafeteria selections. School staff perceives students with low socioeconomic backgrounds as only being able to afford inexpensive foods. Consequently, they bring cheap unhealthy lunches to school (Leow et al., 2014). Some believe that adolescents should be given the option to make food-related decisions on their own and in moderation (Vine & Elliott, 2013). Another barrier associated with P/PM 150’s restrictive guidelines concerns fundraising that has caused negative school staff reactions (Valaitis, 2015). Similar guidelines also exist within American nutrition policies. Agron et al. (2010) claim that the implementation of nutrition

policies has limited the types of food being sold at “bake sales,” resulting in a loss of fundraising dollars and frustrated staff members. Since schools and school boards suffered a loss in revenue since P/PM 150’s implementation, schools have had to engage in more fundraising activities. Opportunities for food-related school fundraising within this policy are limited as bake sales are restricted to ten days per school year (Government of Ontario, Ministry of Education, 2010).

To limit the number of implementation barriers, school staff claims that key stakeholders must play a larger role in school nutrition policy implementation. Role modeling healthy behaviour is important. Moreover, it is necessary that teachers “buy-in” to the policy to develop and maintain a supportive culture for healthy eating, strengthening the case for comprehensive approaches to policy implementation (Vine & Elliott, 2013). In turn, they must consistently communicate and consult with everyone involved in the implementation process. In an investigation of schools’ readiness for implementing P/PM 150, interviews revealed school administrators were aware of the policy one year prior to its mandate – when it was announced by the Ministry (Chaleunsouk & Kutsyuruba, 2014). However, not all the teachers within this study were “formally” informed of the policy: “Hailey insisted that she was not formally or thoroughly informed about the policy and had a vague understanding of the 80/20 rule” (Chaleunsouk & Kutsyuruba, 2014, p. 20). Due to miscommunications and a lack of communication, personal interpretations of the policy led to variances in its execution.

Consistent communications – for example, newsletters, student assemblies and public meetings – among all stakeholders – such as parents, students, school staff, community groups, the government, and public health – throughout policy execution would enhance the process (Murray et al., 2017; Vine & Elliott, 2013) and may encourage parents to volunteer (Taylor et al., 2011). Although this is the case, school staff in Alberta mention that their administrators strongly support the First Nations school food policy and have been excellent communicators with them about its contents and its implementation process (Murray et al., 2017).

Staff within Australian schools claim that the implementation process of nutrition policies by senior personnel may be enhanced when there are specific, detailed instruments of accountability for policy execution (Leow et al., 2014). Canadian school-level staff mentions there is a need to reduce stigma associated with P/PM 150. This policy has encouraged the provincial government ministry to partially fund a food program entitled Student Nutrition Programs (SNP) whereby breakfast, lunch and snacks are provided daily to students at no cost.

This healthy food program was designed to provide nutritious food to low-income or less fortunate students, or even ones who do not consume enough food during a given day. Many students were reluctant to partake fearing peers might see it in terms of poverty. To help reduce this stigma, school personnel have discretely provided students with cafeteria lunch coupons or have joined students for breakfast at the SNP. However, more strategies are required to reduce and even eliminate the stigma (Vine & Elliott, 2013).

Although many school members perceive barriers between nutrition policies (including P/PM 150) and implementation, their effectiveness lies in stakeholder interest and a school's physical environment. Regarding the former, many teachers have become confused about the expected nutritional changes in schools and discouraged by the lack of time and resources to implement nutrition policies. Consequently, they do not always support the policy, as Leow and colleagues (2014) suggest: "Teachers [can be] unclear about the expected change/or unwilling to change, as was the case in [our] study where the policy imperatives were considered by many to be competing for time and resources" (p. 1009). There is often inconsistency between staff members in policy implementation and uncertainty about staff members' role(s) in policy execution (Murray et al., 2017). That said, many cafeteria managers, teachers and principals instruct and model healthy eating, which is encouraged by nutrition policies. Cafeteria managers supply new nutritious foods while teachers teach students about nutrition and high BMI prevention, as well as provide opportunities for students that are congruous with P/PM 150's nutrition standards and criteria (Orava et al., 2017; Valaitis et al., 2013). Furthermore, teachers and vice principals support school nutrition policies by feeding students – through healthy school meal programs – when they are hungry or whether they are from low-income or less fortunate families (Adamson et al., 2013; Orava et al., 2017; Taylor et al., 2011; Valaitis et al., 2013). Healthy foods, as Vine & Elliott (2013) suggest, improve student learning. These, and other types of strategies to promote healthy eating are common in many schools (Orava et al., 2017; Taylor et al., 2011; Vine & Elliott, 2013).

Orava et al. (2017) claim that numerous elementary and secondary schools promote healthy eating to students throughout the school setting. This is often accomplished through promotional posters or cafeteria signage in secondary schools (e.g., provincial seasonal fruit promotion cards, public health healthy eating stickers). Most secondary schools also hang student-designed murals or artwork to raise awareness. Furthermore, numerous secondary

schools implement activities promoting healthy eating: skits, talent shows, open mic events, pep rallies, competitions to win P/PM 150-compatible food prizes, etc. In a few cases, there exists a student food and nutrition council at school and “nutrition month” activities. Administration even tried encouraging families to eat healthily by distributing the *Canada Food Guide* to parents as well as healthy lunch and snack suggestions.

School administrations also develop local-school initiatives that are congruous with nutrition policies. In Orava et al.’s (2017) study, all participating elementary schools had a written initiative restricting students from leaving school property without a written parental note. This helps restrict student access to local food outlets.

Parent Perceptions

Not much is known about parents’ perceptions of P/PM 150. Perhaps this is due to a lack of awareness as Valaitis (2015) states, “[j]ust 19 of 46 secondary school survey respondents [within Peel, Ontario] reported having heard of P/PM 150” (p. 108). These 19 secondary school parents either heard of this policy from their adolescent or through media (news, radio and/or TV). Elementary school parents were aware of it mostly through their parent councils. Although most elementary school parents who participated in this study reported having heard of P/PM 150, not much is known about their experiences with it. According to Valaitis et al. (2013), parents teaching and modeling healthy eating for students affects BMI rates.³³ This modeling helps promote healthy eating and encourages students to comply with P/PM 150. This positive behaviour extends to the way in which parents view P/PM 150. Many parents consider this policy as beneficial to students as it promotes healthy eating and healthy lifestyles for students; it either helps maintain student health or encourages them to adopt a healthier lifestyle (Valaitis, 2015). Gillies et al. (2020) similarly note this; however, it is in relation to a school nutrition policy from a First Nations perspective. Moreover, it increases students’ access to healthy foods. Within the United States, parents describe a healthy snack reward program that “had a powerful effect on children” (Folta et al., 2018). Merkle (2013) concurs that nutrition policies can help promote healthy lifestyles as a parent stated: “Just recently, I received a letter from my son’s physical education teachers announcing a school wide fruit, vegetable, and water challenge ... If

³³ Note that there is no more detail within this article concerning how parent-modeling/teaching can prevent people with obesity.

the superintendent proposed this and similar challenges district wide, more students would reap the benefits” (p. 118). Although nutrition memoranda can promote healthy eating, it is important that every school implements them properly. A parent within Merkle’s (2013) study mentions that only one of the four elementary schools within her son’s school district undertook the challenge.

Parents also claim that the policy infringes on students’ and parents’ rights. They believe that the Government of Ontario (Ministry of Education) has overstepped boundaries in implementing this policy as the responsibility of healthy eating is that of the student and parent. One parent states that teachers should only teach students healthy eating habits and reading food labels. Then it is the responsibility of the adolescent to either embrace or dismiss this information (Valaitis, 2015). Some parents say that teaching children about healthy eating must be done within the home environment and not at school (Valaitis, 2015; Valaitis et al., 2013).

Elementary school parents feel that the policy applies more to secondary than elementary schools, especially since the former have cafeterias and vending machines while the latter generally do not. Moreover, since many adolescents are making their own money and parents have less of an influence on their child’s eating habits, P/PM 150’s strict guidelines should apply more to adolescents (Valaitis, 2015). Within Gillies et al.’s (2020) study, some parents claim that school nutrition policies have strict guidelines in relation to fundraisers and school celebrations. Parents also claim that the policy’s effectiveness or ineffectiveness may also be due to adolescents leaving school to eat elsewhere. Within the United States, parents identify similar barriers to effective implementation (Folta et al., 2018; Merkle, 2013). Parents also list convenience, cost of nutritious foods, time constraints and child food preferences as factors affecting proper policy execution (Folta et al., 2018). Parents in Prince Edward Island report that schools failed to accommodate students’ food preferences and to make healthier alternatives more appealing for students, resulting in poor policy execution (MacLellan et al., 2010).

Many parents desire to support nutrition policies; however, it is difficult when their child is only willing to eat unhealthy foods during school hours: “Parents said they sent items they knew their child would eat, to ensure that they would be fueled for the school day” (Folta et al., 2018, p. 183). Moreover, it is difficult to comply with P/PM 150 when the policy is complicated. One parent group in the Peel district of Ontario claims, “I just think they’re making it too complicated. And it’s like it’s being forced on us. It’s not something that we were given a choice”

(Valaitis, 2015, p. 125).

Parents' negative attitudes toward the policy extend to their opinions about tax. Parents mention that it is disappointing that tax dollars are helping fund P/PM 150 (Valaitis, 2015). Moreover, within the United States, parents note how frustrated they become when schools demand that students follow a policy, but do not provide sufficient lunch time (Folta et al., 2018).

Nutrition policies, including P/PM 150, only concern food sold at school and on school premises, not food prepared at home and brought to school. Therefore, there is a lack of policy comprehension from some parents. Murray et al. (2017) say that parents lack knowledge because there is very little policy related communication between administrators and parents.

Food Service Purveyors

Food service purveyors (also known as community providers) are local food service distributors that have provided schools with food for either P/PM 150's "Special Days," lunch programs, or other meal initiatives such as the school nutrition program (SNP). Community providers are also public health units that help promote nutrition within schools. Public health professionals in the U.S. mention that some of the barriers to policy execution in rural communities include: cultural differences, population size, limited human capital, and difficulty demonstrating connection between social and economic policy and health outcomes. Strategies for overcoming these barriers include, developing broad-based partnerships and building on the existing infrastructure (Barnidge et al., 2013). Further, there are local restaurants (such as McDonald's, pizza joints, etc.) and convenient stores that are community providers. When P/PM 150 was initially implemented in 2011, numerous community catering agencies with mandates supporting school nutrition had to alter their menus. President of The Lunch Lady corporation, Ruthie Burd (2015), claims:

At the Lunch Lady Group, we are very excited about the new Healthy School Food and Beverage Act in Ontario. We would like to take this opportunity to assure you that the Lunch Lady is fully P/PM150 compliant and is a big supporter of the Act and ones similar to throughout the country. Across Canada, our meals have always abided by strict nutritional standards. Adopting P/PM150 has just taken a little tweaking to account for some unique elements of the legislation and our meals have been fully compliant.

Other food-related services, such as large providers, ones that serve elementary schools, or ones that identify themselves as healthy prior to the policy implementation, all report positive experiences with it (Habayeb, 2013). Within the United States, a food service provider, Aramark, also reports positive experiences with State-related nutrition policies. Like Canada's The Lunch Lady, Aramark highlights the extent to which it is congruous with the federal health mandates/acts, policy: "[We have] nutritious and innovative menus that meet USDA regulations" (Aramark, 2021). Not only do they meet nutrition standards established by the government, they employ people to monitor any upcoming or new nutrition-related regulatory changes that the government or state will employ. This enables Aramark to adjust their menus prior to new federal or state nutrition-related regulations being in place. This food service provider also pride's itself on the "science-based" frameworks it utilizes for developing menus and student nutrition programs. It is even "ready to help your district achieve the criteria of the *Healthier US School Challenge* criteria if desired" (Aramark, 2021).

Dana Habayeb (2013), a researcher at the University of Waterloo, conducted a series of interviews on food providers' experiences. She states, "[a]ll food services, but one, that had to make many changes prior to P/PM150 mentioned having a negative experience with the policy" (p. 33). In Valaitis' (2015) study, some school service providers claim that P/PM 150 had some "loopholes"; many unhealthy products were congruous with the policy's guidelines while healthier items were not. Some businesses were also presented with challenges while altering their menus. For example, some food suppliers allocated funds to hire nutritionalists and spent hours – equivalent to money – training staff. Moreover, locating compliant food alternatives took time and energy. The main challenge described by school food providers is competition with other food suppliers, especially between smaller versus larger companies. Each felt the other had the advantage, although larger businesses indicated this more often than smaller companies (Valaitis, 2015). Smaller companies tend to care more about nutritious food, make their food from scratch, and cater to their audience more than larger companies (Valaitis, 2015). Not only do large food providers feel threatened by other companies, but small food services do as well. Ziperstein (2011) mentions that small food service providers within the Unites States are struggling to compete with larger food providers. Government subsidies favour large corporate farms which can achieve economies of scale. These larger businesses, however, favour less nutritional foods as healthy foods are not as cost effective. Although this is the case, these

larger businesses have been and continue to be employed by school districts within many States. Consequently, students participating in school lunch programs are being provided with nutritionally deficient foods.

Moreover, small companies are threatened by larger companies while losing revenue:

Other chains they get their dough in frozen and they only basically have to take out what they need. But in our case you know especially on a Friday we have a school lets say they only need 30 pizzas you know for us to make a batch of dough we're only going to use 50 or 60 dough balls. So we had to make 30, we had to make a whole batch, we use what we need and the rest of it is going in the garbage so there's a waste factor involved for us whereas before when it was the regular dough that wouldn't matter because we could you use it for the rest of the menu (Habayeb, 2013, p. 51).

Larger chain-businesses usually store frozen dough and therefore, do not “waste” these product-types. Loss in revenue also occurs when compliant products expire: ““You’re throwing out a lot more product, because the granola slots, the slots where the granola bars go, we might as well make those out of plastic because nobody buys them”” (Habayeb, 2013, p. 51). Valaitis (2015) states that both large and small food companies consider it a challenge to serve fresh, more perishable food (that often spoil quickly) to comply with P/PM 150’s standards. Since fewer students are purchasing food supplied by these companies, more perishable food spoils, resulting in a loss of revenue. Coupled with loss in profitability is loss in accountability. P/PM 150 describes elementary and secondary students as having the same food restrictions and thus, the same food proportions (Government of Ontario, Ministry of Education, 2012). Compliant food services are responsible for providing the same food proportions for both elementary and secondary students; however, the latter often consume much more. As a result, secondary school cafeterias can run out of food and, thus, seem unreliable. The list of challenges continues, as small businesses also resent the excess time it takes to prepare compliant foods and the stress in meeting stakeholders’ demands (Habayeb, 2013).

Although many local community agencies are trying to comply with P/PM 150’s standards, it takes everyone’s support – including local restaurants – to promote healthy eating. If all stakeholders involved help support nutrition, then fewer implementation barriers will exist (Vine & Elliott, 2013). One such promotional initiative is the school nutrition program (SNP).

However, similar to school staff, community level respondents identified the stigma associated with SNP. They claim that school personnel should attempt to reduce this stigma by saying the program is for everyone. They should also demonstrate its universality by eating the breakfast supplied by the program caterers (Vine & Elliott, 2013).

Summarizing, students, school staff, parents and community service purveyors mention that there exist aids and barriers to school nutrition policy implementation – including P/PM 150. These policies have been effective in so far as teachers, principals and food service providers model and promote nutritious behaviour. This was accomplished through healthy eating programs and local-level initiatives and events. Although this is the case, adolescents, school staff and food service distributors have identified multiple barriers to complete policy implementation, some of which include: high cost of food, close proximity of other food environments, time constraints, sudden implementation, loss of revenue, and P/PM 150's restrictive guidelines. Parents allude to its restrictive nature saying that the policy infringes on students' and parents' rights. Moreover, like students and school staff, parents perceive adolescents' leaving school to purchase food elsewhere as a barrier. This data – including that which is from vending machines – reveals specific barriers to successful policy execution. It is therefore important that all stakeholders (including supervisory officers) are invested in P/PM 150. No studies express superintendents' perceptions of P/PM 150, specifically; however, many studies depict these school board members as playing a critical role in the development and sustainment of school health initiatives (Beckwith et al., 2013).

School Nutrition Policy & Implementation:

The Gap

Studies depict that adopted memoranda are not always executed as envisioned and therefore sometimes do not achieve intended results (Bhuyan et al., 2010). There are many school nutrition policies that are not always executed as envisioned. This is due to numerous factors affecting the school nutrition policy implementation process (which are mentioned in the above section). According to researchers, some of the most common factors (facilitators and barriers) affecting the implementation process are: stakeholder involvement, personal beliefs, monitoring, resources/facilities, fear of revenue loss, competitive foods, restrictive guidelines, and policy interpretation (Olstaad et al., 2011; Pan-Canadian Joint Consortium for School

Health, 2010; Pettigrew et al., 2012a, 2012b). Each factor is divided into facilitators and barriers and is detailed below, making specific reference to the Canadian context when possible; however, I draw on international studies for comparison to illustrate some of the challenges for implementing school food policies. See table below.

Table 3.0 Facilitators and Barriers to School Nutrition Policy Implementation Identified in the Literature

Facilitators	Barriers
<ul style="list-style-type: none"> • Stakeholder involvement and support • Presence of a champion or committee to champion the policy • Availability of tools, training, resources and facilities 	<ul style="list-style-type: none"> • Lack of stakeholder involvement and support • Fear of revenue loss & fundraising concerns • High levels of competitive foods (outside and within schools) • Restrictive nature of the policy itself and difficulties with policy interpretation • Lack of tools, training, resources, and facilities

Facilitators

Stakeholder Involvement.

The most common facilitator reported by researchers is stakeholder involvement and support (McKenna, 2010; Quintanilha et al., 2013; Rideout et al., 2007). The stakeholders involved in nutrition policy implementation are: government organizations, food industry/food service providers, health professionals (public health nurses, dietitians, nutritionists), families, students, school staff (principals, teachers, EA's, cafeteria managers, food service staff), and school officials (Ministry officials and school board supervisory officers). The Pan-Canadian

Joint Consortium for School Health (2010) and McKenna (2010) state that all these stakeholders must be involved and invested in the policy for the memorandum to be adopted, monitored, and executed successfully. The way they interact within a school food system³⁴, will affect implementation (McIsaac et al., 2019). The way stakeholders coordinate and collaborate will influence policy execution (Kennedy et al., 2020).

Policy investment pertains to stakeholders' personal beliefs in the policy. To have much support from principals, teachers, students and parents, these stakeholders must believe in the policy, school nutrition/healthy eating in students (Quintanilla et al., 2013). Masse et al. (2013) claim that nutrition guidelines were adopted when stakeholders believed that policies were required in schools and that schools had a social responsibility to support nutritious eating.

Taylor et al.'s (2011) and McIsaac et al.'s (2019) studies express the extent to which community support and parent volunteers facilitate successful policy execution. Like Taylor et al. (2011), MacLellan et al. (2010) discerns that parent and student support are primary factors in successful policy implementation. When family members engage in practices promoting health, the successful implementation of nutrition policies increases (Christensen, 2003). Furthermore, Quintanilla et al. (2013) notice the importance of parental support. However, their case studies regarding Alberta's voluntary educational nutrition guidelines also reveal that principal and superintendent support is a key factor in policy execution.

Implementation Committee.

Not only must stakeholders believe in the policy for successful policy execution, but school administrators/staff should implement a committee to oversee the nutrition policy (Olstaad et al., 2011; Quintanilha et al., 2013; Rideout et al., 2007). Veugelers and Fitzgerald (2005) state that schools with a formal group responsible for school nutrition are more likely to have nutrition policies in place as they can help monitor the policy. Moreover, they can encourage others to comply and promote the memorandum. When these committees or other school representatives collaborate with outside agencies³⁵ to promote healthy eating, nutrition policies seem to be more successfully implemented (Agron et al., 2010).

³⁴A school food system pertains to the interconnectedness and interactions between various stakeholders, institutions, and organizations that affect the types of foods and beverages available to students (McIsaac et al., 2019).

³⁵ Such agencies are: Food Secure Canada (for Growing Up Organic garden programming), Ottawa Public Health, The Lunch Lady, etc. (Burd, 2015; Food Secure Canada, 2020; Ottawa Public Health, 2016).

Resources & Facilities.

Resources and training are another facilitating factor to successful policy execution. In the United States, the National School Lunch Program (NSLP) and the School Breakfast Program (SBP) are federally funded food assistance programs. They subsidize meals or provide free meals to over 101,000 public and private schools (Ralston et al., 2008). In 2008, the Ontario government invested \$32 million over three years to the Student Nutrition Program (SNP), focussing mostly on communities with the highest needs (Kucharczyk, 2014). This type of funding helps the implementation of nutrition initiatives (Kucharczyk, 2014; Vine et al., 2014). Sufficient financial resources help proper implementation (Reeve et al., 2018; Valaitis, 2015).

Fahlman and colleagues (2011) claim that in-service professional development on nutrition increases self-efficacy, intentions to teach nutrition education, and outcome expectancies. Moreover, school board officials and nutrition committee members express that training facilitates adoption of school wellness memoranda. Viewing similar policies and standards also helps them understand wellness policies more thoroughly (Agron et al., 2010). Taylor et al. (2011) report that easy access to food suppliers/distributors and proper kitchen facilities facilitates successful policy implementation. Provincial supports and resources (such as additional guides and brand name food lists) helps stakeholders adopt nutrition policies (Masse et al., 2013).

Barriers

Stakeholder Involvement: Lack Thereof.

Although there are factors facilitating school nutrition policy implementation, many barriers exist. Stakeholders must be ready and willing to communicate the policy (Downs et al., 2012; Kennedy et al., 2020; Masse et al., 2013). Communication encompasses the dissemination, training, and education provided to key stakeholders (e.g., parents, community members, students, etc.). This can be in the form of consistent messages in multiple environments, promotional posters, and online updates (Vine & Elliott, 2013). MacLellan et al. (2010) and McIsaac et al. (2019) claim that one major barrier to implementing school nutrition policies is the lack of adequate communication among schools, teachers, students, and their parents. Regarding students, although nutrition has been integrated into the curriculum, the number of hours devoted to teaching this topic may be insufficient to affect behavioural change

(Story, et al., 2006, 2009). Stakeholders must also support and believe in the policy (Levay et al., 2020). Quintanilha et al. (2013), Pettigrew et al. (2012b), and Ronto et al. (2020) express the extent to which parents, families, and communities do not support school nutrition guidelines. Parents are often resistant to change (Downs et al., 2012). It is also important that school officials, including superintendents, are invested and monitor the policy properly (Reeve et al., 2018).

Revenue Loss.

The loss of revenue in schools and for food service providers is another barrier to successful policy implementation (McKenna, 2003; Reeve et al., 2018; Ronto et al., 2020). Weaver-Hightower (2011) mentions that food sales in both elementary and secondary schools comprise almost \$15.9 billion of all restaurant and food service sales in the U.S. In Canada, the estimated annual food revenue was \$60 billion before the implementation of many provincial nutrition policies (Canadian Restaurant and Foodservices Association). Callaghan and colleagues (2010) conducted a pilot project whereby vending machines with healthy snack selections were monitored. There was a 66% decline in vending machine revenue because as one student expresses, “[t]hey’re really expensive, the healthier ones. They’re more expensive than the other ones, and you get less” (Callaghan et al., 2010, p. 189). Carillo et al.’s (2011) study similarly divulges this response; the price of healthier foods is too high. The costly food is a concern for many stakeholders. Those who profit from vending machine and cafeteria sales are concerned that the higher cost of nutritional versus non-nutritional food for sale results in revenue losses, reduced funds for extracurricular activities, and even a loss of cafeterias altogether (Masse et al., 2013; McKenna, 2003; Vine & Elliott, 2013). Taylor et al. (2011) report that stakeholders are concerned about the revenue loss associated with school fundraisers. Vine and Elliott (2013) as well as Masse et al. (2013) claim that the increase in food price for healthier options is a concern for schools with low-income populations.

Competitive Foods.

Another factor that influences students’ food choice is competitive food. Downs et al. (2012), Hanning et al. (2019), and Ronto et al. (2020) claim that schools’ close proximity to fast-food outlets is a major concern. If a nutrition policy does not restrict students (adolescents) to leave campus during lunch hour to purchase food elsewhere, many students will travel elsewhere (i.e., to fast-food restaurants) (Hanning et al., 2019; Masse et al., 2013). These fast-food

restaurants also entice students through their promotional posters, as well as other forms of advertising and marketing strategies. Food and beverage marketing may include logos, brand name signage in vending machines, as well as free product samples (Chaleunsouk, 2012; Story & French, 2004). This type of food marketing is highly influential in students' purchasing behaviour and subsequent consumption (Hanning et al., 2019; Neumark-Sztainer et al., 2005; Valaitis et al., 2016).

Policy Restrictions & Interpretation.

Not only is competitive food a barrier, but the restrictive nature of policies and their associated misinterpretations. Some stakeholders report difficulties finding a balance between policy objectives and what was practical to offer (Moore et al., 2010). Others feel that the policy restricts the variety of foods available. Moreover, there are not enough policy-allowed foods being offered (Gillies et al., 2020; Taylor et al., 2011; Vine & Elliott, 2013). Stakeholders also express not knowing whether the nutrition policy is a mandatory standard or a guideline. Ambiguity in policy wording allows a wide range of interpretation of the foods eligible to be provided in schools (Reeve et al., 2018). Moreover, many stakeholders are unaware of the contexts to which the memorandum applies (e.g., cafeterias, vending machines, etc.) (Masse et al., 2013; McKenna, 2003). Some stakeholders may misunderstand or misinterpret the nutrition policy as one parent claims, "I don't think [schools] have the right to step in and say, You're not allowed to bring these products to school, just because [the school] thinks it's not healthy" (MacLellan et al., 2010, p. 175). This response is a misinterpretation of a nutrition policy because this memorandum only prohibits students from purchasing unhealthy food on school campus; it does not prohibit students from bringing unhealthy food from home.

Resources & Facilities: Lack Thereof.

Lack of resources, training, and facilities affect proper policy execution (Agron et al., 2010; Levay et al., 2020). Kann et al. (2007) and Agron et al. (2010) claim that there is not enough in-service training and staff development to support and promote the execution of school wellness policies. Concerning financial resources, it is challenging to implement nutrition policies when students are continuously influenced by the low-cost of non-nutritional foods at home and within their communities (Fitzpatrick et al., 2017). Families with fewer financial resources opt for the energy-dense grains, fats, and sugars since they cost less than lean meats, and fresh fruits and vegetables (Callaghan et al., 2010; Chaleunsouk 2014; Holmberg et al.,

2010). Since obesity and hunger co-exist in low-income families (Drewnowski & Darmon, 2005), a lack of financial resources is a barrier to nutritional initiatives (Chaleunsouk, 2012). Downs et al. (2012) claim that the lack of proper school kitchen facilities and food preparation areas are barriers for providing students with greater food variety. Moreover, lack of facilities within schools without cafeterias presents many challenges for preparing healthier food options (Taylor et al., 2011).

It is evident that there are many facilitators and barriers to successful nutrition policy implementation. Thus, investigating “promising practices”³⁶ for policy implementation may assist schools in developing, executing, and monitoring school nutrition policies. The following section discusses a few “promising practices” based on current evidence.

Bridging the Gap: Promising Practices

Policy goals do not necessarily translate into practice easily. For this reason, it is important for researchers to examine “promising practices” to help stakeholders implement school nutrition policies. Such “promising practices” are, but not limited to: a whole-school approach, financial resources, curriculum linkage, communication strategy, regulated monitoring/inspection, and policy design.

Whole-School Approach

Many researchers claim that successful nutrition policies are a result of taking a “whole-school approach.” This approach includes the involvement and engagement of all the stakeholders affected by the policy (e.g., community, school staff, parents, students, etc.). Stakeholders should not only be engaged in the design of the policy, but the implementation process (Adamson et al., 2013; Downs et al., 2012; Mendelson, 2007). Valaitis (2015) states, “slowing down and engaging all stakeholders throughout the policy process” (p. 200), will help the successful implementation of such nutrition policies as P/PM 150. By “slowing down” and

³⁶ As noted above, this thesis uses the term “promising practices” in relation to educational nutrition policy, specifically P/PM 150 because the term “promising practices” denotes a policy with some scientific research or data showing positive outcomes, that has not necessarily been replicated and implemented multiple times in similar contexts. Whereas the term “best practices” denotes policies which have demonstrated desired changes through the use of multiple implementations, the ability to be replicated, and the potential to be adapted and employed multiple times (Smith et al., 2015).

engaging all stakeholders in the design and implementation process, schools and school boards may be able to build strong partnerships with dietitians, school cooks, food service providers, etc.

When taking a whole-school approach to implementation, not only should stakeholders be considered, but the physical structure of schools. By altering the organizational socio- and/or physical-structure of a school, such as enlarging the cafeteria and other eating spaces to comply with a particular nutritionally related policy, student interest in policy compliance can be increased (Vine & Elliott, 2013; Vine et al., 2014).

Financial Resources

For healthier foods and beverages to be more accessible to students (especially low-income families), policies should investigate ways to make these foods more affordable. Research suggests that decreasing the prices of nutritious foods (French & Wechsler, 2004; McIsaac et al., 2018; Valaitis, 2015) and increasing the price of less healthy items (Olstaad et al., 2011) will help promote healthy consumption. Since factor analyses reveals that taste, cost, convenience, and health are among a few of the consistent factors influencing food choice (Brug et al., 1995; Holmberg et al., 2010; Neumark-Sztainer et al., 1999), school food service providers could provide appealing healthy food selections that are both affordable and palatable (Chaleunsouk, 2012; Valaitis, 2015). By so doing, more students may purchase these healthier options rather than leave to eat off campus.

Furthermore, there should be more resources and supports to schools in implementing the policy (McIsaac et al., 2018; Valaitis, 2015). Core funding from the government to support policies is specifically recommended (Adamson et al., 2013; Olstaad et al., 2011; Vine & Elliott, 2013).

Curriculum Linkage

Many researchers express the need for nutrition memoranda to link directly to education, curriculum, and other health related initiatives that are already in place (nutrition programs, school gardens, etc.) (McIsaac et al., 2018; Pettigrew et al., 2019; Turner et al., 2017). Moreover, promoting the reform through pedagogical strategies (e.g., organizing field trips related to the policy's goals) may encourage more students to comply with the policy (Valaitis et al., 2013)

Communication Strategy

P/PM 150 should be communicated to students, parents, and school staff to help them better understand the reason behind the policy (Adamson et al., 2013; Au et al. 2018; Downs et al., 2012). Moreover, using promotional strategies for healthier food options can sustain revenue for schools (French et al., 2001; Valaitis, 2015). A nutrition policy may state that food marketing posters are disallowed in school hallways; however, a school cannot dictate what the community allows to advertise. Consequently, students will continue viewing food marketing within their communities, on television and the internet (Ofcom, 2007; Russell et al., 2019). For this reason, population level interventions focusing on other contexts (e.g., home and community) are required to complement existing school nutrition policies (Godin et al., 2019). Since food marketing may influence food choices among children and adolescents, nutrition policies could promote healthy eating through advertisements (e.g. promotional posters in hallways, wall murals, etc.).

Regulated Monitoring

Implementation may also be enhanced if supervisory officers or researchers follow up with schools and monitor³⁷ compliance, as well as evaluate the impacts of the policy (Adamson et al., 2013; Stylianou & Walker, 2018; Valaitis, 2015). Moreover, researchers have recommended that schools have specific implementation or school wellness committees responsible for school nutrition policies (Adamson et al., 2013; Au et al. 2018; Downs et al., 2012).

Policy Design

To address nutrition policy misinterpretation, Stylianou and Walker (2018) claim that policy designers must “use clear language” (p. 16) when writing a memorandum. Valaitis (2015) also mentions that altering P/PM 150’s direction by having mandatory nutrition and physical activity, tailoring the policy to individual schools’ needs, and reducing policy restrictions may help implementation. Concerning the latter, Neumark-Sztainer and colleagues (2005) as well as Woodruff et al. (2010) notice the contrary to proper policy execution; they say that firmer

³⁷ Monitoring is defined as, “an instrument or device used for observing, checking, or keeping a continuous record of a process” (Oxford Dictionary, 2022).

restrictions help implementation. For example, firmer restrictions to fast-food (i.e., disallowing students to bring in unhealthy snacks, or prohibiting students to leave campus to eat elsewhere) will help policy implementation. Moreover, limiting the hours of operation of vending machines results in fewer soft drink purchases from those vending machines (Neumark-Sztainer et al., 2005). Students may also be encouraged to comply with certain policies when school administrators demand students have a parental/permission note enabling them to leave school premises during lunch (Orava et al., 2017).

Researchers stress the role policy designers can make toward recognizing school-community proximity and other characteristics to address students leaving campus to eat elsewhere (McIsaac et al., 2018). Schools are in a highly influential position to affect changes in students' dietary habits and, therefore, attention to the environment is one of the critical components in improving their diets.

Summarizing, to help bridge the gap between nutrition policy and practice, a whole-school approach should be adopted; stakeholders must actively engage in its design and implementation processes. Moreover, altering the organizational socio- and/or physical-structure of a school, should be considered. From a financial standpoint, core funding from the government should be provided, and prices of nutritious foods should decrease while the cost of unhealthy items increase. Students may be more willing to comply when a nutrition policy is directly linked to education (curriculum), and they continuously see and participate in healthy promotional strategies. More stakeholders may be willing to comply when nutrition policies are better monitored. Policy compliance may also increase when memoranda are written clearly, are tailored to the individual schools' needs, and have either firmer or fewer restrictions. Since there is conflicting data concerning the latter, future research should explore the impact of restrictions on nutrition policy implementation.

Concluding Comments

Educational systems have been implementing policies for decades. P/PM 150 is a relatively new policy as it has only been executed in the past ten years. Impact research has been gathered from the Ontario Auditor General and school vending machines on P/PM 150's implementation. Many stakeholders, including school board officials, have also provided data on this policy. They have perceived the many factors (facilitators and barriers) affecting proper

policy execution. Such facilitators are: stakeholder involvement and support; the presence of a champion or committee to champion the policy; and the availability of tools, training, resources, and facilities. The barriers include: a lack of stakeholder involvement and support; fear of revenue loss and fundraising concerns; high levels of competitive foods (outside and within schools); the restrictive nature of the policy itself and difficulties with policy interpretation; and last, a lack of tools, training, resources, and facilities.

These factors result in unplanned and unexpected policy outcomes. Since policy goals do not necessarily translate into practice easily, researchers have identified many “promising practices” that help bridge the gap between policy and practice. For example, a whole-school approach should be adopted. Moreover, altering the organizational socio- and/or physical-structure of a school, should be considered. Funding from the government should also be provided, and the cost of unhealthy items must increase, while the prices of nutritious foods decrease. A nutrition policy should also be directly linked to education (curriculum), and students should continuously see and participate in healthy promotional strategies. Furthermore, policies should be better monitored, written clearly, tailored to the individual schools’ needs, and have either firmer or fewer restrictions. While some “promising practices” have been identified, more research is needed regarding ‘what works,’ especially from the perspective of supervisory officers as there is little data on superintendents’ experiences with implementing school nutrition policies – including P/PM 150.

Chapter 4: Study Rationale, Objectives, Research Questions, and Theory & Framework

Study Rationale

Managing the complexities of implementation is one of the biggest challenges that leaders of complex and ambitious reforms face in the 21st century. In 2008, the Medical Research Council of Health Services and Public Health Research Board revised a framework for developing and evaluating complex health policies (Craig et al., 2008). This framework describes the need to assess practical effectiveness, specifically examining how the intervention varies among recipients and between sites over time. Moreover, it outlines the need to assess how the intervention works within a specific context. In 2010, two similar frameworks were created to address health-related policies within an educational setting – the Comprehensive School Health (CSH) model (Veugelers & Schwartz, 2010) and the Foundations for a Healthy School (FHS) framework (Government of Ontario, Ministry of Education, 2016, 2019). These health-related frameworks are also congruous with Viennet and Pont’s (2017) adaptive, actionable, and flexible framework of education policy implementation (see Figure 4.0 in Chapter 2). However, Viennet and Pont elaborate upon their dimensions and provide a few additional aspects pertaining to adaptability and flexibility. Viennet and Pont’s (2017) framework is supposed to help education policy designers, including stakeholders, attain educational goals by being flexible and adaptive. It is flexible in so far as it addresses the extent to which implementation strategies should be flexible enough to cope with the unexpected (Fullan, 2015). The implementation plan must also be flexible enough to adapt to issues that policy designers may not foresee (Barber, 2008). Moreover, this framework has been designed to highlight and address the complexities associated with the evolving education process/field. This has been accomplished through the four determinants comprising the framework: *Smart Policy Design, Inclusive Stakeholder Engagement, A Conducive Institutional and Societal Context* and *A Coherent Implementation Strategy*. Since implementation strategies are more action-oriented than the policy itself, Viennet and Pont (2017) adapt their predecessors’ models – separating the implementation strategy from the policy, that is, the policy’s theoretical underpinnings (Viennet & Pont, 2017).

Although many education policies have been effective in attaining some goals, there remains a gap between these policies and the way in which they are being implemented. Since P/PM 150 was written to address the increasing childhood BMI rates in Ontario (health related), it is paramount that its execution within schools (education related) be successful.

Many qualitative studies have been conducted to discern the implementation process and possible gaps between policy and execution. Such methods can help a researcher better understand the process involved in implementing the intervention from those who experience it first-hand (Murray et al., 2010). P/PM 150's implementation has been examined qualitatively from the perspective of students, parents, principals, teachers, and non-staff stakeholders (Habayeb, 2013; MacLellan et al., 2010; Valaitis et al., 2013). These studies reveal both positive and negative perceptions of the policy. Positive aspects include teaching and modeling healthy eating for students, hanging health related advertisements within schools, and introducing new foods to students. Such negative factors as institutional and socio-structural obstructions, as well as stakeholders' lack of interest and policy understanding, are all barriers to complete implementation. The studies primarily examined Central and Western regions of Ontario, not all of Ontario.

Although many stakeholders have been interviewed to discern P/PM 150's execution, studies have not yet explored superintendents' experiences with the policy since its genesis. Moreover, since supervisory officers oversee and therefore assess and evaluate its implementation, it is pertinent to understand their perceptions of this nutrition policy, and on that basis, to determine possible solutions that narrow the gap between the formulation of P/PM 150 and its execution. This thesis will therefore contribute to the few studies on P/PM 150, as well as the research on nutrition policies, specifically, how they are being implemented and how the gap between policy and practice may be bridged. It will reveal the ways in which supervisory officers and policy makers within the Government of Ontario (Ministry of Education) can improve P/PM 150's execution. Consequently, students, staff and parents may learn more about healthy food behaviours. Moreover, this study may encourage post-secondary institutions and more³⁸ hospitals to implement similar nutrition policies. It may also be of interest to BMI and

³⁸ The term "more" is used as some medical institutions have recently implemented nutrition policies (Dietitians Canada, 2010; National Collaborating Centre, 2012; Murphy, 2017).

education related policy makers. If so, then we may encounter healthier and happier people, as Barbara Mintz (2014) claims, “Healthy lifestyle equals healthy, happy children” (p. 20).

Objectives & Research Questions

To understand how P/PM 150 is being implemented in Ontario, I had to go to the source – supervisory officers who are responsible for executing and overseeing the implementation of the policy. I believe that their experiences with and perceptions of P/PM 150 will add to knowledge/research on nutrition policy, and specifically P/PM 150. My experiences with P/PM 150 (e.g., the literature review research I conducted and the conversations I had with the supervisory officers) will help me and others (researchers, policy makers, educators, etc.) formulate knowledge on this policy. Moreover, my interpretation of this data will help contribute to what researchers know about this policy. I am contributing knowledge through this thesis. Since knowledge also derives from my observations, viewing P/PM 150 related content through school board and individual school websites and social media pages, is appropriate for this thesis – which is based on pragmatism.

Pragmatism is an epistemology that has both philosophical foundations and a practical aspect. Its philosophical underpinnings express a maxim of logic, involving a system of philosophy (James, 1907/1981; Peirce, 1905). James (1907/1981) argues that humans come to know about the world through sense-perception. Since every human being has distinctive characteristics, and experiences can occur in varying contexts, one person’s experience may contrast another’s and is thus “subjective” or individual. Consequently, one capital “T” Truth³⁹ does not exist, but numerous individual understandings of truth do. Dewey concurs, asserting that pragmatism is related to humans’ practical reactions and sensations; however, when describing experience, Dewey emphasizes two main philosophical aspects: people’s beliefs, and meaning of actions. He argues that the origins of our beliefs arise from our prior actions (based on habit or active inquiry) and the outcomes of our actions are found in our beliefs. Moreover, Dewey claims that pragmatism is comprised of three theses concerning knowledge: 1) knowledge neither has nor requires foundations; 2) people’s beliefs are open to rational revision; and 3) knowledge depends

³⁹ Capital “T” Truth pertains to universal truth or a fixed ideal. Those who believe in Truth argue that knowledge claims arise out of antecedent conditions (Comte, 1817/1858). Peirce (1905) also concurred with this definition.

on a person's interests (Talisso & Aikin, 2008). All three pragmatic aspects are based on the notion that "knowing" occurs, not through a "Truth" (foundation), but through experiences and re-interpretations (revision) of experiences (often relating to a person's interests). Pragmatism's practical aspect concerns "what works" and what is deemed "appropriate." Dewey draws attention to the importance of the consequences of actions pertaining to particular ideas and understandings: "Pragmatism...does not insist upon antecedent phenomena but upon consequent phenomena [and] possibilities of action" (Dewey, 1931/1989, p. 32). Thus, when taking a systematic approach to inquiry, a researcher must: 1) recognize a situation that is problematic; 2) consider the benefits of defining the problem one way rather than another; 3) develop a possible line of action as a response to the problem; 4) evaluate potential actions in terms of their likely consequences; and 5) take appropriate actions that address the situation. Pragmatism therefore is practical in nature as it concerns "best practices" and "what works."

Pragmatism, however, is not just instrumental and solely concerned with action. From an ethical standpoint, pragmatism is concerned with "caring"; pragmatists desire to bring about the "good", although not all goods are commensurable (Talisso & Aikin, 2008). When striving to do what is "good", one attempts to satisfy as many demands – their own and others' – as possible. One acts based on what is morally best to produce the greatest quantity of happiness. It is important to note, however, there is no single morally optimal resolution to a problem when attaining this quantity of happiness. This pragmatic ethical view of striving for happiness without a fixed ideal is called *Meliorism* (James, 1981). When striving for happiness and resolving a problem, pragmatist researchers ask, what are the consequences of using a particular theory and methodology versus another kind? What sort of consequences follow that choice?

Although pragmatism has been associated with mixed methods research (Biesta, 2010; Bryman, 2016; Creswell, 2012), it is now accepted by most scholars that it can be used to frame qualitative studies as well (Denzin, 2010; Greene, 2009; Morgan, 2014). Qualitative studies employ Dewey's notion of experiential meaning: people making meaning from their perceptions/experiences (Denzin, 2010; Dewey, 1999; Morgan, 2014).⁴⁰ Consequently, this qualitative case study provides a comprehensive look at supervisory officers' perceptions within various settings in Eastern, Central, North-Eastern, Northern, Southern, and Western Ontario. Moreover, this study reveals nutrition policy (P/PM 150) content located on school board and

⁴⁰ Pragmatism is explained in more detail below.

individual school websites/social media pages. Thus, I compare data (from multiple sources) on the object of inquiry – an appropriate method to use when employing pragmatism as it helps confirm the findings within the interviews (Creswell, 2012; Lichtman, 2013).

Since a pragmatist should give voice to the participants and not misrepresent their views (Talisce & Aikin, 2008), the research question and interview questions⁴¹ were crafted with particular syntax and diction. They had to avoid “leading” the participants to thinking that P/PM 150 has been “successfully” integrated. The overarching research question guiding this study is therefore:

1. How is Ontario’s *School Food and Beverage Policy* (P/PM 150) being implemented in secondary schools by school boards and the Ministry of Education?

Sub questions guiding this study are as follows:

2. What are the roles and responsibilities of a supervisory officer in designing and/or implementing P/PM 150?
3. How have school boards, schools, and the Ministry of Education communicated this policy to stakeholders?
4. What are the consequences of P/PM 150 to stakeholders, school culture, pedagogy, and curriculum (e.g., barriers, facilitators, stakeholder mindsets)?

Consequently, the results of this study seek to: 1) provide an in-depth exploration of supervisory officer experiences in the design/implementation of P/PM 150, as well as the perceived impacts the policy has had on stakeholders, school culture, pedagogy, and curriculum; 2) understand how the Ministry of Education, school boards, and schools communicate the policy to stakeholders; 3) contribute to the existing literature on school nutrition policies, and; 4) analyze results in relation to the constructs described in Viennet and Pont’s (2017) framework. Summarizing, the research questions reflect three of Viennet and Pont’s (2017) determinants: Supervisory officer experiences with the policy and its implementation address *Inclusive Stakeholder Engagement* and *Smart Policy Design*; Ministry, school board, and school communication address *Inclusive Stakeholder Engagement*, while impacts (e.g., enablers and barriers, etc.) associated with P/PM 150’s implementation reflect *Coherent Implementation Strategy* (see Figure 4.0 in Chapter 2). Before the specific research methodology and methods for analysis are described, the theory and framework underpinning this thesis will be discussed.

⁴¹ The interview questions’ developmental process is articulated in Chapter 5.

Theory & Framework

Many epistemological and educational theories and frameworks exist. As I described in the previous section, this thesis adopts a pragmatism epistemology. What has not yet been explained is how other frameworks (the FHS model, the CSH framework, and Viennet and Pont's Flexible and Actionable model)⁴² guide this study.

FHS & CSH Models

The overarching model that guided this study was the Foundations for a Healthy School (FHS) model (see Figure 7.0) as it was directly used when designing and executing P/PM 150. It was first published in 2010 and updated in 2016 (Government of Ontario, Ministry of Education, 2016). This model was based upon the Comprehensive School Health (CSH) framework and recognizes the many factors (social, personal/behavioural, physical, curricular) affecting a Canadian school environment. Like the CSH model, the FHS recognizes that “healthy students are better prepared to learn, and education is a key determinant of health” (Government of Ontario, Ministry of Education, 2019). This framework is comprised of five dimensions: *Curriculum, Teaching and Learning; School and Classroom Leadership; Student Engagement; Social and Physical Environments; and Home, School and Community Partnerships*. All of them are alluded to within the CSH model. Moreover, these dimensions are reflected in the study's three sub questions and the study's objectives: 1), 2), and 3). The model addresses supervisory officers' experiences (*Partnerships; Social Environment; and School Leadership*), as well as the roles and responsibilities of a supervisory officer in monitoring/leading workshops, etc. (*Teaching & Learning; School Leadership; and Home, School and Community Partnerships*). Furthermore, the model addresses how the policy is communicated/discussed (*Partnerships; Social and Physical Environments*).⁴³ These five dimensions must interact with each other for intended health behaviour change to likely occur (Fung et al., 2012, 2013). While the FHS model applies to P/PM 150, an additional framework was employed as it elaborates upon the FHS model, providing more detail on every facet/dimension. It also includes an

⁴² These frameworks are detailed in Chapter 2.

⁴³ It is interesting to note that the FHS model does not have a policy design dimension like the CSH framework and Viennet and Pont's (2017) model. Consequently, the FHS framework does not address superintendents' experiences designing the policy, reflected in objective 1).

important aspect of education policy implementation which the FHS model neglects – policy design. Moreover, it is the most up-to-date for addressing education policy implementation and the complexities associated with it as it is supposed to help education policy designers, including stakeholders, attain educational goals by being flexible and adaptive.

The Flexible & Actionable Framework

The additional theory that guided this research was one of complexity and flexibility (Honig, 2006; Viennet & Pont, 2017). Since the education system is complex, it is important to note the complexities associated with education policy implementation and know how to manage them to reduce the gap between policy theory and practice. Viennet and Pont’s (2017) framework addresses up-to-date educational complexities as well as the multi-layers and multidimensional aspect of education reform. They adapt Honig’s (2006) model to reflect more recent education policy research concerning flexibility (Fullan, 2015) and change (Supovitz, 2008). They propose a four-dimensional overarching model comprised of the determinants: *Smart Policy Design, Inclusive Stakeholder Engagement, Conducive Context, and a Coherent Implementation Strategy* (see Figure 4.0 in Chapter 2). These determinants have many facets and all interconnect/interrelate for “successful” policy implementation (Viennet & Pont, 2017).

Smart Policy Design.

Viennet and Pont (2017) state, “our concept of the ... design of the policy is understood in a narrow sense, as the object being implemented” (p. 28). As such, it should be framed correctly, provide a suggested logic addressing the problem at hand, and the possible solution(s) to that problem. In so doing, it must be comprised of clear⁴⁴ and concrete goals, targets, and “causal theory” for successful implementation. These goals outline specific challenges, timelines, and the scope, for the policy. These goals can be large-scale, aiming to change professional practice. They are also related to time – a reasonable timeline for effective implementation to take place – and the number of stakeholders involved in the implementation of it (the scope). Concerning targets, policies are often directed toward targeted groups of users and beneficiaries. In the case of P/PM 150, the target groups are: students (as they learn and are encouraged to eat healthily); teachers (as they teach and promote nutrition to students); and school food service providers (as they must alter their menus to comply with P/PM 150’s

⁴⁴ This is to reduce or eliminate misinterpretations from stakeholders.

nutritional standards). The causal theory (also known as theory of change) underpinning the policy is essential for it divulges how and why the policy change takes place. It can also guide and encourage the stakeholders (Fullan, 2015). It is important to have a valid theory linking the policy problem to the behavioural changes policymakers expect to cause in the target groups. *Smart policy design* also concerns the feasibility of the solution as this determines to what extent a policy can be executed and how. The policy must be designed in such a way that it is practical, considering the resources or technology required for proper execution.

Everything mentioned within the policy must be properly ordered⁴⁵ to aid the legitimacy and implementation of the solution (i.e., the need of the institution). Moreover, the policy should express urgency and be clearly justified for stakeholders to prioritize it (Fullan, 2015). The solution should also be based on “evidence”⁴⁶ and on a good knowledge of the cultural, demographic, political, and socioeconomic contexts of the educational system, as well as its “mechanisms of change.” If it is, then it should be reasonable and feasible for stakeholders to implement.

Inclusive Stakeholder Engagement.

Education policies are executed by organizations and individuals, making them central to the implementation process. Their interaction with other people and their own personalities (policy interests, motivations, and beliefs) also influence implementation. Moreover, their interaction with the other determinants listed within this framework, determines how a policy is implemented. *Inclusive Stakeholder Engagement* includes people at varying (local, district, provincial, federal) levels – i.e., those inside and outside the formal education system. Local school stakeholders are: principals, teachers, students, and parents, whereas district/local stakeholders are: school boards, school providers, local authorities, and the community. Those at the provincial level are, ministry of education officials, and perhaps evaluation, inspection, or improvement agencies, teacher training institutions, research agencies, etc. In many cases, ministry of education officials, along with some district stakeholders, design the goals and priorities for local education management. A “steering” group can be comprised of administrators, school authority, etc., as they are responsible for concretising the goals and

⁴⁵ For example, the order of the goals should be based on priority. Their order impacts the way a policy will be implemented (Viennet & Pont, 2017).

⁴⁶ This refers to qualitative and/or quantitative data (i.e., evidence-based practices).

planning the implementation, whereas the “working” groups responsible for carrying out the goals are often comprised of those directly related to the policy.

It must be noted that many stakeholders, even if they are not directly related to the policy or are part of the targeted group, may exert some political leverage over the education memorandum. Moreover, this determinant emphasizes the importance of policy designers considering how and why stakeholders respond (or not) to policy demands. Thus, policy advocates must discern ways of encouraging key stakeholders to agree with the policy and comply with its implementation. This determinant also addresses the importance of knowing to what extent particular stakeholders can affect a given policy; they must ask the following questions: Do particular stakeholders have political authority? Do they have material resources or expertise?

Conducive Context.

This pertains to the institutional setting in which the policy is executed; this setting is comprised of the informal (i.e., a local school’s collaborative culture) and formal (i.e., governance system) social constraints that regulate the implementation process. For example, the way in which teachers and principals collaborate in a school – promoting a policy or not – affects education policy implementation. The governance system in Ontario, Canada, is the Ministry of Education, coupled with district supervisory officers and school principals. The way they monitor and make decisions pertaining to the policy, affects implementation. They should also consider the possible changes in the institutional context(s) and enable implementers to adapt their practices; discretion must be granted to the implementers. Other policies within or outside educational institutions may also be considered as these may hinder or facilitate implementation. Other policies may hinder implementation if they contradict or misalign with each other. Thus, it is important to be aware of other policy areas and whether enough policies align in a favourable environment.

Moreover, this determinant addresses the importance of predicting or knowing the events that originate outside of, but not connected to, the implementing system. For example, societal trends and events (be they technological, political, social, economic, or demographic) may affect the manner in which the education policy is being implemented. Societal mentalities may affect the politics of implementation as they “define issues that can arise and the policy solutions offered” (Viennet & Pont, 2017, p. 37). They also shape and constrain stakeholders’ strategies,

belief systems, and habits. For example, in the context of P/PM 150, societies' emphasis on fast-food entices children to such an extent that students wish to eat tasty junk (unhealthy) food.

Coherent Implementation Strategy.

This determinant concerns the policy's "theory of change": the operational plan that guides the process to ensure effective policy execution (Viennet & Pont, 2017). This plan provides specific details concerning who is supposed to execute what, and who is responsible in case a given step of the implementation goes wrong; it explains "how to make the policy happen in effect" (Viennet & Pont, 2017, p. 37). Moreover, it addresses objectives, implementation timing, pace, task allocation, resources, communication strategies, and accountability measures – tools to measure policy compliance and instruments encouraging stakeholders to implement the policy. These instruments can be in the form of top-down command-and-control mechanisms and/or capacity-building and school-community partnerships to achieve the policy objectives.

Many implementation researchers combine this determinant with the policy itself because the *implementation strategy* and *policy* are considered parts of the policy statute (i.e., the document or decisions that frame the goals, tools, rules, targets, etc.). Viennet and Pont (2017) state, "the policy may provide a vision the implementation strategy has to realise, but the latter is more action-oriented, and ought to be flexible enough to cope with the unexpected" (p. 38). For this reason, and the fact that differentiating between the two highlights strategic determinants of the implementation process that could be otherwise overlooked, a *Coherent Implementation Strategy* should be a separate determinant from *Smart Policy Design*.

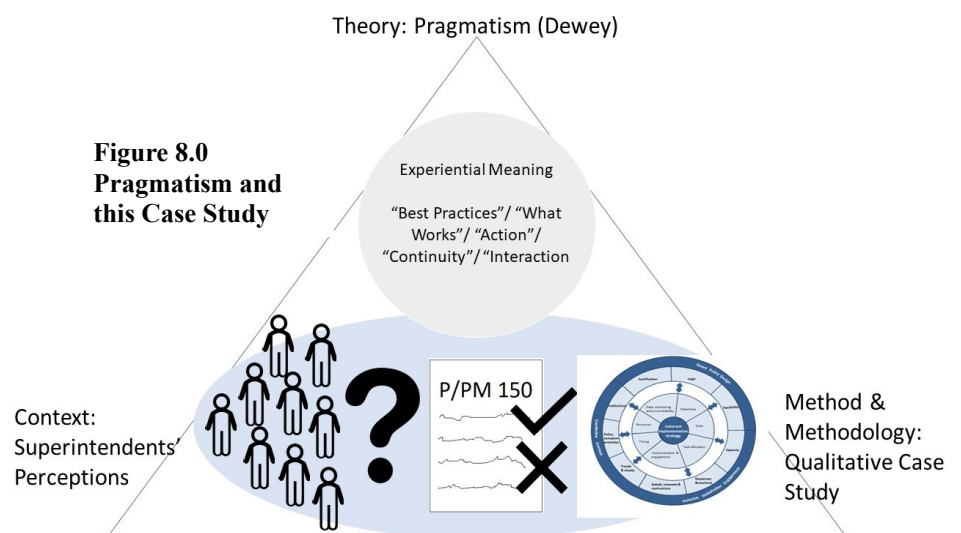
Why Use It?

This framework was selected to frame the discussion of this thesis, because: 1) it is a comprehensive and current framework of many existing implementation theories and frameworks; 2) it not only addresses the many determinants and constructs affecting implementation (including facilitators and barriers), but also the multiple environments/settings that can impact implementation (i.e., multiple contexts) and 3) it addresses the process and monitoring of implementation. Their framework was utilized to analyze results relating to the sub questions and objectives listed in the above section. Since supervisory officers' perspectives were examined – and these school board administrators only played a minor role (if any) in formulating the policy – the first dimension (*Smart Policy Design*) was only briefly addressed.

The results are presented in the discussion section of this thesis.

This framework is also congruous with my epistemology as the model helped me address the “problem” of students purchasing unhealthy food at school with “what works” (Ontario’s *School Food and Beverage Policy*) and the practical “consequences” of this nutrition policy (Cherryholmes, 1992). It enabled me to pursue an issue most meaningful to me (unhealthy students/people) and therefore partake in “freedom of inquiry” (Dewey, 1989, 1997). Moreover, since Viennet and Pont’s (2017) framework not only alludes to the dimensions within the FHS model, but it provides more detail about each dimension (highlighting the importance of a policy’s theoretical underpinnings and implementation, etc.), and it is the most up-to-date model for addressing educational policy implementation, it is the most appropriate one to employ in this study. This notion of “most appropriate” and “best practices” reflects pragmatism (Dewey, 1997). Furthermore, pragmatism concerns actions and possible consequences. As a result, it was important for me to consider most, if not all, possibilities of actions (Greenbank, 2003). By considering the value in the CSH and FHS models (since P/PM 150 was indirectly based on the former and directly based on the latter) and deciding to employ Viennet and Pont’s (2017) more detailed and updated framework, I valued differing approaches to inquiry and pondered numerous action and consequential possibilities to conducting research on P/PM 150 – a reflection of pragmatism. Furthermore, Viennet and Pont’s (2017) model was employed to explore supervisory officers’ interactions with a nutrition policy, and nutrition policies address pragmatism’s notion of world improvement (Talissee & Aikin, 2008).

The *Stakeholder* dimension within Viennet and Pont’s (2017) framework regards people who have been affected by and/or have experiences with P/PM 150. Dewey’s pragmatic ideas regarding how people make meaning from experiences (perceptions) was employed through this qualitative case study as I determined supervisory



officers' experiences with P/PM 150 (Creswell, 2013; Dewey, 1931/1989). This is illustrated in a diagram (see Figure 8.0). Dewey (1997) claims that people make meaning from their experiences and the re-interpretation of them; this frames how people approach future experiences (Dewey, 1997). Moreover, experiences derive from interactions with other people and/or an individual's environment (Dewey, 1997).

Since pragmatism also emphasizes the conceivable practical consequences of what is "real", I decided to examine the consequences of P/PM 150's implementation from the perspective of school board officers (Greenbank, 2003). Supervisory officers' experiences were also sought as it is "most appropriate" in light of the literature on P/PM 150; very few studies explore superintendents' perspectives and thus a lack of data exists. It is most appropriate to contribute to the very few studies that have been conducted on school board officials' experiences with nutrition policies, including P/PM 150.

Moreover, the strength and appropriateness of interviewing board officials derives from the fact that these administrators are responsible for ensuring the successful execution of this memorandum. They demand regular updates from principals. These updates are generally in the form of documents signed by the principal or another food administrator. They are also responsible for ensuring the policy and any associated updates are on the school board website. By viewing the board websites and analyzing related literature from differing P/PM 150 perspectives, pragmatism's notion of "dialectical synthesis"⁴⁷ was addressed.

Some may argue that the frameworks used to design/implement P/PM 150 are the most appropriate, and therefore reflect pragmatic thought; however, both the CSH and FHS models lack implementation detail and are not the most up-to-date frameworks for education policy implementation. The CSH model was first published in 2010 and only updated in 2015 (Pan-Canadian Joint Consortium for School Health, 2015) and the FHS model was used in 2010 for P/PM 150's design and only slightly revised in 2016. This revision is not reflected in P/PM 150 as this policy has not yet been revised (T. Jardin, personal communication, February 25, 2021). These models therefore do not reflect the most up-to-date research concerning education policy implementation. Moreover, it must be noted that their dimensions are located within Viennet and Pont's (2017) model; however, Viennet and Pont elaborate upon their facets, providing more detail than the original CSH and FHS models.

⁴⁷ Dialectical synthesis is the gathering and summation of data from multiple sources (Rorty, 2000).

Chapter 5: Research Methodology

As a pragmatist researcher, I took “a practical view when attempting to problem solve and link theory and practice through the research process” (Savin-Baden & Howell Major, 2013, p. 22) by discerning the most appropriate research design for addressing the research question. Once familiarized with potential research methodologies, positionality influenced the types of questions asked within the data collection tool, how they were asked, and to whom. Before delving into the participants and the interview protocol, it is necessary to first describe the study’s design.

Study Design

Qualitative Method

The study’s pragmatic nature enables a researcher to employ a qualitative research method. Denzin (2010, 2012) and Morgan (2007, 2014) argue that pragmatism’s philosophical foundations are compatible with qualitative research (as briefly mentioned in Chapter 4). Since pragmatic philosophy concerns Dewey’s notion of experiential meaning, it is appropriate that a researcher solely uses a qualitative method in understanding how a participant interprets situations and experiences. Moreover, in the mid to late 1900s scholars began discussing how the notion of experience and how people make meaning in qualitative research closely resembles pragmatic ideas of “warranted assertions” and not capital “T” Truths. These scholars (Denzin, 2010; Denzin & Lincoln, 1994; Greene, 2009; Morgan, 2014) decided that Peirce’s (1905a) idea – that pragmatism was invented to express a “general truth” regarding logic – could be associated with qualitative research. Thus, a qualitative research design was employed in this study as supervisory officers drew upon their experiences to answer the research question: How is Ontario’s *School Food and Beverage Policy* (P/PM 150) being implemented in secondary schools by school boards and the Ministry of Education?

Case Study

Since qualitative research methods are commonly employed in educational studies (Bryman, 2016), pragmatism can be associated with such qualitative research methods and methodologies as narrative inquiry, grounded theory, ethnography, and case study, or a more recent method – participatory action research (PAR) (Creswell, 2013; Lichtman, 2013).

Although this is the case, after considering all these methodologies, case study was selected as it best suits my research question (the object of inquiry at hand).

Creswell (2013) and Lichtman (2013) describe a case study as a depiction or analysis of an individual matter with the purpose to explore interaction between participants in a situation and/or to assess the performance of progress in development. This study analyzes the implementation of P/PM 150 (the individual matter). Moreover, it explores supervisory officers' interactions with this policy⁴⁸. Looking to the “what” (what supervisory officers have done with the policy) and “how” (how they interact with it and its facets) of my research topic based on its intended consequences reflects qualities of a case study (Creswell, 2013; Lichtman, 2013) as well as pragmatism (Creswell, 2013; Rorty, 2000). Superintendents, directors of education, and board facilitators/consultants⁴⁹ interacted with this policy while assessing the development, progress, and performance (i.e., outcome) of P/PM 150. By examining the supervisory officers' experiences with the purpose to assess the performance of progress in development (i.e., the performance and progress of P/PM 150), this study reflects Creswell's (2013) and Lichtman's (2013) depictions of a case study.

Not only may a researcher, employing a case study, apply pragmatic Deweyan notions of action (interaction), but they can look to the “what” and “how” of their research topic based on its intended consequences. As a result, I examined the consequences of P/PM 150's implementation from the perspective of supervisory officers. I also valued differing approaches to inquiry and pondered numerous action and consequential possibilities to conducting research on P/PM 150. This is reflected in the theoretical framework selected for this study (see Chapter 4). It is also reflected in the two data sources (interviews and online content) employed in this study.⁵⁰ The focus on what works and consequences, reflects a pragmatic case study approach (Creswell, 2013; Rorty, 2000).

⁴⁸ Case studies, as a form of qualitative research, can “inform professional practice or evidence-informed decision making in both clinical and policy realms” (Baxter & Jack, 2008, p. 544).

⁴⁹ Consultants and facilitators are employed by a school board to help manage or provide input concerning policies, including P/PM 150. Some facilitators or consultants are part of a school board's Financial/Managerial Administrative Services. For example, one of the facilitators (in this study) is within a board's Manager, Supply and Administrative Services department. Consequently, they support, manage, and oversee the vendor who manages cafeterias within their school board. This facilitator manages the board-food providers contract and oversees what is being delivered to schools. Similar to a superintendent, this facilitator visits schools to inspect the cafeterias, discerning whether they are P/PM 150 compliant.

⁵⁰ A hallmark of case study research is the use of multiple data sources (Baxter & Jack, 2008).

Unlike narrative inquiry, a researcher employing a case study will use a formal (practical) tone and not be concerned with narrating their own story⁵¹ and/or closely interacting with the participants (Clandinin & Connelly, 2000). They will not be concerned with “telling” the participants’ stories in a story-like manner. Since I did not establish a close relationship with the participants, desire to integrate autobiographical narratives, and reveal the board officials’ experiences through story-telling, employing a case study was the most appropriate research method for this study.

Moreover, a case study was employed as I examined P/PM 150 (through documents, websites, online articles, news articles, and dissertations) from an outsider’s perspective – a pragmatic notion. I never experienced P/PM 150. The only relation I had to my topic were my observations of North Americans, children, and adolescence with obesity, as well as the literature I reviewed to write Chapters 2 and 3 of this thesis. Furthermore, when comparing a case study methodology to that of grounded theory, I did not construct a theory based on “data” that emerged from my own interpretation of observations regarding P/PM 150 (Bryant, 2009). Moreover, a case study approach was the most appropriate one to employ as I was not studying school nor classroom culture and dynamics – that which ethnography emphasizes (Lichtman, 2013). Furthermore, participatory action research (PAR) would not have been the best approach to this study for it involves researcher-participant-stakeholder collaboration (Jacobs, 2016). Since new knowledge only generated from the board officials and I did not interact often with the participants (Jacobs, 2016), adopting a case study methodology was most appropriate for this research.

Thematic Analysis.

Case studies often include pattern matching (also known as thematic analysis) and linking data to the research question. In so doing, a researcher may use a database to organize the data (Baxter & Jack, 2008). In this study, a software program was utilized to organize and locate patterns within and among the interview transcripts. Moreover, patterns (themes) among the interview data were cross-referenced with Ministry, school board, and individual school website and social media content. I ensured that the data from these sources were converged in an

⁵¹ When using narrative inquiry, a researcher should add autobiographical narratives to their study (Clandinin & Connelly, 2000). Moreover, a narrative inquirer establishes a relationship with the participants and/or often interacts closely with them (Clandinin & Connelly, 2000; Riessman, 2008).

attempt to understand the overall case (P/PM 150's implementation) (Baxter & Jack, 2008). Thus, thematic analysis was an appropriate method for analyzing the study's data.

Participants

Since one of the dimensions in Viennet and Pont's (2017) model is *Inclusive Stakeholder Engagement*, and school board members are involved in implementing P/PM 150, twenty-four⁵² school board supervisory officers (12 female and 12 male) participated in this study. From the twenty-four, twenty were superintendents, one was a director of education, two were board facilitators/consultants, and one was a retired administrator. They all ranged in age from 40 to 65 years. All of them were administrators (principals, vice-principals, etc.) before their current positions. Thus, all of them have been educators for at least 20 years. All of them have experiences with P/PM 150, either in the capacity of a board official, school administrator, or both. Thus, all of them have or have had experience implementing P/PM 150 for many years (i.e., 5-10 years). This enabled them to comment upon their reactions, beliefs, interests, motivations, and capacity/role(s) in relation to P/PM 150⁵³ since its genesis, thus providing a more holistic view of it. From the twenty-four participants, fourteen deal with it currently as it is part of their portfolio, while ten encountered it either briefly in their current role or extensively when they were a school administrator. Thus, many of them drew upon their experiences with it when they were principals. Most of them were employed by their current school board for 25/30 years and only three were recently transferred to their current board from another school board. Most of them also worked as a principal in secondary⁵⁴ schools prior to their current role.

There are sixty-three school boards across Ontario (33 English-Public and 30 English Catholic/Protestant) (Government of Ontario, Ministry of Education, 2021). From the sixty-three boards, seventeen boards⁵⁵ were selected. Each supervisory officer (superintendent,

⁵² Although there is much debate about sample size in qualitative research, Baker and Edwards (2012) claim that there is no "right" number in qualitative research. A sample size depends upon many factors (one's methodological approach, epistemology, participant availability, etc.). Since participant response rate and availability were leading factors in this pragmatic study, twenty-four participants became my sample size. This number was large enough to allow "the unfolding of a new and richly textured understanding of the phenomenon under study, but small enough so that the deep, case-oriented analysis of qualitative data is not precluded (Vasileiou et al., 2018, p. 2).

⁵³ Reactions, beliefs, etc., are listed within Viennet and Pont's (2017) framework.

⁵⁴ Only a couple superintendents worked as an elementary school principal prior to their current board role.

⁵⁵ From the sixty-three boards that were contacted (through e-mail/phone), I was only able to conduct interviews from supervisory officers within seventeen boards. This is because most of the other boards did not respond at all, or they did not grant permission to conduct interviews.

director of education, facilitator/consultant) represents boards from all the regions comprising Ontario: Central, Eastern, North-Eastern, Northern, North-Western, Southern, Western.⁵⁶ (See Appendix F for map of regions). Central Ontario (n=5); Eastern (n=4); North-Eastern (n=1); Northern (n=2); North-Western (n=1); Southern (n=1); and Western (n=3). These school boards have schools within urban/suburban/rural neighbourhoods: urban schools only (n=5); urban and suburban (n=1); suburban only (n=0); suburban and rural (n=3); rural only (n=3); rural and urban (n=0); urban, suburban, and rural (n=5).⁵⁷ (See Appendix G for a summary of each school board). Thus, there were representatives from the catholic and public boards, and from rural, urban, and suburban settings. Furthermore, all these boards have schools within high-income and/or low-income neighbourhoods: solely high-income (n=5); solely low-income (n=1); high- and low-income (n=1)⁵⁸ (see Appendix H for a summary of all the boards).⁵⁹ High-income concerns households producing well over the “cut-off”⁶⁰ line, often \$80,400.00/year or higher depending on community and family size (Statistics Canada, 2018, 2019). Low-income is defined as the income below the “cut-off” line which is based on community and family size (Statistics Canada, 2015). Grubel (2020) says that this income is often below \$45,000/year. All the participants selected a date and time that suited them. Moreover, they selected the online platform to be used for conducting the interview. Four interviews were conducted via Microsoft Teams, whereas the rest were done through Zoom.

Since the supervisory officers lay aside their busy schedules and volunteered to participate in this study, it was necessary for me to consider their potential biases toward P/PM 150’s implementation. I also had to consider their feelings and biases since they heavily interacted with the memorandum and, in most instances, with school principals. From a pragmatic standpoint, interaction concerns the engagement an individual has with his or her existential conditions (Dewey, 1997). It is possible that since these supervisory officers have a responsibility to implement P/PM 150 successfully, they view everything they do with it through that lens.

⁵⁶ Many of these regions and their corresponding school boards are listed on the Internet (EOSDN, 2021; Ontario Association of School Districts International, 2020).

⁵⁷ These numbers reflect the total number of schools within urban/suburban/rural neighbourhoods across all the boards within this study.

⁵⁸ These numbers reflect the total number of schools in high- or low-income neighbourhoods across all the boards within this study.

⁵⁹ These numbers derive from data from the following sources: Grubel (2020) and Statistics Canada (2019).

⁶⁰ For the purposes of this study, “cut-off” is based on median household income after tax (Grubel, 2020).

Recruitment Strategies

To address Viennet and Pont's (2017) *Context* dimension, a representative sample of urban/suburban and rural school boards⁶¹, as well as boards with schools in high-income and low-income neighbourhoods, were selected. To have a representative sample of supervisory officers from boards within these contexts, every superintendent and director of education within the sixty-three English school boards across Ontario were contacted. This was done to recruit as many board officials to represent these venues. Moreover, it was accomplished to ensure that a sample of board officials represented every region across Ontario (Eastern, North-Eastern, Central, Southern, Western, and North-Western). Although this was the case, supervisory officers were recruited through convenience sampling (Suen et al., 2014). This technique was employed as school boards made the decision to accept or deny my request to conduct interviews. When it was the latter, they often selected the interviewee or recommended the board official with whom I should converse. The board official selected was often a superintendent responsible for monitoring P/PM 150. In some cases, however, the board did not feel the need to "grant" permission and thus, I was able to contact whomever I desired from the said board.

Most initial contact was done by searching the supervisory officers' contact information online from each of the school boards' websites and making a phone call. This was then followed by an e-mail describing the study with instructions for next steps. This e-mail had attachments (e.g., an information letter, a consent form, and the interview questions). Within the information letter and consent form was a description of the research. The consent form also detailed the procedure (information on audio-recording, transcription), as well as anonymity and confidentiality. Participation in the interview was, thereby, deemed as consent. Concerning the interview questions, the supervisory officers had more of an opportunity to provide in-depth, well-informed responses as the questions were sent in advance (Creswell, 2012).

In other instances, the supervisory officers were contacted directly or through their executive assistants via e-mail with the corresponding attachments. In some instances, a snowball technique⁶² was employed as a superintendent (who did not have P/PM 150 in their

⁶¹ A rural board is deemed rural when most, if not all, schools within that board are in a country setting. The same logic applies to urban and suburban boards.

⁶² Snowball technique or snowball sampling is a non-probability sampling technique where participants or potential participants recruit future participants from among their acquaintances (Goodman, 1961; Morgan, 2008).

portfolio) directed me to the superintendent, director of education, or board facilitator/consultant responsible for its implementation.

Data Collection

Data was collected through online interviews with each participant, Ministry and school board websites, as well as individual school websites/social media page(s). Statistics Canada was also referenced for neighbourhood (high-low family income) characteristics.⁶³

A. Interviews

Data was primarily collected through semi-structured interviews.⁶⁴ Semi-structured interviews provided a means for obtaining participants' "attitudes, interests, feelings, concerns, and values" (Gay et al., 2009, p. 370) regarding their views and experience of readiness to implement. In addition, the discussion(s) during the interview were tailored to answer specific questions as well as more flexible and adaptable to the situation (Hennink et al., 2011; Monette et al., 2005). These interviews were conducted using an online platform that enabled me to see the participants. This enabled me to analyze non-verbal and contextual data (Novick, 2008). Since all the interviews were conducted through an online forum, time and cost associated with individual interviews were not an issue. These facts, coupled with how interviews may encourage thorough experiential responses, express their appropriateness as a primary data collection tool.

The interview's strengths and its adherence to pragmatism also lay in the questions' developmental process. The interview questions (see Appendix I) focused on Viennet and Pont's (2017) four determinants (*Coherent Implementation Strategy, Smart Policy Design, Conducive Context, and Inclusive Stakeholder Engagement*) as the research questions were concerned with P/PM 150's implementation and its many facets. Thus, the supervisory officers were asked questions pertaining to their role(s)/capacity in implementing the policy – i.e., how they communicate the policy (its objectives, tools and task allocation) to other stakeholders, how they monitor its execution, and whether resources, timing, and other institutional or contextual factors

⁶³ For consistency purposes, all the supervisory officers were provided with definitions of low-income and high-income neighbourhoods (see Appendix I at the beginning of the interview protocol).

⁶⁴ The interview, in its numerous shapes and forms, is finally being considered the most significant data collection tool in educational research (Gudmundsdottir, 1996).

hinder or aid implementation. Since, however, implementation is affected by the other determinants (*Smart Policy Design, Conducive Context, and Inclusive Stakeholder Engagement*), these and many of their descriptors⁶⁵ were also reflected in the interview protocol.

Consequently, the interview questions addressed supervisory officers' role(s) developing P/PM 150 (*Smart Policy Design*). Questions also concerned high- and low-income neighbourhood schools, as well as urban, suburban, and rural secondary schools⁶⁶ (*Conducive Context*). The supervisory officers' interactions with other stakeholders (*Inclusive Stakeholder Engagement*) were also explored.

It must be noted that the questions were open-ended. Open-ended questions allowed the supervisory officers to provide in-depth reflections on their experiences (Neal, 2011). Moreover, the interviews lasted anywhere from twenty-five minutes to just over an hour. They were also digitally recorded (audio) in a quiet location, free from noises and distractions (Creswell, 2012). To address Dewey's (1931/1989) notion of "best practices," the interviews were recorded and transcribed verbatim.

Interview Protocol: Those Involved.

To determine practical questions (an aspect of pragmatism), I developed and refined the interview questions in consultation with those who helped design P/PM 150. Consequently, the interview protocol was developed and refined in consultation with Ottawa health dietitians and members of the Canadian Cardiovascular Pharmacist Network (CCPN) (see Appendix J). These dietitians and CCPN members helped develop the policy by sharing their understanding of health-related ones as well as their expertise in nutrition and the Canada Food Guide.

B. Online Content

Data was also obtained from Ministry, school board, and school websites/social media pages. These websites provided information, some in the form of documentation, related to nutrition policies (including P/PM 150). The online content and documents reflected Viennet and Pont's (2017) four determinants. The Ministry developed P/PM 150 (*Smart Policy Design*) and its associated resource guide outlining nutrition standards (based on the Canada Food

⁶⁵ Descriptors refer to the words used to describe each of these determinants. For example, within the *Coherent Implementation Strategy* determinant, there exist such descriptors as, data, monitoring and accountability, resources, communication, and engagement, etc.

⁶⁶ For consistency, all the supervisory officers were provided with definitions for the following terms: urban, suburban, and rural (see Appendix I for these definitions).

Guide). It also outlines a “Special-Event Days” protocol and other mandatory and non-mandatory protocols based on local school-level factors (*Conducive Context*). Moreover, the guide outlines stakeholders involved in the policy’s execution (*Inclusive Stakeholder Engagement*), and the ways in which this policy is monitored⁶⁷ (*Coherent Implementation Strategy*). These documents, including other website content, were used as a cross-referencing tool in relation to supervisory officers’ interview responses concerning stakeholders’ roles, the monitoring process, and P/PM 150’s implementation at the cafeteria and vending machine levels. Moreover, the Ministry and school board sites alluded to updates on, when, or how, this policy will be revamped (*Smart Policy Design*).

Another cross-referencing tool concerns school websites/social media page(s). The school websites were selected through stratified random sampling.⁶⁸ 50%⁶⁹ (n=79) of the schools within the seventeen boards, wherein twenty-four supervisory officers were interviewed, were selected. This technique was employed as I desired to have a representative sample of urban, suburban, and rural schools, as well as ones within low-income, and high-income neighbourhoods. To discern the schools’ contexts (*Conducive Context*), Statistics Canada was consulted. The schools’ websites/social media pages offered insight into their contexts (*Conducive Context*), newsletters about P/PM 150 (*Inclusive Stakeholder Engagement*), and other information that shed light upon the policy’s implementation (*Coherent Implementation Strategy*).

Data Analysis

A. Analysis of Interviews

The twenty-four interviews and corresponding data were analyzed using a coding framework that is the most appropriate and current for research concerning education policy implementation. Consequently, Viennet and Pont’s (2017) flexible and actionable one was

⁶⁷ The policy is monitored through such forms as, “School Assessment” and “School Inventory of Food and Beverages Offered for Sale.” These forms must be completed annually and by every school. Supervisory officers oversee these forms.

⁶⁸ In this method, every secondary school within the 17 school boards were first divided into subgroups (or strata) that share similar characteristics. For example, all the rural schools were in the same group, all the urban/suburban, and so forth. This was done to ensure representation from all the subgroups (Thompson, 2012).

⁶⁹ This percentage reflects a representative sample based on the identified parameters listed above: high-income, low-income, urban, rural, and suburban from the different regions. 50% is also equivalent to five schools per board. To address school boards with less than five high schools, I examined more schools within other boards.

employed. It guided the data collection as data was grouped according to the framework's four dimensions. Consequently, both inductive and deductive coding was used for the analysis (Miles et al., 2014; Thorne, 2008). Codes were first created inductively through first and second cycle coding. They were then categorized. Last, they were analyzed deductively using the four dimensions within Viennet and Pont's (2017) framework. Apparent similarities and differences among the supervisory officer perceptions were assessed under each dimension.

Data was analyzed using NVivo 10 Qualitative Analysis Software (QSR International, Victoria, Australia). The transcripts were analyzed through a process of qualitative coding. Codes are labels or constructs that attribute meaning to text within the transcript (Miles et al., 2014; Saldana, 2015). The first cycle coding was inductive as I used descriptive and In Vivo codes to highlight what was pertinent to the research question(s). Descriptive codes summarize the primary topic of the excerpt while In Vivo coding regards a word or phrase that is directly taken from what the participant says and is placed in quotation marks (Saldana, 2015). Once first cycle coding was complete, a second cycle of coding (or pattern coding) was conducted (Miles et al., 2014), where first cycle codes were re-assessed and potentially reconfigured to discern patterns and common themes (Miles et al., 2014). This analysis also included the use of query functions and matrices in NVivo to examine any potential differences by school setting (high-income neighbourhood schools vs low-income neighbourhood schools and urban vs suburban vs rural schools). Once coding was complete, these codes were categorized. Some categories contained clusters of coded data that merited further refinement into subcategories (Saldana, 2015). These categories were then compared to the dimensions within Viennet and Pont's (2017) model to discern similarities and potential differences among the data. It is important to note that I used a research memo journal wherein comments, questions, and thoughts concerning the data were written. This journal was also part of my qualitative analysis. Moreover, this data was analyzed with the help of member-checks; I sent the findings to the supervisory officers for feedback, as case studies often employ multiple sources of data (Creswell, 2013; Lichtman, 2013). By engaging in member-checks, compiling themes based on Viennet and Pont's (2017) framework to suit P/PM 150's context, and substantiating data analyses through NVivo, I employed the "best practices" in my study. Consequently, my case study reflects pragmatic views of logic, practicality, and "what works."

Pragmatism's notion of "what works" and "best practices" are also reflected in the study's Deweyan (1997) ideas of action, continuity, and interaction. I explored "what" supervisory officers' have done with this policy (action) and "how" they interact(ed) with it (continuity) and all its corresponding facets, including their corresponding principals (interaction) (Dewey, 1931/1989; Morgan, 2007, 2014). Since interaction concerns the engagement an individual has with his or her existential conditions, I considered the supervisory officers' feelings and potential biases toward the memorandum. This consideration helped validate data and produced a more reliable study.

B. Analysis of Online Content

Document and content analyses of public records⁷⁰ were employed in this study as Ministry, school board, and individual school websites/social media pages were examined. This was accomplished by placing content into categories related to nutrition, P/PM 150, and Viennet and Pont's (2017), four determinants: *Smart Policy Design*, *Conducive Context*, *Inclusive Stakeholder Engagement*, and *Coherent Implementation Strategy* (see Appendix K for the categories/assessment tool). The assessment tool, designed for this study, is comprised of predefined categories (e.g., "Nutrition in General," "P/PM 150's Design," etc.) and questions – within each category – related to the study's research objectives, framework, and themes from the interview results.⁷¹ However, some questions were added to the assessment tool throughout the analysis process as themes emerged from the data. Bowen (2009) and O'Leary (2014) relate this type of coding process to thematic coding – that which is often employed when researchers analyze focus group or interview transcripts. Thematic coding is not the only similarity between analyzing documents and analyzing interview transcripts. O'Leary (2014) states that the predefined categories (in document analysis) act like interview questions. The researcher then uses these categories (topics) to highlight the answer within the text. Since the content was online, rather than highlighting the answer within the text, the pertinent content was copied and pasted into the study's assessment tool.

There was one website page (on the Ministry website) detailing P/PM 150. This was analyzed for content related to Viennet and Pont's (2017) four determinants: *Smart Policy*

⁷⁰ A public record is one of the three primary types of documents examined when employing document/content analysis in research (O'Leary, 2014).

⁷¹ The use of these three elements helped me develop a practical assessment tool – an aspect of pragmatism.

Design, Conducive Context, Inclusive Stakeholder Engagement, and Coherent Implementation Strategy. Searching for content related to the four determinants was also employed when I clicked the page's links to online training modules, and P/PM 150 resource guides and forms. Moreover, the seventeen school boards selected for this study had their websites examined. Thus, seventeen school board website pages were analyzed for nutrition- and P/PM 150-associated material (all relating to the four determinants). Moreover, by using Statistics Canada, the school board's urbanicity⁷² was determined, thus addressing the *Conducive Context* dimension of Viennet & Pont's framework. It must be noted that many of these websites had links to other nutrition-related content within school board newsletters, agendas/meeting notes, annual reports, nutrition guides, tools, etc. Screenshots were taken of any photographs/images relating to the assessment tool's categories. Hence, content analysis was employed.⁷³ As mentioned above, 50%⁷⁴ (n=79) of the schools within the seventeen boards were analyzed. Therefore, approximately five schools per board were examined. To address school boards with less than five high schools, I examined more schools within other boards.

Stratified random sampling helped me have a representative sample of urban, suburban, and rural schools, as well as ones within low-income, and high-income neighbourhoods. The schools' websites/social media pages offered insight into their settings (*Conducive Context*), newsletters about P/PM 150 (*Inclusive Stakeholder Engagement*), and other information (e.g., curriculum documentation, photographs of fundraisers, school events, cooking classes, cafeteria food, etc.) that shed light upon the policy's implementation (*Coherent Implementation Strategy*). Seventy-nine individual school websites were examined. An assessment tool (mentioned above) was used to analyze data on each site. Screenshots were taken of any photographs/images relating to the assessment tool's categories. Moreover, the schools' social media pages (Twitter, Facebook, Youtube, and Instagram) were examined: Twitter (n=72); Facebook (n=38); Youtube

⁷² This is defined as a neighbourhood's designation as rural, suburban, or urban. See Appendix I for definitions of urban, suburban, and rural neighbourhoods. It must also be noted that a school board's urbanicity is based on the number of schools within a particular urbanicity category. For example, if most schools within a board are within a rural neighbourhood, then that school board is deemed rural.

⁷³ Content analysis is very similar to document analysis. The core difference between the two techniques is that document analysis only examines written documents, whereas content analysis examines all mediums (e.g., images, photographs, etc.).

⁷⁴ This percentage reflects a representative sample based on the identified parameters listed above: high-income, low-income, urban, rural, and suburban from the different regions. 50% is also equivalent to five schools per board. To address school boards with less than five high schools, I examined more schools within other boards.

(n=7); Instagram (n=15).⁷⁵ Thus, from the 79 schools that were examined, 132 social media pages were examined in total. Categories from the assessment tool were in mind when taking screenshots of the social media pages. Most of these social media pages were comprised of photographs.

Since the use of multiple data sources is often a feature of pragmatism (Creswell, 2013) and helps substantiate data analyses (Lichtman, 2013), document and content analyses of online content were coupled with thematic analysis of interview data.

Study Rigour

Although the study included twenty-four supervisory officers from sixty-three boards across Ontario, its rigour lies in its sampling and cross-referencing methods, coding, and documenting. The snowball/convenience sampling technique enabled me to recruit supervisory officers who were well-versed and had extensive experience implementing and/or designing P/PM 150. The stratified random sampling technique enabled me to have a representative sample of school websites/social media page(s) from the following neighbourhoods: high-income, low-income, urban/suburban/rural. Document and content analyses from the websites/social media page(s) helped corroborate and supplement the interview data (Creswell & Plano-Clark, 2011; Miles et al., 2014; Thorne, 2008). Moreover, corroborating findings across data sets can reduce the impact of potential bias (Creswell, 2012). Care was also taken to avoid introducing personal bias during the interviews.

To address reliability of coding, a codebook was created. This included definitions and descriptions of each pattern (thematic) code. A second coder with graduate level training also undertook an “inter-rater reliability exercise” wherein they coded a subset of the website content/documents and interviews (Vine & Elliott, 2013). First, they used the said codebook to examine five transcripts. Their analysis was compared to the primary researcher’s analysis of the same transcripts. Second, the second coder viewed three school board websites, using the assessment tool I developed for this study. Any disagreements between the transcripts and assigned codes, as well as website content were discussed, and any potential codes that were

⁷⁵ From the seventy-nine schools examined, most had at least one social media page (either Instagram, Facebook, Twitter, or a Youtube channel). Most nutrition-related content, however, was posted on their Instagram page.

missed were identified. In addition to verifying level of agreement, peer debriefing occurred during the analysis process (Creswell, 2012, 2013).

Moreover, to ensure rigour, memoing (briefly described above) was employed. Memoing (journaling) is described as a “brief or extended narrative that documents the researcher’s reflections and thinking processes about the data” (Miles et al., 2014, p. 95). The journal memos helped document any analytic thinking (questions, thoughts, conclusions) that occurred, and possible patterns or relationships that emerged throughout the analysis process (Thorne, 2008). This helped me write the Discussion chapter of this thesis.

Ethical Considerations

Ethics Review Board

The study was reviewed and received clearance from the University of Ottawa Office of Research Ethics (see Appendix L). Moreover, it was approved by all seventeen school boards.

Anonymity & Confidentiality

All data collected from the supervisory officers remained strictly confidential. Only the primary investigator (me) and my thesis supervisor had access to any personal information (names, school boards, etc.) and audio-recordings. The graduate student who helped with the inter-rater reliability exercise did not have access to any identifying information since names and places within the data sets were either removed or replaced with pseudonyms prior to the data set analysis.

The participants were also aware (through a consent form) (see Appendix M) that a copy of the data analysis would be sent to them for comment and revision by a password-protected e-mail. This was done before a final copy of the research was produced for publication. They were also informed through this form that audio-recordings would be kept in a secure manner at the researcher’s (my) home during the research and on a password protected computer. Moreover, they were informed that a copy of all original data would be securely stored for five years following data collection.

Assessment of Risks

All the supervisory officers were informed (via a consent form) that there were no foreseeable risks when participating in this study. However, they had the option to stop the

interview at any time if they experienced any discomfort. Since I made every effort to minimize discomfort and the participants had no ethical concerns, all of them completed the interview sessions. Moreover, since participation was voluntary, the supervisory officers had the option to withdraw from the study at any time and/or refuse to answer any interview questions, without suffering any negative consequences. None of the participants withdrew nor did they refuse to answer any interview questions.

Chapter 6: Interview Analysis

Upon examining the interview data, many themes emerged: supervisory officer roles, P/PM 150 related communication and monitoring, barriers and facilitators, pedagogical implications, a cultural paradigm shift, and recommendations for promising practices. Consequently, this chapter has been divided into four sections, beginning first with supervisory officers' roles developing P/PM 150 and/or designing a related school board nutrition policy. I also articulate their roles revising this policy. Since these officers are responsible for communicating and monitoring P/PM 150, these two themes are presented next. The second section of this chapter describes P/PM 150's barriers and facilitators, while the third section presents pedagogical implications and how P/PM 150 has caused a school paradigm shift. The final section reveals the many ways this policy and its implementation process can improve.

Section 1:

Supervisory Officer Roles

P/PM 150's Development

Every supervisory officer, except one, did not partake in the initial design of P/PM 150. “[I only took care of it] as a principal, just the implementation.” While another officer said, “from what I understand, we were never involved in the consultation of this.” Two supervisory officers speculated about those who formed P/PM 150: “[T]he people who developed the policy were probably in and around the Toronto area and [the Ministry of Education] certainly had advocates and stakeholders from around the province.” This supervisor also speculated that most of the designers specialized in policy design and were not necessarily implementers. “I don't think principals were involved and if superintendents were involved, it was probably from a very superficial perspective.” A school board facilitator from Central Ontario is certain that “the Ministry took our [nutrition] policy [and] used that as a stepping-stone.” This particular board's nutrition policy preceded P/PM 150's implementation by five years.

Only one supervisory officer (a program facilitator at the board level) was asked by their board and the Ministry to contribute to the review, writing, and rollout of P/PM 150 from 2009

to 2011. This program facilitator was asked to participate by their superintendent and the Ministry because it aligned beautifully with their portfolio.⁷⁶

I was invited to the ministry meetings ... The bulk of my work was to connect with the Ministry liaison. We were meeting with the Ministry of Health and there wasn't much discussion with the Ministry of Education at the time. In terms of the rollout in the development, I was leading the writing of the board policy, the procedure, and the regulation, as well as leading administrative teams in terms of how we were going to implement this.

As a facilitator, they established relationships with the board's regional health department promoting healthy eating, lifestyles, and choices. They met in Barrie (Ontario) with other board facilitators, including some elementary and secondary administrators, as well as teachers. The design team was diverse as they had different viewpoints, experiences, and knowledge. The facilitator concluded, although many helped design P/PM 150, "it feels like it has been my baby at the board for the time I was a facilitator." Facilitators have been integral to P/PM 150's development as another supervisory officer recalled his superintendent, at the time of P/PM 150's initial implementation, "reaching out to our facilitator ... so [that superintendent] would have been part of the development and implementation" of the board's nutrition policy.

Although the other school board officials (who were interviewed for this study) did not partake in the initial design of P/PM 150, many (who have P/PM 150 as part of their portfolio) were responsible for viewing what the Ministry of Education disseminated to them. P/PM 150 was then altered (when required) and uploaded to the school board website. Most officers said that very few alterations were necessary: "We pretty much stuck to the P/PM in terms of what it said." P/PM 150's concepts were copied and became part of their boards' regulation. A superintendent expressed, "the board policy reflects P/PM 150 ... [It mentions] the 80/20 rule⁷⁷ ... the compliance aspect ... how it only concerns food being sold and not what kids bring into school." One of the officers mentioned "having a smaller group," comprised of some PIC (Parent Involvement Committee) members and a few administrators, designing the board

⁷⁶ This program facilitator's area of support included health and physical education from kindergarten to grade 12.

⁷⁷ This rule ensures that nutritional products comprise at least 80% of all food and beverage choices, while products with slightly higher amounts of fat, sugar, and/or sodium constitute no more than 20% of all product choices.

nutrition policy. They continued, once it was designed, “it went up for constitution and then got passed by our senior administration team ... which is my colleagues and I ... and then it went to our Board of Trustees,” they concluded. Associated with this school board policy/regulation is an administrative procedure. “Administrative procedures give the operational pieces of the board policy ... which is much more robust.” Another superintendent said that this procedure was “operational” in nature as it outlined stakeholders’ roles implementing the policy. Some of the roles included administrators having meetings to inform school staff and parents about the policy. Another superintendent expressed, “there was a lot of debate in how we wrote the policy, what it meant for schools, and the importance of it being understood by all.” It was important that the school board nutrition policy reflected P/PM 150, but was also clear (in the vernacular) so that all stakeholders would understand its goals, their own roles in its execution, and ways of implementing it. It was also important that stakeholders viewing the policy on the school board website understood its reasoning.

The Revisional Process

All the supervisory officers claimed that P/PM 150 has not yet been revised and updated: “I haven’t heard anything on this policy shifting at the Ministry level,” expressed one superintendent, while another said, “the food and beverage policy hasn’t changed in 10 years.” Although this is the case, many mentioned revising their board’s nutrition policy (also known as a regulation in some boards), which is based on P/PM 150: “We review the policy every five years, so in this case we’ll bring stakeholders together to ask for feedback as we look to update it.” This process was confirmed by a few other superintendents. Part of the process is also to review the administrative procedure associated with the board’s nutrition policy. “The procedure often changes ... it is for our principals and staff and not for public use,” claimed a superintendent. During one of the review sessions in 2016, a supervisory officer recalled clarifying the 80/20 rule in the policy and in the administration procedure as the rule was “troublesome and required clarification.” A different school board (a Catholic one) reviewed the policy every three to five years. Another superintendent claimed that their school board revised the policy every five or six years as the review process is a “cycle.” This supervisory officer continued, saying that their nutrition policy on the board website “is up for review this year.” Although this is the case, there may only be few or no alterations as P/PM 150 has not undergone

any revisions at the Ministry level. This superintendent also expressed,

my biggest criticism of a lot of the policies and memorandum that come out, is there's usually a launch within the school board ... and then they're really not spoken of again. It's really up to the principal at the school to ensure that it continues.

A few other officers concurred, saying that their nutrition policy/regulation is also scheduled to be revised in 2021. A director of education mentioned that their board recently reviewed the school board administrative procedure on P/PM 150. Their review process consisted of examining the current procedure and incorporating stakeholder feedback on P/PM 150's implementation. Some of them claimed that the next time they review their board's policy, they will likely have to incorporate the updated Canada Food Guide. This cyclical process of reviewing policies enables a school board to "update it, and then push it back out there" to remind students and staff about its implementation.

The Importance of Communication

The supervisory officers said that P/PM 150 has been communicated to multiple stakeholders (e.g., superintendents, school administration, school staff, students, parents, and food service providers): "[W]e had to work with our parent councils and identify our pizza days ... [work with] our vendor: are they able to put turkey pepperoni on instead of pork? [Everything had to be] within the guidelines." P/PM 150 related communication transpired at meetings, training sessions, and through PowerPoint presentations, e-mails, posters, newsletters, and social media pages. This is all articulated below.

P/PM 150's Genesis

The Meetings.

In the beginning of P/PM 150's implementation, the Ministry employed a "train the trainer model." All officers claimed that the Education Ministry presented the policy to supervisory officers, or one superintendent responsible for health with P/PM 150 in their portfolio. This is because superintendents were mostly responsible for "getting a general understanding up and down the system." An officer (who helped design P/PM 150), distributed thousands of nutrition policy booklets to their school board. All the officers claimed that superintendents disseminated the policy and corresponding material to their school board's

committee, which consisted of school administrators. Some superintendents mentioned that all the secondary principals within the board comprised this committee, which was held once a month. Another superintendent concurred; however, discussions related to P/PM 150 occurred at a “central leaders meeting” known as Catholic Learning of Leadership (CLL). A superintendent in Northern Ontario expressed that this meeting was the “Leadership Meeting.” “I was the person then to do a presentation for the principals and staff, to roll this out.” A different superintendent said, “[t]here were meetings for sure ... there were conversations at our program committee with the board of trustees.”

Most of the supervisory officers claimed that the initial “rollout” meeting (or training session) comprised of a PowerPoint presentation, and was led by a school board facilitator or a superintendent. In one instance, there were two training sessions in the initial stages of implementation wherein a public health nurse discussed nutrition and the Physical Education consultant helped lead the training session. In another instance, the training (workshop) was not led by a board facilitator or superintendent, but it was led by the Ministry and their policy advisors. Another officer recalled a public health nurse and nutritionists discussing P/PM 150. During one of the meetings, they taught about sugar addiction. Within these initial training sessions or “rollout” meetings, each school within the board was provided with a copy of P/PM 150, coupled with “a little flip guide,” or as others said, “flip charts,” “a little green flipbook,” “little books ... big books,” or “little wheels that helped us figure out what met the [P/PM 150] criteria.” Some superintendents (who were school administrators at the time) also received booklets, or binders – essentially a P/PM 150 kit – which was used to discern what foods could be sold at school. According to many officers, the initial meeting was informational in nature, wherein a discussion about “rolling out” the policy ensued. At the initial meeting, a supervisory officer said, “here are things that we're going to send you, whether it be letters to parents, whether it be forms for mom-and-pop shops or external agencies, that you have to keep on file.” There were also discussions about supervisory duties. One officer claimed that his duty was to chair the Implementation Committee. The board’s superintendent contacted him (the principal), saying, “[m]aybe you should take it on as just another committee ... and call it the Food and Beverage, or the P/PM 150 Committee.” In this particular role, the supervisory officer said,

[When] lots of issues came up, [school administrators] filed off emails to me, left, right, and center [asking], what do I do? Or, where do I go? We [the superintendent and I] would direct them to the proper places or connect them with an OPH [Ottawa Public Health] representative.

While administrators learned of their roles in executing the policy, they used the initial meeting as a venue for asking questions. Such questions concerned P/PM 150's regulations concerning what "is sold versus what can be given." While another officer said that there were many questions about the policy's implications, and the types of "Special Day" events that could be selected to satisfy the "Special Day Events" module, also known as the ten-day rule.

At subsequent meetings⁷⁸, including the Administrators Association ones (which were held monthly), school administrators conversed about compliance, ways of executing the policy, and ways of addressing implementation challenges, claimed many of the superintendents. Administrators also divulged the realities of implementation within a secondary school and how administrators ensured that students had nutritious opportunities. One superintendent, in particular, mentioned that it was a forum in which ideas were shared. It was a forum for providing feedback, especially to one's school board superintendent, as a director of education stated: "I provided feedback to my superintendent [at the time] on what I thought about it ... I'll be honest with you, the 80/20 rule and then the zero [tolerance of junk food] ... and the ten special days were tough." This director of education also claimed that these P/PM 150 regulations were "tough" because it meant that quite a few changes had to be made at the school level for P/PM 150 to be properly implemented. One change concerned reading food labels, knowing what they meant, and then ensuring that "whole wheat buns," among other healthy options, were provided. Other conversations between the principals and superintendents concerned the strengths, weaknesses, opportunities, and threats in relation to P/PM 150, expressed a director of education. Another supervisor concurred,

The meetings generally comprised of five things: Just the overview of P/PM 150 (i.e., just a reminder of what the policy was all about and the rationale for the policy). Number two, the implemented strategies, the successes, the failures, external stakeholders, and

⁷⁸ A supervisory officer says that these meetings were also known as "problem-solve meetings."

timelines ... Number three [concerned] the problems arising out of P/PM 150. Those could have been unique to schools or unique to the board. Number four [concerned] the administration responses; some were very good [and] some were not so good. And then the fifth portion was really about, what type of resolution do we have? Or, what can we put in play to address some of these issues?

A different supervisory officer claimed that sometimes a committee at the school board would share some food ideas that were congruous with the policy's regulations.

Another officer mentioned that not only were there meetings with superintendents and administrators, but there were "professional development" (PD) training sessions with nutritionists. There were also meetings with managers from their food service provider. Thus, in two years, principals, and other school staff members, "had two or three full or half day sessions just dedicated to P/PM 150." The meetings with food service managers transpired two to three times a year wherein the managers and principal asked: "Are we hitting our targets? What do you think of our food options? Do you have any suggestions for us? What do you think would make it more appealing?" Another supervisory officer claimed that the Ministry of Education helped with these types of training sessions since it "put out some material that the schools were able to use and augment."

"It became a sort of standard agenda item [at meetings]," expressed a superintendent. Many supervisory officers said that meetings ranged from twice to four times a year in the genesis of its implementation. "We would meet regularly about it, probably quarterly, with principals," stated a director of education, while a superintendent said that meetings occurred frequently for the first two or three years of the policy's implementation. Even meetings with the "board of directors" occurred "twice a year" in the genesis of its implementation, expressed another supervisory officer. A superintendent from Central Ontario reported that meetings (wherein P/PM 150 was discussed) occurred three times for the first year "and that really was the only time it was discussed."

Promoting P/PM 150.

Many superintendents said that the policy was promoted through: informational posters, videos, appealing infrastructure, food presentations, and social media. One of the supervisors who was on the school board committee said that the board provided promotional posters and

mail messages to parents. “We also had templates for information to external eateries.” There were posters, signage, messages, and advertisements “all the time ... plastered in the cafeteria” other officer proclaimed. A superintendent from Northern Ontario mentioned the local health unit promoting nutrition through posters and videos. Rather than having a school wide promotional campaign, a superintendent from Central Ontario mentioned posters being in “isolation.” Most of the messages about nutrition were only in health and physical education classes. In a different school board, “there was a bit of a resurgence in trying to make the cafeteria serveries more attractive and trying to make new posters and promote the new food options.” They continued, saying that not only were “fancy” and appealing photos on display, but the healthy options were on display behind the glass counter; the cafeteria was even repainted and redecorated. Updating a school’s infrastructure to promote healthy eating was also expressed by another supervisory officer as schools in Northern communities integrated water bottle-filling stations. Every student was provided with the same aluminium reusable bottle on which they had their initials. The same superintendent claimed that the school board and schools promote nutrition/P/PM 150 through their social media pages and “display panels.” These panels are in every school and display water usage by students and staff. From the twenty-four interviewees, only one claimed that they did not see any promotional material about P/PM 150 in the genesis of its implementation.

Stakeholder Conversations.

Conversations ensued between school administration and parents. “School council, regional school council, and parent involvement committees were all part of this discussion,” expressed an officer. There were also many P/PM 150 discussions with parent engagement committees and parent involvement committees at the board level. After presenting P/PM 150 to school councils, school counselors (who were in an advisory role on the council) “made recommendations to their school principal,” claimed a director of education. While another superintendent said that they, as a vice-principal, ensured that the School Community Council was aware of P/PM 150. Parent council chairs were always part of the P/PM 150 discussions, expressed the supervisory officers: “Parents want to know what their children are eating.” Parents learned about P/PM 150 through parent-teacher interview nights and at school council meetings, especially when P/PM 150 compliant food was being served. They also learned from parent council newsletters, and those on the council learned through presentations from food

service managers and principals, stated many of the superintendents. In one instance, the food service providers “reached right out to the parent community through e-mail.” In a different school board, the board’s Community Development Officer presented and conversed with stakeholders about P/PM 150. Another supervisory officer expressed, “I do recall ... the public health nurse coming in to speak to my parent council about the implications of P/PM 150 and the rationale behind it.”

Conversations between the food service providers, vendors, and supervisory officers ensued: “The one gentleman [responsible for the vending machines] kept them going because he and I worked together ... he would proof the cookies, baked chips, and everything else with us.” Another superintendent (who was a principal at the time) had a similar experience,

I was sitting with our cafeteria provider [and] we were able to have some conversations about what [the cafeteria food] would look like and what we could do to put out something that was palatable for kids. Hopefully, they would say, ‘Yeah, I’ll buy that.’ We had lots of conversations to make sure that the cafeteria food and cafeteria were tenable ... school cafeterias must have a bang for their buck.

This superintendent noted “the bang” that resulted from one of the cafeteria meals. Whenever the cafeteria offered Noodle Day (a special on the menu), many students partook in this day. Consequently, cafeteria sales “increased literally five times” that day. Consequently, this superintendent conversed with the cafeteria managers about capitalizing on this special by having it more frequently.

Another supervisory officer said that there was “lots of communication” between himself and the superintendent at the time. One of the mandates that they discussed was the need to observe other schools that began implementing a nutrition policy prior to Ontario’s P/PM 150. Consequently,

[My superintendent] sent me to visit schools on the Québec side to see how they were able to implement their policy ... I talked to the principal and the VPs, and one of the things they did mention was, because they’re right beside the shopping mall, kids would go across and come back in. And they said, you know, it’s almost impossible with 2000 students to really police that.

One superintendent summarized the communicative process succinctly: “We had a number of nuts and bolts to try and make this work for September and roll that out with our teachers, and roll it out with our communities.”

P/PM 150 Today

The Meetings: Lack Thereof.

Since P/PM 150’s initial implementation (i.e., after 2 to 4 years) meetings began dwindling and P/PM 150 related communication substantially diminished. Some supervisory officers said that there have been P/PM 150 related updates, although seldom: “I would say it still remained on the agenda ... probably right up until I left [to be a superintendent] in 2018.” This superintendent continued, saying that principals should have the “P/PM 150 binder” with the policy’s regulations. Moreover, they should be receiving e-mail updates from the Ministry of Education. A few other superintendents claimed that school principals are “reminded” of this policy every September (once a year) and perhaps twice throughout the year at administrative meetings (according to another supervisory officer). While one officer claimed that, in their board, principals are reminded of it every five years when the regulation is being renewed. Many principals are reminded of it through an “operations memo ... so I review it with the principals,” a superintendent stated. Annual information on the policy is communicated to the principals who then communicate it to school councils. In one board, the health unit (comprised of health nurses), likely refers to it more than the board’s superintendent: “They would be referencing more ... way more than I do.” A director of education concurred with many of their colleagues about conversations and meetings about P/PM 150, “we still have meetings about it ... we still expect school counselors to have meetings and talk about it.” A couple of superintendents (with P/PM 150 in their portfolios) stated that the superintendent-administrator meetings about the policy transpire once or twice a year “if we’re lucky.” One of them (whose school board is being audited⁷⁹) added that “experienced” principals and vice-principals engage in annual P/PM 150 training sessions, not just meetings. During these training sessions, administrators view a PowerPoint presentation comprised of slides: outlining P/PM 150’s

⁷⁹ Their board is undergoing a Healthy Schools Audit by the Office of the Auditor General. Since the 2013 audit report, the Auditor’s Office has revisited many school boards. The auditors continue to ask school boards questions about how P/PM 150 is being monitored. They recommend monitoring strategies (Office of the Auditor General, 2015).

background; mentioning where associated resources are; and describing what a school must do to comply. This is followed by a “scenario session” wherein they are presented with types of foods and are asked whether these foods are compliant. Administrators use the policy’s resource tool to discern food compliance. There is often a discussion of the 80/20 rule “as this rule seems confusing,” the superintendent added. The training sessions conclude with superintendents reinforcing the importance of following P/PM 150. Superintendents in Eastern, Western, and Southern Ontario claimed that there are administrative training sessions/orientations for new administrators, which occur every August. The superintendent in Western Ontario leads two principal qualification courses wherein they teach administrators about P/PM 150. Training sessions for “leads” and administrators who are part of a school board’s Food for Learning program,⁸⁰ also transpire annually.

Although this is the case, many officers claimed, “[a]t the beginning, meetings were probably more frequent than towards the end because once implementation started, there was no need.” The reason for less frequent meetings is that there is an “increase in the expectation that the food service managers [are] the ones still helping with implementation,” a superintendent stated. Another supervisory officer said, “there was really no review all the time because the assumption is that principals do their job [monitoring] in the schools.” Moreover, from a logistical, feasible standpoint, “the board won’t provide information sessions on it every year because there are so many policies.” Another officer confirmed this, but added, “when new principals come into play, we make sure that [P/PM 150] is part of their onboarding as well. However, at the same time, they’re not getting the same amount of time that we had when we first unrolled it.” A different supervisory officer claimed that there is likely a lack of meetings as P/PM 150 is well established. He concluded saying that for whatever reason, “it [has not] been a standard significant item on agendas after implementation occurred.” Another superintendent concurred, “within three to four years, they [the P/PM 150 guides and flip charts] were gone.” Not only did flip charts disappear, but all the meetings and trainings, especially in the “last six years.” A facilitator and a superintendent agreed, saying that there have been no workshops, formal meetings, training sessions, nor a policy revision since 2014. Two superintendents (who have been in their current role for four years) do not recall any conversations with administrators,

⁸⁰ This “program supplies students with breakfast, lunch, and snacks,” expressed a superintendent.

other board superintendents, or those from the Ministry of Education for the past four years. Although superintendents from nearby boards communicate about other policies, P/PM 150 “is not really sort of cropped to the top.” This was also expressed by a few other superintendents as many of them stated that at SO (Supervisory Officer, that is superintendent) meetings, P/PM 150 is not discussed. Since meetings and training sessions no longer exist, one of the supervisory officers said, “I would say that our new administrators who weren’t administrators at the time [of its rollout], wouldn’t know what you were talking about.” A facilitator concurred, saying that vice-principals may not know much about P/PM 150. Conversely, a superintendent mentioned stakeholders being aware of it and when they are not, they quickly become aware through observations and conversations.

Promotions: Lack Thereof.

Most superintendents do not recall seeing many (or any) promotional posters about nutrition and P/PM 150. “There aren’t very many;” “Now, probably, not so much ... and I haven’t seen any in high schools.” A facilitator claimed that nutritional advertising exists, just not to the same extent as in P/PM 150’s genesis. Other supervisory officers confirmed this; however, a couple added that their food suppliers (such as the Eat Well to Excel organization or the Food for Learning) provides some, but not a lot.” The Eat Well organization provides posters annually. These are often posted near a school’s breakfast club or lunch area. The Food for Learning coordinator even creates a bulletin board in schools advertising “healthy choices.” This was similarly expressed by a superintendent in Northern Ontario: “We’ve got eating balanced posters in our breakfast area and a big bulletin board outside the [school] store. The staff we have working in there are showcasing healthy eating choices [the menu selections] all the time.”

Other officers claimed that there are no promotional posters: “We haven’t had any posters,” while another said, “we don’t really advertise the policy, we [as administrators] just put it into motion.” Another officer from Ontario’s Western region said that they have not seen posters nor messages promoting P/PM 150 for many years; the messages have “shifted to mental health and bullying ... and ones in guidance offices, but not for healthy food.”

Stakeholder Conversations.

Within one school board, P/PM 150 is still being communicated to parents: “We start that awareness piece as soon as they [parents] start registering. During our registration evenings, we

don't bring in a bunch of junk food; we bring in healthy food,” expressed a director of education. Moreover, the kindergarten teachers or early learning teachers remind parents of healthy eating and alternatives. A superintendent within the same board agreed, adding that their local health unit provides monthly school newsletters with reference to healthy eating. A different superintendent stated that recently (just prior to the COVID-19 pandemic), their board began collaborating with public health “around building healthy habits.” Consequently, many schools had “healthy eating habits evenings” at which healthy foods (e.g., healthy smoothies) were served. “The public health nurse ... would often do a little session on sugar ... they showed how much sugar was in pop,” expressed this superintendent.

Since there is a turnover of school staff, discussions concerning P/PM 150 transpires between local-level administrators:

[Information on the policy] is just passed down from administrator to administrator. So, when I was leaving that portfolio [and] another VP [vice-principal] was coming in and picking up my portfolio, I walked them through what they needed to do to monitor it, but that was kind of about it at the time.

A director of education claimed that new administrators become aware of P/PM 150 at principal meetings wherein P/PM 150’s expectations are discussed annually or when required. It is then expected that these principals share P/PM 150 with new school staff members. A superintendent from Eastern Ontario confirmed this. Although some people are still conversing about P/PM 150, many superintendents believe that they are not as frequent as in the policy’s genesis (as detailed above). One superintendent concluded, “I think the fact that we don't have to talk about it now, means that in many ways the policy probably did what it was supposed to.” It provided an environment in which healthy foods were sold.

Monitoring:

Forms or No Forms? That is the Question

All the supervisory officers said that they monitored (either as a principal or in their current school board role) P/PM 150’s implementation. “The board is responsible overall ... to make sure that all schools are in compliance ... the school principal [is also] responsible for their own school.” A superintendent from Central Ontario claimed that after the initial P/PM 150

informational meeting, “it was up to the schools to implement and enforce the policy.” Another officer concurred, “we’ve asked schools to keep track of [monitoring] ... it’s up to the individual principals to ensure that they are complying.” To enforce the policy, school principals monitor compliance through accountability forms and/or conversations, and observations. A few school board purchasing and finance departments monitor food providers, while superintendents monitor by conversing with school administrators and filing these accountability forms.

Accountability Forms: Then & Now

Most supervisory officers said that monitoring forms, either in the form of a letter, chart, or checklist, were completed during the initial implementation. These were completed by school principals, vice-principals, a designated staff member, or even a food provider: “[T]he actual implementation forms of the accounting of it would have been done by the subcontracted food provider in our case.” Thus, the food provider was responsible for documenting the “number of types of milk, and the types of soft drinks, and the offerings of water and all that sort of stuff in the vending machines,” expressed a superintendent. Another supervisory officer mentioned that it was part of their portfolio as a vice-principal and they were therefore responsible for tracking the ten days, “but also for coordinating with the food school at the time, just to make sure that they were compliant.” The ten-day tracking sheet was created by each school, another superintendent added. A few supervisory officers said that they completed the “School Inventory of Food and Beverages Offered for Sale” form,⁸¹ as an administrator, which was completed annually; however, over time, one of them stated, “it got to a point where I was just duplicating what I had sent in [to the school board] before. [I was] not really monitoring anything at my school.”

Many superintendents stated that monitoring forms existed in the genesis of the policy’s implementation; however, they do not believe they exist today: “I don’t think we have them now ... the forms per say,” while others said: “I don’t think they’re attached to our current [board] procedure;” “I am not involved with those forms;” or, “the forms are not completed now.” One superintendent explicitly announced that the forms and checklists are “ridiculous” and consequently, their board “has moved away from that kind of micromanaging.” Another supervisory officer justified the shift from forms to no forms:

⁸¹ This is also known as the evaluation form according to one of the officers.

When this began, it was a big deal; developing and communicating it to the school councils, [and] following up with it, was a very big deal for many years. It's less of a big deal now because it's just part of the [education] fibre and probably across the province. But initially it was monitored.

Recently, many superintendents do not review P/PM 150's monitoring forms. According to two of them, they did not even complete these forms when they were a vice-principal. A superintendent from Central Ontario (who was also an administrator – a principal – during the initial implementation stages), said that there were no forms, charts, nor checklists at one of the schools in which they worked, “when I moved schools, there wasn't even a counting of the [ten] days.” This superintendent believes that the lack of monitoring was likely due to that fact that “the board office never asked us for them.” Another officer concurred, “there was no accountability piece [from the Ministry] for the monitoring ... there was never any follow-up from our Ministry.” When asked about whether there were or are monitoring forms, another superintendent did not explicitly mention them, but rather stated that all their school staff has been trained and therefore know about P/PM 150's rules and regulations,

as far as monitoring, all of our staff have taken the safe food handlers' courses. We also have our student success teacher at the office, ordering for the breakfast program ... we're always checking with [our food supplier], what we're ordering, and if it complies with the 80/20 rule.

This superintendent concluded by saying, “there's that accountability piece, so it's just built into practice.” Another superintendent expressed, “I think at first, we did a really good job of monitoring ... [but] honestly, I don't think there's a lot of monitoring now.” When asked whether forms are being completed today, this particular superintendent quickly said, “No. No.” Another superintendent said the same, adding that there are “no specific forms per se.” Some supervisory officers stated that this could be because food suppliers have been complying since the genesis of this policy: “There are companies that do cookies ... and baked chips that meet regulations ... we don't have to worry.” It could also be due to the perception that “these forms are more diagnostic at best,” expressed another officer.

When monitoring forms were completed, “the principal signed off in all good faith and sent them to the board ... I’m sure [the superintendent] took a quick gander at them, and then they went into file folders,” reported one supervisory officer. A superintendent (with P/PM 150 within their portfolio) confirmed this, adding that they still receive forms that are placed in a filing cabinet.

A few others (who have P/PM 150 in their current portfolios or who partook in the policy’s initial design) said that forms are being completed today,

I ask the vendor for a report. I have a list of all the menu items that they have. I have a list of the things that they sell. They break it down by group for me: what are we selling in the sell most? What are we selling in the sell least? I just ensure that those percentages are part of their business review plan.

“[As a principal] I am completing them,” expressed another supervisory officer. Another supervisory officer claimed that they provide “monitoring” forms to all the schools they supervise. These forms are then completed by the school principal or food provider, who then submits them to the board superintendent. Once this is done, the supervisory officer reports to the school board associate director, and ultimately to the director of education, reporting on the school-compliance follow-up. Monitoring forms are no longer in paper format, but are electronic: “Before, you’d be sitting there with a piece of paper scratching out what your formula is and determining what is ‘eat-more/eat-less’ ... [The P/PM 150 monitoring system] has really improved ... It is now online.” What this particular supervisory officer does, along with many other officers, is ask all the principals to select ten special food days, “keep track” of them, and send this information to the school board. This special food day document (also known as the food and beverage planning and tracking form) consists of: 1) what the special events days are; 2) the special event dates; 3) whether the school is selling food and if so, the types of food; and 4) whether the school is using environmentally friendly practices. This document indicates whether a school complies, and according to a superintendent in Southern Ontario, a school’s parent council signs this document. This information is supposed to be transferred to the “School Board Tracking Sheet” by the board’s supervisory officer. This sheet lists the name of each school in the school board and whether they are complying. This sheet “was supposed to be submitted to the Ministry ... but they [the Ministry] hasn’t asked for it in a long time,” expressed

a superintendent. Consequently, “we don’t fill out the tracking sheet.” A director of education concurred, saying that although they and the board’s superintendents do not “micromanage” school principals, principals must “get permission for the fundraising they do every year.”

Another superintendent detailed their “comprehensive compliance structure,” saying that every principal in their board is required to sign a compliance form: “It’s an attestation saying that [the principals] are following it in their own school.” There are also annual “cafeteria audits” whereby a team from the board’s purchasing department visits every cafeteria with a checklist. They complete this checklist to ensure that cafeterias are complying with P/PM 150. This type of cafeteria audit was echoed by a few supervisory officers. Some board consultants/facilitators⁸² within a school board’s purchasing and finance department are responsible for visiting cafeterias, expressed a superintendent. Moreover, since some board’s employ a central food service provider that caters to all schools within that board, the consultants/facilitators must ensure that their providers sign a “Central Agreement.” This agreement states that they comply with P/PM 150’s regulations. Thus, there is “central monitoring of the food sharing program and the cafeteria.”

Other Monitoring Strategies

Principals’ & Supervisory Officers’ Observations & Conversations.

Even though P/PM 150 may not always be monitored through forms, it has been monitored through other “monitoring structures” (i.e., observations and conversations). As a principal, one of the superintendents monitored by standing in the cafeteria during lunch hour and “several times I would actually pitch in and help serve the food,” they expressed. Another administrator at the time also “policed the cafeteria.” Principals observed school staff, ensuring that “teachers didn’t give out candies at Halloween, or do that at bake sales.”

When one superintendent was a secondary school principal, they (the principal and school department heads) “went through the policy with a fine-toothed comb to take a look at how many quote-unquote cheat days we could have.” These “cheat” days pertain to the ten “Special Event Days” rule with P/PM 150. Monitoring through conversations and observations

⁸² Not all facilitators and consultants within this study are part of a school board’s purchasing and finance department. From the 3 facilitators/consultants, 2 of them are from different departments within their school board: program services, and curriculum.

was similarly expressed by another superintendent. As an administrator, they ensured that the vendors for the milk program and for fundraising abided by the policy.

Although it is the principal's responsibility to ensure school compliance, superintendents with P/PM 150 within their portfolio have been and continue to monitor its implementation through conversations and observations. In the genesis of the policy's execution, one superintendent (who was a principal at that time) stated that their superintendent asked whether the school was complying, and then distributed documents related to the policy. These documents were "a template or form with standard questions." This superintendent then visited the schools regularly. Visiting schools on a regular basis (i.e., every six to eight weeks, three to six weeks, or once a term) was expressed by many supervisory officers. In a Northwestern and Northeastern Ontario school board, supervisory officers are visiting schools. In one case, "we can go to all the schools [because] we're a small school board," stated a director of education; while a superintendent claimed that although their board is not small, school visits are important. Consequently, they visit schools weekly, ensuring that the cafeteria provider is complying, and food sold at bake sales or athletic events are P/PM 150 compliant. Many superintendents (with P/PM 150 in their portfolio) said that these visits are their most common monitoring strategy. One expressed that they visit some schools more often than others: "I have to identify within my family of schools, which principal probably needs a little more support with healthy active living." When a superintendent visits, they ask the principal, "where are you with the policy? How is it impacting your budget?" They are also asked about their types of fundraising events and what they are "doing for healthy eating practices," proclaimed a consultant. During these visits, superintendents also observe a school's culture, taking note of, for example, nutrition programs and events that would benefit other schools within their board.

Another supervisory officer claimed that one of his duties is to help ensure compliance too, especially when hearing that a school is not complying:

If one school is not following [P/PM 50], then the other schools find out about it; they do complain about it ... It doesn't happen all the time, but periodically. I had one school this year that wasn't following the ten days and so we did follow-up with that.

This superintendent's follow-up consisted of phoning the principal, asking whether the school is following P/PM 150's rules and regulations. Thus, P/PM 150 is "monitored by the principal and

monitored by the school superintendent because the school superintendent supports those schools.” Another superintendent (with P/PM 150 in their portfolio) ensures to remind principals of P/PM 150’s existence annually. Moreover, this supervisory officer views schools’ social media pages:

One of the things that’s very nice is that we are very connected through social media with all of our schools. Normally, when there’s something happening, we know where it’s happening, and when it’s happening ... So anytime somebody is advertising something going on, we have it: Is one school doing a whole pile of something or not? We have opportunities to have [P/PM 150] conversations.

This particular superintendent can also monitor P/PM 150’s implementation by viewing schools’ cashless electronic systems. These systems record all the wire-transfers from parents to schools in relation to school field trips and other extracurricular events. “When we do our auditing, we can actually go and see why a particular school suddenly has \$5,000 ... We’re going to wonder whether it was a whole bunch of field trips they did, or whether this was all food.”

Another superintendent stated that monitoring is executed in the form of collaboration and communication with the food service provider, “[o]ur secondary schools have cafeteria services which are operated by a company, so we work with them on the physical space and equipment.” Although this is the case, another officer wondered whether cafeteria managers or school administrators who were not part of the initial implementation “pay attention to the detail of P/PM 150.” During the initial execution stages, many administrators asked food service providers to “show us the recipe;” however, according to this officer, “are [new administrators] verifying that the recipes from these companies are still matching P/PM 150?” They continued, saying that it seems that administrators are assuming that food service providers are complying. This assumption likely derives from the fact that so many other schools are employing the same provider: “There’s a sense that they [the food service providers] are aware, so they must be meeting the requirements [and] everyone else is using them.”

School Council Monitoring.

School councils also monitor compliance. To do so, they must be aware of the ten “Special Events Day” rule and ensure that cafeterias are complying with P/PM 150’s regulations, expressed a superintendent. A director of education said that their board receives a year-end

school council report on P/PM 150's implementation rather than forms or checklists. This report details "what the council has done throughout the year [e.g., fundraising in relation to P/PM 150, and what transpired on those ten special days]." The director of education also receives agendas from school staff meetings "so we know that it [P/PM 150's implementation] has been done."

One superintendent summarized the monitoring beautifully: "I would say that administrators, principals, and vice-principals, are very heavily involved at the school level monitoring, [especially in regards to] what is being sold."

Monitoring vs Competing Priorities

Most supervisory officers stated that although they believe in P/PM 150's intentions, competing priorities affect how it is being managed and monitored: "Once implemented and reviewed every three to five years, it is not as high a priority as many other policies [such as] safe schools, student achievement, equity, etc.," while another officer claimed that competing priorities caused him to "not even check the nutritional information." One superintendent with P/PM 150 as part of their portfolio mentioned that the board rarely discusses it. Consequently, the board has not yet solved the challenges associated with school cafeterias: "I would say that we are, as an organization, have to fundamentally rethink how we do cafeterias." This superintendent continued, saying that they are uncertain as to whether their current vendor will continue with the board as the vendor is not profiting that much from school sales. Other superintendents with P/PM 150 in their portfolios said that currently (during COVID), "...it's not a high priority. Am I going to be looking at the data during this year? Probably not." Even prior to the pandemic, one superintendent claimed, "if you're asking me whether I monitor it [since it's part of my portfolio], I'm going to say no because I don't have time to do it." The regulation is not monitored as this officer "trusts" their school administrators. "I trust that they will have ten special days a year ... and I've never asked them for this list," they expressed. Although this is the case, one officer claimed that they will continue conversing with stakeholders about P/PM 150 when it is mentioned or when there is a concern.

A few other superintendents stated that in some regions, especially the low-socioeconomic areas, the priority is to ensure that students have "something in their stomach, even if not entirely policy compliant." Principals try their best to ensure that the food (that has either been donated or made at school) is compliant. For example, in one instance, little cracker-

like goldfish (which were not very healthy) were donated to a school. To be policy compliant, the goldfish were coupled with an apple. Thus, students were given both a package of goldfish and an apple. Another superintendent claimed that as a principal, “if I’m being truly honest with you, [P/PM 150] slowly went down the priority list.” There were competing priorities and “we had to prioritize our bureaucracy in the paperwork.” A facilitator and three other superintendents agreed. Principals within Ontario’s Northern region also have difficulties prioritizing this policy as they are the only administrators in the school, juggling all the policies, addressing student/staff conflicts, complaints, and conducting drug investigations; schools are so small in this Northern region that there are no vice-principals. Consequently, “principals’ jobs are becoming more challenging and more stressful,” expressed a superintendent. Another superintendent confirmed this, saying that people perceive schools as a place for “doing everything.” This notion applies pressure on school staff and juggling all the policies and procedures becomes challenging for staff to manage.

Although there are competing priorities, a couple of supervisory officers claimed that this should not be the case, “I think broadly speaking, [all the Ministry policies] are fairly equal in terms of being necessary protocols ... one shouldn’t take priority over the other ... otherwise there’s no equity within the system.” Another supervisory officer expressed that P/PM 150 “certainly is a priority.” It is a priority in their life as they are living with nutritionists and dietitians who help design meal plans. “I also see firsthand that it is very important since young people today need guidance when it comes to those choices,” they expressed. P/PM 150 should be followed; however, according to one superintendent, monitoring it now, is non-essential: “We don’t need to monitor the policy because there are no flags ... the implementation went well ... [and] it’s just continuing.”

The Ministry’s Monitoring: Lack Thereof

Competing priorities affect the monitoring of P/PM 150; however, the Ministry of Education’s lack of involvement, also affects P/PM 150’s implementation. “The ministry didn’t monitor the compliance of P/PM 150 ... the onus was on the school boards to make sure that people were in compliance.” The onus was on the school boards, repeated a school board facilitator who helped design P/PM 150. This facilitator speculated about the reasons school boards became responsible for monitoring compliance. First, monitoring and accountability

were not thoroughly discussed. This is because when multiple ministries (in this case the Ministry of Health and Ministry of Education) collaborate on a project, there is often a lack of communication between them. And second, since every school board is in a unique situation/context, the Ministry of Education desired each board to “tailor P/PM 150 to their lived realities.” The facilitator concluded, “the frustration in that final meeting was that there wasn’t a hard line in terms of the policing of it ... the policing was being left to the board.”

For this reason, coupled with the fact that “policing” was the boards’ responsibility, many superintendents became frustrated: “It became very difficult because people said, ‘Well, if you’re not monitoring, why do I have to do it?’” This challenge was similarly expressed by a superintendent in Northern Ontario, “what I’ve heard a number of times [from school staff] is, there’s no food and beverage police.” Many supervisory officers used the “police” term when expressing their frustrations: “I was always expecting somebody from the food police to come down and check on us. But it never really did happen ... [t]here was no Ministry of Labor Inspection for food or anything like that.” “There is no P/PM 150 police,” expressed a different officer. Another supervisory officer (who experiences the oppression and suffering of communities in Northern Ontario) felt that the Ministry of Education often “forgets” about them. An officer from Central Ontario concluded that since there is no “legislative compliance” for employees to read, P/PM 150 “is not being touched upon.”

Summarizing, supervisory officers are responsible for their board’s nutrition policy and implementing it. In so doing, they and their corresponding school administrators are responsible for communicating and monitoring P/PM 150’s implementation. During its initial implementation, forms were completed and sent to superintendents; however, over time, completion of these forms subsided. Although this is the case, school administrators are still responsible for ensuring school compliance and many do so by conversing with and observing school staff, students, parents, and food service providers. Consequently, P/PM 150 is being implemented; however, is it being successfully implemented? Competing priorities, such as safe school policies or a pressing incident at school, detracts principals and superintendents from closely monitoring the policy’s implementation.

Section 2:

P/PM 150's Barriers: The Collateral Damage

There was “collateral damage” associated with P/PM 150, a superintendent articulately expressed. This “damage” became evident as supervisory officers expressed the policy’s implementation barriers: policy timing and restrictions, revenue loss, proximity to restaurants, and a lack of stakeholder interest.

The Consequences of Policy Timing & Restrictions

It took time (approximately a year) for schools to comply: “The Ministry gave us a year to roll it out completely.” Although schools were granted permission to slowly (one year) adjust to the policy before having to fully comply, a supervisory officer said, it was insufficient time, “I think the implementation from the Ministry should have been more transitional. What they did is, they dropped the bomb and said, ‘You have X number of months. Make it work.’” Another officer concurred, saying that a slower transition of approximately five years would have been more beneficial as it would have given stakeholders (students included) time to adjust to P/PM 150’s regulations. While a director of education claimed, “it was tough to actually go from 80 to 20, and then zero right away.” Moreover, conversations pertaining to its implementation were lengthy, “there were lots of conversations ... there were conversations at our program committee ... it took a while,” expressed one of the superintendents.

P/PM 150’s implementation was not only slow, but the policy seemed quite restrictive. One superintendent said that adolescents do not “understand” the importance of a healthy body and nutrition. Consequently, when they feel “restricted” from eating what they desire from the school cafeteria, they leave campus to eat elsewhere.

Revenue Loss

Since P/PM 150’s implementation, schools and food service providers have suffered a loss of revenue: “The practicality of [the policy] ... is that we saw cafeteria sales in our schools just plummet.” All the other supervisory officers, except one⁸³, concurred, “they [the school food suppliers] did take a hit in terms of profit when it was first implemented;” “profits are

⁸³ This supervisory officer is in a unique situation; since the school board and its associated schools are in a very remote (rural) area in Northern Ontario, the schools do not have a cafeteria service provider; however, they do have “phenomenal staff” who work at ensuring the food sold complies with P/PM 150, expressed this superintendent.

down, and it is challenging for the cafeteria service providers to make profits.” Because many of them could not profit from selling healthy food, they did not renew their contracts with particular school boards. “I think our third-party providers want to bail on us,” a superintendent expressed.

Many superintendents mentioned schools losing over half their revenues generated by cafeteria sales. In one particular instance, “the school lost \$40,000 because they weren't getting the revenue.” This is because cafeteria providers often give 10% of their profits to schools, expressed another officer. A different officer said that the Ministry of Education did not even provide funding to minimize this impact, but only provided funding for implementation (e.g., cafeteria renovations, etc.). There are many reasons for this revenue loss, one being the limited cafeteria options. Students loved purchasing Jamaican meat patties; however, when the cafeteria could no longer supply these, due to P/PM 150’s ingredient regulations, students ate elsewhere, claimed another superintendent. “It did not accommodate the different foods from different nations,” expressed another. Consequently, this policy impacted “ethnic diversity” due to the fat and sugar content in ethnically diverse foods.

The limited food options concerned the food service providers at a suburban school in a high-income neighbourhood, proclaimed a supervisory officer. As a principal in this type of setting, they observed students (who could afford expensive cafeteria food) leave campus to eat elsewhere due to the limited cafeteria selections. Unlike most other supervisory officers, they did not observe as much revenue loss within a low-income neighbourhood school which was in an urban (inner city) area: “In the low-income areas, like my last school, it [P/PM 150’s impact on cafeteria sales] wasn’t huge because they [students] didn’t have the money to spend on it [cafeteria food] anyway.” Not only were there limited food options, but the price of healthier options was high: “[Associated] with going into a healthier streamline, was the additional cost of cafeteria food,” expressed many officers. A superintendent (living in Northern Ontario) claimed that their food service provider could not necessarily refrain from selling “a \$14 full grained bread sandwich” to students due to the high cost of healthy foods in Northern Ontario. They continued, saying that prices are also high because there is only one grocery store that operates every Saturday morning which sells expensive healthy food “probably three or four times the price ... \$40 for a small chicken.” It is costly to import/ship healthy foods to remote schools. Healthy food (including vegetables and fruit) is expensive all over Ontario, claimed other

superintendents. In Eastern and Southern Ontario, the cafeteria food prices also increased as “nutritious foods are expensive.”

A director of education in the Northwestern Ontario region said that students in low-socioeconomic neighbourhoods cannot afford expensive healthy food options:

You can tell when kids are coming from a home where there isn't a lot; they bring in fruit roll-ups, chips, crispers, and pop because that's cheap. You can buy a 24-case of pop for \$7. But a healthy drink, like milk, is \$4 a carton.

A few more superintendents (one from the same region, one from Eastern Ontario, and another from Southern Ontario) confirmed this, saying that many students from low-income neighbourhoods purchase inexpensive “junk” food from local stores. The superintendent from Northwestern Ontario added that this behaviour is understandable as the cost of living in this region is even high. Parents supporting P/PM 150 by supplying their child with healthier food options, is “infeasible for them.” Consequently, their Northwestern school board relies “heavily on partnerships with the health unit and other agencies in those communities.” Rather than relying heavily on partnerships, another officer from Ontario's North-Eastern region, mentioned their frustration with higher priced cafeteria food: “The problem with high cost, is kids will go off campus and buy something else down the road.” Another issue with cost concerns the “quality” of foods being offered at a low-socioeconomic neighbourhood school, also known as a “high-priority” school. Since some “healthier” meats are more expensive than others, a vendor will select the less expensive (which is often less nutritious) meat to place on their pizzas. Their pizzas (which still abide by P/PM 150's rules) are then sold to students in these high priority schools. Whereas students in high-income neighbourhood schools are often served by vendors who use healthier ingredients since they know that students can afford their higher-priced pizzas, expressed one of the supervisory officers.

Even when school cafeteria managers altered their menus (applying student recommendations) and renovated their eating space(s), sales continued decreasing, expressed a superintendent. Conversely, another superintendent observed, “we surveyed the students [and] when you want to make a change, the best thing to do is ensure students have their voice heard loud and clear.” Although this is the case, many other officers noted other consequences

associated with lost revenue. The decrease in sales not only affected school revenue, but students' Co-Op programs:

[W]e had student placements in the cafeteria, or Co-Op placements for kids. And even those opportunities tended to disappear because we went from a staff of five serving kids every lunch, down to a staff of four, and then the three because there was just that little in the way of traffic.

Other officers observed these types of student opportunities dwindle:

These are school revenues that were used to support students in need to provide additional opportunities to students. It was to purchase school equipment, it was to subsidize trips, school teams, musical instruments, plays, [and] all the curriculum-based events and classroom materials.

While another claimed, "that [cafeteria] money was used for augmenting programs, whether it be sports, arts, whether it be parent nights, food baskets, or breakfast programs ... that all vanished." Another officer observed the same, mentioning that "we've killed our cafeterias." Consequently, "we have to go to our families and say, 'we need an activity fee.'"

In many cases, cafeterias are "dead", both metaphorically and literally. Some supervisory officers expressed, "many of the serveries in high schools throughout the province were faced with closing down." Some cafeterias in small high schools closed. One supervisory officer heard that "there were some school cafeterias, in Ontario, that had to close because they were not profitable ... especially the rural school cafeterias." Superintendents in Northern, Eastern, and Western Ontario confirmed this, "in rural communities, there is no viability for cafeterias, while another said, "the cafeterias close to urban neighbourhoods are either non-existent or just house kids who bring their lunches." Another officer stated that five of their regional high school cafeterias closed, while another said that their cafeterias are close to closing. "The problem is that cafeterias are understaffed [and] there's so little food available now," the superintendent added. Another reason cafeterias closed is that students just "didn't want to eat [healthy food]."

Many superintendents claimed that the loss of revenue has resulted in vending machine reductions and closures, as well as cafeteria lay-offs, and limited student-food support programs.

“In terms of vending machine companies ... they all consolidated into one company because most of them quit; they weren’t able to make a living,” In Northern Ontario, vendors could not make a living as students were discouraged by the restricted healthy food options. As a result, vending machines “shut down.” Cafeteria employees have also been laid-off: “[W]e’ve got a school of 250 kids in a secondary school. The cafeteria company we have cannot sustain an employee there because we can’t create the foods for kids to survive ... the stuff just goes to waste.” To counter the loss in revenue and help stakeholders retain their employment, this school sold food in vending machines. This supervisory officer also mentioned school food suppliers stocking and renting the machines to schools. Even though this is the case, “those machines don’t get a whole lot of traction.” Another negative impact associated with P/PM 150 concerns student-food programs, especially ones helping “marginalized” students:

[W]e [the school] would get a rebate or a cafeteria kickback that I (as a secondary principal) used to support the neediest students in that school ... we had methods of handing out caf-bucks [to students who were] “good, a good citizen, a good student,” so that when that needy student came to the cafeteria, the presumption would be that he or she had done something great to get those cafeteria dollars rather than when they [caf-bucks] are presented to [students] in front of their peers ... but the lack of revenue meant that we had less of those things to share around.

Commissions generated from cafeteria sales directly supported students who were marginalized (e.g., students who did not have the latest technology or could not pay for field trips). “When P/PM 150 came in, we saw a huge decrease in commissions,” a facilitator expressed. This loss has also affected the maintenance and upkeep of all cafeteria equipment. Since commissions are low, the board must now pay for all cafeteria equipment and the associated costs.

Many other superintendents said that the loss of revenue from fundraisers has impacted the students and/or the school: “There was pushback around the type of fundraising that had traditionally been done in schools ... it was tough for some student groups in the high school because they were limited to only ten days.” While many claimed, “it had a negative impact on the lower-socioeconomic schools ... in the fundraising aspect.” Wealthier students “would just donate \$100 or \$50 to the school and not bother with fundraising ... but that’s not an option in lower socioeconomic communities,” a superintendent stated. “Inequity is in the fundraising

practices” a consultant observed. Another officer continued, saying that these lower-income schools relied heavily on the funds which were raised by “bake sales” and the lack of funds caused students and staff to “not be in compliance with it ... they would prioritize some equity along technological acquisition, and they would forego the requirements of P/PM 150.” Moreover, the revenue loss affected the types of sports offered at school. “Some sports around that time were dropped because the revenue from cafeteria sales was not there to fund those,” expressed one of the officers.

Another superintendent said that a lack of financial resources not only affects students and schools, but how P/PM 150 is being implemented: “for anything to be successful in school, we have to have the additional staffing that’s required to make it work ... it’s hard because I know [there are] limited resources.” In Northern Ontario, one officer mentioned that financial resources were quite limited so that a cafeteria never existed. Upon receiving government funding, however, they created their own store:

[W]e structurally [knocked out] a wall and now have a serving door. We have ... stainless steel sandwich refrigerators, prepping tables, and freezers. We [also] started sourcing from a wholesale supplier because food is crazy expensive. So, we were able to re-thermalize soup and chili that all is food and beverage compliant, whole wheat bread (you can stock up on it). We usually have four sandwich choices ... we have a trolley with lettuce, tomatoes, and cucumbers so the kids can add to their sandwiches. We were also cooking once a week for the store ... lasagna, shepherd’s pie ... We have it set up as a cashless store.

This store and its food only exist because of funding. For this reason, it is important to have enough resources for P/PM 150’s implementation.

One superintendent summarized it succinctly, “if you were to do a whole cost benefit analysis of [the policy], in my opinion, I would think that it actually did more long-term harm.”

The Consequences of Restaurant Proximity

A reason for cafeteria revenue loss concerns students leaving school campus to eat elsewhere: “I will tell you that the real determinant in implementation had to do with the availability of fast-food restaurants in proximity to the school.” The high school is “right there,”

next to many fast-food restaurants, claimed a director of education. Some superintendents said that P/PM 150's implementation has "pushed" students out of schools and school cafeterias to such local restaurants as Little Caesars. Another officer mentioned students eating elsewhere due to the societal context in which they live: "I think our communities have been more conditioned to go to McDonald's or Taco Bell, then to go to their school cafeteria."

According to most superintendents, when students are near restaurants (i.e., in an urban or suburban setting) they are more likely to purchase food from these restaurants rather than what is offered at school: "[W]e've seen across the board in schools, a real shift away from kids buying food in school, particularly in our urban centers." While a few others claimed, "for some kids, especially the ones with vehicles, they'd often hop in their car and run to McDonald's" or some of them walked to Tim Hortons, Harvey's, Burger King, pizza places or the corner store to purchase "pop and a bag of chips." Another superintendent within a Catholic board expressed, "the challenge is that students ... can choose (where geographically possible) to cross the street and go to a fast-food restaurant." A couple of supervisory officers speculated the percentage of students leaving school to eat elsewhere: "I would say that probably ... 30%-40% of our student body exited the building at lunch," while another hypothesized 50%. Although most communities are rural in Northern Ontario, a superintendent claimed that in one town (a suburban community), many students left school to eat at A&W or the local diner. This was similarly observed in North-Eastern Ontario. The superintendent (who was a principal at the time) also noted that cafeteria sales were four times more in their rural school than in their suburban one. A few superintendents even correlated P/PM 150's implementation with the number of fast-food restaurants opening near schools:

[W]e saw an increase in the number of chip wagons around. There were new fast-food restaurants springing up all over the place close to school. They all started showing up in school neighborhoods as soon as P/PM 150 was put in place ... and that's where you see all of your students who are allowed to leave school at lunchtime ... they would simply go across the street and get whatever they wanted.

"Businesses aren't stupid," a superintendent concluded.

A couple of superintendents observed students leave campus to eat elsewhere not only in urban/suburban settings, but in rural ones (some small schools in rural centers). A supervisory

officer heard from a colleague (who works in a rural school) that students in rural areas are now having take-out food delivered to school. Other officers confirmed this, adding that this also occurs in suburban and urban settings. One of the negative impacts is that students are no longer exercising by walking to restaurants. To address this concern, some school administrators create local food-related policies. “We had a school policy that students ... couldn’t just have their lunch delivered to the school.”

Concerning having take-out in rural regions, most superintendents mentioned that rural settings tend to deter students from eating elsewhere: “[I]f you go out to some of our more rural schools ... which is about 45 minutes west of [the city], there are no fast-food restaurants. So those kids tend to stay closer to school or bring their lunch because they really don’t have another option.” Another superintendent concurred, saying that if students only have a 40-minute lunch period then they do not have much time to walk to and from a restaurant. Other supervisory officers confirmed this; however, a director of education added, “I think the other thing too is that rural kids are still connected to the land. They know where their food comes from ... the garden. I think they're more in tune with that.” Although many supervisory officers expressed restaurant proximity as a barrier, one superintendent said that the geographical setting was not a barrier to implementation: “All of our high schools are suburban other than two [rural] schools ... that don’t have commercial options and I can’t say there would be much of a difference.”

A superintendent mentioned the negative impact that leaving campus had on school culture: “I think if you were to do an autopsy on this, I think that it harms the community, well being, and extracurricular activities ... [when] they’re gone for that lunch period, there’s no ability to make connections. There is no ability to work on their involvement in school.”

One superintendent summarized the problem succinctly, “It has nothing to do (in my perception) with differentiating the level of income, and everything to do with proximity to those restaurants.”

Stakeholder Interest: Lack Thereof

“People found ways around it,” expressed a superintendent, while another said, “so many people found so many loopholes around [P/PM 150’s regulations] that you really didn’t end up caring if you were at twelve or fourteen event days [rather than abiding by the ten-day rule].”

Supervisory officers were “roasted” as parents, students, and school staff were “mad” about the policy’s implementation. When P/PM 150 was initially implemented there was resistance from some parents, food service providers, students, and school staff members.

Parents’ Lack of Support.

A director of education (who was a principal at the time of its initial implementation), said that some parents resisted:

Not all parents liked it. I’d get phone calls from some parents, saying, “Who are you to tell me what to feed my kids?” I get it. And you know, I acknowledge that to them. But I also said to them, we’re not telling you what you have to feed your children. We’re offering you alternatives that actually fall in line with our P/PM.

Another supervisory officer speculated the reason some parents did not support the policy. Parents were insisting that it was an infringement of a student’s right to purchase what they desired for lunch. Whatever the reason for policy resistance, superintendents expressed that some parents continue to provide their children with chips, chocolate bars, etc., which they bring to school, and “we have no control over that.” Although this practice does not encourage students to eat healthily, it remains within P/PM 150’s regulations; the policy’s rules only apply to food and beverages sold at school. When parents provide their child with money to purchase food during lunch hour, and the child decides to eat at a local restaurant, parents are still abiding by the policy’s rules. To encourage students to remain on campus during lunch hour, a few administrators create school-level policies. A supervisory officer said that had they (as an administrator) created a rule whereby students required permission to leave school during lunch, “parents would have been furious ... we would have had an uproar on our hands.” This fear of parent resistance to the policy discouraged this superintendent from developing such rules.

When one of the superintendents was a principal, he recalled debates pertaining to offering healthy versus unhealthy or less healthy lunches: “There were two sides of it. The barriers focused on our stakeholders and their particular beliefs.” This superintendent also claimed that parents did not fully understand, nor did they comply until 2013. Other superintendents said that many parents “pushed back” or were “upset” since they (the ones on parent councils) were accustomed to traditional fundraising with food. A director of education concurred, “parents would say, we’ve had this pizza lunch every month for 100 years. Why

can't we continue doing that? We have always had candy grams at all the special events. Why can't we do that anymore?" Other parents were frustrated because they desired to sell Freezies as a fundraiser and they could not, due to the policy's restrictions. The parents' response was, "this is so stupid. It's just a Freezie."

Food Service Providers' Lack of Support.

Not only was there resistance from parents, but from food service providers. Some food service providers did not fully comply with the policy's regulations:

The last school I was at, Kramer's⁸⁴ [was] the service provider. When I came in as the new principal, I asked questions, specifically around P/PM 150, and whether [Kramer's] were compliant. They were shifty with their answers and I had to press a little bit. I think that's the case with some of the outside groups that work within schools; they don't adhere to it [the policy] as much as they should.

Furthermore, as time passes, food providers (who may have initially been compliant) may no longer be, as one superintendent claimed, "[when] P/PM150 came in ... they [the cookies] shrunk significantly, but then over time, they started to grow again. So, it's that little creep that starts to happen if we're not consistent with [monitoring] it." Even today some food service providers are non-compliant:

[E]very Wednesday morning, there are big giant chocolate chip cookies, muffins, and all those things. The hard part is if we cut that off, we're cutting off food for our most vulnerable students coming from our First Nations communities. We know that there's a very fine line.

Even in wealthy, high-income regions, some food providers do not comply. A supervisory officer from Central Ontario observed the catering company (Kramer⁸⁵) resisting full compliance:

⁸⁴ This is a pseudonym and will be used throughout this chapter in relation to a specific food service provider. It is interesting to note that a few supervisory officers expressed challenges associated with this food provider. These challenges often concern a lack of compliance.

⁸⁵ This is a pseudonym.

The biggest issue came with the catering company ... they began opting out of our [P/PM 150] meetings early on ... I hate to say it, but there is a lot of big business pressure with these types of businesses which results in lies ... [for example], I walked in to one school and asked, “Why are we selling ice cream sundaes with M&M sprinkles?” And their response was, “We were told that this was one of our 10 days.”

This supervisory officer claimed that the corporate office must have misunderstood or was dishonest about the ten “Special Day Events” rule as it is the principal who establishes what and when the ten events will be, not the catering company. This officer was quite frustrated with this company since they (as a facilitator) knew that the company “was totally wrong because I had written the policy and the procedure ... I was able to call them on it.” The food supplier even attempted to argue how some “unhealthy” foods aligned with P/PM 150. This supervisory officer also claimed that once they saw a Coke truck in the school parking lot, wondering why it was there; it should not have been since Coke is not P/PM 150 approved. Upon conversing with the provider, the case of Coke from the truck was for school staff. The supervisory officer also mentioned that some colleagues observed students, at particular schools, reach behind the approved apple and orange juice sections in the cafeteria to locate some Mountain Dew cans.

Students’ Lack of Support.

Students’ interest in eating unhealthy foods was a barrier to successful implementation: “[Pre-P/PM 150, cafeteria staff] used to make these large cookies, and when they shrunk significantly, the kids complained.” Students were so accustomed to accessing unhealthy food from vending machines that when vending machine vendors changed their food selection, “there was some initial grumbling from kids.” Another superintendent said that students were “not excited” when they realized that the cafeteria food did not taste the same. While another expressed, “there were a handful of kids who said, ‘no, I’m not eating that ... whole wheat crust; I want real pizza.’” Consequently, many students purchased fast-food elsewhere and returned to school with it. A supervisory officer claimed that some of his administrative colleagues implemented local school initiatives banning this type of food from campus.

A few superintendents said that a students’ family income (whether high or low) did not deter them from eating at fast-food restaurants during school lunch hour; students just wanted to

eat unhealthy food: “A number of those schools [with a low SES⁸⁶ area to serve] adjacent to fast-food restaurants had kids vacate the school ... and then we’ve got some high-income areas ... and those kids went to fast-food places as well.” According to another supervisory officer, the problem does not necessarily lie in a family’s socioeconomic status, but in the way a school operates. In a low-socioeconomical area, students were exposed to and desired to eat nutritious foods because students made healthy meals which were served in the cafeteria. Moreover, the school had a free healthy breakfast, lunch, and snacks program. Whereas students from a high-income suburban neighbourhood (being serviced by a “testy” food supplier), were eating an amount of non-compliant cafeteria food. Moreover, in this supervisory officer’s experience, students from a rural school without a “good food program” were also consuming unhealthy food.

Many students also refrained from eating cafeteria food due to the limited options: “All that our cafeterias are left with are three choices ... [and] they’re usually pre-packaged ... [and] really bland,” expressed one of the supervisory officers, while another mentioned the limited ethnic food being a deterrent.

School Staff’s Lack of Support.

There was and still is resistance from school staff as a superintendent stated, “in relation to those ten special days, we’ve had to constantly clamp down on people ... they need to have a plan and they don’t always provide it.” Not only is this a challenge, but not everyone is abiding by the ten-day rule. This superintendent speculated that most schools in their board have eleven or twelve days. This was also alluded to by another superintendent; however, they added the reason for this behaviour: “The policy feels punitive to schools who rely heavily on fundraising.” Most of the schools that rely heavily on fundraising are in low-socioeconomic neighbourhoods because, prior to P/PM 150, it was “easy” for parents to provide their child with a quarter to purchase a cookie at a fundraiser. Moreover, it was inexpensive for “poor families” to donate Rice Krispy squares to be sold at a school fundraiser. Rather than feeling restricted by the ten-day rule, another supervisory officer claimed that the school at which they worked often had only 7 or 8 special days.

Recently (prior to COVID), a few superintendents observed staff members distributing unhealthy food at school events:

⁸⁶ SES is an abbreviation for socioeconomic status.

I saw a couple of years ago ... that our kids were involved at the school ... in some soccer, basketball, and volleyball tournaments. And what do they serve in the canteen [at these tournaments]? Junk food! So, at a sporting event, kids were provided with pop, chips, and chocolate bars instead of fruit cups and things like that. I thought that was kind of ironic, considering we're promoting fitness and being active yet we're not providing them with what they need to stay healthy.

Another superintendent said that "there was push-back from staff" as they provided an unhealthy lunch to students: "I saw an advertisement go out [on social media] and they were ... doing a fundraiser selling food from the never sell category." Students have also been accustomed to selling frozen yogurt as a fundraiser, even though it is not policy compliant:

There are so many misconceptions about the policy. Frozen yogurt is a great example. It sounds healthy, right? ... When I spoke to a principal about the unhealthy aspect of it [as it is full of sugar and fat], and they used the policy resource tool to figure it out, they realized that it is in the "Do Not Serve" category. They were so surprised.

Rather than observing school staff resistance, another superintendent speculated on the students' resistance. One of the high schools is used as a community centre after school hours. As a result, it has vending machines stocked with unhealthy food. To comply with P/PM 150's regulations, these machines are supposed to be unplugged during the day and then plugged in after school. "When I do a school site inspection, however, I know that they're plugging those things in during the day when I'm not there," they expressed. Another superintendent said that many staff members resisted compliance, finding loopholes where possible. For example, a recent loophole concerns the policy's "selling" aspect. Since P/PM 150 only disallows the selling (and not giving) of unhealthy food, some staff members brought treats from home and distributed them to students. Not only did some teachers engage in this, but parents and students: "There are still Valentine's Day parties, Halloween parties ... holiday events, and people bring in all the sugar and all the same things, but they are not sold." Another loophole concerns the "Save the Dish" initiative that many principals employ. "I've heard some school boards say, 'We're selling the paper plate and that's what we're charging people,' but then there's a big greasy slice of pizza on top of it that is free," claimed one superintendent. Another loophole

pertains to school staff rooms wherein unhealthy foods are being sold; a superintendent claimed there are soda machines and chocolate bar sales. A school board consultant expressed some struggles associated with student fundraisers: “Our administrators need reminders like, ‘You can’t do Pepperette fundraisers and chocolate almonds.’ Once you remind them, you send them back to the policy.” A superintendent from the same school board said that these reminders are not as frequent as they used to be. In the genesis of the policy’s implementation, many administrators “complained” about the healthy foods in vending machines. When these machines were stocked with unhealthy items, they produced a decent amount of revenue for schools; however, since P/PM 150, revenue is nonexistent. Much of this staff resistance derives from “fatigue or frustration” or a lack of belief in the policy.

P/PM 150 Facilitators: The Positive Outcomes

Although some stakeholders resist P/PM 150, all the supervisory officers claimed that this policy has many strengths, including: its theoretical intentions, how the policy fostered partnerships, and the way it affected stakeholders.

The Theory

“When [P/PM 150] came into play, it was a great intent, a very well intended policy to make sure that we are providing in a school setting only healthy things for kids to eat,” expressed a supervisory officer. The Ministry of Education’s policy was “good” and “beneficial” as many superintendents alluded to the notion that “healthy bodies, create healthy minds.” “We want students to live holistically ... balance what you’re putting in your body with sleep, and so forth,” claimed another superintendent. Others agreed, mentioning that it had “the best intentions” as it encouraged healthy eating for both students and staff, promoted healthy lifestyles, and tried to address childhood obesity. “I was ... happy that it came out because I thought it did some good things to really shift what was available in many of our schools.” This is especially important with schools in suburban (residential) and rural areas for “there really isn’t access for kids within their 40-minute lunch to get anywhere and back in time.” Thus, students within these areas can only eat that which is offered at school or that which they bring from home. The policy “emphasizes the healthier side of things” and without it “students would just eat the feel-good options: poutine and all those other one they love.” Students were “gravitating” to these types of

unhealthy food options and therefore, “I think it [P/PM 150] was needed,” claimed another superintendent. It did, as another superintendent expressed, “stop the bleeding.” It also highlighted the importance of knowing about healthy foods and encouraged many stakeholders to read ingredients (sugar and salt content) on food packages, stated another officer.

Although the policy is well intentioned and many supervisory officers were “happy” that it was released, a few superintendents said, “unfortunately, implementing it, is a whole other story.” A superintendent within the Western region expressed, “although it was a good thing, I don’t think it was done sensitively.” Moreover, it did not “make a dent in the overall epidemic of childhood obesity,” claimed another officer. Thus, in theory, the policy was necessary and “worked well” (according to many officers); however, executing it was not a flawless process.

P/PM 150: The Launching Pad

All the supervisory officers alluded to P/PM 150 being a good launching pad for discussing and engaging in nutritional eating: “It opened up conversations [among stakeholders] ... it created learning.” “It brought nutritional understanding to our students,” another expressed. It also fostered relationships among such organizations as Ottawa Public Health, the Champlain Network, the United Way (Eat Well to Excel), local health units, individual school boards, and the Ministry of Education, claimed many officers. “Certain organizations were really good at assisting us in rolling it out ... providing us with recipe books.” In another instance, health nurses (from a local health unit) “were assigned to our families at school to help us move along some of the initiatives that we made at the school,” a superintendent articulated. Other partnerships organizations helped fund a breakfast program within Northern Ontario. Moreover, one of these organizations donated eggs “so we would have egg day on Friday and a bigger breakfast with which to start our kids off.”

Another superintendent said, “it was a good trigger. It was good to get the car moving.” This policy triggered many healthy ideas which became part of school practice as one director of education claimed:

[As a teacher], what I saw in my kids’ lunches ... were processed food, high fat content, high sugar content, and high everything. When the school food and beverage policy came in, while it was specific to schools, one thing that we started doing was going in and having a look at the kids’ lunches and just sending parents notes about we noted.

While the school food and beverage policy doesn't really apply [since the policy only concerns food being sold at school], we [the school staff] thought this was a good idea and ... started giving families options around that.

Other healthy ideas or initiatives pertained to delivering free pizzas and food baskets to lower-socioeconomic families in a school neighbourhood, expressed another supervisory officer.

P/PM 150 has also spawned or supported nutritional eating programs: “Our lunches are more nutritious,” responded one superintendent, while another reported, “we’ve turned our [abandoned/non-funded] cafeteria into a food nutrition program space.” This superintendent continued enthusiastically, describing the program, how it impacted the cafeteria environment. They also detailed other nutrition programs that have spawned from P/PM 150,

So, our kids go in there and we [the superintendent and other school staff] have the chef coats. We have a convection oven, walk-in refrigerators, and we had to get rid of the deep-fryer, but everything else is operational. There’s a dishwashing station. We also run a program, which is very popular, the Food and Nutrition Program. And then there’s the food service part which we use for our breakfast program. We partnered with the Children’s Centre⁸⁷ and the Red Cross. We now have a full serve free breakfast program with bagels, etc., and it’s all compliant.

A superintendent from Northeastern Ontario said that the learning foundation with their board that fundraises and organizes “food for learning programs” within schools, began offering policy compliant food. A consultant mentioned their nutrition for learning program supplies students with healthy snacks and a breakfast. Other supervisory officers confirmed these types of changes, “[i]t changed breakfast programs, it changed lunch programs, and it changed how school councils can support schools.” There is a Nutrition for Schools program that supplies a healthy breakfast, claimed another officer. One of the officer’s moms volunteered at a school, offering students fresh vegetables and fruit as part of their breakfast and snack program: “She couldn’t believe that students were taking peppers,” this supervisory officer stated. Another superintendent (who was also a principal at the time of P/PM 150’s genesis) said that students who prepared school food, altered what and how they prepared it. Students even took the free

⁸⁷ This is a pseudonym to protect the superintendent’s anonymity.

apples from the snack basket in the office, stated a couple superintendents. One even said, “9 out of 10 times, students chose an apple over a granola bar.” This was likely because the apples were organic and tasty; they were picked from a nearby apple farm, they concluded.

Many officers noted that all their snack, breakfast, and lunch programs (even if associated with the Ontario Student Nutrition Program), are now policy compliant, whereas a couple of superintendents stated that P/PM 150 supported their existing nutrition programs. Whatever the case may be, school nutrition programs reflect P/PM 150, even if there have been some hurdles along the way. For example, one superintendent said that a few years ago their local health unit demanded that all foods (including fruits and vegetables) must be “cut-up by certified food handlers.” This was challenging as it took time and money to employ certified handlers. Consequently, much of the food offered within these school nutrition programs was prepackaged and “that’s not really nutritious.” “We managed to work through it, although it took a year. We came to an understanding with the health unit and their inspectors.”

P/PM 150 altered programs to such an extent that local health units began supporting schools. A superintendent in Northwestern Ontario said that their local health unit provides healthy eating opportunities for students by supplying the school with fresh fruits and vegetables. Another officer claimed that their health unit supports schools by approving their vendor list/menu. “The after-hours programs that we have in our system support our schools,” stated a director of education. They continued, saying that “every school [in our board] has a program now, and we get some grants for them.” For example, all schools within this board have a “healthy food shelf.” It is a place where students can obtain a free healthy snack.

Another superintendent, who was a principal at the time, expressed how this policy not only altered school programs, but school-level initiatives:

There’s an aphorism about education that if you don’t feed the teachers, they eat the students. So, what we would do is normally when catering for a staff meeting, we would find some kind of sweet treat or salty treat to bring ... I can remember vividly getting complaints: “How come we don’t have chips?” ... Because they are not healthy, I’d say. We’re buying it from the cafeteria, so now you’re getting healthy food too. So, I think for our staff members The Healthy Eating policy really came into focus when they had to participate in as well.

This policy also restricted staff members from purchasing unhealthy snacks from vending machines as a director of education stated, “when P/PM 150 came in, we got rid of the vending machines which were only used by staff.”

Stakeholder Interest

It took time for stakeholders to comply: “It’s a change ... implementation ... it’s the same as an anaphylactic shock⁸⁸ ... so it takes a little bit of time to get on board with it.” It was necessary to “shock” or “rip off the band aid, so to speak,” another officer stated. Although this was the case, many stakeholders (school boards, the Education Ministry, school staff, food service providers, parents, and the community) support the policy.

School Boards & Ministry Support.

All the supervisory officers support and believe in P/PM 150 as one superintendent announced, “I’m supportive. I’m supportive of P/PM 150 personally. I think even the system is supportive of it.” Enthusiasm continued shining as two others (who have P/PM 150 in their portfolio) said, “I believe in it 100%.” One of them added, “I just think that everything is connected: mind, body, and soul.” A different supervisory officer (who specializes in human resources) mentioned that wellness and physical well being are important, especially since they not only impact students, but the board’s employees. They continued, “I have a personal belief in balance ... making sure that any eating choices are done in moderation.” This belief in balance and being a proponent of a person’s wellbeing (mental, emotional, and physical) was expressed by many other superintendents. One of them elaborated upon the reason for their belief; their “climate survey” (surveying five boards within the same region) indicated that BMI rates, especially in their region, were increasing. Not only was BMI an issue in this region, but across the country. Consequently, “the school system had to do something to help families and address this [obesity] problem,” they claimed. Another superintendent who also has human resources within their portfolio claimed, “I believe in active living and eating healthily,” which was echoed by many supervisory officers. Some also added: “My family doesn’t eat anything commercially prepared ... I believe in it;” “I would say, absolutely, I’m a proponent of the policy; “I’m always a proponent of healthy everything.” Many superintendents also claimed that they were “supportive of seeing healthier food options for students,” while others said that they support the

⁸⁸ Another superintendent described it as a “shock wave.”

policy in its intent. The program facilitators and consultants announced their support of it; however, one concluded, "... but I'm not happy with its current state."

One supervisory officer believes in the policy to such an extent that they helped their colleague "make sandwiches to have at our student council store because we don't have a cafeteria." Furthermore, since money was required to fund their nutritional programs, this superintendent applied for a governmental grant, which was approved. The Ministry then,

followed-up with us and just coached us on, if you tweak this a little bit ... [They also] ensured that our application grant went through, and they really wanted to know that we had support, which was great ... there was a concerted effort to make sure that we could do great things with it, and we have.

Thus, not only does this supervisory officer believe in the policy, but the Canadian government (including the Ministry of Education) does as well. According to this superintendent, the Ministry of Education provided approximately twenty "health eating grants" that were available for secondary schools, and this initiative was available for one school year only. A few years ago, the province even initiated a "fresh fruit and vegetable campaign" that aided healthy school programs. Another superintendent even made a general statement about their school board: "[W]ithin the school board our key stakeholders believe that kids should be eating healthily. And that's important for teachers in society." They continued, "[w]e follow the P/PM and we implement it accordingly." One superintendent, summarized it succinctly, "it is hard not to believe in it since so much good comes from it."

School Staff Support.

"If we're role models in education, we have to be role models in every form of education, including healthy eating." Another supervisory officer concurred, saying that many staff members are modeling what they are teaching; they are modeling nutrition. It is important that educators (principals, teachers, and other school staff) believe and understand the policy: "Getting an understanding and belief from our principals" is necessary for P/PM 150 to be successfully implemented. Some superintendents said that administrators "are excellent individuals who do a fantastic job!" For example, some of them are so dedicated to P/PM 150, that they attend cooking seminars to learn how to cook healthy and appealing dishes. These dishes are then sold at school fundraisers. Many school administrators are diligently

documenting their ten Special Event Days and are ensuring that all the “checkpoints” associated with P/PM 150 are being followed. Many principals employed in Northwestern Ontario support the policy to such an extent that they “do weekend deliveries [to individual homes] so that kids are actually getting healthy alternatives on the weekends in our system since they live in a low-socioeconomic region.” Each school within this board determines the method for delivering food to these homes. This director of education expressed, “[f]rom my perspective, in our system, the principals are doing a really good job following the P/PM.” Many principals are “doing a good job” supporting the policy since they have prohibited the sale of energy drinks (e.g., Gatorades), expressed another supervisory officer. Another officer in Northern Ontario stated that all stakeholders (including principals, other school staff, school board officials, service providers, and parents) “are really on what we can serve in schools.” They continued, speculating the reason for this support:

[O]ne of our EAs⁸⁹ that works in the store, previously was a registered nurse. One of our other EAs has diabetes, and that’s huge in our area. So, she’s always got that lens on making sure that and we’ve got quite a few students that manage their diabetes ... you’ve got to have staff who are passionate, and she understands why we do what we do.

Another superintendent in Northern Ontario also observed EAs supporting and coordinating breakfast programs, especially since these programs are not “run” by volunteers. Many staff members are passionate about P/PM 150 that they encourage students to eat healthily, as one superintendent expressed, “we do encourage them to grab a fruit or vegetable from their classroom so that we know that they have some kind of healthy food in them for the day.”

Some supervisory officers claimed that once P/PM 150 was implemented, teachers stopped using “unhealthy” foods as a reward, “[u]sing food as rewards has been frowned upon. So there definitely was a learning and understanding with our system.” Another officer added, “using food as an incentive ... is a big no-no pedagogically speaking.” This was not the case in other systems as one of the superintendents noted, “[P/PM 150] was an education piece for the staff as well [but] because children are very food motivated ... treats [were sometimes used] as a reward.” Although this is the case, using “junk food” as a reward remains within P/PM 150’s

⁸⁹ This is an abbreviation for Educational Assistants.

rules and regulations: “If you were rewarding kids and just giving the food away, you were still able to do that” as P/PM 150 only concerns food sold at a school event or on school premises.

As a principal, one of the superintendents said that their enthusiasm shone as they collaborated with the food service provider, asking each other questions, and trying to entice students to purchase from the cafeteria, to encourage the success of P/PM 150. The principal and caterer “were both on the same page ... it benefited us as administrators, to have our students in our school, purchasing healthy choices, and it benefited them concerning their revenues.”

Food Service Providers’ Support.

Many food service providers also complied: “Vendors ... and those companies all complied. It was good that it made them comply.” While most officers said, “in our vending machines, we had chocolate bars, chips, and sugar drinks [but] all of that was removed ... [and] loaded with low fat and low sugar options [and] water.” For example, vending machines now have “diet coke, other diet sodas, and diet juices.” Not only did vendors comply, but also did school chefs. According to one supervisory officer, because their head chef was “on board with the policy,” he was therefore “a strong proponent of it.” Consequently, the food supplied to the students was congruous with P/PM 150’s regulations. This chef was so optimistic that, even when profit was low in the genesis of P/PM 150’s implementation, he “knew that it was just the initial stage and that kids would eventually just get hungry and come back to [the cafeteria].” Employing a school chef who complies helps P/PM 150’s implementation process, expressed another superintendent. This was the case in another school board as the supervisory officer stated, “the head chef was actually a buddy of mine from university.” Consequently, the chef and officer closely collaborated to ensure that everything offered was policy compliant.

Other supervisory officers observed cafeteria managers altering their menus, offering fresh fruit, vegetables, yogurt, wraps, and salads. Although it was a challenge for their catering company to offer fresh fruit (that easily spoils), and offer diverse and appealing food, while “trying to keep prices low enough,” the caterer introduced culturally based food options. The price of these options remained consistent in various institutional settings, such as urban and suburban. “It was very much regulated that way,” expressed a superintendent. Another supervisory officer noted the difference between large food providers and smaller ones. A school within their board employs a “cafeteria provider” who employs a few people to make lunch everyday. They offer muffins, cookies, salads, wraps, etc., that is all P/PM 150 compliant,

nourishing, fresh, and wholesome. Students pay for this, resulting in many cafeteria sales. Since only a few people are employed, food revenue pays for their part-time salaries. In large conglomerates, the food is not as appealing or nourishing and all the money from cafeteria sales “goes to the company.”

To comply with P/PM 150’s regulations and entice students, catering companies became creative. They baked French Fries and offered cookies with lower fat and sugar. They incorporated low-fat cheese into their pizzas. The “providers were trying to be creative, trying to still provide those comfort foods ... but within the P/PM 150 standard,” expressed a superintendent. This superintendent also claimed that the creative food providers with “really good cooks and a really good supervisor (who was an excellent chef), was able to make all of this appealing and it worked.” In other cases, “it just became sad to see ... what was being offered.” Another supervisory officer said that many food providers (who were already employed by a school board) complied with P/PM 150 because “they had no choice. [If they hadn’t complied], they would have lost their status as a provider.”⁹⁰ Many food suppliers desired to continue providing schools with food that they began distributing “nutritional value printouts.” These printouts detailed the nutritional value of foods and beverages being supplied: “Subway does it, Papa John’s does it, and all the pizza places do it,” expressed a superintendent.

Parents’ Support.

Some superintendents mentioned parents supporting the policy: “Because of a dedicated family group that came from Parent Council ... hot lunch days at a couple of our elementary schools incorporate foods that are in the sell more category.” Parent Council is involved to such an extent that it “raises money just to pay the chef’s salary.” Parents are also beginning to understand that students require water, not soda, especially at school. A facilitator claimed that many parents “embraced” the policy, asking questions, and realizing, “[our children] won’t like it, but it’s better for their health.”

Community Support.

Only a few supervisory officers mentioned the community (First Nation, Indigenous, Métis communities) supporting P/PM 150: “Northern stores gives us anywhere from a 10% to

⁹⁰ Many school boards have a purchasing/financial department that is responsible for hiring a vendor to service their schools. Since P/PM 150’s implementation, only policy-compliant vendors have been employed, expressed most officers.

25% discount, if it's produce ... with us, if they know it's for the kids in the school, [they'll do that]." While another said, "we have a great relationship with our local public health unit ... for our Fruit and Vegetable program, they actually paid for all the facilities and upgrades that we needed to make our schools support the policy." Moreover, the Red Cross and some family health teams subsidize breakfast programs and donate to schools, expressed another supervisory officer. This superintendent in Northern Ontario said that their First Nations leaders would like to also provide money for students' meals. Consequently, there is one operational school cafeteria from which First Nations students purchase food.

Summarizing, there were many implementation barriers associated with P/PM 150, including: policy timing and restrictions, revenue loss, proximity to restaurants, and a lack of stakeholder interest. Concerning the former, the policy's execution was fast and the rules restricted students in such a way that they left campus to eat elsewhere. Consequently, schools and school boards lost substantial revenue. Restaurant proximity to schools also exacerbated this problem, along with policy resistance from parents, food service providers, students, and school staff. Although this is the case, P/PM 150 has many strengths: its theoretical intentions, how the policy fostered partnerships, and the way it affected stakeholders. In theory, the policy was necessary and "worked well." It was also a launching pad for discussing and engaging in nutritional eating. Moreover, it spawned and supported nutritional programs. Many stakeholders (e.g., school staff, food service providers, parents, and the community) engaged in these programs as they supported P/PM 150. Policy support also extends to school board members and the Ministry of Education.

Section 3:

P/PM 150 Affected Pedagogy

Curriculum & Classroom

Superintendents mentioned that teachers used the policy as a pedagogical tool: "I think that healthy eating is part of conversations that teachers have with their students." These conversations transpire especially within health and parenting classes, expressed a supervisory officer, while another superintendent mentioned teachers weaving P/PM 150 into all classes associated with physical education, nutrition, and cooking. Within cooking classes, teachers are instructing students on how to cook and how to eat healthily. They also teach students that

“what you put in your body matters ... and students actually listen.” They converse with students within these classes as it is “our responsibility to educate our children on proper eating and nutrition,” another superintendent claimed. A supervisory officer from Central Ontario said that integrating P/PM 150’s nutritional aspect into the curriculum would benefit students, which is exactly what many other officers expressed, “we definitely utilized P/PM 150 with our curriculum ... the healthy active living and several other cross curricular areas ... which helped propagate a message about healthy choices and what you put in your body.” While other officers within Southern and Northern Ontario said that there are courses within their schools, specifically designed to support the policy. Such courses are within culinary arts or hospitality programs. Many secondary school cafeterias within these boards are managed by students within these programs:

There’s a Specialist High Skills Major ... in tourism and hospitality, which includes a lot of food prep and is very popular. We have a couple of those programs, one downtown and one in [another] ... school. Students work towards running the cafeteria. They prepare food in the morning and then sell it at lunch to students. It is very popular and often affordable because they’re not trying to make a profit. We use a contractor as a third party to work with the money and so on. But that [program] has been very successful.

A superintendent in Northern Ontario also expressed using the curriculum to their advantage, “we’ve also been able to over the years ... teach them [students in life skills programming] how to do some basic cooking skills ... since we don’t rely on outdoor vendors. Everything [we make and serve] is in house.” Another superintendent (who is also in a Northern community) said that teachers also incorporated healthy eating in their life skills program:

Our special education teachers offered a life skills program. They were teaching kids about healthy living and having them actually prepare homemade soup following the [P/PM 150] guidelines. They’d freeze it for the kids who would come to school without a lunch. There was that education piece with our higher-needs students; the staff embraced it and saw [P/PM 150] as a learning opportunity for the kids. Those kids would go home and say, “Hey, I made vegetable soup today.”

Another superintendent working in Northern Ontario hopes to see this type of pedagogy as their board renovates the school cafeteria: “It’s going to be a food service room, so it’s going to be a learning opportunity for students.” This superintendent envisions students serving policy compliant meals that were made in their “food classes.” A different superintendent expressed, “chang[ing] everybody to be healthy eaters ... comes from in class teachers.” Not only should they instruct students about nutrition, but they should “role model through incidental teaching,” expressed another officer. A facilitator concurred, adding that teachers have been teaching students about nutrition and health by integrating this material into their lesson plans. “We try to educate the best way we can, [trying to instill] a positive sense of self and a positive relationship with food,” expressed a consultant. A superintendent said that there should be a “holistic revamping of all pedagogical approaches to healthy eating and healthy being.” Not only can school staff members teach students about healthy eating in cooking classes, but they can encourage students to “work with our cafeteria.”

Leading By Example

The policy enabled school staff to lead by example and be the “nutritious” role models for students: “We are aligning what we do with what we say,” expressed one of the supervisory officers. This superintendent continued, “you don’t want to be like that Phys-Ed teachers who’s huge and overweight, eating a Big Mac at lunch, telling kids to go around a lap ... there’s a disconnect with that.” Thus, it is important for school staff to eat nutritionally at school to promote P/PM 150.

This policy also shed light on the pedagogical tool (leading by example) when schools altered their cafeteria menus:

[F]or years there was a disconnect between the message that we gave kids in health class and Phys-Ed class, and the message that they saw in the cafeteria every day: “eat healthy, take care of yourself, and exercise regularly ... [but] go to the cafeteria and buy these fries and gravy ... buy these ice cream bars.” That was a disconnected message for sure. We are [now with P/PM 150] presenting a unified front in that regard.

A superintendent summarized teachers’ promotions of P/PM 150 succinctly: “There have been lots of connections to curriculum and pedagogy ... it has been an easy sell that way.”

P/PM 150: The Mindset

“We have to bring about that change and mindset,” expressed a supervisory officer. The change and mindset for healthy food consumption began with the implementation of P/PM 150: “There has been a culture shift that probably started with this,” while another officer claimed, “I think the biggest advantage is really that change in mindset for healthy food consumption and the impact that [P/PM 150] seems to have had in resonating with family households ... about eating well and healthy living.” This mindset took time to germinate; however, once it did, monitoring subsided. Stakeholders learned to accept the policy and there was a cultural paradigm shift.

Taking Time

Most supervisory officers said that it took time (2-5 years) before P/PM 150 was part of the mindset or fibre of a school. Sometimes people did not have the mindset until 2013, while another officer claimed that it was not fully accepted until 2015. “[I]t took time for people to have this mindset.” It took time for administrators to learn about and read product labels. It took time for them to understand what healthy eating is. Because many administrators “educated themselves,” the policy has caused this shift in awareness, “especially for me,” expressed one of the officers. A facilitator likened this mind-shift to the gradual change in attitudes to technology: “It is similar to the shift in attitudes regarding technology and being able to work from home. Parents have been thrust into this during COVID.”

It took time for this healthy mind-shift to transpire because educating the young about healthy eating is a process. If the process begins with a child, “by the time they get to high school, they have it ingrained.” Another superintendent said that it took time for stakeholders, including parents, to adjust: “[T]he community [had] to start to understand the reason for the shifts ... it was a big shift for parents.” Other officers concurred, saying that P/PM 150 helped people become aware of healthy eating, as one consultant expressed,

[It spawned] a culture shift. There was frustration at the beginning of the whole thing. It was so easy to sell chocolate bars. But now we do dance-a-thons, or we do fit-a-thons, or we sell poinsettias at Christmas or different things. Now that’s not even a second thought ... people no longer question it.

It has become part of what schools do. Once stakeholders began understanding the policy and realizing that it is now part of a school's operations, many just accepted it. "I think once you're on the road, you're not really thinking, I intentionally did that," expressed a superintendent. People "just became used to it," "accustomed to it" and are now "conforming." "It is no longer an issue for us as it once was ... it's a common practice [and] it is the mindset right now," proclaimed other superintendents. Other supervisory officers concurred, "it's fairly ingrained, and I think for the most part, people understand the expectation around that." The policy is so ingrained that "you don't really have to worry about what the cafeteria is selling, or what is put in vending machines," expressed another superintendent. In other words, over time, P/PM 150 became a protocol that many stakeholders subconsciously followed. Although some officers observed or experienced this, one superintendent does not believe that this policy has yet been ingrained: "It's going to take time. This isn't something that over 10 years is going to just change."

Mindset vs Monitoring

In relation to monitoring, one superintendent believes that once stakeholders have a healthy mindset, there is no need for monitoring, "compliance ... eventually just morphs into a good philosophical background of operating your school." This morphing seems to be exactly what another superintendent expressed, "Accountability ... it's just built into practice." Another superintendent agreed, although they expressed that the school community is at that stage: "I think the school community is aware of it ... I just think it has become part of what we do, versus, [what] we have to monitor."

Cultural/Societal Paradigm Shift

The notion and promotion to eat healthily also exists in society as a supervisory officer claimed, "healthy eating has come a long way since 2010 ... not only do we see these policies in schools, but in hospitals, and we're seeing them pop up all over the place now, which is really important." It seems that more people "are having this healthy mindset," they concluded. Many other supervisory officers concurred, "we're at that stage now ... as opposed to the past, where people have a bit more sense of, I need to be healthy and active ... I need to eat well because it helps me in the long run." Children and adolescents today, although they have more opportunity to engage in unhealthy eating practices, they are more educated than previous generations and

are different from children 10 years ago, expressed many supervisory officers. Another superintendent also alluded to this: “If you take a look at society as a whole, it has a more holistic approach to eating now ... we’re at a different place in time now and our cultural context right now.” For example, there are more restaurants such as “Buddha Bowls,” and “Chipotle” offering healthy foods that are “actually enjoyable.” This cultural paradigm shift has affected people in such a way that they would “naturally say, ‘sure you’re offering poutine in your cafeteria but ... [I] really want a good salad.’” Although many supervisory officers said that there has been a societal mind-shift, one superintendent questioned this belief: “As a province, we still don’t promote the healthy lifestyle and we don’t [really] promote it.”

Although this is the case, another supervisory officer wondered whether people, including students, are employing it: “Have students even at the post-secondary level ... been employing this mindset ... using [it] and living healthier lives?” Another superintendent similarly questioned students’ actions, saying, “I think there’s thought [surrounding P/PM 150], but to assume that it has changed everybody to be healthy eaters? No.” According to a few supervisory officers, although students and staff are aware of this policy, sometimes they must be reminded of it: “[W]e don’t do a good job as a system on reminding people about it ... [we have to] put it back on everyone’s radar ... because as we all know, overtime, practice has a tendency to lag.” While another claimed, “I think like everything else, once it’s implemented, and it gets going, people forget.”

Summarizing, although over time people may require reminders about the policy, it seems that P/PM 150 became ingrained in many stakeholders’ minds. It has become the norm, just as nutritious type restaurants and advertisements promoting nutrition in North America have become common. Many people just follow P/PM 150 unintentionally. Consequently, monitoring has subsided and many stakeholders no longer “worry” about a plethora of people resisting compliance.

Section 4:

The Supervisory Officers' Recommendations

“I think [P/PM 150] did stop the bleeding [and] it got a symptom, but it didn't address the disease” (Jonathan Fox)⁹¹

Upon analyzing the interview transcripts, it became evident that P/PM 150 is not always executed as envisioned; policy goals do not necessarily translate into practice easily. This is due to factors (facilitators and barriers) affecting its implementation process. Since barriers exist and there is often a gap between policy and practice, the supervisory officers (during the interviews) recommended ways of improving P/PM 150 and its implementation, including how it can be redesigned, re-emphasized, promoted, and better monitored.

Redesigning P/PM 150

A superintendent claimed that P/PM 150 “was siloed on its own, and got pigeon-holed into, what can the cafeteria offer? And that’s all it became ... [it also] pigeon-holed picky eaters.” The Ministry of Education, through the policy, was saying,

we have healthy eating, and therefore, by restricting what you can offer at the school, we’ve done our job. You haven’t really; you’ve just restricted access to it. You haven’t necessarily made the kids understand the importance of healthy eating. (superintendent of education)

To address this concern, a few superintendents mentioned the need to alter the policy by creating an “umbrella” memorandum that is flexible and less restrictive.

Umbrella Policy & Curriculum.

P/PM 150 could be “incorporated into more of an umbrella policy on healthy children.” It could be more “broad based and built into the curriculum.” Other supervisory officers also alluded to this, saying that if you want to educate students about healthy eating, it must be embedded into the curriculum. Rather than having a stand-alone policy, the notion of nutrition

⁹¹ To protect the privacy of the supervisory officer, this is a pseudonym.

and wellness should be part of the curriculum or should comprise a section of a “comprehensive public health campaign or a wellness campaign.” This supervisory officer stated,

with the focus on mental health, the focus is on not necessarily solely on your eating habits and what’s accessible at school, but rather, it’s on finding a balance between exercise and healthy eating as part of that mental health.

This notion of “not having a stand-alone policy” is important as it can also address the challenges associated with school vending machines, expressed another superintendent. Since some schools are used as community centres, and these centres allow junk food in vending machines, school staff and students are enticed to utilize these machines during the school day. Consequently, P/PM 150 “really needs to be a province wide agenda ... all government buildings should have it.”

When creating a broad-based policy that educates students about healthy eating and living, perhaps the memorandum can also restrict people from serving unhealthy food at school: “I would love it if it was about serving food and not just selling food,” stated a superintendent in Southern Ontario. This would then eliminate the mentality of rewarding students with food or celebrating a child’s birthday with candy and cake.

Flexible Policy.

The policy should be revamped to be “flexible” and concern “balance, so that we can get some of our revenue back to offer those [extracurricular] programs that will help students maintain their well being,” expressed a supervisory officer. Other superintendents also mentioned the importance of having a flexible policy: “[I]f you’re in a community with a lower-socioeconomic status, and people are struggling ... families can’t afford [fresh food] ... so I think everything has to be taken with, how can we do this in our schools?” Since smaller schools (i.e., schools with a low population) cannot offer many cafeteria options that align with both P/PM 150’s “Sell Most” and “Sell Less” categories, the policy should accommodate smaller schools, expressed another officer. They continued, “there needs to be an exception component to the policy.” It should be flexible enough to address such regional and economic issues as food insecurities, limited access to foods, and living in a rural area. A director of education within a lower-socioeconomic region alluded to the importance of the Ministry recognizing that “sameness is not fairness ... equal is not equity ... we really do need to embrace some of those

strategies to make [P/PM 150] more reachable for everyone, including our schools.” Another supervisory officer from Northern Ontario concurred, “there isn’t true equity amongst the province” as the cost of food and living is higher in the North. “There is a food security issue in the North,” expressed this superintendent. Consequently, P/PM 150 should be flexible enough to consider all the contexts in which schools are. Thus, it should be more of a “guideline,” than a policy, another superintendent concluded.

The Ten-Day and 80/20 Rules.

Superintendents from three different school boards and a director of education alluded to removing or reducing the ten-day rule from the policy. The director said:

There are those ten special days every year, which honestly drive me crazy. I'll be honest with you, [it's as though the Ministry is saying], let's follow healthy eating and a healthy diet, and then not ten times a year.

The tracking of these days frustrated many supervisory officers, and “terrified” school staff. They were terrified of “being found out that [they] may have more than ten allotted days,” expressed a superintendent. Another supervisory officer mentioned a possible solution to this problem. The Ministry can remove or reduce the number of special days; however, the conundrum is, if the number is reduced, then “fundraising will take a hit” and schools will lose more revenue. Therefore, the ten days should be removed; however, by so doing, perhaps more unhealthy food will be sold at school. According to a director of education, not only should the ten-day rule be tweaked, but the 80/20 regulation: “I think that they [the Ministry] could probably look at that 80/20 model and tweak that instead of being very rigid about 80%, 20%, and 0%.” Whereas another superintendent said, “one way to do it might be to modify the ratio. Instead of 80/20, maybe it's 50/50 or 46... whatever it has to be. I think there has to be a little bit of give because kids are going to do what they're going to do.”

Thus, the policy should be “simplified” by being a more broad-based memorandum. It should be flexible enough to accommodate various school contexts and revamped to address the frustrations concerning the ten special-days rule, as well as the 80/20 one.

Implementing P/PM 150

A few supervisory officers claimed that the memorandum should have been gradually implemented: “[I]f we provided a wide variety of nutritional options in the beginning, but not eliminated the food that the students are now leaving school properties to seek, [that] may have been a better integration and a better approach.” A director of education also alluded to this concept, saying that it would have been easier to integrate P/PM 150 had it been gradual.

Re-Emphasizing P/PM 150

Most superintendents said that P/PM 150 should be on the forefront of stakeholders’ minds and should therefore “surface again.” The Ministry of Education or Ministry of Health should re-emphasize it, especially once the COVID-19 pandemic ceases. These ministries should ask themselves, school boards, and school administrators the following questions: “Where are we now? What have we learned? Here’s what we’re seeing about the health of kids. What other impacts has it had? What are the positives [associated with the policy]? What are the next steps?” In so doing, they “will force boards to critically review their policies,” stated another superintendent. If school boards and the Education Ministry review their nutrition policies and how they have been implemented, these institutions may be able to address some of the challenges associated with P/PM 150, stated another superintendent. They continued, “[t]he policy’s end-result was fine. But surely [its implementation] could have been done in a way that allowed for different voices.” Consequently, P/PM 150 should be re-emphasized, especially once stakeholders provide the Ministries with implementation input. A facilitator concurred, “some of the newer folks do not [know about P/PM 150]. We want to make sure that they’re up to speed.” Reminding people (especially new administrators) of the policy, is “a good practice,” a superintendent added. School staff can be reminded of it through an online module, as one superintendent claimed, “wouldn’t it be great to have an online module for someone who’s new and wants to know more? ... [W]e put a lot of things into online modules now that are available for on demand learning.” They can also be reminded of it once P/PM 150 is revamped by the Ministry to reflect the updated Canada Food Guide, expressed a few supervisory officers.

Summarizing, to help improve P/PM 150 and its implementation, it can be redesigned and re-emphasized. To help future nutrition policy implementers, it is necessary to consider the pace at which a nutrition policy is implemented; it is important to gradually execute a

memorandum.

Promoting P/PM 150

“Whatever is out of site, is out of mind,” claimed a superintendent. Consequently, it is important to promote P/PM 150 through a variety of means: healthy food in display cases, tasty food dish names, conversations and engaging food suppliers, posters, message boards, social media, positive role models, and school events/programs.

To entice students to eat healthily, cafeterias should offer a tasty (palatable), appetizing salad bar with fresh (non pre-packaged) ingredients, expressed a couple superintendents. Other officers added, “[it is] about having it on display” and using an appealing “catchy” breakfast meal name, such as “The Baconater.” It is beneficial to promote the policy in this manner as one is asking, “What can we do in schools to keep them [students] in? But one of the things that I have come across in that Compass research is that kids feel the need to get out of their surroundings. They need a mental and physical break and cafeterias aren’t set up for that,” expressed a board consultant. Consequently, more research on addressing this problem should be conducted.

Another way to entice students to remain on campus could be to employ “engaging” lunch ladies, or a private chef (a “Jamie Oliver”), and educate students on the importance of healthy eating:

[I]f we had a company with perhaps more education, more presentations on healthy choices ... and dieticians in schools to assist with the educational piece for students, informing the students and parents about the healthy options and what we were trying to do, it may have prevented the mass exodus of students into their neighborhoods or on their lunch breaks to seek out other options.

Students must not only be educated through presentations and discussions, but through visual means, as many superintendents expressed, “have the posters there.” Moreover, one can promote nutrition through social media, such as Instagram, expressed another officer.

P/PM 150 can also be more effective when more “leaders” or influential people in the community support and promote it since “it’s really difficult when you have one institution (the school) promoting it and nobody else is.” It can also be more effective if more staff members

“model for students what healthy choices are” since students can be heavily influenced by people (teachers) whom they trust. Being a role model is more easily attainable when P/PM 150 is on the forefront of teachers’ and administrators’ minds. This can be accomplished with more professional development days, expressed another supervisory officer.

A superintendent claimed that students observe their surroundings. Consequently, there can be an “advertising campaign” focusing on health and nutrition. These advertising campaigns can involve students, promoting and encouraging student leadership in relation to health. For example, in high schools, students can partake in such programs as the Specialists High Skills Majors, promoting, and marketing hospitality and nutrition. There can also be “Food Fairs”, expressed another superintendent or “healthy fundraisers,” stated another. Fundraisers can focus on selling fruit boxes “which picked up steam in one of the schools.” Parents and/or local health units can engage in a “Lunchable” event whereby they supply students with a Tupperware-type kit and educate students on how to make their own healthy lunch. Funding for such events can derive from the Ministry: “There are grants out there that help you do that.” While another officer said, “I think if the Ministry provided some grants for that, these types of events would happen in every school.” This officer continued, saying that the Ministry can mandate every school to organize at least one healthy nutrition project a year. Moreover, students can be enticed to remain on campus during lunch hour by having a free food program, supplying students with food (snacks and meals) throughout the day – that which is employed in elementary schools, expressed one of the superintendents. They continued, “food should be provided as part of the ongoing education ... it would bring us in line with many education systems around the world.”

By promoting P/PM 150 and nutrition through such means as, healthy food in display cases, tasty food dish names, conversations and engaging food suppliers, posters, message boards, social media, positive role models, and school events/programs, “you can inspire students to change,” an officer concluded.

Monitoring P/PM 150

“That which gets monitored, gets done,” expressed a superintendent. Consequently, this particular officer believes that P/PM 150’s implementation can improve if the Ministry of Education asks for a report from school board officials:

I think because there's no Ministry reporting attached to this (there's no requirement for schools to report how many days they used or what it looks like from year to year), [implementation] can be easily forgotten over time.

Other supervisory officers confirmed this – the Ministry should monitor and hold boards “accountable” somehow. Not only should the Ministry ask for a report, but it should explicitly outline consequences for improper implementation, stated another superintendent. A facilitator concurred, saying that the Ministry of Education and Ministry of Health should communicate thoroughly about how to monitor and hold schools and school board accountable. Moreover, these ministries should explore the potential of monitoring P/PM 150 as part of a school's annual inspection “under the Health and Safety Department of each board.” A representative of this department in each board could visit a board's schools and verify accountability.

Monitoring can also improve with frequent follow-ups: “I think we probably could monitor more ... perhaps it could be better in how we follow-up with what dates [ten special/junk food days] they're [principals] are doing it and so forth.” Although follow-ups are important, some supervisory officers said that “the only way to confirm compliance is to have the manpower to do so.” This officer continued:

At the board level, you'll have to hire somebody like myself, to go around to each school and check for compliance. But that's a huge job and costly. At the Ministry level, in order to check that the boards are complying, they'd have to hire many people to come into the board to check the schools ... and that, of course, would never happen. So, we go back to the idea, are these forms good? Yeah, they're good (what they were intended for), but are they good for compliance? I have my doubts.

Consequently, this supervisory officer suggests that the only way to monitor compliance would be to pay a supervisory officer to visit every school – even though it is “unfeasible.”

Furthermore, monitoring may be improved through an online “monitoring system.” Every administrator, implementation committee or school staff member, would have access to this centralized system, inputting data about the policy. For example, they would enter when and what their ten special-event days are. Whoever is responsible for selling “junk food” on those days would confirm the event's execution. School board supervisory officers could then view

this data in chart-form. It would be like “attendance tracking.” If a school inputs, for example, seven special-event days after only two months of school, then superintendents could “red flag” that and follow-up with that school. “I think this system would alleviate some of the principal’s stress,” the superintendent concluded.

Concluding Comments

Supervisory officers are responsible for their board’s nutrition policy and implementing it. In so doing, they and their corresponding school administrators communicate to multiple stakeholders (e.g., superintendents, school administration, school staff, students, parents, and food service providers). In the genesis of its execution, and to an extent today, P/PM 150 has been communicated at meetings, training sessions, and through PowerPoint presentations, e-mails, posters, newsletters, and social media pages.

Supervisory officers and administrators are also responsible for monitoring compliance. During the initial stages of implementation, forms were completed and sent to superintendents. Completion of these forms, however, has subsided. In many instances, they are not completed today. Although this is the case, school administrators are still responsible for ensuring school compliance and many do so by conversing with and observing school staff, students, parents, and food service providers. Consequently, P/PM 150 is being implemented; however, competing priorities interfere with monitoring.

Implementation barriers associated with P/PM 150 also exist: policy timing and restrictions, revenue loss, proximity to restaurants, and a lack of stakeholder interest. Concerning the former, the policy’s execution was fast, and the rules restricted students in such a way that they left campus to eat elsewhere. Consequently, schools and school boards lost substantial revenue. Restaurant proximity to schools also exacerbated this problem, along with policy resistance from parents, food service providers, students, and school staff. Although this is the case, P/PM 150 has many strengths: its theoretical intentions, how the policy fostered partnerships, and the way it affected stakeholders. In theory, the policy was necessary and “worked well.” It was also a launching pad for discussing and engaging in nutritional eating. Moreover, it spawned and supported nutritional programs. Many stakeholders (e.g., school staff, food service providers, parents, and the community) engaged in these programs as they

supported P/PM 150. Policy support also extends to school board members and the Ministry of Education.

This support is also observed in the way teachers teach. Many school staff members use the policy as a pedagogical tool by conversing with students, encouraging nutritious behaviour in class, and leading by example. Many have a healthy mindset. This mindset, however, took time to germinate, but once it did, monitoring subsided. Stakeholders learned to accept the policy and there was a cultural paradigm shift. One superintendent succinctly summarized the entire process concerning P/PM 150: “It’s just a matter of developing the policy, creating understanding within all of our stakeholders, communicating, and moving the system along, to create better, healthy eating habits for our students.”

To “move this system along” smoothly and reduce gaps between P/PM 150’s theoretical underpinnings and its implementation, the supervisory officers recommended many promising practices. Firstly, the policy can be redesigned to incorporate more of an umbrella policy on healthy children. It can also be flexible to address the many contexts in which schools are. The special-event day and 80/20 rules should also be revamped. Concerning the policy’s implementation, it should have been gradually implemented to allow schools to adjust to it. Moreover, P/PM 150 should be re-emphasized as stakeholders tend to forget about policy details over time. Secondly, P/PM 150 should be promoted through a variety of means: healthy food in display cases, tasty food dish names, conversations and engaging food suppliers, posters, message boards, social media, positive role models, and school events/programs. Lastly, P/PM 150 can be better implemented with improved monitoring strategies. It is, as one superintendent expressed, “getting to the heart of what the goal was and looking to whether we can we reach that goal, not just meet the requirements of the P/PM.”

Chapter 7: Online Content Analysis

To have a more holistic view of the interview results, I examine the Ministry of Education website. In so doing, content related to nutrition and P/PM 150 is analyzed. I also inspect nutrition related content on seventeen⁹² school board websites. From all the secondary schools within these boards, 50% of them were selected (equivalent to five high schools within each board) for viewing nutrition related content on their websites/social media pages. The following themes emerged from the data: communicating a detailed policy; communicating administrative procedures; describing the review process of said policy and procedures; P/PM 150's implementation; promoting the policy; and communicating the policy's results. These themes are detailed below, along with the similarities and differences among the online content and interviews.

Communicating P/PM 150: A Detailed Policy

Introduction, Layout, & Content

According to the Ministry of Education website, P/PM 150 was announced in January 2010 and “took effect on September 1, 2011,” thus providing schools time to adjust to the policy. This is “the time they need to make the transition.” Having some time (approximately a year to adjust to the policy) was mentioned by a few supervisory officers. Within this time, they observed the removal of school deep-fryers from cafeterias and the integration of nutritious foods in vending machines. Moreover, many witnessed policy-compliant foods, such as baked chips, smaller cookies, and bottled water, being sold in vending machines. Some even observed schools renovate to include bottle filling fountains. However, many said that this transitional time was “insufficient.” Some officers also mentioned that their board nutrition policy is on their school board site. P/PM 150 (or its school board version)⁹³ was uploaded to the following

⁹² The seventeen school board sites represent the seventeen school boards that participated in this study. From the seventeen boards, twenty-four supervisory officers were recruited.

⁹³ Since many school boards slightly tweaked P/PM 150 to render it more accessible to staff and parents, the term “school board version” is used.

websites: the Ministry of Education and most of the school boards. Only one individual school site had a link to P/PM 150.

The nutrition policy on these sites is divided into sections and resembles P/PM 150. In some instances, only their layouts are different. For example, the Ministry’s policy is not colourful, but is comprised of words, which is reflected in many boards’ policies. The Ministry’s nutrition guide, however, is colourful and engaging, comprised of images, photos, and words, which is reflected in only a few school board nutrition policies. One school board incorporated a chart into its policy with various colours. These colours represent nutrition criteria for “Maximum Nutritional Value,” “Minimum Nutritional Value,” and “No Nutritional Value” food and beverages.

When introducing stakeholders to the nutrition policy, the Ministry and school board sites provided the rationale behind it: “Twenty-eight per cent of Ontario children between the ages of two and 17 are overweight or obese – putting them at risk of diseases including diabetes.”⁹⁴ Not only was the obesity/BMI pandemic mentioned, but the notion of “healthy body-healthy mind”:

This is part of a broader effort to develop healthier learning environments and improve student achievement since research (in the *Journal of School Health*) has shown that children who eat a healthy diet are more ready to learn and more likely to be successful in school.

The link between a healthy body and mind was also expressed on some individual school sites and by many supervisory officers. Some of these officers also articulated the policy’s goal(s), which is detailed on the Ministry site. The policy “will give our students healthier places to learn and help them perform better in school ... substantially reducing unhealthy food/beverages sold in schools.”

The Ministry and school boards not only provided the rationale, but detailed the rules, including the 80/20, selling of items, and ten special-event days. The former addresses fat, sugar, and sodium level content within food. For example, 80% of food being sold at a school “must include products with the highest levels of nutrients and lowest amounts of fat, sugar, and sodium.” Such items are: vegetables, whole grain breads, and fresh fruit. This is also known as

⁹⁴ One school resource (released in 2021) also mentioned obesity statistics.

the “Sell Most” category. The remaining 20% of food being sold include “slightly higher” amounts of sodium, sugar, and fat, such as bagels, cheese, etc. These items are within the “Sell Less” category. The last category is the “Not Permitted for Sale.” Regarding the selling of items, the nutrition policy only applies to food and beverages that are being sold, which is reflected in the supervisory officer interviews. More specifically, it applies to food and beverages being sold “in all venues on school property ... [and] at all events on school property.” Thus, the nutrition standards do not apply to lunches or snacks that students bring from home. Concerning the special-event days, “schools are allowed up to 10 ... days throughout the year, where they are exempt from the [nutrition] standards.” Some school board sites mentioned allowing principals (in consultation with the school council and students) to select “up to” ten exemption days, renders the nutrition policy “flexible.” Even though this is the case, “schools are still encouraged to sell items that meet the nutrition standards on special-event days,” one school board noted in their Nutrition Policy Brochure. A Southern Ontario school board added that these junk food days, whether they be used for fundraisers, sporting events, etc., will be communicated to the school community by school administrators. All these rules were mentioned by the supervisory officers.

Many fundraisers incorporating junk food were announced on school social media pages: “Support Pink Shirt Day by purchasing some yummy goodies [cupcakes, Rice Krispy Squares, etc.],” while another school announced, “Join the Christmas Sharing Cake Raffle.” There were photographs of gingerbread cookies, hot chocolate, Christmas cookies, doughnuts, pie, hotdogs, and cupcakes on schools’ social media pages as they advertised school fundraisers. Schools even sold cultural foods (such as samosas or bannock) in recognition of cultural holidays and celebrations. Some supervisory officers said that these types of cultural foods are not always policy compliant. Hence, cafeterias cannot provide them, but they can be sold during a school’s special-event day.

Resources & Tools

Like the Ministry site, most boards provided resources or links to P/PM 150. Some resources include, but are not limited to: school or board contact information; local health units’ or EatRight Ontario phone numbers and site links; parent workshops; school board links to social media pages (including Pinterest) that provide nutritious recipes; a nutrition tool for schools; a

quick reference guide about the nutrition guidelines; a parent council toolkit; a PIC (Parent Involvement Committee) handbook; and a parent resource guide coupled with a video, as well as other resource videos on nutrition and healthy hydration. One school board announced that the parent resource guide video was presented to parents during a local school registration night. Advertising or providing information to parents at school registration nights was mentioned by a few supervisory officers. Promoting the policy to parents and the community was also accomplished through a school community council handbook. There is a reminder within this handbook about P/PM 150 and its rule concerning the “selling” of food and beverages. Some officers also mentioned nutritious foods being offered at these types of parent-teacher events. This was confirmed by a school board in Southern Ontario. This same board, however, also announced that food and beverages being sold at “sporting events” must comply with P/PM 150’s nutrition standards, which was not observed by a superintendent in Northwestern Ontario.

Similar to what a few supervisory officers stated, the Ministry also “put out some material that the schools were able to use and augment.” On the Ministry site, there were sample newsletters. Newsletters were also on most school board and individual school websites. Many letters (announcing or describing a board’s nutrition policy) are dated October/November 2011 – in the genesis of P/PM 150’s implementation. They outline the policy’s rules, and mention that P/PM 150 is province- and board-wide. Other newsletters indicate when a draft of the board policy will be available for public review and comment. Although this is the case, school board and school newsletters relaying P/PM 150 related information have been released in 2014, 2016, and more recently, in 2021. Many of these newsletters articulate the types of special-event days selected by a school: Halloween, Easter, Mission Day, Christmas, Valentine’s Day, Popcorn days, etc. Agenda and committee minutes have also been posted on school board and school websites recently. In 2019, there was concern that a board’s nutrition policy was not being consistently implemented across the board. In an agenda from 2020, a parent complained that the food offered in their child’s school was unhealthy. In another school, a newsletter revealed the importance of parents reading recipes and preparing food with their child.

Communicating Related Procedures

Some board websites had an administrative procedure associated with the board policy. This procedure was mentioned by a couple of superintendents. One expressed its “robust” nature

compared to their board's nutrition policy/regulation. The administrative procedures on school board sites are "robust" as they detail all or many of the following: a board's nutrition policy (purpose, goals, rules, etc.); stakeholders' roles in relation to the policy; nutrition education; the monitoring process; workshops; nutrition related meetings; nutrition programming; pricing of food and beverages; advertising nutrition; food during a celebration; and the policy's cyclical review process. For the purposes of this chapter, a few of these points will be elaborated upon.

Regarding the roles associated with the policy, principals are responsible for disseminating and communicating to stakeholders (parents/guardians, students, and the community) about the nutrition policy through various means: newsletters, school council, parent council, or their school website. A Southern Ontario school board said that this communication must be done annually and will be measured through an annual survey, which reflects what a superintendent said in relation to their school board's auditing phase.

Principals are also responsible for providing information, resources, and other tools for understanding the policy. They must "provide guidelines and suggestions for foods to be served to students for lunches, snacks, and school celebrations," stated a school board. This same board also added that "schools may choose to develop additional guidelines in a school nutrition policy," which was confirmed by some supervisory officers. These officers claimed that there were other guidelines, rules, and initiatives: "skip the dish," and rules prohibiting students to leave campus or prohibiting them to bring take-out on school property. A few school websites confirmed these types of rules. Their codes of conduct or parent newsletters state that students are prohibited from ordering food from restaurants, bringing "fast-food" to school, or engaging in online delivery. Many other schools mentioned a hallway food and beverage policy in their code of conduct. This local-level policy disallows students to eat or drink in school hallways. Principals are also responsible for ensuring school compliance and for being role models as they support the policy, many boards claimed.

The administrative procedures also outline the community's roles: "The school, in cooperation with the parent/guardian and the community, has an important role to play in the development of positive attitudes toward nutrition and lifelong healthy eating habits." A Western Ontario school board said that community volunteers are helping educate students about the importance of good nutrition. They are also informing parents about nutrition programs and other nutrition related activities and events. Children, adolescents, and parents/guardians also

have a role and should be encouraged to “make nutritious food and beverage choices,” claimed a Southern Ontario school board. Moreover, food service providers, cafeteria managers, and vending machine operators are responsible for selling policy compliant food and beverages. One board added that cafeterias must supply nutritious foods that reflect cultural diversity and provide vegan and vegetarian options on a regular basis. Culturally diverse foods were not observed by many supervisory officers. Although this is the case, a school newsletter (released in 2017) mentioned its school’s community committee organizing a multi-cultural lunch that featured “tasty” African, Italian, and Philippino foods. Furthermore, another school invited parents and guardians (through a newsletter) to its multi-cultural night in its cafeteria. While another school announced that its cafeteria provided a “wide” food selection for staff and students. Other schools stated that their breakfast clubs offer a variety of “nutritious” breakfast foods. These breakfast club announcements were accompanied by photographs of scones, whole grain bread, and croissants. These sites also revealed schools offering fresh fruit, yogurt, waffles/bagels, cheese strings, granola bars, and fruit cups/juice boxes.

Furthermore, the administrative procedures detail the roles school staff have in implementing the nutrition policy. School staff must model nutritious behaviour, supporting the policy by providing healthy food and beverage choices. Moreover, they must incorporate nutrition into the curriculum and classroom activities when possible, which was confirmed by the supervisory officers. A school website revealed a teacher serving students Greek food in class in 2017. This announcement was coupled with photographs of a Greek salad, and one of rice, potatoes, and chicken. Another school said that the Mediterranean diet (comprised of Greek salad, etc.) is very close to adhering to all the nutrition requirements of the body. In another school, students created an advertisement for a healthy snack they invented or one that they already enjoy eating. Furthermore, this same school announced (in a newsletter dated 2021) that students in health and physical education courses have been learning about the impact of food and nutrition. They have also learned about the effect food has on health and wellness. In an Eastern Ontario school, grade 7 students cooked nutritious food, while a school’s social media page revealed a student completing a classroom project about solar energy and food; this student used solar energy to cook food. Within a Western Ontario school, a life skills/parenting class built gingerbread houses around Christmas time.

Many school and board sites claimed that one can incorporate nutrition into the curriculum when teaching a nutrition related course such as, Food and Nutrition (grade 9 or grade 10), Nutrition and Health (College and University courses), Food and Nutrition in France, Food and Culture, or Food and Healthy Living. Many school websites and social media pages promote these nutrition courses. A newsletter released in 2019 said that learning to prepare nutritious foods (such as apple pie, apple crisp, chicken noodle soup, etc.) in these courses is an important skill for students. A few schools mentioned that students within these courses/cooking classes prepare and sell their “nutritional food” at lunch, which was confirmed by some supervisory officers.

Many websites mentioned the Hospitality and Tourism course, which was confirmed by a few supervisory officers. Within this course, students study culinary techniques, the origins of foods, event planning, and tourism attractions. One school site announced an interactive workshop wherein a chef instructs students about culinary preparation, the presentation of food, and how to use contemporary kitchen equipment. In many instances, there were photographs on school social media pages of food students cooked and baked. These were often coupled with a message or announcement. For example, “[c]heck out these amazing Breads of the World that students in ... class made! Some talented and creative chefs that we have. Great job!” Other food announcements included: “[t]he class [made] Indigenous Fry bread Tacos”; “[a student] with her jerk chicken recipe for our cultural meal today in culinary class;” “Remember there will be free beef macaroni soup available at the entrance to the lunch areas tomorrow!”; and “Two days of perogy making.” These types of announcements were coupled with photographs of nutritious and less nutritious foods. The healthy foods are as follows: soup with chives, grocery bags full of vegetables, banana bread, whole wheat fajitas (the salsa and sour cream were in separate dishes), a plate of chicken, black beans, rice, and green beans, and a platter of fruit comprised of apples, bananas, clementines, and oranges. The less or unhealthy foods presented on social media pages are as follows: perogies, deep-fried bread, cakes, cinnamon buns, pancakes, cookies, pizza, white bread, a curry dish with few vegetables, a German Bratwurst dish with fries and no vegetables, and waffles with whipped cream and strawberries.

In relation to school nutrition courses, a few school board and school sites mentioned two textbooks associated with these courses: *Nutrition and Healthy Eating: An Introduction*, as well as *Nutrition and Health Eating: Choices, Practices and Patterns*. One school site reported the

following resources associated with courses within their Social Studies and World Studies departments: Cook's Illustrated (which has online recipe testing and demos) and Teach Nutrition Ontario.

One school board announced that there were nutrition related rooms in a particular secondary school. There were the Culinary Arts and Nutrition classrooms. In a newsletter from 2020, a school announced that they had a food room which will be "state of the art" for teaching and learning about nutrition and health. Another school site announced (in a parent newsletter) that their family studies and hospitality classes hosted a luncheon for seniors. A school website even provided a link to parents and the community about summer salad recipes. Incorporating nutrition and P/PM 150 related material into the curriculum is reflected in the supervisory officer interviews. Some superintendents also mentioned using non-food rewards, which is incorporated into many boards' administrative procedures.

In relation to offering food during a celebration, a few board sites stated that only policy compliant foods may be sold or even offered during classroom birthday parties, or other celebrations. Some school boards even indicated in their procedures that food and beverages from the "Not Permitted" category may not be served during staff meetings, which is confirmed by a few supervisory officers. It is also interesting to note that most of the Catholic secondary school boards incorporated God into their Administrative Procedures: "Schools are encouraged to recognize that ... the sharing or consumption of food is an opportunity for prayerful expressions of gratitude to our God."

P/PM 150 and Related Procedures:

The Review Process

The Ministry and some school board sites alluded to the nutrition policy and administrative procedures undergoing a review process, which is reflected in the interviews. The Ministry site reveals that P/PM 150 has not yet been amended and it is "effective until revoked or modified." In Central Ontario school boards, the policy has been amended in 2011, 2016, 2017, and 2018, while the administrative procedures have been reviewed in 2011, 2018, and 2021. In other boards across Ontario, there was mention of the policy and procedures being revised in 2021 or the policy projected to be reviewed in 2022. These review dates are congruous with what some superintendents expressed regarding their next revision date.

According to a school board, during the review process in 2016, discussions concerning the new Canada's Food Guide ensued. References to the new guide would have to be revised. A Southern Ontario board mentioned that "there were no recommended changes" to their nutrition policy as of 2018, while another board indicated (in 2019) that they "approved the revisions to the policy."⁹⁵

P/PM 150's Implementation

P/PM 150's implementation process was mentioned by the Ministry of Education, school boards, and some individual schools. This process includes: replacing existing nutrition guidelines/policies with P/PM 150; collaborating with the board of health; offering P/PM 150 training/workshops; and monitoring the policy.

Replace the Old and Communicate the New

As part of the policy's implementation, the Ministry claimed that existing school board policies or guidelines related to food and beverages sold in schools "must be in accordance with P/PM 150." All the school boards, that have uploaded their nutrition policies/guidelines to their sites, have abided by this. Moreover, as part of the implementation process, the Ministry asked school boards to "consult with their board of health to implement the nutrition standards." Communication and collaboration with the board of health is reflected in the supervisory officer interviews. A few superintendents mentioned nutritionists attending and leading some school board training sessions.

Stakeholder Training

The Ministry of Education website has interactive online modules (known as online training) for stakeholders who require more information on P/PM 150. Stakeholders can learn about the 80/20 rule and other specific rules/facts concerning the policy. They can learn by watching videos, reading about the policy, and clicking on options that reinforce effective implementation strategies. There are specific training modules for board members, elementary and secondary teachers, and a more generic one for other stakeholders. A workshop for parents and students was also announced. All these modules are supposed to "help in the successful implementation of the Ministry of Education's School Food and Beverage Policy."

⁹⁵ The school board does not provide details about the revisions.

Although these modules were not explicitly mentioned by supervisory officers, training (in the form of courses and superintendent-administrator discussions) were. A few officers said that their boards offer training sessions for new administrators. Moreover, some school sites supply safe food handling information available to students, staff, parents, and volunteers involved with food activities. Rather than offering courses, a school board mentioned a summer program providing young parents with the opportunity to learn about cooking, health, well-being, and nutrition. Although this is the case, most supervisory officers mentioned that there are no formal (in-person) training sessions. Individual schools and school board sites did not mention any in-person training sessions, except for that which was offered in the genesis of P/PM 150's implementation. For example, one Central Ontario school board indicated (in a school council newsletter) that parents had an opportunity to attend two workshops "of their choice," including one on "the new nutrition policy." Whereas parent council minutes (posted on a Southern Ontario school site) indicated that parents were able to attend wellness and nutrition workshops. A Western Ontario school site mentioned that a nurse discussed nutrition with its parent council.

Monitoring: A Facet of the Implementation Process

According to the Government of Ontario Ministry of Education website, school boards are responsible for monitoring its implementation, which is reflected in the supervisory officer interviews. Moreover, the site revealed that there are many forms and checklists for monitoring school compliance. Some of which include: "Venues, Programs and Events Assessment Tool," "Special Event Tracker," "School Board Tracking Sheet," "School Inventory of Food and Beverages Offered for Sale," and the "Letter of Compliance." Most superintendents alluded to these forms, especially the one tracking the ten special-event days. Although the Ministry site does not specifically provide a form entitled "special food day document (also known as the food and beverage planning and tracking form)," it provides two documents that resemble that which many of the supervisory officers described: "Venues, Programs and Events Assessment Tool," and the "Special Event Tracker" (see Appendix N). The former asks for an analysis date, the contact person, and whether this person is analysing a program, venue, or event. The contact person must then provide the title of the event. This is followed by a table in which every "product" (food and beverage offered for sale) must be listed, described, grouped, and

categorized based on P/PM 150's 80/20 rule. The "Special Event Tracker" is also comprised of a table; however, this one has ten rows, representing the ten special days. There are five columns in which are written: special event, date, lead staff/volunteer, students involved, and comment. There is also a place to write the school's name and school year on the form. There are no sections for a signature, which is contrary to what one supervisory officer mentioned.

Like what one officer expressed, the Ministry site has a "School Board Tracking Sheet." This form includes a table in which the following must be documented by a school board supervisory officer: school name, whether it is an elementary or secondary school, and whether it is complying. If a school is non-compliant, the school board supervisory officer must provide an explanation. Although a superintendent stated that this form had to be sent to the Ministry upon completion, there is no mention of this role/responsibility on the Ministry website, nor on any school board sites.

Many officers claimed that monitoring forms were completed and signed by either the principal or food service provider, which reflects what is asked in two forms: the "School Inventory of Food and Beverages Offered for Sale" and the "Letter of Compliance" (see Appendix E)⁹⁶. The former presents a table consisting of two columns and three main rows. The columns ask whether food and beverages are offered for sale in the venue, program, or event listed (the list is detailed in the rows). The columns also ask that the school completing the form list the "Provider" (if applicable). This form must be signed and dated by the principal, while the "Letter of Compliance" (a sample letter stating that the food supplier swears to comply) must be signed and dated by the food provider. Once completed, it must be sent to the school and viewed by the Implementation Committee or the principal. One school board said that this form is known as the "Catered Lunch Compliance" form which must be signed by the board's vendor. This was confirmed by the school board's facilitator. Whereas another school board indicated that their food service provider must complete and sign their compliance form which was adapted from the Ministry's site.

Upon viewing these forms, the Ministry of Education asks that these forms be discussed among a school, school board, and caterer: "School and school board representatives are

⁹⁶ Within Appendix E there is a third document entitled "School Assessment." Although this is a "monitoring" form, there is no place for a signature. Consequently, I omit this document from my discussion on monitoring forms that require a signature. In other words, I only extrapolate on two forms (that require signatures) within this section.

encouraged to meet as required with their caterer(s) to ensure compliance with the School Food and Beverage Policy” (School Food and Beverage Policy Resource Guide, 2010, p. 93). P/PM 150 related conversations are reflected in the supervisory officer interviews.

Promoting P/PM 150

The Ministry website provided samples/templates of newsletters and parent letters that schools may use when promoting P/PM 150. Many school board websites also highlight some of the newsletters that were distributed to parents. This is congruous with what some of the supervisory officers claimed. One officer, who was on the school board committee, said that the board provided promotional posters and mail messages to parents. Some school boards collaborated with local health units in 2010/2011 on posters, brochures, and other materials to promote P/PM 150. Advertising is also outlined in some of the boards’ administrative procedures, as one stated: “Only posters that portray nutritious food items should be displayed. Posters are to be visual and include positive messages that appeal to youth.” A Western Ontario school board announced in 2013 that products or services being advertised should promote healthy practices. School sites and social media pages across Ontario displayed this type of advertising. For example, a health and wellness poster indicated the benefits of eating healthily. There were also healthy eating tips on this promotional online poster. A school magazine advertised ways of being stress-free: one is to eat healthily and have a balanced diet. Other schools mentioned the following, “snack on brain food,” or “a healthy start to your day, to help your brain rev up for your exam!” The latter was coupled with a photograph of melons, strawberries, cantaloupe, grapes, bananas, and apples. Advertising through promotional posters is reflected in the interviews within this study.

Moreover, some supervisory officers mentioned nutritious promotions through other means, which board procedures also indicate: “Advertise daily nutritious specials over the morning announcements and on video and/or radio advertisements.” School boards also announced food fairs, school gardens, and school greenhouses. Individual school sites and media pages revealed schools having cooking clubs, cooking/baking competitions, school gardens, nutrition related field trips, food fairs (selling butter chicken, apple cake, and homemade quesadillas, to name a few), and a nutrition month. Regarding the latter, one school

said that registered dietitians across Canada were going to help students, staff, and parents discover the “potential” of food.

These nutrition related events and activities were accompanied by photographs of nutritious food (e.g., salads, stir fries, omelettes, and whole wheat tortillas with chicken and vegetables, to name a few). Other posters on social media pages promoted “meal prep” (how to prepare healthy meals and avoid extra trips to the grocery store). One school announced (in a 2018 newsletter) that students collected food rather than treats on Halloween. Another school announced the importance of having healthy celebratory events. For example, on a special occasion (such as a student’s birthday) teachers and students should celebrate with nutritious food.⁹⁷ According to this site, celebrating with healthy food results in healthy learning; students learn new food skills. Rather than promoting nutritious food, some school social media pages advertised less healthy or unhealthy food and beverages, such as a Starbucks’ drinks, Subway sandwiches, doughnuts, cinnamon buns, muffins, cookies, lollypops, pizza, Valentine’s Day chocolates, and tacos (with ground beef, cheese, sour cream and no vegetables). These photographs were coupled with messages to help promote what was being sold in the school every day of the week. For example, this school had “Take-Out Tuesday,” and “Muffin Monday,” while another school advertised a “Chicken Shawarma Day.” A couple of schools advertised a fast-food restaurant (Pita Factory or Pita Pit) on their social media pages.

P/PM 150: The Outcome

The Ministry of Education site also provided a quotation from a school board supervisory officer which is congruous with the interview data: “When our school board introduced nutrition standards in 2007, it was because we knew that a healthy diet would lead to more active and engaged students. The results have been outstanding.” A board facilitator from this same school board did not comment on the results related to a healthy diet and active students, but rather the negative and positive results associated with P/PM 150. Regarding P/PM 150’s negative impact, there was a huge decrease in the number of commissions from cafeteria sales. In terms of its positive impact, there were many nutrition programs in schools supplying students with nutritious breakfast, lunch, snacks. Many school board and individual school sites elaborated

⁹⁷ This site also provided examples of how to promote and serve healthy foods on Valentine’s Day, while ensuring that students are having fun.

upon P/PM 150's positive impact. Such positives included nutrition education and school-community partnerships.

Nutrition Education

P/PM 150 helped “reinforce the key concepts taught through the curriculum” as some school board nutrition policies and administrative procedures stated that nutrition education, based on the Canada's Food Guide, is part of the curriculum that students learn (Government of Ontario, Ministry of Education, 2010). The Canada Food Guide was also mentioned on some school sites. One school highlighted the importance of filling a quarter of one's plate with protein and the importance of consuming foods that are lower in saturated fats. While another school mentioned that the new Guide provides evidence-based dietary guidance. Nutrition education also appeared on one of the Literacy Tests. According to a school site, there was a question pertaining to dried fruit being a good food option for people with limited time within their busy schedules. There was also mention of planning ahead to have time to prepare nutritious meals and avoid consuming “junk” food. Another school site revealed its Literacy Test preparation question from 2015 concerning junk food. Nutrition education was also observed on another school's social media page – the Society for Neuroscience presented neuronutrition and the brain to students.

Moreover, part of students' nutrition education derives from school events and initiatives, as one board announced, “Tuesday: WildCat Cafe, featuring education through nutrition and interactive cooking.” Interactive cooking, or cooking fundraisers, were featured on many school social media pages. Whereas another board and a few school sites/social media pages announced having nutritional snack bins for students. There was also mention of a Feed the Meter Campaign fundraiser, Food for Learning Silent Auction, a Good Food Stand (featuring fresh, local produce), and a Hospitality Chicken Dinner fundraiser, offering dark meat chicken, a dinner roll, rice, and a dessert. One school even posted fundraising information about the importance of selling healthy, not junk food. The school concluded, saying, “we passionately believe that everyone deserves to eat healthily and live better.” Incorporating nutritional fundraisers (especially a feed the meter event) within a school culture was confirmed by supervisory officers.

The Partnerships Formed

Most school boards and individual school sites have information in the form of newsletters, school council or school board agendas, and PIC/staff handbooks revealing the partnerships P/PM 150 formed. “The Board recognizes its responsibilities to work with community partners to ensure that students have equitable access to high quality school-based nutrition programs.” Not only did this school board recognize this, but many others did also as another stated, “collaboration within the school community is necessary.” A school board in Northwestern Ontario also claimed:

The success of initiatives that seek to engage parents in their children’s education is often enhanced when additional partners are included. Community organizations can be valuable partners in programs such as parenting and health and nutrition.

Other boards claimed that their schools partnered with the community to offer free or reduced-priced breakfast, snack, and nutrition programs. These programs were mentioned by all the supervisory officers. Such nutrition programs include: the Food Sharing Project, Canadian Feed the Children Aboriginal Nutrition Program, Eat and Learn, Jumpstart Nutrition Program, Food for Thought, Eat Well to Excel, and Food for Learning Programs.⁹⁸ Concerning the latter, a school’s social media page advertised this program with photographs: an adult supplies students with apples and oranges, while another photograph captures a child eating an apple. A school site claimed that when their students are hungry, there is always food to eat. Some boards even outlined how and when to schedule snack and nutrition breaks. Many of these scheduled breaks are advertised on individual school sites. A few boards stated that their hot lunch and continental breakfast programs align with the nutrition policy and are facilitated by a “steering committee.” Although this is the case, a school’s social media page announced a hot lunch day, which was coupled with photographs of chips, pop, and hotdogs.

These breakfast and hot lunch programs are offered because P/PM 150 states: “School boards will encourage student nutrition programs, such as breakfast or snack programs, in all schools.” Some boards also offer these programs “in order to reduce the impact of poverty on academic achievement,” or as one school site indicated, to address food insecurities. Some

⁹⁸A school board claimed, “Food for Learning is a community partnership that is committed to enhancing classroom learning by supporting school nutrition programs.”

school boards have partnered with Student Nutrition Ontario to donate food items to families in their region, announced one school. Funds for these programs derive from special donations, grants⁹⁹, and school board budgets; however, they are most often from school fundraisers, as one school board indicated: “Update on the Food for Learning Student Benefit Auction which raised approximately \$14,000 for student nutrition programs.” Concerning special donations, a school board said that there is the “Now More than Ever” campaign. Other boards mentioned Kellogg’s, Tim Horton’s, and a local Legion donating money to some boards. The funds raised were often used to purchase groceries and equipment required to ensure that all students have opportunities to consume nutritious foods and beverages at school, claimed a school board. To aid school staff and volunteers in employing nutrition programs, “the Ministry of Children and Youth Services ... provided guidelines for student nutrition programs,” stated a school board.

School food providers, not only supply these breakfast, lunch, and snack programs with nutritious food, but supply school cafeterias with healthy foods and beverages, as was revealed by many school boards and school sites. One school said that its cafeteria offers a “full” menu and is operated by the school in partnership with an external food supplier. Its “full” menu consists of salads, subs, sandwiches, wraps, and hot selections, which are all policy compliant. Other cafeterias have pizza days or specials, which supply students with policy compliant pizzas, expressed the supervisory officers. There is no mention of the ingredients on school sites.

Concluding Comments

The Government of Ontario (Ministry of Education) and most school boards within this study uploaded P/PM 150 (or a school board version) to their websites. The policy was to be fully implemented in all school across Ontario by September 2011. Part of its implementation process was communicating it to stakeholders (including school staff, parents, and students) so that it could be easily comprehended. In so doing, school board supervisory officers slightly tweaked P/PM 150 to make it more accessible, adding visuals and colour to the memorandum. All school boards that uploaded it to their sites retained its content (such as its rationale and rules). They also provided resources and tools to help stakeholders understand the nutrition policy. Furthermore, administrative procedures associated with the nutrition policy were uploaded to some school board sites. The procedures’ “robust” nature includes (but is not

⁹⁹These can be local or government grants. One supervisory officer mentioned receiving a government grant.

limited to) a description of stakeholders' roles, nutrition education, and the types of food offered during in-class celebrations. The Ministry and some school boards also mentioned the nutrition policy and administrative procedures undergoing a review process. Concerning the policy's implementation, the Ministry revealed the importance of replacing existing nutrition guidelines/policies with P/PM 150. The process also involves the school boards collaborating with their boards of health, offering training/workshops, and monitoring the policy. Moreover, the websites described the promotional aspect of P/PM 150. This chapter concludes with the positive impacts of P/PM 150, including nutrition education and school-community partnerships.

Chapter 8: Discussion

“The tricky part is implementing a [policy] which is a great idea on the surface,” expressed a superintendent, which reflects comments in numerous studies (Deber, 2014; Nilsen, 2015; Springer et al., 2017, etc.). Implementing a policy (including education policy) is complex as numerous factors must be considered: those (stakeholders) being affected by the policy, stakeholder involvement, stakeholder communication, how the policy is communicated, other institutional policies, various contexts, the growing institutional system, the multidirectional and multidimensional aspect of an institution, and the way all these factors interact (Datnow & Park, 2009; Honig, 2006, 2009; O’Toole, 2000). This complexity has been illustrated in many frameworks, including Viennet and Pont’s Flexible and Actionable one.

Since Viennet and Pont’s (2017) implementation model was employed in this thesis to analyze the data, the framework guides the study’s discussion. Consequently, this chapter has been divided into four sections, representing the four determinants: *Smart Policy Design*, *Inclusive Stakeholder Engagement*, *Conducive Context*, and *Coherent Implementation Strategy*. Within these determinants are many facets.¹⁰⁰ The former (*Smart Policy Design*) concerns the logic, justification, and feasibility of policies, including P/PM 150. Since policy revisions are an aspect of a policy’s cycle (see Chapter 2 for more information), I discuss P/PM 150’s revisions within this determinant. The second determinant (*Inclusive Stakeholder Engagement*) addresses the responses, reactions, interests, capacity, and identification associated with P/PM 150. The third determinant (*Conducive Context*) pertains to an institution’s setting, the way a policy is complemented, and the particular societal trends affecting its implementation. The last determinant (*Coherent Implementation Strategy*) concerns task allocation, the policy’s objectives, tools, resources, and timing, as well as how it is monitored and communicated. Since Viennet and Pont’s (2017) barriers and facilitators exist among the four determinants,¹⁰¹ I explore P/PM 150’s strengths and hindrances within each section below.

¹⁰⁰ These facets are described within Chapter 2: Current Research; Chapter 3: Implementation: P/PM 150 & Other School Nutrition Policies; and Chapter 4: Study Rationale, Objectives, Research Questions, & Theory & Framework.

¹⁰¹ Each determinant typically comprises a number of individual barriers and facilitators, which are viewed as “independent variables that have an impact on implementation outcomes” (Viennet & Pont, 2017, p. 28).

Smart Policy Design

A policy's life cycle begins with the identification of a problem and its placement on the policy agenda (*agenda setting*). It then progresses to formulating a policy or policies (*policy formulation*), from which one is adopted (*policy adoption*). Subsequently, the adopted policy is implemented in its corresponding setting(s) (*implementation*). Finally, the impacts of the policy are evaluated (*evaluation*) (Knill & Tosun, 2017). "This last stage leads straight back to the first, indicating that the policy cycle is continuous and unending" (Knill & Tosun, 2017, p. 353). The process is therefore lengthy and often complex (Mason, 2016; Nilsen et al., 2013; Radford, 2006). This complexity is evident, beginning with the first determinant that Viennet and Pont (2017) discuss – *Smart Policy Design*. Within this determinant, there are a few constructs: logic; justification; and feasibility. These are detailed below, along with policy revision. The latter construct has been added since Viennet and Pont (2017) do not mention the revision of a policy within any of their framework's determinants. Moreover, revisions are an integral part of a policy's life-cycle and this dimension was gleaned from the study's data (Knill & Tosun, 2017).

Logic & Justification

When designing a policy, it is logical and reasonable to include stakeholders (educational researchers, professional designers, and implementers) in the process (Pinto, 2012; Springer et al., 2017). Studies reveal that perceptions of whether the intervention was internally or externally developed can influence the success of the intervention (Greenhalgh et al., 2004; Lucarelli et al., 2014; Roberts et al., 2016). Two supervisory officers claimed that representatives from the Ministry of Education and from other educational and/or health related organizations who were "advocates" and/or "stakeholders" partook in P/PM 150's design. Springer et al. (2017) claim that these stakeholders are known as outsiders as they are not directly affected by P/PM 150's implementation. A school board facilitator who partook in P/PM 150's design said that the design team was diverse and included school staff, which is bolstered by T. Jardin – a representative of the Government of Ontario, Ministry of Education (personal communication, February 25, 2021). School staff (known as insiders) helped design P/PM 150, which is congruous with Pinto (2012) and Springer et al. (2017). Conversely, a supervisory officer speculated that most of the designers specialized in policy design and were not necessarily implementers. Literature suggests that if an intervention is driven by an external

source (top-down approach), with little input from internal stakeholders, the intervention may be less successful (Damschroder et al., 2009; Helfreich et al., 2007; MacLellan et. al., 2009). Thus, solely employing external (or outside) people to design a policy is not a promising or best practice (Pinto, 2012; Public Health Agency of Canada, 2021). Moreover, all the supervisory officers, except one (a school board facilitator), did not partake in the initial design of P/PM 150. Perhaps the reason most supervisory officers did not partake in the design concerns their educational roles at the time: they were principals or teachers at the time of its development, not supervisory officers. It is likely that the officers who participated in the initial design of P/PM 150 retired prior to the policy's tenth anniversary. This situation was alluded to by a few superintendents.

Concerning P/PM 150's logistics, the Ministry of Education site outlined the reason for the policy, its objectives/goals, and the tools used to help reach them (Viennet & Pont, 2017). Since one objective/goal of P/PM 150 is to help address the increasing BMI rates in Ontario, by ensuring schools can no longer sell unhealthy food to students, would it not be logical for the policy to also restrict the "serving" (and not just the "selling") aspect within schools too? This was recommended by one supervisory officer and confirmed by the Auditor General (Office of the Auditor General, 2015). When the Auditor General visited this particular school board, the auditors recommended that the board set goals pertaining to healthy eating environments. One goal was to ensure that students had healthy lunches and that they were not given unhealthy foods and beverages at school.

Viennet and Pont (2017) claim that a policy must also be justified and outline and/or provide the "tools" for stakeholders. Online content revealed P/PM 150 tools, such as a resource guide and a PIC (Parent Involvement Committee) handbook. The board officials also mentioned tools which are detailed later in this chapter. Although most school board officials did not partake in the initial design of P/PM 150, many (who have P/PM 150 as part of their portfolio) are responsible for viewing what the Ministry of Education disseminates to them. They viewed P/PM 150's justification, goals, and tools, among other information. They then altered P/PM 150 so that it could be communicated clearly to school administrators, teachers, parents, etc. These alterations were to help implementers understand more clearly the reason behind its execution, which strengthens the implementation process (Viennet & Pont, 2017). Moreover,

these alterations were made to clarify or emphasize goals and rules to prevent misunderstandings and misinterpretations (Viennet & Pont, 2017).

Although this is the case, some supervisory officers said that parents and school staff misunderstood P/PM 150. This is congruous with other studies on nutrition policy, including P/PM 150 (Gillies et al., 2020; McKenna, 2003; Reeve et al., 2018). It seems that misunderstandings and misinformation exist as a food service provider did not fully comply with the policy's rules and a superintendent had misconceptions about those involved in P/PM 150's design. Food providers misinterpreting P/PM 150 is reflected in Chaleunsouk's (2012) study:

Since they [food providers] are also interested in the profitability of food sales, they had conveniently interpreted the policy's 80/20 rule to allow either a specifically labelled pop or merely a limited amount of pop to be sold in school vending machines. (p. 107)

Misinterpretations and misunderstandings can result in improper implementation, which is evident with P/PM 150 (MacLellan et al., 2010; Valaitis, 2015). There were also misunderstandings related to target groups (specifically staff roles). Perhaps these misunderstandings existed as many of the nutrition policies uploaded to school board sites did not detail stakeholders' roles. Rather, the administrative procedures extrapolated upon their roles. Most of the procedures indicated the extent to which school staff (including principals) must model healthy eating. Viennet and Pont (2017) claim, "[l]abelling targets often comes down to creating a group that was not consciously perceived as such ... for reform implementation to be successful, policy goals and targets must be clear and concrete" (p. 29).

Feasibility

Since P/PM 150 concerns the selling of healthy foods at school, this policy has affected schools in remote (rural) areas – such as those in Northern Ontario – differently from those within other Ontario regions. Stakeholders within remote (Indigenous) Northern communities have huge food insecurities as the cost of food (both nutritious and non-nutritious) is high due to the associated costs of shipping food and beverages. This food insecurity is reflected in other studies (Doming et al., 2021; Parker et al., 2019; Skinner et al., 2013). Due to high-priced or lack of nutritious food, it is infeasible for all these Northern Indigenous schools to fully comply. This warrants further exploration of all school boards within Northern and Northwestern Ontario.

What is the role of potential pricing strategies and food subsidies within these Northern communities? It is interesting to note that only one superintendent mentioned that their First Nation community supported the students' eating by offering school produce at a discounted price. This communal Indigenous way of being (i.e., those in the community helping others) is reflected in other studies concerning First Nations communities (Kenyon & Hanson, 2012; Poonwassie & Charter, 2001, 2005).

P/PM 150 may not only be infeasible for Northern Ontario schools, but also for those in Southern, Western, and Eastern Ontario. Aguinis and Kraiger (2009) state that yearly training and development activities can produce important benefits for stakeholders. The supervisory officers said that yearly training or informational sessions for school staff and parents across Ontario is infeasible as there is a plethora of education policies that require attention. Thomas (2021) argues that educators are already pushed to the limit and are experiencing "too much" work. Consequently, educators should "seek to decrease, wherever possible, the social complexity ... extend grace to ourselves." Educators need to prioritize their tasks, which many supervisory officers agreed upon. Although there may not be enough time to prioritize all educational policies, the Ministry of Education supplies online P/PM 150 training modules. These modules enable school staff and parents to learn about the policy at their own leisure (Government of Ontario, Ministry of Education, 2018). These modules may help school staff and parents understand P/PM 150, and, in turn, remind students about it as Subedi (2020) claims, "when teachers are fully trained and prepared for their jobs, they are able to positively affect student learning and life outcomes" (p. 61).

Supervisory officers from schools in Ontario also mentioned the effects P/PM 150 had on catering companies. In many instances, these companies could not supply students with inexpensive nutritious food. Asking small catering companies to provide students with healthy, but inexpensive food, is infeasible as the price of nutritious food is high. How can food service providers make a profit if they are selling low-priced nutritious food? Chaleunsouk (2012) and Valaitis (2015) claim that many catering businesses cannot make a profit with inexpensive food and thus, they resign from a school/school board. CTV News (2011) reports that an Ottawa-area high school closed its cafeteria because its food service provider refused to make meals. The provider refused due to the nutrition standards and the lack of profitability in making healthier foods. Moreover, the Toronto District School Board (TDSB) estimated a loss of \$1.2 million,

while the Essex County District School Board (ECDSB) in Windsor lost \$95,000 in revenue (Kretzel, 2012; Taylor et al., 2011). Many studies (Agron et al., 2010; Orava, 2016; Suarez-Balcazar et al., 2007, etc.) indicate that a lack of revenue often impedes the successful execution of nutrition policies. This revenue loss has caused many food service providers to renegotiate their commissions and question the sustainability and viability of their business in school boards (Kretzel, 2012). Certain food companies express their frustrations with these types of food policies by actively opposing nutrition-related memoranda (Nestle, 2015).

Revisions

Revisions are part of a policy's life-cycle (Hill & Hupe, 2002; Knill & Tosun, 2017; Sabatier & Mazmanian, 1980). The Government of Ontario (Ministry of Education) was scheduled to revise P/PM 150 in 2020; however, due to the COVID-19 pandemic, they had to postpone its revision process (T. Jardin personal communication, August 26, 2021). Although this is the case, school board officials have been reviewing their nutrition policies, which are based on P/PM 150. This is corroborated by online content. Websites also revealed school boards replacing old food policies with P/PM 150. According to the Ontario Human Rights Commission (2021), "school boards in Ontario are under a legal obligation to adopt and revise policies, guidelines and procedures." In many instances a policy (including P/PM 150) is reviewed on a regular basis (e.g., every two, three, five or six years) (Government of Ontario, Ministry of Education, 2017; Ottawa Catholic School Board, 2020; University of Auckland, 2021). Gray (2018) and the University of Auckland (2021) state that this renewal process ensures that policies are consistent, effective, current, and reflect best practices.

For policies to reflect "best practices," KMb (knowledge mobilization) must be employed and communicated effectively. It seems that KMb was employed (to some extent) when designing and implementing P/PM 150 as many stakeholders (researchers, knowledge brokers, and knowledge users within and beyond academia) collaborated. When designing the policy, the Ministry of Education interacted with the Ministry of Health, the Ministry of Children, Community and Social Services, the Ministry of Agriculture, Food and Rural Affairs, and the Nutrition Standards for Schools Committee (comprised of school administrators and representatives from the health and food industry sectors) (T. Jardin personal communication, February 25, 2021). One supervisory officer who was part of this process mentioned there was

reciprocity and an exchange of ideas among the design team members. In the genesis of P/PM 150's execution, KMb transpired (to an extent) as practitioners shared knowledge of P/PM 150's barriers and facilitators to colleagues at the school and school board levels. Many of these ideas were also shared with researchers (Chaleunsouk, 2012; Valaitis et al., 2013; Vine et al., 2014). More recent findings within Orava's (2016) study were returned to schools (through the dissemination of KT feedback reports) to strengthen approaches to comprehensive school health and address barriers to the policy's implementation. Although KMb seems to exist in relation to P/PM 150, there appears to be little reciprocal and complementary flow and uptake of research knowledge between all these stakeholders as most supervisory officers claimed that P/PM 150 has not been discussed in detail since its implementation. Hence, there needs to be an evaluation process encouraging the flow and uptake of research knowledge among stakeholders. This evaluation process will also remind stakeholders of a policy's relevance and existence (Alberta Health Services, 2016). Reminding stakeholders of a policy's existence was also expressed by a few superintendents concerning P/PM 150. Furthermore, the need to update P/PM 150 to include the Canada Food Guide was gleaned from the study's data. This is also reflected in S. Vranas personal communication (February 10, 2021).

Inclusive Stakeholder Engagement

This determinant concerns all the stakeholders involved in the design and/or implementation of P/PM 150. Viennet and Pont (2017) claim that stakeholders' characteristics and belief systems affect implementation. Consequently, stakeholders' responses, reactions, beliefs, interests, and motivations, are discussed first. This discussion is then followed by stakeholders' capacities to execute the policy. Finally, their identity (specifically in relation to their position and role in the education sector) is delineated.

Responses & Reactions

When the supervisory officers were introduced to the policy, they thought that the idea of a nutrition policy (specifically P/PM 150) was "good" and beneficial, which is similarly expressed by stakeholders in Dick (2020), Orava (2016), and Valaitis (2015). Many superintendents noted that the policy promoted healthy eating which was known to have positive outcomes on student learning. Vine and Elliott (2013) corroborate this: participants addressed linkages between hunger, accessibility to healthy foods, and student learning.

Not only did supervisory officers react positively to the policy, but also many staff members, cafeteria managers, and food service providers. The supervisory officers said that many staff members role modelled nutritious behaviour by trying to eat healthily in front of students and integrate P/PM 150 in the curriculum. Vine and Elliott (2013) state that role modeling healthy behaviour is important; when teachers “buy-in” to the policy, they develop and maintain a supportive culture for healthy eating. Consequently, they help strengthen the case for comprehensive approaches to policy implementation. Even when school administrators react positively to P/PM 150 (promoting, educating, and communicating the policy to stakeholders), they strengthen the implementation process (Murray et al., 2017).

School staff, cafeteria managers, and food service providers reacted in such a way that breakfast lunch programs, cafeteria food services, and catering companies’ menus were revised to include more nutritious items (Aramark, 2021; Orava et al., 2017; Valaitis et al., 2013). Aramark (2021) not only mentions supplying schools with revised menus, but with ones that are innovative; to entice students, the options and meal names must be unique. Within this study, a few supervisory officers mentioned students helping plan cafeteria menu options, which is also reflected in Caspi et al. (2015) and MacLellan et al. (2010). Supervisory officers also said that the revised menus limited food choices (MacLellan et al., 2010; Taylor et al., 2011). Moreover, these menus did not always accommodate culturally diverse foods (Murray et al., 2017). Within this study, many schools failed to accommodate students’ food preferences and make healthier alternatives more appealing for them, resulting in poor policy execution. To accommodate students’ preferences, small food companies or local chefs became creative and innovative. Valaitis (2015) claims that smaller companies tend to care more about nutritious food, make their food from scratch, and cater to their audience more than larger businesses. Within this study, some schools employing small businesses incorporated student-ideas concerning cafeteria food options. This is similarly reflected in Chaleunsouk’s (2012) study wherein some elementary teachers and students were able to supply the principal with food ideas and options.

Although many stakeholders reacted positively to the policy, some did not. A few staff members became frustrated with the policy (especially the 80/20 rule) as it restricted what one could sell as a fundraiser, thus affecting school revenues. This frustration is replicated in Agron et al. (2010) and Valaitis (2015). Several parents did not comply as they believed that the policy infringed on their child’s right to consume unhealthy food (Valaitis, 2015). Consequently,

parents continue providing their children with unhealthy foods or enable them to purchase these types of foods. Valaitis et al. (2013) say that parents who do not teach or model healthy eating are contributing to the obesity epidemic. Another reason for this negative reaction to P/PM 150 concerns traditions. Some parents were so accustomed to school traditions related to unhealthy food that P/PM 150's implementation frustrated them. Suarez-Balcazar et al. (2007) claim that resistance to altering the status quo (e.g., traditions) may emerge when implementing food policies.

Resistance from staff members also existed in the genesis of its execution and remains to this day. This is reflected in many studies on nutrition policies, including P/PM 150 (Chaleunsouk, 2012; Dick, 2020; Valaitis, 2015, etc.). Staff members found “loopholes” pertaining to the 80/20 rule, monitoring, and fundraising/school events. They sought loopholes to such an extent that some principals did not always abide by the ten-event day rule. This is similarly reflected in Sánchez et al.'s (2014) study. They describe stakeholders (including administrators) not always abiding by their policy's fundraising rules. Finding loopholes is common among people resistant to change (Dick, 2020). If policy enforcement is not well defined in a memorandum, stakeholders will find ways to continue consuming unhealthy food at school or selling non-compliant food (Dick, 2020). Resisting change derives from a fear of the unknown/unfamiliar which is common behaviour among human beings (Downs et al., 2012).

Many students also reacted adversely to the policy (Orava, 2016; Valaitis, 2015; Vine & Elliott, 2013). They left school campus to eat elsewhere as the cost was too high or the food was not that palatable. Negative consequences on the price and taste of food were reported in other nutrition policy research (Dick, 2020; Gray, 2015; MacLellan et al., 2010). For this reason, Folta et al. (2018) claim that it is important to present food in such a way that students can relate to it, as well as develop taglines and slogans for particular food selections. It is important to entice students to eat healthy foods by using branding¹⁰² tactics restaurants use (Folta et al., 2018). Research suggests that student food behaviours may be heavily influenced by restaurants, thus affecting policy implementation (Briefel et al., 2013; Coleman et al., 2012; Mendelson, et al., 2007). Superintendents within this study alluded to this. They specifically mentioned the lack of

¹⁰² Branding tactics are techniques used by restaurants to entice children. Such tactics include: associating food with familiar characters, song, fun, and humour (Folta et al., 2018).

control over students' purchasing behaviour off school property, which challenged the overall goals of the policy.

Beliefs, Interests, & Motivations

Implementation research suggests that for individuals to perceive an advantage to the intervention, they must believe that it will work, and that the policy will lead to its intended impacts (Damschroder et al., 2009; Greenhalgh, et al., 2004; Viennet & Pont, 2017). All the supervisory officers support and believe in P/PM 150. This is likely due to the policy's clear goals and justification as many officers said that obesity rates have increased with time and should be addressed (Active Healthy Kids Canada, 2014; Dietitians of Canada, 2004a; Story et al., 2002, 2009). If a policy is clearly justified and people understand and agree with its justification, they will be more inclined to support it (Viennet & Pont, 2017). Furthermore, literature suggests that stakeholders might be more accepting of a new policy if they feel that the current evidence (whether research-based, or clinically-based) supports the reasoning behind implementation (Masse et al., 2013; Damschroder et al., 2009; MacLellan, et al., 2009). Many supervisory officers agree that it is important to promote healthy eating – a component of P/PM 150. This belief is congruous with what principals said in Chaleunsouk's (2012) study on P/PM 150. It is also important to note that only the supervisory officers who are advocates of the policy, would likely volunteer (take time from their busy schedules) to discuss P/PM 150 with me.

Not only do supervisory officers believe and support the policy, but so do many other stakeholders (e.g., school staff, parents, students, and school boards in general). Most superintendents said that principals are monitoring P/PM 150 and being nutritionally involved at the school. This type of interest from principals is depicted in other studies (Orava, 2016; Roberts et al., 2015; Valaitis, 2015). Roberts and colleagues (2015) describe APPLE (the Alberta Project Promoting Active Living and Healthy Eating in schools) and the ways school principals were advocates of school change. They mention how principals provided navigation, held stakeholders accountable for compliance, and continuously supported the project.

Other school staff also expressed interest in P/PM 150. An EA's diabetic condition motivated her to believe in and support the policy. A change in health may encourage someone to alter their belief system and ultimately, their behaviour (LaMorte, 2019). This is also

congruous with other studies on behavioural health theories (Cook, 2021; Institute of Medicine, 2001; Nooriani et al., 2019). Another reason school staff follow P/PM 150 is because it is considered a “thread” woven into the fabric of schools – stakeholders know about it and follow it. Subconsciously following rules/memoranda is replicated in Gadiraju (2016) and Wagner (1997). During childhood, people develop a belief system and habits. Once formed, these beliefs are stored and rarely questioned (Rees, 2021). A supervisory officer alluded to this concept when describing a healthy student mind-shift; when children are educated in and offered healthy food, they are more inclined to eat it as adolescents and adults.

Many supervisory officers within this study said that parents and students also subconsciously follow P/PM 150. Moreover, a parent council is involved to such an extent that it raises money to pay the school chef’s salary. Many parents also said that P/PM 150 is “better” for their child’s health as it encourages healthy eating. Parent interest and involvement in nutrition policies (including P/PM 150) are discussed in other studies (Gillies et al., 2020; MacLellan et al., 2010; Valaitis, 2015). Gray (2015) says that students know they should eat healthily; however, a lack of knowledge about how to eat properly deters them from so doing. This lack of knowledge was not mentioned by the supervisory officers within this study – only the fact that students continued eating unhealthy foods. A supervisory officer speculated that students purchase food elsewhere because they prefer unhealthy food flavours. Unhealthy food preferences are congruous with Jensen et al. (2012), Valaitis et al (2013), and Vine et al. (2014). Conversely, First Nation students within Alberta schools preferred the taste of policy compliant nutritious food (Gillies et al., 2018). Selecting healthy foods (e.g., apples) over unhealthy or less nutritious foods (e.g., granola bars) was mentioned by a couple of superintendents.

McIsaac et al. (2013) claim that the execution of a school nutrition policy is often successful when school boards approve and support the policy. Orava (2016) concurs, adding that many school boards believe and support nutrition policy. From these boards, there may be a “champion.” A champion is an individual or an organization with a personal passion for stimulating action and sustaining momentum by encouraging other school staff to participate and believe in CSH (Comprehensive School Health) initiatives (Durlak & DuPre, 2008; Lee et al., 2006; MacLellan et al., 2009). These champions are also key drivers for change (Deschesnes et al., 2003; Downs et al., 2012; Greaney et al., 2014). Even though all the school boards (within this study) disseminated P/PM 150 to schools, one is considered a champion as it encouraged

healthy eating prior to P/PM 150's implementation. It was a driver for change before the Government of Ontario (Ministry of Education) decided to implement a mandatory food and beverage policy for all Ontario public schools. Moreover, its website has a plethora of nutrition-related content, and it is one of the only school boards to have had at least four revisions of their nutrition policy. Furthermore, its administrative procedure is the most detailed when compared to other board administrative procedures.

This “champion”-like behaviour is also evident among a couple of superintendents and food service providers. Two superintendents within rural communities have and continue to work progressively to ensure that their school(s) abide by the memorandum. For example, they both addressed the barrier (lost revenue) by creating or renovating a cafeteria wherein school staff or students prepare meals for students. In a study conducted by Downs and colleagues (2012), researchers sought to identify barriers to the adoption of the *Alberta Nutrition Guidelines for Children and Youth*. They discovered that many schools encountered barriers to policy implementation, although those with a school champion showed resilience (Downs et al., 2012). This was especially true for rural schools that required additional financial assistance, which the champion was able to address and achieve (Downs et al., 2012). Another example of champions within this study concerns school chefs. These stakeholders were quite passionate about creating healthy meals which encouraged students to purchase food from the cafeteria. Consequently, these cafeterias remained open, while others closed. Kretzel (2012) describes how lost revenue caused cafeteria closures: “Ontario’s healthy food policies are proving unpopular with students and taking their toll on school board coffers, with Ottawa and Toronto schools both reporting million-dollar drop in cafeterias sales.” These closures were in urban, suburban, and rural areas (Chaleunsouk & Kutsyuruba, 2014; CTV News, 2011a; Rushowy, 2012), which was mentioned by the supervisory officers.

Although school boards, supervisory officers, and other stakeholders believe in P/PM 150 and support it, it is interesting to note that one supervisory officer does not believe that P/PM 150 has made a “dent” in the childhood obesity epidemic. Conversely, studies (Bleich et al., 2013; Ickes et al., 2014; Habib-Mourad et al., 2020) indicate that there is a correlation between nutrition policies, programs, and positive impacts on student BMI (Body Mass Index). Although there is a correlation between policies, programs, and BMI, one does not immediately see these results; it takes decades before observing changes in obesity rates (Hruby & Hu, 2014). Changes

in child food intake, however, are more likely to be observed in less time (Decosta et al., 2017). Moreover, changes to chronic diseases (such as obesity) require a layering of multiple policies to effect change rather than one policy (e.g., P/PM 150) (Gearing & Anderson, 2014).

It seems that many supervisory officers are motivated to implement P/PM 150. However, are they motivated enough? Competing interests and priorities often affect how they and school administrators monitor the policy, which is reflected in Chaleunsouk (2012), Mosack (2010), and Winnail and Bartee (2002). The penultimate study reveals school boards prioritizing curriculum and test preparation over health initiatives. In a study concerning superintendents' top school priorities, financial related issues/policies were mentioned, among academic priorities; health initiatives were low on the priority list. Chaleunsouk (2012) reveals bullying, self-confidence, and mental health issues as school priorities. Competing priorities also affect how principals manage policies. Walker (2020) says, "school principals are experiencing work-related stress and anxiety as a result of work intensification" (p. 467). Principals are stressed because there are too many school-related issues and memoranda to juggle. Due to their work intensification, not all school-related problems and policies can be properly addressed. Some superintendents within this study confirmed these factors, concluding that P/PM 150 is not a high priority.

Many supervisory officers (within this study) mentioned that they would likely be more supportive of it, if a more suitable intervention could be implemented instead, which is reflected in Dick (2020) and Valaitis (2015). Within Valaitis' (2015) study, participants felt that focusing on school food (through P/PM 150) was insufficient. They reported concerns that physical activity was not addressed by P/PM 150, nor did the policy impact other environments outside of school (home and community). All of this limited the perceived effectiveness of the policy. Supervisory officers within my study similarly reported the need for a more holistic (broad based) P/PM 150 to address student wellness (i.e., their physical, mental, and emotional wellbeing).

Although this is the case, it is interesting to note that two supervisory officers from the same Ontario region observed the same food supplier either being disinterested or unmotivated to comply. Viennet and Pont (2017) claim that when a stakeholder believes in a policy, they often support it; however, if they are disinterested in any aspects of it, they may "arbitrate and decide which policy elements and tools to favour in the implementation process" (p. 32). This is exactly what transpired with a food service provider. A couple of superintendents observed the

same food provider (an outside school company)¹⁰³ resisting full compliance. This company decided to establish their own ten “Special Event Days” and serve students non-compliant foods and beverages. Perhaps the company’s resistance derived from its profit mentality.

Chaleunsouk’s (2012) study on P/PM 150 alludes to this mentality when describing food service providers’ resistance. Moreover, when large external companies focus on bottom-line outcomes¹⁰⁴ (i.e., are motivated to make money), “employees may adopt self-interest cognitions (i.e., a cognitive state of self-interest) that instigate customer-directed unethical conduct” (Babalola et al., 2020p. 19). Employees may lie, cheat, and be “shifty,” which is congruous with what some supervisory officers experienced. Smaller, local, or internal food service providers seem to be more interested in supplying good quality, palatable food, and less into profits (Arend, 2013; Fooda, 2021), which is reflected in this study; the large food service provider (Kramer¹⁰⁵) resisted full compliance while chefs and many students supplying food, did not.

Capacity

Viennet and Pont (2017) describe this facet as the “relative power ... measured by the actors’ [stakeholders’] resources (such as prestige, connections, individual attributes) ... to affect a given policy” (p. 33). Although many supervisory officers used their resources to implement P/PM 150, two superintendents within this study used their power in unique ways. These superintendents in Northern Ontario regions formulated partnerships with funding and/or food organizations. Developing partnerships with external organizations in a policy’s implementation process is congruous with Honig (2009b). Within my study, superintendents also employed their power and resources to build cafeteria spaces. One superintendent even volunteered to prepare food for students. Research suggests that when stakeholders are dedicated and employ their leadership skills to implement a policy, they can significantly contribute to effective implementation (Cheung & Man Wong, 2012).

School board superintendents also employed their authoritative roles in disseminating P/PM 150’s rules and regulations to principals. According to Dick (2020), when administrators,

¹⁰³ External food companies are often large and hired by a school board, whereas internal food suppliers are small local businesses and hired or provided by a school. Food suppliers that are hired are paid by the school/community while those that are provided by the school are volunteers/students.

¹⁰⁴ Bottom-Line Outcomes (BLMs) is a term used to describe a business that solely focuses on bottom-line outcomes (often profits) to the exclusion of other considerations (Babalola et al., 2020). This can result in both dysfunctional and beneficial organizational outcomes.

¹⁰⁵ This is a pseudonym.

and the Ministries of Education and Health disseminate information about a policy and its benefits in the form of PowerPoint presentations, the policy will likely be more effective. Administrators can even employ their leadership-capacity to organize information sessions for staff and students. To help engage them, one can utilize music (Dick, 2020).

Teachers also used their leadership skills and authoritative positions to teach students about healthy eating, as is reflected in research (Chaleunsouk, 2012; Dick, 2020; Orava, 2016). They had to lead by example – a pedagogical tool employed by “great education leaders,” expressed Lynch (2020). He continues saying that “great” educators are those who *always* lead by example. In so doing, they encourage others to follow their positive example and “things get done.” Although this is the case, some staff members are poor role models as they continue eating unhealthy foods at school. This is congruous with Orava’s (2016) study; a school representative thought that teachers modeling healthy eating was not relevant, nor feasible, since staff did not eat lunch with students. Perhaps poor role modeling was another barrier to successful implementation. For this reason, it is important that all stakeholders involved believe in and support the policy (Viennet & Pont, 2017). Such support was demonstrated by a superintendent when they were a principal. They used their leadership role (serving food) to help the cafeteria managers provide students with policy compliant food. Principals are leaders and have the power to facilitate or restrict the adoption, execution, and sustainability of CSH (Comprehensive School Health) initiatives (Fullan, 1992; Hallinger, 1996; Storey, 2013). In this case, this principal used their power to facilitate the implementation of P/PM 150.

Identification

Multiple stakeholders, whether they be formal policy makers, providers involved to deliver the effective service, constituency groups, recipients and consumers of the memorandum, or policy evaluators, they have the power to influence education policy (Viennet & Pont, 2017). Within this study, the government of Canada, Ontario’s Ministry of Health, Ministry of Education, school board supervisory officers, administrators, other school staff, students, parents, food service providers, and the community, all played a role in designing and/or implementing P/PM 150. Those involved in designing the policy were both insiders (supervisory officers, administrators, school staff) and outsiders (Ministry of Education, Ministry of Health, Ministry of Children, Community and Social Services, Ministry of Agriculture, Food and Rural Affairs,

and The Nutrition Standards for Schools Committee) (M. Bédard, personal communication, February 25, 2021; Pinto, 2012; Springer et al., 2017). Many designers from the education sector were responsible for disseminating and discussing it with their colleagues. This transpired at meetings and training sessions. School staff within other studies (Agron et al., 2010; Chaleunsouk, 2012; Valaitis, 2015) confirm these informational and training sessions. Meetings and training sessions aid in the successful implementation of policies (Barber, 2007; OECD, 2010).

These meetings helped inform stakeholders (specifically school board supervisory officers, school administrators, teachers, and food service providers) about the implementation process and their roles within. Supervisory officers and school administrators were identified by the participants within this study and the Ministry of Education (2010) as the ones to hold schools accountable. As a principal, many supervisory officers stated that their role was not to “police” the food students brought from home nor from fast-food restaurants, nor the food offered (not sold) to students at school, which is reflected in Chaleunsouk’s (2012) study. Many principals within this study claimed that it was not their job to be the “nutrition police.” Their monitoring roles are discussed in more detail below (within the *Coherent Implementation Strategy* determinant).

School staff were identified as the ones to encourage and influence student-compliance.¹⁰⁶ This is confirmed by many administrative procedures on school board websites. Food service providers had to comply with the policy by selling nutritious foods and beverages to students (Government of Ontario, Ministry of Education, 2010). They also had to complete forms.¹⁰⁷ Moreover, students and parents influenced P/PM 150 outcomes. Parents on school regional councils and parent involvement committees became aware of their roles in relation to P/PM 150’s execution (e.g., monitoring, promoting, organizing nutrition events, etc.). Contrary to Murray et al.’s (2017) study, there were no uncertainties about their roles in P/PM 150’s execution.

Furthermore, the Canadian government played a role in P/PM 150’s implementation. The government provided grants to help support the policy’s execution. Within a Norwegian study, the Directorate of Education and Training (a government agency responsible for

¹⁰⁶ How they did this is detailed throughout the chapter (e.g., role modeling, curriculum integration, etc.)

¹⁰⁷ Their roles are detailed throughout this chapter.

implementing education policies) also provided financial¹⁰⁸ support to municipalities and counties (Hopfeneck et al., 2015). Community members may also have a role in policy outcomes, whether positive or negative (Fullan, 2015; Honig, 2006). Such community organizations as the Red Cross, grocery stores, and local public health units donated money or provided subsidized food to help P/PM 150's implementation process. Whereas those using a school as a community centre negatively influenced P/PM 150's implementation by having vending machines within the school setting. Vine et al. (2014) describe students accessing nonpolicy-compliant foods and beverages through adjoining or affiliated buildings (e.g., vending machines in community centres) not under the same jurisdictional guidelines.

Conducive Context

This determinant concerns the elements that comprise the environment in which P/PM 150 was executed. Consequently, school board and school settings are discussed, as well as existing policies, and societal trends and shocks. Fullan (2015) describes contexts as both “local” and “external.” In this study, local contexts are school boards, schools, and their policies. External contexts pertain to societal trends and shocks.

Institutional Setting

The supervisory officers (either in their current roles or when they were school administrators) observed students within urban and suburban school neighbourhoods leave school campus to eat elsewhere, as is reflected in (Chaleunsouk, 2012; Habayeb, 2013; Orava, 2016). Students are even paying for delivery whereby restaurants deliver to schools. A secondary school teacher in Valaitis' (2015) study confirms this: “Outside vendors deliver right to the school, so students are still able to access outside vendors without leaving school grounds” (p. 105). He et al. (2012a) say that schools situated closer to convenience stores and fast-food restaurants (i.e., ones in urban and suburban areas) are associated with poorer diets for adolescents. Moreover, there is an association between the density of restaurants and the proximity to schools; the closer fast-food outlets and convenience stores are to schools, the greater the density of fast-food restaurants are near schools (Hanning et al., 2019; He et al., 2012a; Nixon & Doud, 2011). This was also observed by a few supervisory officers. In

¹⁰⁸ More details on grants are provided within the *Coherent Implementation Strategy* determinant.

Southwestern Ontario, descriptive statistics indicates that as urbanicity¹⁰⁹ increases from rural to urban, the number of junk food outlets per school zone threshold also increases (Dubreck et al., 2019). When using correlation analysis concerning junk food outlets within 800 meters of schools, Dubreck and colleagues (2019) discovered that “58% of rural schools had zero JFOs [junk food outlets] per square kilometer compared to 25% of suburban schools and only 3.33% of urban schools” (p. 37). A study conducted in Chicago discerned that fast-food restaurants were more likely to cluster within a 5-minute walking distance of schools than anywhere else in the city (Austin, 2005). The researchers recognized that all students had access to fast-food restaurants before and after school; however, high school students had access to nearby food services at lunch as well (Austin 2005). Consequently, urbanicity and its relation to restaurants acts as a barrier to the successful implementation of P/PM150.

Not only were students in urban and suburban regions leaving school to eat elsewhere, but so were those in rural districts, which is reflected in Kruschner et al. (2020). Adolescent girls attending school in a rural, largely Indigenous Maya community, mentioned leaving school to eat nutrient-poor foods from street vendors and convenient stores. Traveling to convenient stores is also replicated in the supervisory officer interviews. Furthermore, some officers said that students within rural neighbourhoods had take-out delivered to the school, which was explained earlier in this chapter. Although this was the case, many supervisory officers claimed that being in a rural school deterred students from traveling to fast-food outlets as these were too far from the school. Research confirms this (Chaleunsouk, 2012; D’Angelo et al., 2016; Habayeb, 2013).

Moreover, one supervisory officer said that the cafeteria sales in their rural school was higher than in their suburban one. Cluss et al. (2014) discovered that when cafeteria managers presented elementary students (in a rural neighbourhood school) with nutritious foods that were 15.2% more expensive than their previous unhealthy ones, cafeterias flourished; there was only a slight decline in students purchasing from these cafeterias. Perhaps this transpired as many cafeterias within rural areas use fresh, tasty ingredients: “[R]ural schools quite often have access to gardening facilities compared to schools located in major city centres” (Orava, 2016, p. 161). Moreover, students within rural settings do not have much of a choice: they either eat from the cafeteria or bring their own lunch from home (Chaleunsouk, 2012; D’Angelo et al., 2016; Habayeb, 2013).

¹⁰⁹ This is defined as a neighbourhood’s designation as rural, suburban, or urban.

Conversely, Slawson et al.'s (2013) study examining elementary and middle rural school cafeterias reveals students selecting less nutritious options due to family influence, consequently affecting cafeteria sales. Would a similar result derive from high school cafeterias within rural neighbourhoods? When examining cafeteria sales from middle and high schools in rural neighbourhoods, Sánchez and colleagues (2014) claim that these cafeterias were not flourishing; during lunch students purchased food off campus or had parents deliver them take-out. More research is required to determine a pattern among high school cafeteria sales and neighbourhood demographics, especially in relation to P/PM 150.

More research is necessary since the supervisory officers within this study provided mixed responses when describing urban/suburban cafeterias versus rural ones. As mentioned above, many supervisory officers alluded to rural cafeterias remaining open because more students – compared to ones in urban/suburban settings – remain on campus during lunch hour. Although this is the case, other supervisory officers claimed that cafeterias within rural settings could not survive due to limited food selections, and the lack of staff and revenue. Studies examining cafeteria and/or food service program sales in rural middle and/or high schools similarly reflect this (Fernandes, 2013; Nollen et al., 2011; Wharton et al., 2008). Nollen and colleagues (2011), however, state that for school food programs to generate a sufficient level of revenue to remain operational, schools must increase lunch prices. Within this study, a supervisory officer mentioned lunch prices being consistent within all their schools' settings – urban, suburban, and rural. According to the Lester B. Pearson School Board (2018) in Québec, their catering company sells food at the same price to all its urban and suburban schools.

To address barriers associated with demographics and cafeteria sales, some superintendents mentioned administrators employing local-level initiatives, such as a campus restriction. In Orava et al.'s (2017) study, all participating elementary schools had a written initiative restricting students from leaving school property. The restriction was lifted, however, when students presented the principal with a parental note granting permission to leave campus. Other research confirms this, stating that in order to address the restaurant barrier, secondary school campuses should close during lunch hour (Neumark-Sztainer et al., 2005; Winson, 2008). Findings reveal that students on closed campuses consume fast-food and convenience store foods less frequently. Within Patte et al.'s (2021) study examining Ontario schools, students who attended CCP (Closed Campus Policies) schools reported eating lunch from restaurants on fewer

weekdays than students from non-CCP schools. Moreover, there is a correlation between student food consumption and zoning laws. For example, communities across America have successfully used zoning laws to exclude fast-food restaurants from specific areas (Spacht, 2009). The effects of closed campuses or other local-school initiatives (in the Canadian context), as well as having zoning laws, may be worth exploring.

It would also be worth exploring the effects of P/PM 150 on Northern Ontario (Indigenous) schools. A few supervisory officers mentioned that Northern or Northwestern Ontario schools (i.e., schools within remote rural communities) are struggling financially. Paton's (2017) study examined fruit and vegetable intake of Indigenous and non-Indigenous students from Northern Ontario, Canada. She concludes, "among Indigenous participants, those living in remote locations consumed statistically significantly [fewer] fruit and vegetables" (p. iv). There are many reasons for this, one being that the cost of healthy foods is high. Consequently, P/PM 150 should be flexible and adaptable (Viennet & Pont, 2017) to accommodate these Indigenous, First Nations, Métis, and Inuit communities. They should be flexible to address the contexts in which schools are (Damschroder et al., 2009; Durlak, et al., 2008). For example, a policy should address "equity" across the province by ensuring that Northern communities (where healthy food is expensive and the cost of living is high) are accommodated. This type of flexibility was also mentioned within Valaitis' (2015) study: "One school stakeholder who taught in a lower-income school community thought that the Ministry needed to consider lower prices for students who could not afford the new healthier, more expensive foods" (p. 197).

Although having a flexible policy was recommended by some supervisory officers, it must be noted that P/PM 150 is flexible in relation to the ten special-event day rule. Principals have the flexibility to select as many "special" junk food days as they would like, as long as they do not exceed ten (Government of Ontario, Ministry of Education, 2010). The ten-day rule is known as an "adaptable periphery" as it can be tailored to each school based on their needs (Valaitis, 2015); while the 80/20 rule (outlining the nutritional standards) is considered to be a "core component" of P/PM 150. Like Valaitis (2015) and Gillies et al. (2020), the supervisory officers expressed the need for the policy to be less strict, especially in relation to the exemption days and nutritional standards. Research by Vine and Elliott (2013) which studied Ontario school food policy implementation around Hamilton, Ontario, also describes P/PM 150 as

‘restrictive in nature.’ Thus, the Ontario Education Ministry should alter P/PM 150 so that it is flexible enough to accommodate individual schools. This was a common recommendation emerging from other studies on the execution of school nutrition policies and programs (Coffield et al., 2011; Downs, et al., 2012). Studies reveal that the more flexible, or adaptable the intervention to specific real-world contexts, the greater likelihood for successful implementation (Damschroder, et al., 2009; Greenhalgh et al., 2004; Durlak, et al., 2008).

Policy Complementarities

For policies to be successfully implemented, they must align with other existing memoranda and programs (Viennet & Pont, 2017). P/PM 150 complements the existing Ontario Health curriculum (specifically the Health and Physical Education curricula). These curricula emphasize the importance of nutritional eating and exercise, which is congruous with P/PM 150’s promotion of health (Government of Ontario, Ministry of Education, 2010, 2017a). Hernandez et al. (2018) and Hollar et al. (2010) claim that there are many benefits associated with multi-component school food interventions. For example, both high- and low-income students tend to consume healthy foods when in an environment employing a nutrition policy, health related curriculum, and a nutrition breakfast/lunch/snack program. Most supervisory officers said that schools offer these types of free or subsidized programs, which research corroborates (Cullen et al., 2009; Orava et al., 2017; Vine & Elliott, 2013). According to a study examining schools in a populous Ontario region, many elementary and secondary schools offer regular breakfast, lunch, and snack programs (Orava et al., 2017). A vice principal within Vine and Elliott’s (2013) study confirms this, “[t]o make sure they [students] were having a healthy lunch, we ... gave them an actual lunch whereby the right food groups were presented, in terms of nutrition, fats and fibre” (p. 1294). When a school does not employ such programs, many students (whether in high- or low-income neighbourhoods) continue having poor dietary habits (Orava et al., 2017). This is one of the many reasons Hernandez and colleagues (2018) argue for a Canadian national school food program whereby all public schools within Canada are mandated to have these types of nutrition programs.

To help these nutrition programs¹¹⁰ remain afloat, students within culinary arts and hospitality programs/courses prepare meals (Vine et al., 2014), which was also expressed by many supervisory officers. Consequently, students feel connected to the food and are excited to consume that which their peers have prepared. Vine et al. (2014) confirm this,

Student involvement in nutrition programs (i.e., breakfast, snack, lunch programs) through advisory councils and food preparation were useful ways to link students with their school nutrition environment, including peer modeling and communication with teachers and administrators who are responsible for food and nutrition. (p. 122)

Although many nutrition programs align with P/PM 150, not all photographs on school websites and social media pages complement the policy. Many photographs reveal students preparing unhealthy (deep-fried or high-sugary) foods. Despite this, many other photographs and messages on social media pages reveal students cooking nutritious meals.

P/PM 150 is also supported by local level initiatives (as mentioned above): requiring students to provide a permission slip/note from parents indicating that their child can leave school during lunch (Orava et al., 2017). An initiative mentioned in this study was a note from a principal to parents outlining the unhealthy foods children were bringing to school. Included in this note was a list of healthier food options. Another initiative pertained to restricting students from bringing fast-food back to campus, which is reflected in Valaitis (2015) and Woodruff et al. (2010). It is interesting to note that only one supervisory officer (out of twenty-four) mentioned this initiative being employed. Perhaps this is one of the many reasons fast-food restaurants are a barrier to proper P/PM 150 execution. Other barriers exist when communal policies and initiatives do not complement P/PM 150. When community or federal policies (such as the vending machine policy, noted by a superintendent) are not congruous with P/PM 150's regulations, stakeholders may be more likely to resist compliance (Datnow, 2002; Desimone, 2002; Viennet & Pont, 2017).

¹¹⁰ Other healthy eating-related programs include, but are not limited to: school gardening and field trips to local farmer's markets (Orava et al., 2017).

Societal Trends & Shocks

Societal contexts may “shape and constrain actors’ [stakeholders’] strategies as well as the implementation plan” (Viennet & Pont, 2017, p. 37). For example, in Hong Kong, poor employment opportunities and the declining student population caused stakeholders to slowly implement new curriculum (Cheung and Man Wong, 2012). In this study, societal factors (e.g., political/social/economic/demographic) affecting P/PM 150’s implementation concern fast-food restaurants. Students are raised in a society promoting tasty juicy burgers and crispy fries from such fast-food restaurants as McDonald’s, Burger King, and Wendy’s. Folta et al. (2018) state that billions of dollars are spent to market foods to children. Businesses employ branding tactics such as humour, fun, and familiar characters to attract children’s attention and generate sales (Roberto et al., 2010). McDonald’s promotional material (beginning in the 1960’s) was geared toward children (i.e., Ronald McDonald, Happy Meal toys, etc.), all of which entice children (Calvert, 2008; Hosany et al., 2013). These children then become so accustomed to eating at McDonald’s that as adults, they bring their children to this restaurant (Calvert, 2008). Since students’ palates are accustomed to high sodium, fat, and sugar foods, many leave school campus to eat at these restaurants, including McDonald’s (as mentioned above) (Hanning et al., 2019; Vine & Elliott, 2013; Winson, 2008). It also does not help that many fast-food restaurants are being built near schools, especially secondary ones (elaborated upon above) (Dubreck et al., 2019; He et al., 2012a; Simon et al., 2008).

Although this is the case, many restaurants (including McDonald’s) have recently altered their menus to include healthier options and/or provided the public with a calorie chart (Kang et al., 2015; Swartz et al., 2011; Waqas, 2021). This change is a result of society’s views concerning health and nutritious eating (Swartz et al., 2011) – the mind-shift that so many supervisory officers noted. Recently, due to the growing concern of high BMI-related health problems, the Government of Canada has developed nutrition-related mandates¹¹¹ (Health Canada, 2016). Fast-food restaurants¹¹² are not the only facilities that must comply to

¹¹¹ The Government has committed to implementing a series of new nutrition policies, including (but not limited to): revising Canada’s Food Guide, revising nutrition facts tables on prepackaged food and front-of-package food labels, restricting commercial marketing of unhealthy foods to children, and reducing sodium in pre-packaged and restaurant foods (Health Canada, 2016).

¹¹² For example, such restaurants as Chipotle, Buddha Bowls, and even McDonald’s, offer more alternatives that are nutritious and appetizing (Saulais, 2015).

government mandated nutrition-related policies (Government of Ontario, 2015). Hospitals, publicly funded recreation and sports facilities, train stations, etc., have nutrition policies dictating that nutritious-type foods must be sold in vending machines (Lesser et al., 2012; McDonald et al., 2006; Naylor et al., 2015). Moreover, these types of facilities have water fountains in the form of water bottle filling stations (Brock University, 2021; Kushner, 2013; Munro, 2019). This is to reduce viral transmissions and encourage people to carry reusable water bottles, and drink water. Water bottle filling stations in a school was mentioned by a supervisory officer.

Fast-food restaurants (e.g., McDonald's, Tim Hortons, Subway, etc.) are social and cultural hang-out spaces for adolescents; they feel comfortable gathering at these settings (Majabadi et al., 2016; Sudiarto, 2018). Moreover, adolescents may associate these environments (including a mall or movie theatre) with freedom and responsibility, especially since these corporate chains provide economic employment to adolescents (Barnett, 2022; Leidner, 1993).

Another societal context affecting nutrition policies' (including P/PM 150's) implementation is the economical demographic surrounding a school. Many supervisory officers mentioned students from both high- and low-income neighbourhoods leaving school to purchase food from local restaurants and grocery stores as these products were cheaper than the costly nutritious food being sold within school cafeterias. This is reflected in the following studies (Valaitis, 2015; Vine & Elliott, 2013; Vine et al., 2014). Nation-wide statistics across New Zealand indicate an association between fast-food restaurants and neighbourhood socioeconomics; a large percentage of fast-food outlets are located within walking distance of low-income neighbourhood schools (Pearce et al., 2007). Travel distance to fast-food restaurants within high-income neighbourhood schools were at least twice as far as the ones in low-income neighbourhoods. Canadian findings similarly reveal higher levels of low-income, Indigenous, renters, and lone parents in neighbourhoods with greater geographical proximity to fast-food restaurants (Hemphill et al., 2008; Leatherdale et al., 2011; Smoyer-Tomic et al., 2008).

Even though the cost of healthy food is a concern across Ontario, it is more pronounced in schools where a larger percentage of the school population is considered low-income as reflected in Vine and Elliott (2013). Furthermore, many supervisory officers said that the policy's ten-day rule restrictions, limited the number of fundraising days, thus affecting a

school's revenue, and ultimately the students. Stakeholders within Valaitis' (2015) study and Chaleunsouk's (2012) confirm this. Students within low-socioeconomical neighbourhoods rely heavily on fundraising to afford school trips, athletic equipment, jerseys, etc. (Chaleunsouk, 2012). They are also the ones who can only afford to donate and purchase inexpensive "junk" food at these fundraisers. Nutrition policy barriers associated with low-income neighbourhoods is replicated in other studies (Chaleunsouk, 2012; Leow et al., 2014; Valaitis, 2015). Leow et al. (2014) even mention students bringing inexpensive "junk" food to school as part of their lunch. Students purchasing cheap unhealthy food from convenient stores and local-level restaurants is reflected in the supervisory officer interviews. For these reasons, it seems that schools and students within low-income neighbourhoods are affected more by P/PM 150's implementation than those within high-income areas. A way to address barriers associated with low-income neighbourhood schools is to lessen the cost of nutritious foods within cafeterias (Kenny et al., 2018).

Although many supervisory officers mentioned that socioeconomic status affects P/PM 150's implementation, a few officers within Northern and Northwestern Ontario regions said that they did not observe a difference in P/PM 150's implementation within their low-socioeconomic regions. They claimed that P/PM 150 was implemented in these regions the same way as in high-socioeconomic neighbourhoods. The difference between these neighbourhoods; however, lies in the quality of food students bring to school. Leow et al. (2014) say that students within low-economic areas cannot necessarily afford healthy food as it is expensive. Thus, most of what they consume is high in fat and sugar.

Coherent Implementation Strategy

The implementation strategy explains *how* the policy will be executed and therefore is action-oriented (Viennet & Pont, 2017). Consequently, I discuss P/PM 150's objectives and tools. This is then followed by a description of task allocation, accountability, communication, and engagement, all in relation to P/PM 150. Lastly, I delineate the policy's resources, data, monitoring, and timing.

Objectives & Tools

One of P/PM 150's objectives is to teach students about healthy eating (Government of Ontario, Ministry of Education, 2010). This can be accomplished through pedagogical strategies and by cafeterias offering students appetizing nutritious food, as many superintendents noted. The notion of offering more appealing and appetizing food selections is replicated in Cross (2013) and Rajbhandari-Thapa et al. (2017). According to Cross (2013), a catering company employed by the Catholic school board creatively supplies appealing foods: "A good example is how they've replaced that high school cafeteria mainstay – french fries – with 'home fries,' a healthier baked version that uses spices to make it tastier." Another policy objective is to ensure that all cafeteria deep-fryers no longer exist in school cafeterias, which many supervisory officers alluded to, and one explicitly mentioned. The removal of deep-fryers affected many stakeholders, including food providers; since they no longer have a deep-fryer, they require additional ovens, which are costly (Valaitis, 2015). Research suggests that having proper facilities is critical for successful policy execution (Bergman et al., 2010; MacLellan et al., 2010; Taylor et al., 2011).

Certain policy tools (e.g., incentives, capacity-building, and mandates) can aid in the implementation process (Honig, 2006; Viennet & Pont, 2017). A federal mandate regarding health was adapted by the Government of Ontario (Ministry of Education), which was then adopted by school boards and schools across Ontario. School boards and individual schools were responsible for disseminating P/PM 150 to stakeholders, and in so doing, they distributed tools (such as flip charts and implementation wheels) to help stakeholders understand the policy. These types of tools/resources aid the execution of a policy (Kraft et al., 2018; Mentoring Minds, 2021). Kraft and colleagues (2018) claim that specific flip charts and wheels not only have the ability to help one understand a policy, but can engage stakeholders – depending on the wheel/chart colours, formats, how the information is conveyed, etc.

Ejler et al. (2016) claim that implementers can educate themselves by observing the execution of a policy in a different institutional setting. They must always ask themselves: "Is it possible to observe the evidence [of a policy] before testing it?" (p. 12). Within this study, one supervisory officer desired to know implementation strategies associated with P/PM 150. Consequently, they visited a school in Québec as this province's nutrition policy was released prior to Ontario's (Central Québec School Board, 2008; McKenna, 2013).

Stakeholders can also use online tools (modules) for learning how to implement P/PM 150. The Ministry of Education site has interactive learning modules for stakeholders (including food service providers) and has a workshop for parents and students to learn how to read food labels. The Ministry is therefore reaching to the community and offering services that can help the policy's implementation (i.e., capacity-building). A policy may be complemented by more elaborate tools such as capacity-building and community-partnerships (Viennet & Pont, 2017). Capacity-building and partnerships are also evident on school board and school sites. Many of these sites announced nutrition-related workshops, enabling parents and others within the community to learn more about P/PM 150.

Other policy tools that help the implementation process include: resource guides, sample newsletters, as well as sample compliance letters and forms, which were all on the Ministry website. The supervisory officers used several different methods to disseminate, educate, and promote P/PM 150 to parents, such as newsletters, parent-teacher nights, parent council, "display panels," and social media. Using newsletters, events, meetings, etc., to promote and educate stakeholders enhances the policy execution process (Murray et al., 2017; Vine & Elliott, 2013). Conversely, Chaleunsouk (2012)'s study reveals most principals disseminating information and educating parents about P/PM 150 only within the confines of the school. Perhaps, for this reason, MacLellan et al. (2010) discovered that many parents were unaware of nutrition policies or misinterpreted them. Studies reveal that engaging parents and family in promoting health practices are key in supporting behavioural changes (Christensen, 2003; MacLellan et al., 2009, 2010; Suarez-Balcazar et al., 2007).

Task Allocation & Accountability Mechanisms

A policy's "implementation strategy usually identifies key stakeholders and their corresponding responsibilities" (Viennet & Pont, 2017, p. 37). Supervisory officers have responsibilities executing education policies, including P/PM 150. One role is to converse with the board of trustees¹¹³ about a policy's implementation (OESC, 2018), which was mentioned by a superintendent. Another task is to ensure policy accountability (Government of Ontario,

¹¹³ Every school board in Ontario is governed by a board of trustees, comprised of publicly elected educators, First Nation representatives and/or secondary students. This board must ensure that "schools operate within the standards established by the province, and that programs and services remain responsive to the diverse communities they serve" (OESC, 2018, p. 15).

Ministry of Education, 2010). Research demonstrates that having higher accountability standards on education policy implementers results in a more effective and qualitative implementation (Viennet & Pont, 2017). For example, the United States' School Wellness Programmes were executed more effectively when a systematic evaluation was employed by the programme, and implementers were transparent and closely monitored by the district (Budd et al., 2012). The supervisory officers expressed the extent to which school boards monitor P/PM 150's implementation. Do these officers, however, closely monitor schools?

In the genesis of P/PM 150's implementation accountability forms were being completed across Ontario. Over time, however, accountability measures (such as the completion of forms and frequent meetings with stakeholders) dwindled, which Lysyk (2013) documents in an Auditor General's report.¹¹⁴ The supervisory officers claimed that accountability measures diminished due to the Ministry's lack of involvement; the Ministry of Education does not require forms from superintendents and therefore does not hold schools accountable. This lack of participation was also mentioned by stakeholders within Valaitis' (2015) study: "Many described a lack of Ministry involvement after the policy was mandated ... lack of monitoring for policy compliance" (p. 234).

The Government of Ontario, Ministry of Education (2010) says that it is not the Ministry's responsibility to monitor, but the school boards. Principals within Chaleunsouk's (2012) research confirm this. Within this study, many school board members disliked the fact that school boards (not the Ministry of Education) are responsible for holding schools accountable. Stakeholders within Valaitis' (2015) study agree, stating that whoever develops and mandates a policy, should monitor it. Many supervisory officers expected the Ministry to unleash "monitoring police," although it did not transpire. This indicates that many board members misunderstand their role and the Ministry's in relation to monitoring P/PM 50's implementation. This misunderstanding is evident in Valaitis (2015): "Participants also seemed to have mixed thoughts on who was ultimately in charge of monitoring P/PM 150 compliance (whether it was the Ontario Ministry of Education, school boards, principals, food providers)" (p. 151). This confusion likely transpired as there are no clear descriptions of the monitoring process (see the Ministry website and P/PM 150 guide) (Government of Ontario, Ministry of

¹¹⁴ This is the Ontario Auditor General.

Education, 2010). A lack of well-defined monitoring and accountability procedures was also alluded to by a school board facilitator who participated in P/PM 150's design.

Dick (2020) and Leow et al. (2014) claim that the implementation process of nutrition policies by senior personnel may be enhanced when there are specific, detailed instruments of accountability for policy execution: "A clear statement about the consequences of non-compliance would have reinforced the importance of the ... policy" (Dick, 2020, p. 23). The Ministry should hold superintendents accountable and there should be intended consequences for non-compliance. One supervisory officer claimed, if there is no "legislative compliance" component for employees to read, then the policy does not become a priority. This philosophy is congruous with other research on policy implementation (Adamson et al., 2013; Lock et al. 2002; Valaitis, 2015). Stakeholders within Orava's (2016) study recommend adopting, enforcing, and utilizing a formal monitoring strategy for P/PM 150, such as an audit and feedback system. This auditing system was mentioned by a supervisory officer.

Had there been explicit and detailed accountability measures, P/PM 150's execution may have been more successful. Lock et al. (2002) discusses the importance of monitoring policies and the challenges associated with it. There are challenges of evaluating the long-term impacts of memoranda. Furthermore, short-term follow-up and monitoring might not provide the answers for which stakeholders are looking in terms of policy effectiveness. Nevertheless, the supervisory officers felt that the Ministry should have been engaged in the monitoring process.

Not only are supervisory officers responsible for monitoring compliance, but principals as well. One of the many tasks that must be employed by a principal is to ensure their food distributors are complying with P/PM 150, which is reflected in research (Orava, 2016; Valaitis, 2015). To ensure compliance, principals sometimes appoint a staff member or committee to monitor food being sold on school premises. Having an implementation committee member/staff member monitor compliance is also suggested by the Ministry of Education (Government of Ontario, Ministry of Education, 2010).

Although many supervisory officers expressed that stakeholders communicated, debated, and began following the policy, none of them explicitly mentioned the teachers' role in implementing P/PM 150. Nevertheless, many board officials claimed that the teachers' task is to teach the health curriculum, which includes the Canada Food Guide that P/PM 150 utilizes. Moreover, teachers educate students about nutrition in culinary arts and hospitality school

programs. Teaching healthy eating through curricula is consistent with the following studies (Adamson et al., 2006; McKenna, 2010; Valaitis, 2015). Conversely, Gillies et al. (2018) reveal a lack of communication between teachers and students: “Although the [Alberta nutrition policy] encourages all staff to incorporate health education and positive food messaging into the classroom, students indicated that they do not speak with their teachers about healthy eating” (p. 537). It is unfortunate that this lack of communication exists since research suggests that curriculum integration, along with other nutrition programs (e.g., food preparation clubs, age-appropriate nutrition counseling, etc.) in schools, have all helped improve student eating behaviours (Powers et al., 2005; Watson et al., 2009).

A supervisory officer mentioned students purchasing healthy meals from the cafeteria because their peers prepared them in cooking class. Peers play an influential role in eating behaviours, especially at the secondary level (Suarez-Balcazar et al., 2007; Vereecken et al., 2005). Hence, “creating initiatives that enable peer mentors to lead and promote healthy eating would have a powerful impact on fellow peers” (Chaleuncouk, 2012, p. 113), which is exactly what superintendents revealed in this study; cooking classes help promote P/PM 150 and influence student food behaviours.

Within these cooking classes, teachers empowered and engaged students in the decision-making process, congruous with Boyd (2009). When students participate and are more knowledgeable of P/PM 150, they may be more accepting of it – leading to successful implementation (Valaitis, 2015). Although this is the case, school social media pages present students in cooking classes with both healthy and unhealthy (even deep-fried) or less nutritious foods. Consequently, one begins to wonder whether all the teachers leading these classes believe and support P/PM 150. If they believe in the policy, would they not all instruct students on how to prepare flavourful healthy meals? Valaitis (2015) says that students discussing or preparing unhealthy (especially deep-fried) foods in hospitality classes, is a barrier to P/PM 150’s implementation. Valaitis (2015) discovered that certain cooking methods (i.e., deep-frying), while banned by the policy, are necessary food skills for students hoping to work in the food industry. For this reason, teaching nutrition policies in hospitality classes was not considered a priority by many stakeholders within Valaitis’ (2015) study.

Communication & Engagement

For a policy to be effectively implemented, it is important that stakeholders communicate and collaborate (Viennet & Pont, 2017). A supervisory officer said that P/PM 150 related communication existed (in the form of meetings) prior to the policy's initial implementation. Preparing stakeholders before a memorandum is implemented is reflected in D'Amore (2021). Valaitis (2015) also reveals that some meetings (specifically healthy committee meetings) existed prior to P/PM 150's execution; however, these were only informational and therefore did not address stakeholder feedback. Although this is the case, research on nutrition policies (including P/PM 150) reveal stakeholders (including parents) either a) not hearing about a nutrition policy until after execution, or b) only hearing about it just prior to implementation (Chaleunsouk & Kutsyuruba's, 2014; Dick, 2020; Valaitis, 2015).

Most supervisory officers mentioned P/PM 150 related communication in the genesis of its implementation; there were many informational and instructional meetings that occurred monthly or quarterly. These meetings were informational and instructional wherein administrators were asked for implementation input (Valaitis, 2015). A secondary school participant within Valaitis' (2015) study claims,

coordinators/consultants ... held events and meetings for school stakeholders involved in P/PM 150 implementation ... I think there were three meetings altogether offered by the board. And they discussed [the policy] in detail ... they gave us booklets [at the first meeting] and in the second one they gave us some materials" (p. 137, 138).

Over time, the frequency of these meetings and training sessions dwindled, as mentioned above. Participants within Dick's (2020) study reveal the same: "At two meetings we spoke about the policy ... but after that, that was it" (p. 23). Many formal training sessions dwindle or are no longer necessary as information is easily accessible (i.e. training sessions are available) through the Internet (Editorial Projects in Education, 2009; Martinelli, 2017). Stakeholders can view information and engage in online learning modules if they do not understand what P/PM 150 is or how to monitor it (Government of Ontario, Ministry of Education, 2018; Valaitis, 2015). Online modules were not only mentioned by a superintendent but were visible on the Government of Ontario (Ministry of Education) website. A stakeholder within Valaitis' (2015) study claims,

‘if you go on the Ministry of Education website, there’s now a nutritional calculator, but they’ve updated it where you can basically take a package off the shelf, put the numbers in and hit ‘calculate’ and then it will tell you if it’s a sell most or sell less item’ (p. 133).

Moreover, communication about P/PM 150 to parents was visible on school board and school websites, which is also reflected in Chaleunsouk (2012). School boards announced food fairs, school gardens, and school greenhouses. Individual school sites and media pages revealed schools having a nutrition month, cooking clubs, cooking/baking competitions, school gardens, nutrition related field trips, and food fairs (selling butter chicken, apple cake, and homemade quesadillas, to name a few). Similar activities – including a nutrition month – are mentioned in Orava et al.’s (2017) study. Within my study, online newsletters dating from 2011 to 2018 also provided P/PM 150 or P/PM 150 related content. Conversely, Murray et al. (2017) claim that there is very little policy related communication between administrators and parents. Valaitis (2015) also confirms this as 19 secondary school parents within this study mentioned not hearing about P/PM 150 from school council or from administrators. Parents heard of it, however, from their children or through the news, radio, and/or television. Valaitis (2015) says that only elementary school parents were aware of P/PM 150 through their parent councils. Analyses of P/PM 150 communication (specifically the modes and frequency to parents at both the elementary and secondary levels) are warranted.

Within this study, P/PM 150 was also communicated through promotional messages and posters. Promotional posters, messages, and advertisements are important when executing a policy and should not diminish with time (Orava et al., 2017). Dick (2020) says that schools can distribute a healthy lifestyles magazine to students and staff wherein attractive recipes are. This strategy is congruous with what some schools and school boards posted on their websites: recipes incorporating nutritional foods. Moreover, within this study, there were many messages in the beginning of its implementation, but they began dwindling with time. Some of these posters were supplied by food service providers. External organizations (either related to food or health) supplying schools with nutrition related resources, is replicated in Orava’s (2016) and Valaitis’ (2015) studies about P/PM 150 in the Peel Region of Ontario. A secondary school participant states, “in the second [meeting], they gave us some materials to put up in the cafeteria, the posters mentioning about the food and beverage policy” (Valaitis, 2015, p. 138).

Advertising and promoting a nutrition policy through various means (e.g., redecorating a cafeteria, integrating water bottle-filling stations, offering water rather than sweetened beverages,¹¹⁵ displaying nutritional food in a display case, having assemblies, field trips etc.) is replicated in educational research (Adamson et al., 2013; Dick, 2020; Folta et al., 2018). Merkle's (2013) study reveals a school wide fruit, vegetable, and water challenge, which similarly reflects what superintendents stated. They claimed that promoting P/PM 150 through nutrition fairs, fundraisers, and other healthy advertising campaigns will help promote P/PM 150. Some supervisory officers also mentioned promoting P/PM 150 through social media pages (e.g., websites), which is congruous with Orava (2016): "the principal can use school media platforms such as newsletters, websites, and knowledge translation reports to promote healthy eating messages to students" (p. 149).

Although P/PM 150 has and continues to be promoted through nutrition programs, it is important that principals and those leading these programs (including food service providers) are constantly communicating (Murray et al., 2017; Viennet & Pont, 2017, Vine & Elliott, 2013). According to Valaitis (2015), a lack of communication may result in tension and misunderstandings, especially in relation to P/PM 150's exemption day rule – that which a supervisory officer mentioned within this study. Thus, there must be strong partnerships, collaborations, and communication for effective implementation to occur (Bergman et al., 2010; Greenhalgh et al., 2004; Moore et al., 2010).

It seems that in the genesis of P/PM 150's implementation, there was much discussion about the policy as it affected many stakeholders. Conversations related to P/PM 150 may have dwindled over time due to competing priorities or this policy's simplicity (Chaleunsouk, 2012; Dick, 2020). For this reason and many others (including the notion that outdated policies may result in stakeholders disregarding the policy), it is important that policies – especially complex ones – are discussed and regularly reviewed (Irving, 2014).

Resources

"The amount, quality and distribution of ... resources allocated to implementation determine to a great extent whether and how a policy is implemented" (Viennet & Pont, 2017, p.

¹¹⁵ Eck et al. (2018) claim that there are many benefits when one consumes water: it maintains hydration, reduces puffiness around the eyes, clears the skin, reduces sluggish behaviour, etc.

39). There were resources associated with P/PM 150's initial implementation, such as nutrition booklets, wheels/flip charts, and resource guides. However, were these enough for proper implementation? Many supervisory officers alluded to how beneficial the resources were, especially when one officer confronted a food service provider with a resource regarding the ten-day rule. Conversely, participants within Valaitis' (2015) study expressed that not all the resources (booklets, workshops, training, P/PM 150-specific committees, Public Health support) were helpful.

Many supervisory officers said that only one resource was lacking – finances. Financial resources became quite scarce, resulting in cafeteria closures (Kretzel, 2012), as mentioned above. To help schools and school boards financially, the Canadian government issued a grant for which boards could apply (Canada Grant Watch, 2021). This funding aided one school board in Ontario's Northern region; however, many other school boards have not received funding to help implement P/PM 150. Additional financial resources may be required when implementing a nutrition policy, along with instrumental resources (e.g., providing workshops for students), community-based resources (e.g., linking school with a local health organization), and informational (e.g., providing materials to be embedded into classroom curriculum) (Orava, 2016) – all of which were mentioned above. Valaitis (2015) concurs, stating that core funding from government to support policies is necessary when implementing P/PM 150, especially since a lack of funding is a barrier to P/PM 150's implementation. Other research concerning education and nutrition policies reflects this (Adamson et al., 2013; Olstead et al., 2011; Vine & Elliott, 2013).

Data & Monitoring

Data on children and adolescent obesity/BMI rates was the catalyst to P/PM 150's design (Centers for Disease Control and Prevention, 2021; Government of Ontario, Ministry of Education, 2010; PHAC & CIHI, 2011). Current data, in the form of an audit (Office of the Auditor General, 2015), helps inform the implementation process: "Up-to-date data contributes to measuring progress of the implementation process" (Viennet & Pont, 2017, p. 40). Up-to-date data was divulged by school administrators as they provided input about the policy's execution at Administrators Association (i.e., "problem-solve") meetings. Viennet and Pont (2017) state,

“context-specific and practitioner knowledge is crucial to carry out a policy at the school and district level” (p. 40).

Practitioner (stakeholder) knowledge about monitoring is essential for proper implementation (Viennet & Pont, 2017). Monitoring mechanisms should be flexible and support the policy’s goals (OECD, 2010). Although monitoring strategies were not detailed within the memorandum, many supervisory officers, administrators, and food service providers dealt with “monitoring” forms/documentation. Perhaps monitoring and accountability measures were not explicitly outlined by the Ministry of Education as it wanted administrators and supervisory officers to have the flexibility they desire in relation to monitoring? What is known, is that the “monitoring” mechanism outlining schools’ special-event days, support the policy’s goals; it helps reduce the number of unhealthy foods sold at school.

Within the Ontario education system, school boards (superintendents, directors of education, the board of trustees) monitor many policies (including P/PM 150) (Government of Ontario, Ministry of Education, 2010; OESC, 2019), which many supervisory officers mentioned. Reeve et al. (2018) divulge how important it is for school officials to effectively monitor policies. Monitoring can be accomplished through forms, a systematic review of a policy, follow-up conversations, meetings, etc. (Budd et al., 2012; Glasgow Education Services, 2009; Office of the Auditor General, 2015). Concerning the former method, when an organization provides templates for stakeholders to use, stakeholders have been known to adapt them to their specific context (OESC, 2019, Walan Project, 2020). Adapting forms (especially the Ministry’s “Venues, Programs and Events Assessment Tool,” and the “Special Event Tracker”), was reflected in online site content and the supervisory officer interviews. Many schools or school boards adapted these forms to create their own ten-day tracking sheets, which did not have to be signed or if they did, they had to be signed by either a parent council representative or the school principal.

Not only are school boards responsible for monitoring P/PM 150, but also school principals, as indicated by school board administrative procedures. Food service providers in Valaitis’ (2015) study confirm this, “some of the principals are really engaged in the whole P/PM 150 and they make a schedule [for exemption days] ... and they discuss it with us ... not all of them do” (p. 141-142). Monitoring through discussions and forms was expressed by the

supervisory officers. Some even mentioned principals not completing forms nor sending them to their superintendent.

Although monitoring is a key component of successful policy execution (Viennet & Pont, 2017), over time monitoring and stakeholder compliance may subside (Dick, 2020). Monitoring may transition from active to passive¹¹⁶ (University of Minnesota, 2021). In P/PM 150's genesis, forms were completed and reviewed, and there were a number of meetings and individual school visits (active monitoring); however, over time, monitoring became passive as there were few to no meetings associated with it and the completion and review of forms became virtually non-existent. Some supervisory officers said that they only monitor P/PM 150 when they hear a complaint or observe non-compliance.

Monitoring may subside for many reasons, one being when target compliance may be difficult or costly (Hudson et al., 2018). The supervisory officers alluded to this reason; however, they added another motive; since following P/PM 150 is a mindset within schools, close monitoring is not really necessary. The notion that policy-compliance may become subconscious (i.e., part of someone's regular lifestyle habits) is reflected in studies on recycling (Hwang & Rivera, 2020; Lubowiecki-Vikuk et al., 2021; Peterson, 2014). Moreover, implementers may become lax when supervisory officers are not regularly or effectively monitoring compliance. An administrator from Dick's (2020) study claims:

Usually with the policies that come from the government there's no actual indication of what the punishment would be ... nobody came to see if we implemented the policy ... you just ignore [it because] there's no real penalty." (p. 23)

If an organization (such as the Ministry of Education) who develops a policy monitors compliance by conversing with school board superintendents, etc., then more stakeholders may be more inclined to comply (Dick, 2020).

It is also possible that monitoring subsides with time if the monitoring and accountability process of a policy is not well defined¹¹⁷ (Dick, 2020). Thus, a robust monitoring and evaluation strategy would have likely assisted with achieving P/PM 150's desired outcomes. A clear

¹¹⁶ Active monitoring is employed with high-risk policies and when the context allows this practicality. Passive monitoring often involves taking action when someone reports an incident (University of Minnesota, 2021).

¹¹⁷ Dick (2020) says that policy makers should detail ways of monitoring and by whom.

statement about the consequences of non-compliance would have reinforced the importance of P/PM 150 and encourage stakeholder accountability.

Timing

It takes time for memoranda to be properly executed due to the multifaceted, multidimensional, and multi-interactive aspects of policies and policy stakeholders (Viennet & Pont, 2017). Viennet and Pont (2017) state,

when implementing a policy, actors [stakeholders] are called to arbitrate between acting fast to meet electoral necessities, and taking the time to polish the implementation strategy, engage with stakeholders and let the policy sink in. (p. 40)

The supervisory officers noted the time they were given (one year) to polish their execution strategy and begin engaging with stakeholders. The online content corroborates this finding. Even though Ontario schools were given a year for full compliance, the transition was not smooth, as is reflected in Valaitis (2015). Conversely, school officials within Nova Scotia school boards said that their nutrition policy was implemented smoothly as they were given years (not a year) to adapt to it. Perhaps if Ontario stakeholders would have been given more time to adapt to P/PM 150, the transition would have been more effective.

Chaleunsouk's (2012) research on P/PM 150 reveals that stakeholders within the same school or in different schools within the same board (as Valaitis' study) had different experiences: some felt ready and believed the transition to be smooth, while others did not. Tight timing imposed on teachers and principals can threaten effective implementation of a policy (Cheung & Man Wong, 2012). A study of the reform on education system decentralisation in Sweden leans towards the same conclusion: the shift to decentralisation was too sudden, leaving no time for municipalities to organise and take ownership of the memorandum (Burns & Köster, 2016). Consequently, it is important that stakeholders are allowed sufficient time to adjust to the policy and feel ownership of it.

Concluding Comments

Viennet and Pont's (2017) framework sheds light on the multidimensional aspect of P/PM 150, and the way its numerous facets interact. When examining the policy's design (*Smart*

Policy Design), both insiders (school staff, school board representatives, etc.) and outsiders (representatives from the Ministry of Education and from other educational and/or health related organizations) collaborated to produce this memorandum. They designed a policy with tools, clear objectives/goals, and the reason behind these goals. Although the policy seems feasible, it is not for many Northern Ontario schools. Moreover, it is infeasible to have annual P/PM 150 in-person training and development activities, as well as ask catering companies to sell nutritious, but inexpensive food. Once P/PM 150 was designed, it was scheduled to undergo a revision process. School boards followed suit and revised their corresponding nutrition policies.

When examining *Inclusive Stakeholder Engagement*, supervisory officers (school boards) reacted positively to the policy, along with school staff, cafeteria managers, and food service providers. Consequently, many partnerships were formed, resources were used, and leadership skills were employed when executing P/PM 150. However, not all school staff and food service providers shared this enthusiasm. Several parents also resisted compliance due to school traditions and their own belief systems, while student food behaviours and food costs affected student compliance. Although this is the case, parents and students know the benefits associated with nutritious eating.

The determinant (*Conducive Context*) revealed the settings in which school boards and schools implemented P/PM 150. Students within urban, suburban, and rural schools (from both high- and low-income neighbourhoods) leave campus to eat elsewhere or pay for take-out delivery. This may be due to society's traditional fast-food marketing and where these types of restaurants are being built. Although this is the case, it seems that there is a societal shift to promoting healthier foods. This is evident in the many policies and programs complimenting P/PM 150 (e.g., health curricula, nutrition programs, and culinary arts programs, to name a few). It is also important to note that more students within rural schools remain on campus, bring their lunch to school, or eat in their school's cafeteria. To address barriers associated with demographics, local-level initiatives may be employed. It would also be beneficial to have a more flexible and adaptable P/PM 150.

Furthermore, P/PM 150 may be more effective if: appealing and appetizing food selections are offered in cafeterias; there are more nutrition events/messaging promoting the policy; there are more financial resources; and accountability/monitoring measures are more detailed. Regarding the latter, the Ministry of Education should have held schools and school

boards accountable. All these recommendations were explored when examining Viennet and Pont's (2017) *Coherent Implementation Strategy*. This determinant also shed light on the various tools (flip charts, online modules, workshops, etc.) associated with P/PM 150, as well as stakeholders' roles employing the policy. There was much communication among stakeholders in the genesis of its implementation; however, over time, meetings, and the completion of forms subsided, which may have been due to superintendents' and principals' competing priorities.

Findings suggest that while facilitators (stakeholder interest and belief, promoting nutrition and nutrition programs, and fostering partnerships with external organizations) associated with P/PM 150's implementation exist, there are a number of barriers: policy timing and restrictions, revenue loss, restaurant proximity, misinterpretations, lack of monitoring, and lack of stakeholder interest. These barriers can lead to negative impacts. Facilitators and barriers are common when executing a nutrition policy (MacLellan et al., 2010; McKenna, 2010; Pettigrew et al., 2012a, 2012b), which is congruous with the findings from this study. Until these barriers are addressed, positive outcomes and impacts resulting from school food policies (including P/PM 150) may be limited.

Chapter 9: Conclusion

“It’s very clear that there’s a lot of double standards going on. Should there be a 30mph speed limit? Of course there bloody should. And certainly with kids and school food, kids need to be nannied for sure. So give them a bloody good meal at school”
(Jamie Oliver in Aitkenhead, 2010).

Considering the above quotation by Jamie Oliver, some chefs within Ontario schools have been working hard to provide students with palatable, healthy meals – superintendents expressed. They have been working hard to abide by Ontario’s school nutrition policy. The Government of Ontario, Ministry of Education (2010) mandated all elementary and secondary Catholic and public schools to fully comply with the *School Food and Beverage Policy* (P/PM 150) by September 2011. Although chefs and many other stakeholders (superintendents, school administrators, staff, parents, and food service providers) support P/PM 150, there remains a gap between what the policy states and the way in which it is being executed (Chaleunsouk, 2012; Orava, 2016; Vine et al., 2017). This is due to institutional and socio-structural factors, policy timing, stakeholder interests, as well as a lack of comprehension (Gray, 2015; Hanning et al., 2019; Vine et al., 2014). Because of these barriers to successful policy execution, researchers have identified a need for promising and best practices¹¹⁸ for school nutrition policy design and implementation (Mendelson, 2007).

To examine this divide and have another perspective on P/PM 150’s execution, this qualitative case study explored P/PM 150’s implementation from the perspective of supervisory officers¹¹⁹ in Ontario. Moreover, online content (Ministry/school board/school websites and social media pages) were examined to corroborate the findings. In so doing, this thesis examined: 1) supervisory officers’ roles and responsibilities designing and/or implementing P/PM 150 (i.e., how they communicate the policy – its objectives, tools, and task allocation – to other stakeholders, and how they monitor its execution, etc.); 2) how the Ministry of Education,

¹¹⁸ “Promising practices” denotes a policy with some scientific research or data showing positive outcomes, that has not necessarily been replicated and implemented multiple times in similar contexts. Whereas the term “best practices” denotes policies which have demonstrated desired changes through the use of multiple implementations, the ability to be replicated, and the potential to be adapted and employed multiple times (Smith et al., 2015).

¹¹⁹ Supervisory officers are P/PM 150 consultants/facilitators within a school board. Furthermore, supervisory officers are senior personnel of a school district that consist of assistant superintendents, superintendents, associate directors, and directors of education.

school boards, and schools communicate the policy; and 3) the perceived consequences of P/PM 150 (e.g., barriers, facilitators, pedagogy, curriculum, stakeholder mindsets) that hinder or aid policy implementation among various school contexts. The supervisory officers concluded the interviews with ways of addressing P/PM 150 implementation barriers (i.e., recommendations for promising practices).

Results from the interviews and online content (e.g., school and school board websites/social media pages) provided insights into the process of P/PM 150's execution. The interviews revealed supervisory officers' roles. School board directors of education, superintendents, consultants, and facilitators are responsible for their board's nutrition policy and its execution. In so doing, they and their corresponding school administrators communicate to multiple stakeholders (e.g., school administration, school staff, students, parents, and food service providers). During the initial stages of P/PM 150's implementation – and to an extent today – the policy has been communicated at training sessions, meetings, and through e-mails, newsletters, social media pages, and school posters.

Supervisory officers and school administrators are also responsible for monitoring compliance. In the genesis of P/PM 150's implementation, forms were completed and sent to superintendents. Since then, the completion of these forms has subsided or is non-existent. Although this is the case, school administrators are still responsible for ensuring school compliance and many do so by conversing with and observing school staff, students, parents, and food service providers. Consequently, P/PM 150 is being implemented; however, competing priorities interfere with monitoring.

Within the interviews, supervisory officers also discussed many implementation barriers: policy timing and restrictions, revenue loss, proximity to restaurants, and a lack of stakeholder interest. Concerning policy timing and restrictions, the policy's execution was fast, and the rules restricted students in such a way that they left campus to eat elsewhere. Consequently, schools and school boards lost revenue. Restaurant proximity to schools also exacerbated this problem, along with policy resistance from parents, food service providers, students, and school staff. Although this is the case, the policy has facilitators: its theoretical intentions, how the policy fostered partnerships, and the way it affected stakeholders. In theory, the policy was necessary and “worked well.” Moreover, it encouraged discussions concerning nutritional eating. The policy also spawned and supported nutritional programs. Many stakeholders (e.g., school staff,

food service providers, parents, and the community) engaged in these programs as they supported P/PM 150. Policy support also extends to school board members, the Ministry of Education, and school staff. Many school staff members use the policy as a pedagogical tool as they discuss nutrition with students. They also lead by example and encourage nutritious behaviour in class. Many supervisory officers claimed that stakeholders now have a healthy mindset. This mindset, however, took time to germinate, but once it did, monitoring subsided. Stakeholders learned to accept the policy and there was a cultural paradigm shift.

The online content corroborated many of these findings. The Government of Ontario (Ministry of Education) and most school boards within this study uploaded P/PM 150 (or a school board version) to their websites. There was also mention of P/PM 150 being fully implemented in all schools across Ontario by September 2011. Part of its implementation process was communicating it to stakeholders (including school staff, parents, and students) so that it could be easily comprehended. In so doing, school board supervisory officers slightly tweaked P/PM 150 to make it more accessible, adding visuals and colour to the memorandum. All school boards that uploaded it to their sites retained its content (such as its rationale and rules). They also provided resources and tools to help stakeholders understand the nutrition policy. Furthermore, administrative procedures associated with the nutrition policy were uploaded to some school board sites. Its “robust” nature includes (but is not limited to) a description of nutrition education, stakeholders’ roles, and the types of food offered during an in-class celebration.

The Ministry and some school boards also mentioned the nutrition policy and administrative procedures undergoing a review process. Concerning the policy’s implementation, the Ministry revealed the importance of replacing existing nutrition guidelines/policies with P/PM 150. The process also involves the school boards offering training/workshops, collaborating with their boards of health, and monitoring the policy. Furthermore, the websites describe the promotional aspect of P/PM 150 and its positive impacts, including nutrition education and school-community partnerships.

The interview data and online content corroborated many of the findings in other school nutrition policy evaluation research. Moreover, the study’s results contributed to current knowledge on implementation research. Viennet and Pont’s (2017) model provided a useful framework to interpret the results and compare interview data with what was online. The model

helped in understanding the reason implementation did or did not work within schools across Ontario.

Summarizing, successful implementation of P/PM 150 across Ontario is possible; however, careful consideration must be given to the following: P/PM 150's design (feasibility, flexibility, 80/20 rule, special-event days); stakeholder engagement (taste preferences, student/teacher/administrative input and buy-in, administrative priorities, cultural needs, affordability); the many contexts in which P/PM 150 is being executed (rural/suburban/urban schools, high- and low-income neighbourhoods, Northern/Indigenous communities, policy complementation); and P/PM 150 implementation strategies (financial resources, thorough monitoring/accountability, re-emphasizing and promoting it).

I concur with most of these recommendations; however, I believe that the first step to improving P/PM 150's implementation concerns monitoring. The Ministry should focus on an effective monitoring strategy since, as one superintendent stated: "That which gets monitored, gets done." Currently, close monitoring is not being done; many monitoring forms are not being sent to school board supervisory officers. Hence, the Ministry of Education should focus on developing a monitoring strategy that is quick and easy, perhaps resembling an online attendance tracking sheet – as one supervisory officer recommended. With this online tool, officers within each school board can easily "red flag" schools that are not fully complying. Moreover, to hold school boards accountable, the Ministry of Education should monitor school boards. There should also be "consequences" for stakeholders who are non-compliant.

To help improve the food environment in schools, I (if I were a school principal) would employ local-level initiatives (e.g., closed campus policies). It is also beneficial to hire a chef who supports the policy. Studies suggest that local chefs are more creative and invested than a large food company (Chaleunsouk, 2012; Valaitis, 2015). It is also beneficial to revise the policy. For example, in lieu of the term "sold," P/PM 150 should have the term "provided/distributed." Thus, the policy should concern food and beverages provided by (not just sold by) stakeholders at school and school events/activities. The policy should provide a definition of stakeholders: "Stakeholders are school personnel, parents, students, school board personnel, food purveyors, and people in the community." The goal is to eliminate unhealthy food at school and school events/activities, except for that which comprises student lunches.

Study Limitations

Although much was gleaned from the study's data, there exist some methodological limitations concerning the participants, the data collection tool (the interview), and the framework.

Participants

The potential of interviewee biases may have limited the interview method (Creswell, 2012; Hennink et al., 2011; Monette et al., 2005). Although this may have been the case, I recognized that the participants were likely advocates of P/PM 150 (and viewed everything through that lens) as they volunteered their time from their busy schedules to discuss the policy with me. They also viewed positive and negative outcomes and impacts of P/PM 150 through that lens.

Furthermore, the supervisory officers may have used terms, such as “urban” and “suburban,” interchangeably as they did not have this type of school-related data readily at their finger-tips during the interview. Moreover, the term “suburban” seems subjective. If suburban refers to schools in a residential area adjacent to an inner/main city, what does “adjacent to” mean? Does it concern schools that are 20km from the city centre? 50km from the city centre? To aid the supervisory officers with these terms, definitions were provided. However, the definition of “suburban” may have still been subjective.

Another limitation concerns supervisory officer roles. Not all the participants have been in their board official role (i.e., superintendent or director) for at least five years. However, they have been in an administrative role. Therefore, most were able to draw from their experiences implementing this policy as a principal or vice-principal.

Some participants worked as a supervisory officer or administrator for a school in a different board for many years (or for most of their career) before their current placement (i.e., before I interviewed them). Consequently, they divulged their experiences from that perspective. For example, one director of education (who is currently employed in Northern Ontario) divulged experiences they had in a low-socioeconomical neighbourhood within a Central Ontario school. Thus, not all the data expressed by participants represents the region in which they currently reside. Although this is the case, most of the board(s) in which they worked are in close proximity to (i.e., in the same geographical area as) the one in which they are currently

employed. Consequently, the supervisory officers were able to still provide experiences related to the geographical locations of the boards and their corresponding schools.

Another limitation pertains to the interview data. This data could have been strengthened through the undertaking of environmental scans. However, Covid prohibited me from conducting the scans. Consequently, I had to expand the interviews from just Eastern Ontario to include superintendents from across Ontario. Moreover, the interview data was cross-referenced with online content from Ministry, school board, and individual school websites/social media pages. Hastings (2010) states, “using multiple sources of data or multiple approaches to analyzing data [enhances] the credibility of a research study.”

The Interview

Although the interview was an appropriate data collection tool, some disadvantages existed. For example, due to the Covid-19 pandemic, I could not conduct face-to-face (in-person) interviews¹²⁰. Since I could not conduct in-person interviews, I resorted to an online platform. While conducting two interviews, the Internet connection was weak. Consequently, the online platform disconnected multiple times which interrupted the interviews’ flow (Garner, 2012). Moreover, the weak connection caused an interviewer-participant response delay. The out-of-turn utterances became a direct interruption. Sometimes the utterance was not properly heard, and the question was ignored – which would not have been the case in an in-person setting (Stephens, 2010). Although this was the case, I repeated the question(s) whenever there was an interruption.

The Framework

The overarching model used to frame this study was developed with Eurocentric conceptions of education policy implementation. Although this framework was the most appropriate one to employ (given the Eurocentric design of P/PM 150 and its implementation process). It must be noted that this study does not address Ontario’s multiculturalism. For instance, it does not consider the differences in epistemology, culture, and politics, between First Nations communities in Ontario and non-Indigenous ones. The framework employed in this

¹²⁰ There are many advantages associated with an in-person (face-to-face) interview: clearly seeing the interviewees facial expressions and non-verbal cues, gleaning contextual data, and being able to conduct the interview in a quiet location (Novick, 2008; Stephens, 2010).

study does not consider First Nations views regarding policy implementation, education, nutrition, or even body image. It seems perplexing that this study does not address these issues since P/PM 150 is being implemented in all public schools across Ontario, some of which are mostly comprised of First Nations students. First Nations communities in Ontario value “holism.”¹²¹ Their culture emphasizes the value of cognitive knowledge, but also self-awareness, emotional growth, social growth, and spiritual development (Canadian Council on Learning, 2009). Their lands, hunting, trapping, and other cultural traditions, contribute to who they are as a people. Because the Canadian government continues to undermine Indigenous food sovereignty (Robin et al., 2021), the NWAC’s (Native Women’s Association of Canada) Board of Directors participated in a roundtable engagement session to help influence the government’s re-evaluation of the National Food Policy for Canada (NWAC, 2018). The Board of Directors asked that the policy consider the additional barriers that Indigenous women experience when attempting to access affordable food.

Problems associated with food sovereignty and colonialism exist and have not been addressed in this study. Moreover, problems associated with employing a Eurocentric framework, were not addressed in this thesis. As a result, I begin to wonder: What would have occurred had a non-Eurocentric framework been employed in this study? How would it have impacted the data collection or the results? These are fascinating questions; however, they are out of this study’s scope. Consequently, these questions should be explored in future research.

Future Research

The supervisory officers mentioned implementation gaps that are reflected in the literature (e.g., lack of stakeholder involvement, revenue loss, fundraising concerns, competitive foods, the restrictive nature of the policy, and policy misinterpretation). Other gaps that literature highlights and the supervisory officers did not, concern a lack of tools, training, resources, and facilities. From this list, the officers only mentioned a lack of financial resources. Would interviews, solely from Northern Ontario/First Nations schools/communities, have yielded the same results? Future research on tools, training, and facilities related to P/PM 150 is warranted. Moreover, future research on re-emphasizing a policy, effective monitoring

¹²¹ Holism concerns the whole person (emotional, physical, spiritual, and intellectual), community, and environment. The epistemological principal of holism is that everything is connected. Knowledge is situated in a relationship to a location, experience, and group of people (Canadian Council on Learning, 2009).

strategies, including how a nutrition paradigm-shift may influence monitoring, should be explored.

New constructs were gleaned from the data: P/PM 150's infeasibility, the policy's revision process, a nutrition paradigm-shift, reasons for monitoring or lack thereof, and cafeteria closure locations. These additional constructs may be useful considerations to guide future implementation evaluations of nutrition policy. Other such constructs that may be worth exploring pertain to on-campus strategies, the effects of demographics, large food providers versus small ones, partnerships resulting from P/PM 150, and BMI (Body Mass Index). These constructs are detailed below.

Since students leaving campus to eat elsewhere is a barrier to P/PM 150's implementation, future research should focus on strategies encouraging students to remain on campus. A supervisory officer stated, "I think part of the investment needs to be in the 'What can we do in schools to keep them in?'"

As limited data exists regarding P/PM 150 and demographics, future studies should explore the affects of P/PM 150 on school cafeterias, specifically in relation to their demographic contexts. Are there more cafeteria closures in urban, suburban, or rural neighbourhood schools? More research is also warranted concerning restaurant sales. Have restaurant sales (within restaurants close to schools) increased since P/PM 150's implementation?

Since two supervisory officers expressed their disappointments in a particular food service provider and one superintendent praised the same company for its efforts, future research should explore this provider's reputation. Is the company complying with P/PM 150's rules? Is it more beneficial to employ a large food provider or a small local one/chef? It may also be worth exploring to what the policy has contributed. What partnerships (community partnerships, Ottawa Public Health, school nurses, etc.) were established? How did the partnerships evolve since its implementation?

Studies measuring BMI (Body Mass Index) of students since the implementation of a nutrition policy exist (Bleich et al., 2013; Ickes et al., 2014; Habib-Mourad et al., 2020). Is there a correlation between P/PM 150's implementation and BMI in Ontario? How successful has this policy been in addressing obesity rates? One superintendent expressed, "P/PM 150 helped us refocus and eliminate the fat around what we were promoting like poutine, chocolate bars, etc." However, has it eliminated actual fat, or has it only been successful at addressing other goals,

such as the removal of deep-fryers in schools? Despite not knowing the answer, another supervisory officer concluded, “here’s something we’ve done well ... say ‘Good job’ ... [People should] celebrate successes and things people have done well.”

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Appendix A

Education Policy in Europe

School food policy factsheets in EU 28 plus Norway and Switzerland				
 Austria	 Belgium-Flanders	 Belgium-Wallonia	 Bulgaria	 Croatia
 Cyprus	 Czech Republic	 Denmark	 Estonia	 Finland
 France	 Germany	 Greece	 Hungary	 Ireland
 Italy	 Latvia	 Lithuania	 Luxembourg	 Malta
 Netherlands	 Norway	 Poland	 Portugal	 Romania
 Slovakia	 Slovenia	 Spain	 Sweden	 Switzerland
 UK-England	 UK-Northern Ireland	 UK-Scotland	 Wales	

European Commission (2015).

Appendix B

Canadian School Nutrition Policies

Nutrition Policies by Province	Who released the policy?	When was the policy released/mandated?		Guidelines Apply to (elementary/secondary)		Guideline Categories	Additional Information
		Released	Mandated	Elementary	Secondary		
New Brunswick <i>Policy 711: Healthier School Food environment</i>	Ministry of Education	1991 (last update 2018)	2008	x	x	Maximum/moderate/minimum nutritional value	- Categories focus on nutrients, fat, sugar, and salt - Items of minimum nutritional value are forbidden when fundraising or when using food as a reward
P.E.I <i>PEI School Nutrition Policy</i>	Ministry of Health & Social services/ Education/P.E.I. Healthy Eating Alliance	2005 (updated 2011)	2013	x	x	Serve most often/serve sometimes/serve least often	- Categories focus on nutrients, fat, salt, caffeine, and sugar - It bans the sale of carbonated soft drinks, energy drinks, and fruit beverages that are not 100% juice
British Columbia <i>Guidelines for Food and Beverage Sales in BC Schools</i>	Ministry of Education/Health	2005 (last update 2013)	2008	x	x	Sell most/sometimes/do not sell	- Categories focus on nutrients, fat, sugar, and salt - It is not supported with a compliance and enforcement program
Manitoba	Provincial Gov't	2006 (last update 2014)	2006/2007 (elementary schools)	x	x	Choose most often/occasionally/rarely	- It aids local schools in creating their own programs based on the

<i>Guidelines for Foods Served at School</i>			& 2007/2008 (secondary schools)				standards within the provincial policy - Updated guidelines known as <i>Moving Forward with School Nutrition Guidelines</i>
Québec <i>Going the Healthy Route at School</i>	Ministère de L'Éducation, du Loisir et du Sport	2007	--	x	x	--	- Very little information on this policy exists - It is based on Canada's Food Guide
Nova Scotia <i>Food and Beverage Standards for Nova Scotia Public Schools</i>	Ministry of Education/Health Promotion & Protection	2006	2009	x	x	Maximum/moderate/minimum nutritional value	- The policy encourages community involvement and the need for supportive healthy environments -Focuses on limiting caffeine and salt
Newfoundland & Labrador <i>Provincial School Food Guidelines for Caterers and Administrators</i>	Gov't of Newfoundland & Labrador	2006 (updated 2008)	--	x	x	Serve most/moderately	- Based on the Canada's Food Guide and the School Milk Program - It provides specific nutrition criteria for fat, sugar, sodium, fibre, iron and calcium
Yukon <i>School Nutrition Policy (Policy 1025)</i>	Yukon Public Health/Safety Act (Ministry of Health & Social Services)	2008 (last update 2010)	--	x	x	--	- Canada's Food Guide & the Traditional Yukon Food Guide are used - It outlines nutrition from both these guides and describes the First

							Nations culture, heritage and language
Northwest Territories <i>Northwest Territories Healthy Foods in Facilities</i>	NWT Health and Social Services	2006	--	x	x	Choose most/sometimes/least/not recommended	- It recognizes the commonly used traditional foods within the territories - All nutritionally related food and beverages should be within vending machines, cafeterias, meetings and special events
Nunavut <i>Nutrition in Nunavut: A Framework for Action</i>	Ministry of Health and Social Services	2007	--	x	x	--	- It does not provide specific examples of menus, nutritional categories - Limited information about the Nunavut Food Security Coalition's (2014) goal about creating school food guidelines for all Nunavut schools
Alberta <i>Alberta Nutrition Guidelines for Children and Youth (ANGCY)</i>	Gov't of Alberta	2008	--	x	x	Choose most/sometimes/least often	- Adopts the Canada's Food Guide - Addresses the cultural diversity within Alberta, including the First Nations, Métis and Inuit cultures
Saskatchewan	Ministry of Education	2009	2012	x	x	Choose most often/sometimes	- It is based on the Canada Food Guide and

<i>Nutrition and Food Safety Guidelines for Saskatchewan Schools</i>							the Healthy Foods for My School by the Saskatchewan Ministry of Health
Ontario <i>The School Food and Beverage Policy</i>	Government of Ontario, Ministry of Education	2010	2011	x	x	Sell most/less/not permitted for sale	-Utilizes Canada's Food Guide - Has "80/20 rule" - Categories focus on nutrients, fat, sugar, and salt

*Note that the symbol (--) within the table indicates either a lack of information or that the policy is not mandatory.

Appendix C

Three Types of Nutrition Guidelines/Policies

- 1). Mandatory provincial policy: provincial policy document intended to be implemented province-wide, as in the cases of **British Columbia, Ontario, New Brunswick, Nova Scotia** and **Prince Edward Island**
- 2). Provincial guidelines for mandatory district policy: a provincial document provides guidance to districts, which are required to develop policies (i.e., there may be variation among the policies at the district level), as in the cases of **Manitoba** and **Saskatchewan**
- 3). Recommended provincial guidelines: a provincial document provides guidance to districts and schools; however, there are no requirements for implementation, as in the cases of **Alberta, Newfoundland and Labrador** and **Québec**

Martorell (2017)

Appendix D

The Nutrition Standards

Understanding the Nutrition Standards

Food or Beverage Group	VEGETABLES AND FRUIT		
	<ul style="list-style-type: none"> • Compare the nutrition criteria below with the Nutrition Facts table and the ingredient list on the food label. • See the section "Nutrition Standards for Beverages" for the nutrition criteria for vegetable and fruit juices and juice blends. • Food should always be prepared in a healthy way – that is, using cooking methods that require little or no added fat or sodium, such as baking, barbecuing, boiling, broiling, grilling, microwaving, poaching, roasting, steaming, or stir-frying. 		
Tips generic tips for each food or beverage group	Healthiest [Sell Most (≥80%)]	Healthy [Sell Less (≤20%)]	Not Permitted for Sale
The Categories	Nutrition Criteria	Nutrition Criteria	Nutrition Criteria
Fresh, Frozen, Canned, and Dried Vegetables and Fruit	Vegetable or fruit (or water) is the first item on the ingredient list and Fat: ≤ 3 g and Saturated fat: ≤ 2 g and Sodium: ≤ 360 mg Examples: <ul style="list-style-type: none"> • Fresh or frozen vegetables with little or no added salt • Fresh or frozen fruit with no added sugar • Canned vegetables • Canned fruit packed in juice or light syrup • Unsweetened apple sauce • Some low-fat frozen potato products, including french fries • Some dried fruit and 100% fruit leathers* 	Vegetable or fruit (or water) is the first item on the ingredient list and Fat: ≤ 5 g and Saturated fat: ≤ 2 g and Sodium: ≤ 480 mg Examples: <ul style="list-style-type: none"> • Some dried fruit and 100% fruit leathers • Lightly seasoned or sauced vegetables and fruit • Some prepared mixed vegetables 	Sugar** is the first item on the ingredient list or Fat: > 5 g or Saturated fat: > 2 g or Sodium: > 480 mg Examples: <ul style="list-style-type: none"> • Vegetable and fruit products prepared with higher amounts of fat, sugar, and/or salt, including deep-fried vegetables • Some packaged frozen and deep-fried potato products, including hash browns and french fries • Some fruit snacks made with juice (e.g., gummies, fruit rolls)

Sub-Group products with a similar nutrient profile	Healthiest [Sell Most (≥80%)]			
	Nutrition Criteria			
Nutrition Criteria specific nutrient levels for each sub-category	Canned Tomatoes and Tomato-Based Products	Fat: ≤ 3 g and Sodium: ≤ 480 mg Examples: <ul style="list-style-type: none"> • Some whole, crushed, or diced tomatoes • Some pasta sauce 		Fat: > 3 g or Sodium: > 480 mg Examples: <ul style="list-style-type: none"> • Whole, crushed, or diced tomatoes that are higher in fat or sodium • Pasta sauce that is higher in fat or sodium
	Vegetable and Fruit Chips	Fat: ≤ 3 g and Saturated fat: ≤ 2 g and Sodium: ≤ 240 mg Examples: <ul style="list-style-type: none"> • Some lower-fat, lower-sodium vegetable chips (e.g., potato, carrot) • Some lower-fat, lower-sodium fruit chips (e.g., banana, apple, pear) 	Fat: ≤ 5 g and Saturated fat: ≤ 2 g and Sodium: ≤ 480 mg Examples: <ul style="list-style-type: none"> • Some vegetable chips (e.g., potato, carrot) • Some fruit chips (e.g., banana, apple, pear) 	Fat: > 5 g or Saturated fat: > 2 g or Sodium: > 480 mg Examples: <ul style="list-style-type: none"> • Some vegetable chips that are higher in fat or sodium • Some fruit chips that are higher in fat or sodium
Examples some common products that may fit into the sub-group				

Footnotes
additional explanatory notes identified in the nutrition criteria and examples

* Food high in sugars and starches (natural or added) can leave particles clinging to the teeth and put dental health at risk. Vegetable and fruit choices of particular concern include fruit leathers, dried fruit, and chips (potato or other). It is suggested that these foods be eaten only at meal times and that foods that clear quickly from the mouth be eaten at snack times, such as fresh (raw or cooked), canned, or frozen vegetables or fruit.

** Look for other words for sugar, such as glucose, fructose, sucrose, dextrose, dextrin, corn syrup, maple syrup, cane sugar, honey, and concentrated fruit juice.

Appendix E

Monitoring Forms

School Inventory of Food and Beverages Offered for Sale

School Name: _____

Complete the inventory below of the food and beverages offered for sale in your school. This will provide an inventory for the school board to assist with the implementation of the School Food and Beverage Policy.

	Are food and beverages offered for sale in the venue, program, event listed?	Provider (if applicable)
Venue		
Cafeteria	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Canteen	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Tuck Shop	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Vending Machines	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Other _____	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Program		
Catered Lunch	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Lunch Program (e.g., pizza day, hot dog day)	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Curriculum Program	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Milk Program	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Other _____	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Event		
Winter Carnival	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Fun Fair	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Family Dinner Night	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Meet the Teacher Night	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Bake Sale/Popcorn Sale	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Graduation	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Performances	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Sporting Events	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Other _____	<input type="checkbox"/> Yes <input type="checkbox"/> No	

Principal Signature

Date

School Assessment

School Name: _____ Date: _____

School Food and Beverage Contact Person: _____

Contact Information: _____

Part A – School Information

1. Does your school have a school implementation team for the School Food and Beverage Policy?

Yes No

2. Do you have any community partnerships established to help implement the School Food and Beverage Policy?

Yes No

If yes, list who will be involved

3. Has information regarding the School Food and Beverage Policy been communicated to:

a. Staff? Yes No

b. Students? Yes No

c. Parents? Yes No

d. Volunteers? Yes No

4. Has your school included a goal specific to healthy eating in the school improvement plan?

Yes No

	Are food and beverages offered for sale in the venue, program or event listed?	Do items from the <i>Sell Most</i> category make up a minimum of 80% of the food and beverage choices?	Are food and beverages from the <i>Not Permitted for Sale</i> category offered for sale?	Does the venue, program or event comply with the 80/20 rule?	If the venue, program or event does not comply, what strategies are in place to ensure future compliance?
Venue					
Cafeteria	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Canteen	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Tuck Shop	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Vending Machines	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Other _____	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Program					
Catered Lunch	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Lunch Program (e.g., pizza day, hot dog day)	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Curriculum Program	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Milk Program	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Other _____	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Event					
Winter Carnival	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Fun Fair	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Family Dinner Night	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Meet the Teacher Night	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Bake Sale/Popcorn Sale	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Graduation	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Performances	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Sporting Events	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Other _____	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	

COMPLIANCE WITH EXISTING
REGULATIONS AND POLICIES

COMPLIANCE

If NO, what plans are in place
to ensure future compliance?

1. Are you in compliance with the Trans Fat Standards regulation?	<input type="checkbox"/> YES <input type="checkbox"/> NO	
2. Have you taken into consideration the strategies developed under your school board's anaphylaxis policy?	<input type="checkbox"/> YES <input type="checkbox"/> NO	
3. Are all food and beverages sold in your school prepared, served and stored in accordance with the safe food handling requirements?	<input type="checkbox"/> YES <input type="checkbox"/> NO	
4. Do all students have access to drinking water during the school day?	<input type="checkbox"/> YES <input type="checkbox"/> NO	
5. How many special-event days have been designated in your school for the upcoming year? <i>Note: Maximum of 10 days, or a number fewer, as determined by the board</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO	_____
6. Was the school council consulted prior to the designation of special-event days?	<input type="checkbox"/> YES <input type="checkbox"/> NO	
7. Has the diversity of your students and staff been considered when deciding the food and beverages to sell in your school?	<input type="checkbox"/> YES <input type="checkbox"/> NO	
8. Do you have a process in place to monitor the implementation of the School Food and Beverage Policy?	<input type="checkbox"/> YES <input type="checkbox"/> NO	

OTHER CONSIDERATIONS

1. Were healthy alternatives considered for special-event days? YES NO

2. Do the teachers in your school provide the necessary instruction (e.g., Health and Physical Education, Science, Technology, Social Sciences) related to healthy eating and nutrition? YES NO

3. Have you consulted with your Board of Health (public health staff) or other community partners to assist with the implementation of the School Food and Beverage Policy? YES NO

4. Have you considered environmentally-friendly practices when determining which food and beverages to sell in your school (e.g., excess packaging, ability to recycle)? YES NO

5. Have you considered using, when available and where possible, food and beverages that are produced in Ontario? YES NO

6. Is safe food handling training available for individuals involved in the preparation and sale of food and beverages in the school? YES NO

7. Are only food and beverages from the *Sell Most* and *Sell Less* categories available at classroom celebrations, school events, class parties and field trips? YES NO

8. Have you considered healthy alternatives for school fundraisers? YES NO

9. Food or beverages are not offered as a reward or incentive for good behaviour, achievement or participation? YES NO

10. Have you included parents, volunteers and community partners in the planning, implementation and monitoring of the School Food and Beverage Policy? YES NO

Letter of Compliance

Name of Food Service Supplier: _____

Address: _____

Contact Name: _____

Contact Email: _____ Contact Phone #: _____

We/I, the above named Food Service Supplier, have read and understand the requirements of the Ministry of Education's School Food and Beverage Policy.

We/I have assessed the products that we are selling in your school against the requirements of the School Food and Beverage Policy and confirm that:

- At least 80% of all food choices and at least 80% of all beverage choices offered for sale in any venue, program, or event are from the *Sell Most* category.
- No food or beverages will be sold from the *Not Permitted for Sale* category.

Please send the signed Letter of Compliance to:
[enter school contact information]

Signature

Date

For the full text copy of the Ministry of Education's School Food and Beverage Policy, please visit www.ontario.ca/healthyschools

Government of Ontario, Ministry of Education (2010), pp. 100, 102-105, 113.

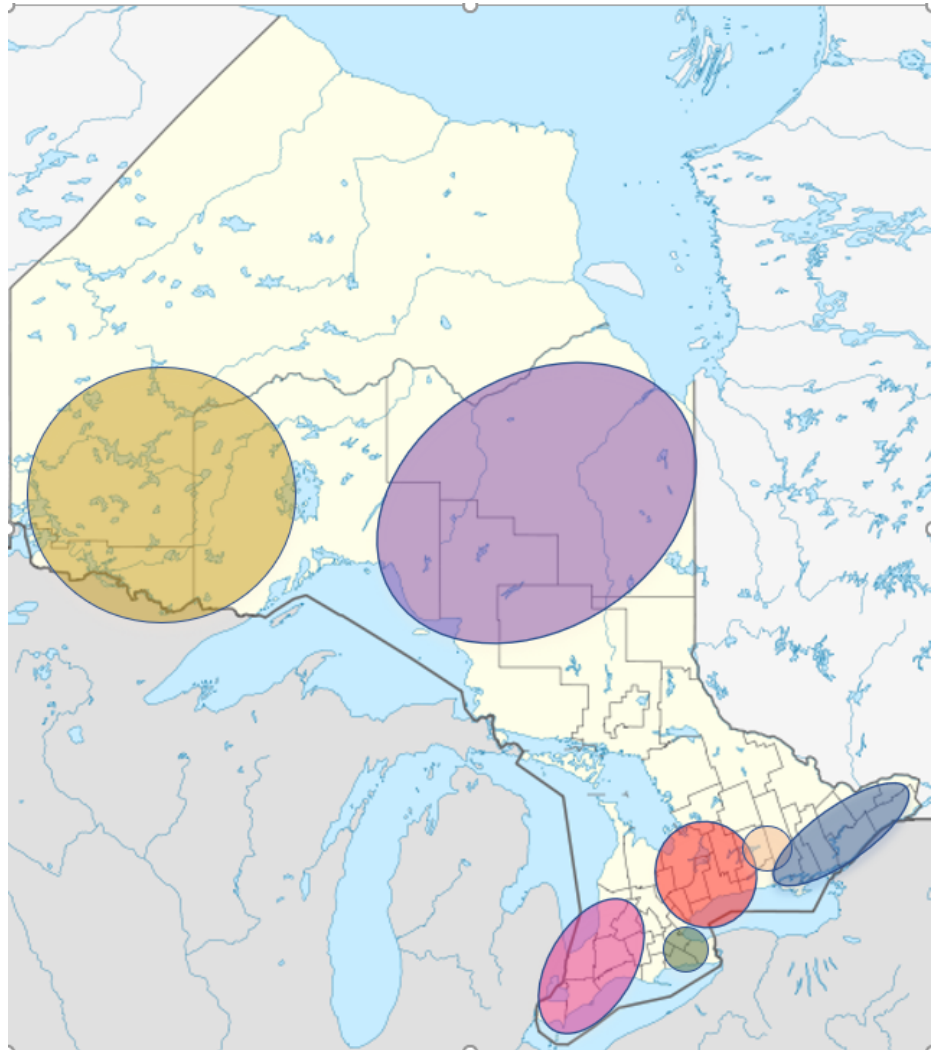
Appendix F

Ontario Regional Map

*Note that all the coloured circles/ovals indicate the different Ontario regions in which the seventeen school boards are (see legend below). To maintain school board privacy, each board is not specifically identified; however, it must be noted that each coloured circle/oval does not exceed the boards' perimeters.

Legend

- Central
- Eastern
- North-Eastern
- Northern
- North-Western
- Southern
- Western



Appendix G

Number of Rural, Suburban, and Urban Secondary Schools per School Board

*To maintain anonymity, the seventeen school boards are identified with letters (A, B, C, etc.). Moreover, SB stands for School Board.

School Board & Region	# Rural High Schools	# Suburban High Schools	# Urban High Schools	Total
SB A (Central)	--	--	8	8
SB B (Central)	1	3	18	22
SB C (Central)	--	3	1	4
SB D (Central)	--	--	6	6
SB E (Central)	3	7	5	15
SB F (Eastern)	--	--	5	5
SB G (Eastern)	1	10	--	11
SB H (Eastern)	1	6	--	7
SB I (Eastern)	--	--	4	4
SB J (North-Eastern)	3	1	3	7
SB K (Northern)	1	--	--	1
SB L (Northern)	5	--	--	5

SB M (North-Western)	5	--	--	5
SB N (Southern)	--	--	7	7
SB O (Western)	4	4	--	8
SB P (Western)	1	5	9	15
SB Q (Western)	5	9	13	27

Appendix H

Number of Schools in High- and Low-Income Neighbourhoods

*Note that only the schools in high- and low-income neighbourhoods are listed. Consequently, the schools within medium-income neighbourhoods are not in this table. Notice that most schools fall within the medium-income category.

School Board & Region	# High Schools (High-Income)	# High Schools (Low-Income)
SB A (Central)	8	--
SB B (Central)	20	--
SB C (Central)	2	--
SB D (Central)	--	--
SB E (Central)	--	--
SB F (Eastern)	--	--
SB G (Eastern)	1	4
SB H (Eastern)	--	--
SB I (Eastern)	--	--
SB J (North-Eastern)	--	3
SB K (Northern)	--	--
SB L (Northern)	--	--

SB M (North-Western)	--	--
SB N (Southern)	--	--
SB O (Western)	--	--
SB P (Western)	3	--
SB Q (Western)	2	--

Appendix I

Supervisory Officer Interview Questions

Topic: Exploring the Ontario Food and Beverage Policy (P/PM 150)

Purpose: To explore the implementation of P/PM 150 from the perspective of supervisory officers in Ontario.

Question: How is P/PM 150 being implemented in secondary schools by school boards and the Ministry of Education?

High-income=This concerns households producing well over the “cut-off” line, often \$80,400.00/year or higher depending on community and family size.

Low-income= The income below the “cut-off” line which is based on community size and family size.

Urban Schools= Schools in an inner/main city. The city is comprised of more than 50,000 people.

Suburban Schools=Schools in a residential area (with stores, etc.) that are adjacent to an inner/main city, or surround that city. The suburb has a population between 5000 and 50,000.

Rural Schools=Schools in the country where the closest store/restaurant is more than 5km away from the school. These schools are in an area with a population of less than 5000.

1). What are your views on comprehensive health (eating healthily, etc.) with respect to nutrition policy? P/PM 150?

Possible probe question: How high of a priority are nutrition policies, including P/PM 150, to you in relation to other protocols within the educational system?

2). Did you partake in the design of the policy? If so, how did you contribute to P/PM 150’s design? (i.e., writing sections, objectives and/or relating ideas and/or helping revamp/tweak the policy after its initial implementation?)

3). Have you noticed a difference in its implementation when dealing with high-income neighbourhood schools and low-income neighbourhood schools?

4). Have you noticed a difference in its implementation among urban, suburban and rural secondary schools?

Probe Question: Have you noticed a difference in its implementation in schools that are in close proximity to fast-food eateries, where students can leave premises to purchase food elsewhere?

5). Do you meet with other school-level administrators from within your board concerning P/PM 150? If so, how often do you meet with them for P/PM 150 updates?

6). Of what do these meetings generally comprise?

7). How else do you monitor and/or support the implementation of P/PM 150 across the schools within your board?

Probe Question: Since there is a turnover of parents, teachers and principals, are there yearly training sessions for them? Is a letter sent every year ensuring schools are complying? Who verifies schools meeting compliance?

Probe Statement: According to a source, school boards have indicated that no additional training is needed as the implementation is running smoothly; however, other sources indicate that schools are having difficulties complying or are just not complying.

Follow-Up Question: Do you engage with PICs (Parent Involvement Committees) or parent associations as well to ensure that parents, especially those involved in ordering school food, are aware of the Policy?

8). How do the following forms (“School Inventory of Food and Beverages Offered for Sale” and “School Assessment” that are overseen by you, ensure the implementation of the policy?

9). What have been the advantages and disadvantages (or facilitators and barriers) of implementing P/PM 150 since its genesis?

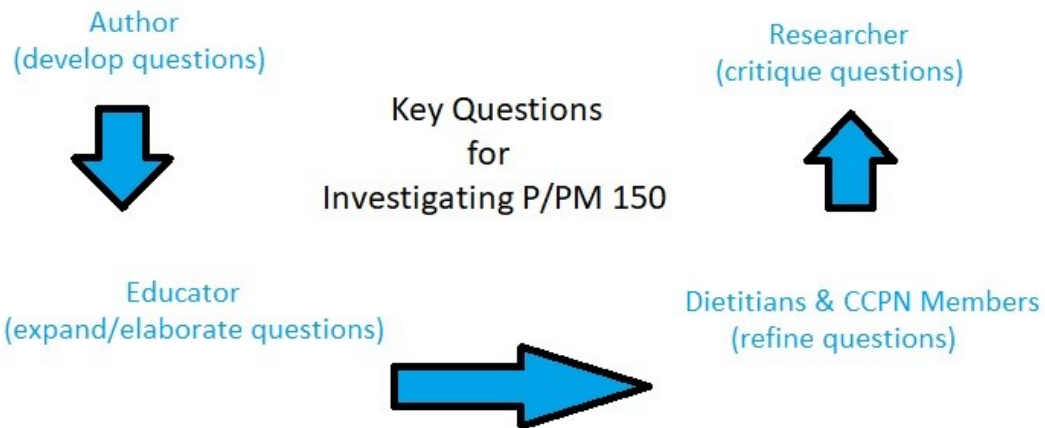
Probe Questions: Has profit from the cafeteria and vending machines increased, decreased or maintain since its implementation? Are food providers conforming/adapting recipes to meet P/PM 150 standards? Are the majority, many, or very few stakeholders complying, including students and parents?

10). How could the implementation of P/PM 150 be improved? OR How could P/PM 150 be better monitored?

Probe Questions: In regards to Practices of Considerations, do schools avoid offering food or beverages as a reward or an incentive for good behaviour, achievement or participation? Have schools reduced the number of “exemption days” for special events? Are there any training events on P/PM 150 for new teachers or parents who deal with food services in schools? Is there any promotional action done to promote P/PM 150 or healthy eating in general?

Appendix J

Integrated Inquiry: Interview Question Development



T. Wendzich

Appendix K

Online Content Assessment Tool

School Board Name/Individual School Name:
Online Content Type (Website, Social Media Page):
School Board Type/Individual School Type (Urban, Suburban, Rural):
School Neighbourhood (High- or Low-Income)¹²²:
Date:

Nutrition (In General)

- Q1. What content/photographs relate to nutrition (not P/PM 150)? What is the context (e.g., breakfast/lunch programs, fundraisers, etc.)?
- Q2. What content/photographs relate to nutritious food, junk food, or both? Specifically, what are the foods? What are the contexts in which they are presented?
- Q3. What content/photographs relate to nutrition courses/curriculum/school facilities? Describe.

P/PM 150's Design

- Q4. If the policy (or the school board version) is online, what is the layout and content of the policy?
- Q5. Is there evidence of who designed the policy?
- Q6. Are there any resources or tools listed/provided that are associated with the policy?
- Q7. Is there mention of an evaluation process of the policy? Has the policy been evaluated? Will it be evaluated?

P/PM 150: Stakeholder Engagement

- Q8. Are there any responses/reactions from stakeholders that are evident in school council minutes, newsletters, school letters, etc.? Describe in detail.
- Q9. Is there any evidence of stakeholders' beliefs and interests in the policy?

¹²² If it does not fall within those two categories (i.e., if it falls within the medium-income category), then its designation is N/A.

Q10. Does the online content reveal who the implementers are? If so, who are they?

P/PM 150: Contexts

Q11. What content/photographs relate to the school's internal setting (e.g., school facilities: cafeteria space, etc.)?

Q12. What content/photographs relate to the school's external setting (e.g., restaurants)?

P/PM 150's Implementation

Q13. How is the policy being communicated (e.g., through newsletters, meetings/discussions, etc.)? Who is communicating it?

Q14. Is there training associated with the policy? If so, provide details about the training sessions/modules.

Q15. Is there promotional material (posters, school events, etc.) associated with the policy? Describe.

Q16. Are monitoring and accountability measures mentioned in association with the policy? If so, how is it being monitored?

Q17. Are impacts of the policy explicitly mentioned (e.g., cafeteria sales, partnerships, etc.)?

P/PM 150 Related Procedures

Q18. Are there procedures related to P/PM 150? If so, what? What is the design/layout of these procedures?

Q19. Is there an evaluation process associated with these procedures? Have these procedures been evaluated? Will they be evaluated?

Appendix L

Ethics Approval

27/05/2020

Université d'Ottawa

Bureau d'éthique et d'intégrité de la recherche

University of Ottawa

Office of Research Ethics and Integrity

CERTIFICAT D'APPROBATION ÉTHIQUE | CERTIFICATE OF ETHICS APPROVAL

Numéro du dossier / Ethics File Number

S-03-20-4023

Titre du projet / Project Title

Willy Wonka and the nutrition policy: Superintendents' perceptions of Ontario's P/PM 150

Type de projet / Project Type

Thèse de doctorat / Doctoral thesis

Statut du projet / Project Status

Approuvé / Approved

Date d'approbation (jj/mm/aaaa) / Approval Date (dd/mm/yyyy)

27/05/2020

Date d'expiration (jj/mm/aaaa) / Expiry Date (dd/mm/yyyy)

26/05/2021

Équipe de recherche / Research Team

Chercheur / Researcher

Affiliation

Role

Tessandra WENDZICH

Faculté d'éducation / Faculty of Education

Chercheur Principal / Principal Investigator

Bernard ANDREWS

Faculté d'éducation / Faculty of Education

Superviseur / Supervisor

Conditions spéciales ou commentaires / Special conditions or comments

Université d'Ottawa

Bureau d'éthique et d'intégrité de la recherche

University of Ottawa

Office of Research Ethics and Integrity

Le Comité d'éthique de la recherche (CÉR) de l'Université d'Ottawa, opérant conformément à l'*Énoncé de politique des Trois conseils* (2014) et toutes autres lois et tous règlements applicables, a examiné et approuvé la demande d'éthique du projet de recherche ci-nommé.

L'approbation est valide pour la durée indiquée plus haut et est sujette aux conditions énumérées dans la section intitulée "Conditions Spéciales ou Commentaires". Le formulaire « Renouvellement ou Fermeture de Projet » doit être complété quatre semaines avant la date d'échéance indiquée ci-haut afin de demander un renouvellement de cette approbation éthique ou afin de fermer le dossier.

Toutes modifications apportées au projet doivent être approuvées par le CER avant leur mise en place, sauf si le participant doit être retiré en raison d'un danger immédiat ou s'il s'agit d'un changement ayant trait à des éléments administratifs ou logistiques du projet. Les chercheurs doivent aviser le CER dans les plus brefs délais de tout changement pouvant augmenter le niveau de risque aux participants ou pouvant affecter considérablement le déroulement du projet, rapporter tout événement imprévu ou indésirable et soumettre toute nouvelle information pouvant nuire à la conduite du projet ou à la sécurité des participants.

The University of Ottawa Research Ethics Board, which operates in accordance with the *Tri-Council Policy Statement* (2014) and other applicable laws and regulations, has examined and approved the ethics application for the above-named research project.

Ethics approval is valid for the period indicated above and is subject to the conditions listed in the section entitled "Special Conditions or Comments". The "Renewal/Project Closure" form must be completed four weeks before the above-referenced expiry date to request a renewal of this ethics approval or closure of the file.

Any changes made to the project must be approved by the REB before being implemented, except when necessary to remove participants from immediate endangerment or when the modification(s) only pertain to administrative or logistical components of the project. Investigators must also promptly alert the REB of any changes that increase the risk to participant(s), any changes that considerably affect the conduct of the project, all unanticipated and harmful events that occur, and new information that may negatively affect the conduct of the project or the safety of the participant(s).

Kim THOMPSON

Responsable d'éthique en recherche / Protocol Officer

Pour/For Barbara GRAVES Président(e) du/ Chair of the Comité d'éthique de la recherche en sciences sociales et humanités / Social Sciences and Humanities Research Ethics Board

Appendix M

Food for thought: P/PM 150's implementation in Ontario – Active Consent Form

Names of researchers/supervisors and contact information

Mrs. Tessandra Wendzich
PhD Student
Faculty of Education
University of Ottawa

Bernard W. Andrews, EdD
Thesis Supervisor
Faculty of Education
University of Ottawa
Office #: (613) 562-5800 ex. 4028
Email: b.w.andrews@uottawa.ca
Office: LMX 232

Invitation to Participate: I am invited to participate in a research project conducted by Mrs. Tessandra Wendzich, under the supervision of Professor Andrews as part of her PhD, at the University of Ottawa.

Purpose of the Study: I understand that the purpose of the study is to collect information on supervisory officers' perceptions of Ontario's School Food and Beverage Policy (P/PM 150). This data will contribute to the few studies on P/PM 150, as well as the research on nutrition policies, specifically, how they are being implemented and how the gap between policy and practice may be bridged. It will reveal the ways in which supervisory officers and policy makers within the Government of Ontario, Ministry of Education can improve P/PM 150's execution. Consequently, students, staff and parents may learn more about healthy food behaviours. Moreover, this study may encourage post-secondary institutions and more hospitals to implement similar nutrition policies. It may also be of interest to obesity- and education-related policy makers.

Participation: My participation will consist of participating in an interview about my experiences with P/PM 150. The time needed for this is approximately 45 minutes. This will take place at a time and location convenient to me. Mrs. Tessandra Wendzich will audio-record my responses.

Assessment of risks: My participation in this study entails no foreseeable risks. However, if I experience any discomfort, Mrs. Tessandra Wendzich has assured me that she will make every effort to minimize this discomfort. I may decide to stop the interview at any time.



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University of Ottawa
Faculty of Education
Office of the Dean

Benefits: By divulging my experiences with P/PM 150 and some personal ideas concerning this nutrition policy, I will contribute to an enlarged understanding of the School Food and Beverage Policy from the perspective of a supervisory officer.

Privacy of participants: I have received assurance from Mrs. Tessandra Wendzich that the information I share will remain strictly confidential. *The information collected for this project is confidential and protected under the Municipal Freedom of Information and Protection of Privacy Act, 1989.* My identity will be protected. Identifying information of names and places within the data will be altered as needed.

I understand that the pseudonyms will be assigned to participants to protect the anonymity of participants. The contents will be used for her PhD thesis.

I understand that a synthesis of the data that I submit will be provided to me for comment and revision by password-protected e-mail before a final copy of the research is produced for publication.

Confidentiality and conservation of data: I have been assured that the audio recording will be kept in a secure manner at the researcher's home during the research and on a password protected computer and all hard copies will be kept in a locked filing cabinet. A copy of all original data will be securely stored for five years following data collection. Thus, upon completion of the project (i.e., when Mrs. Wendzich graduates, likely in June 2023), all material data will be shredded and electronic data will be erased in October 2025.

Voluntary Participation: I am under no obligation to participate and if I choose to participate, I can withdraw from the study at any time and/or refuse to answer any questions, without suffering any negative consequences. If I choose to withdraw, all data gathered until the time of withdrawal will be destroyed.

Acceptance: I, _____ [*Name of supervisory officer; please print*], agree to participate in the above research study conducted by Mrs. Tessandra Wendzich as part of her PhD at the Faculty of Education, University of Ottawa under the supervision of Professor Bernard W. Andrews.

I, _____ [*Name of supervisory officer; please print*], give permission for the interview to be audio-recorded in the above research study conducted by Mrs. Tessandra Wendzich as part of her PhD at the Faculty of Education, University of Ottawa under the supervision of Professor Bernard W. Andrews. Please check the corresponding box below:

- YES
- NO

If I have any questions about the study, I may contact Mrs. Tessandra Wendzich, the principal investigator, or Professor Bernie Andrews, the thesis supervisor.

If I have any questions regarding the ethical conduct of this study, I may contact the Office of Research Ethics and Integrity, University of Ottawa, Tabaret Hall,

613-562-5800 (4057)
613-562-5144

145 Jean Jacques Lussier
Ottawa ON K1N 6N5 Canada
www.uOttawa.ca



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Cabinet de la doyenne
University of Ottawa
Faculty of Education
Office of the Dean

550 Cumberland Street, Room 154, Ottawa, ON K1N 6N5 Tel.: [613] 562-5387
Email: ethics@uottawa.ca

There are two copies of the consent form, one of which is mine to keep.

Participant's Signature Date:
Institutional Affiliation (if applicable):

Researcher's Signature Date:

613-562-5800 (4057)
613-562-5144

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Appendix N

Assessment & Evaluation Tools

Venues, Programs and Events Assessment Tool

Fill out one of these forms for each program, venue and event where food and/or beverages are offered for sale.

Part A – Information

Date of Analysis: _____

Contact Name: _____

Are you assessing a (check one): Program Venue Event

Name of the Program/Venue/Event: _____

Part B – Food Inventory and Category

Product Name	Group	Sub-Group	Category Rating		
			Healthiest (Sell Most)	Healthy (Sell Less)	Not Permitted for Sale

Part C – Beverage Inventory and Category

Product Name	Group	Sub-Group	Category Rating		
			Healthiest (Sell Most)	Healthy (Sell Less)	Not Permitted for Sale

Part D – Assessment

Food Choices	Beverage Choices
Total number of choices = _____	Total number of choices = _____
Healthiest (Sell Most) choices = _____ = _____%	Healthiest (Sell Most) choices = _____ = _____%
Not Permitted for Sale choices = _____	Not Permitted for Sale choices = _____

Does the program, venue or event comply with the School Food and Beverage Policy? Yes No

Part E – Next Steps

If No, outline your next steps to comply with the School Food and Beverage Policy.

Government of Ontario, Ministry of Education (2011), pp. 74-75.

Special Event Tracker

School Name: _____
 School Year: _____

	Special Event	Date	Lead Staff/Volunteer	Students Involved	Comments
1.					
2.					
3.					
4.					
5.					
6.					
7.					
8.					
9.					
10.					

Government of Ontario, Ministry of Education (2010), p. 116.