



April 28, 2014

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Comments from the American Cancer Society Cancer Action Network on the U.S. Department of Agriculture Proposed Rule on Local School Wellness Policy Implementation Under the Healthy, Hunger-Free Kids Act of 2010 (RIN 0584-AE25)

Dear Ms. Brewer:

The American Cancer Society Cancer Action Network (ACS CAN) is pleased to provide comments on the proposed rule for Local School Wellness Policy Implementation under the Healthy, Hunger-Free Kids Act of 2010. ACS CAN is the nonprofit, nonpartisan advocacy affiliate of the American Cancer Society that supports evidence-based policy and legislative solutions designed to eliminate cancer as a major health problem. ACS CAN is strong supporters of robust school policies that create healthy, supportive learning environments and help build the foundation for the establishment of lifelong healthy behaviors where children spend a majority of their day.

Local School Wellness Policies are Cancer Prevention Policies

For the majority of Americans who do not use tobacco, the most important behaviors to reduce cancer risk are weight control, dietary choices, and physical activity. Overweight and obesity are clearly associated with an increased risk of cancers of the breast in postmenopausal women, colorectal, endometrium, kidney, adenocarcinoma of the esophagus, and pancreas and may be associated with many other cancers¹. In its Guidelines on Nutrition and Physical Activity for Cancer Prevention, the Society recognizes the importance of both individual choice and community action to modify these behaviors in order to successfully reduce the nearly one-third of cancer deaths attributable to poor diet, physical inactivity, and overweight and obesity.

Community action in schools that address weight control, dietary choices, and physical activity in children and adolescents, in particular, offer a unique opportunity for cancer prevention. First, focusing interventions on youth can establish behaviors that can reduce cancer risk and promote and maintain health over the course of their lifetime. The Guidelines acknowledge that creating these healthy behaviors in youth is more effective, and perhaps easier, than efforts to change unhealthy behaviors once they are adults. Second, schools offer an opportunity to reach most, if not all, children and adolescents because youth spend half their time, and consume at least one-third of their daily calories, at school during the school year. As the Institute of Medicine report *Accelerating Progress in Obesity Prevention: Solving the Weight of the Nation* stated, schools have acknowledged their responsibility for the health and well-being of its students, such as by requiring immunizations, in addition to their mission to teach academic skillsⁱⁱ. Furthermore, these two responsibilities are interrelated, as there is more evidence about the positive relationship between providing a healthy school environment and students' academic achievement. Local school wellness policies are an opportunity for schools to comprehensively plan, implement, and evaluate a healthy school environment to establish the positive eating and physical activity habits in children and adolescents that can ultimately reduce their risk for cancer and maintain and improve their health over the course of their lifetime.

General Comments

We believe the proposed rule strengthens the existing guidelines around local school wellness policies by assuring that schools have clear and measurable goals for nutrition promotion and education, physical activity, food marketing and advertising, as well as other school-based activities that promote student wellness. The proposed rule also improves accountability and public reporting to provide transparency with parents, students, and the community on implementation, progress, and regular review of the wellness policy. Additionally, it helps to assure adequate representation across the school environment and community on the wellness committee by key stakeholders, including leadership by one or more local education agency (LEA) or school official(s), to optimize the development, implementation, and coordination of the local school wellness policy with input and accountability from those involved.

One point that is not addressed in the proposed rule is a timeline for implementation. We propose that LEAs be required to implement this rule at the beginning of the school year that is not earlier than one year and not later than two years following the date on which the regulations are finalized. We would ideally like to see the rule implemented by school year 2015-16, and hope that USDA will finalize the rule as quickly as possible to help schools begin to comply with the new requirements.

We strongly encourage USDA to provide the types of guidance, model policies, toolkits, and resources detailed in the preamble to support LEAs in implementing the final rule. Additionally, in the rule itself, we encourage USDA to expand the definitions section [210.30 (b)] to include definitions of designated local education or school official(s), local school wellness policy, nutrition promotion and education, physical activity and physical education, and food and

beverage marketing as a way of provide further detail and clarity. We offer the following model language:

Designated local education or school official(s): The *designated local education or school official(s)* is the official designated by the local education agency to lead the local school wellness policy for a district or school. The official must fully understand the local school wellness requirements of the National School Lunch Act (NSLA), facilitate the development and updates of the local school wellness policy, and has the authority and responsibility to ensure that each school complies with the policy.

School Wellness Policy: *School wellness policy* includes the school board-approved local wellness policy as well as any superintendent or principal regulations, rules, and/or procedures that accompany the school board-approved wellness policy for both the school district and school level, where applicable.

Nutrition Education and Promotion: *Nutrition promotion and education* refers to all activities that engage students directly or indirectly in classroom settings, foodservice venues, or throughout the school campus, during the school day, that are designed to provide learning opportunities and facilitate adoption of healthy food and beverage choices and healthy portion sizes, in addition to enhancing and encouraging participation in school meal programs, and other food- and nutrition-related behaviors consistent with the most recent *Dietary Guidelines for Americans*, and other evidence-based recommendations from scientific bodies, such as the Institute of Medicine and the World Health Organization.

Food and Beverage Marketing and Advertising: *Food and Beverage Marketing and Advertising* means any oral, written, or graphic statement or representation, including a company, brand, or product logo, trademark, or spokescharacter, made for the purpose of promoting the use or sale of a product by the producer, manufacturer, distributor, seller, or any other entity with a commercial interest in the company, brand, or product. The location and timeframe for marketing and advertising covers any property or facility owned or leased by the school district or school (such as school buildings, athletic fields, transportation vehicles, parking lots, or other facilities) and used, at minimum, at any time during the school day. USDA may want to consider recommending that schools and school districts extend the marketing and advertising policy to remain in effect beyond the end of the school day, or at all times.

Physical Education: Physical education teaches students the basics of physical literacy and how to integrate physical activity into their lives in order to establish a lifetime of healthy living. A quality physical education program provides learning opportunities, appropriate instruction, evidence-based and sequential content for all children, including children with disabilities, as well as student and program assessment. Physical education should be the cornerstone of increasing the overall quantity of physical activity in school.

Physical Activity: Physical activity is bodily movement of any type and may include recreational, fitness, and sport activities, such as jumping rope, playing soccer, lifting weights, as well as daily

activities, such as walking or taking the stairs, and reducing sedentary time. Opportunities to accumulate physical activity during the school day and on the school campus include time spent in physical education class, classroom-based movement, recess, walking or biking to school, and recreational sport and play that occurs before, during, and after school. Other types of physical activity should not be allowed to substitute for physical education.

Specific Comments on Provisions of the Proposed Rule:

Local School Wellness Policy Leadership

We strongly support the requirement that there be one or more LEA or school official(s) who serves as the designated contact for the wellness policy and is ultimately responsible for implementation, conveying progress, and ensuring regular reviews and updates of the wellness policy, and assuring school compliance with the policy. We would also recommend that the LEA designate an official at both the district and school level to facilitate full implementation of the local school wellness policy. It is important that the LEA make the name, position title, and contact information for the designated official(s) available on the district and individual school websites, in communications to parents, in school newsletters, and/or in other school communications.

As recommended in the preamble and the definition above, it is important that the designated official fully understands the local school wellness requirements of the NSLA, facilitate the development and updates of the local school wellness policy, and has the authority and responsibility to ensure that each school complies with the policy. As such, we recommend that the accountable person be at the leadership level (e.g., a district superintendent). In addition, more than one designee would be appropriate to support leadership in various aspects of the policy (e.g., health services, curriculum, nutrition education, physical education). School food professionals should be involved in the development and monitoring of a wellness policy, but should not necessarily be designated as the responsible party, since only a portion of wellness policies is directed towards school foods. Many school food service professionals report that monitoring is most effective when it is the responsibility of a school principal or superintendent, who can engage support from other members of the wellness committee.

Public Involvement in Local School Wellness Policy Development

We support the requirement that schools seek to involve a broad array of stakeholders to participate in the development, implementation, and periodic review and update of the local school wellness policy to assure coordination across the school environment and throughout the community.

In particular, we encourage the coordination with SNAP-Ed coordinators and educators as mentioned in the preamble, especially as these educators should be prepared to incorporate physical activity into SNAP-Ed resources and technical assistance. We also encourage USDA to provide LEAs with information and guidance for coordinating with other state and local health, education, and transportation departments that can have beneficial programs or resources to assist in implementing local school wellness policies (including state health departments that

have received funding under the *State Public Health Actions to Prevent and Control Diabetes, Heart Disease, Obesity, and Associated Risk Factors and Promote School Health* grant program).

Content of the Local School Wellness Policy

We support the areas of coverage of the proposed rule, including nutrition promotion and education, physical activity, nutrition guidelines for all foods, food and beverage marketing, and other school-based activities and resources that promote student wellness. Improved coordinated school health programs will augment health promotion and chronic disease prevention efforts and help improve fitness, academic performance, mental health, physical health, and well-being across the school environment.

We believe that the resources, toolkits, and model policies USDA should provide will be essential to ensuring schools' success in implementing local school wellness policies. We encourage USDA to incorporate the resources of other organizations (such as WellSAT, the Alliance for a Healthier Generation's Smart Snack calculator, and other resources) in your supporting materials. We strongly agree that local school wellness policies should include measurable short and long term goals, and should include processes for modifying the policies in order to meet the short and long term goals. We are pleased that USDA will provide guidance to and models for LEAs on how best to create strong, clear goals with specific and measurable objectives and benchmarks.

Nutrition Promotion and Education

We strongly support continuing to include nutrition promotion and education in the local school wellness policy. The examples that USDA provides on how schools might implement nutrition promotion and education activities (e.g. integrated into core and elective subjects, posters, participatory activities, information provided to families, etc.) are helpful, and we encourage USDA to provide strong guidance and resources to LEAs to support implementation of these recommendations. Additionally, materials used for nutrition promotion and education should support new food and beverage marketing standards employed by the school or district.

Including nutrition education as a core component of health education classes, as well as integrating nutrition education throughout the curriculum, are effective ways to implement nutrition education in the school environment. We encourage USDA to utilize the resources developed by the Institute of Medicine in this area in your guidance to LEAs.ⁱⁱⁱ In addition, engaging with families through school-sponsored family wellness activities is important in ensuring that nutrition lessons are brought home. Providing students and parents with nutrition education and information can help encourage students to make healthy choices both inside and outside of school by addressing portion size, weight management, and energy balance. Informing parents about how the school is addressing nutrition, nutrition education, and physical activity, and providing ideas and resources about how families can reinforce these lessons, are important to sustain healthy behaviors.

Physical Education & Activity

We strongly support including physical activity in the local school wellness policy. We recommend that USDA specifically mention in its guidance to LEAs and model local wellness policies that school-age children should accumulate at least 60 minutes per day of physical activity and avoid prolonged periods of inactivity. The key method for achieving this goal is quality physical education supplemented by additional opportunities for physical activity before, during, and after the regular school day.^{iv} USDA should include recommendations to limit screen time and long periods of sedentary behavior during the school day. As noted previously, we feel it is important for USDA to define physical education and physical activity within the actual rule, provide examples of physical activity opportunities before, during, and after school, and reiterate the importance of physical education as the cornerstone for physical activity.

We are glad that the agency has mentioned so prominently the importance of incorporating requirements regarding the quality and quantity of physical education into the local school wellness policy. ACS CAN, in partnership with the American Heart Association and the American Diabetes Association, has developed a policy statement and supporting materials containing evidence-based policy recommendations regarding physical education and physical activity in schools. USDA may want to incorporate these consensus recommendations in its guidance to LEAs on physical education or physical activity or promote the policy statement^v and supporting materials^{vi vii} as additional partner tools that may be a useful resource. As part of model local school wellness policies,^{viii,ix,x,xi,xii} we encourage the agency to include recommendations for the following:

- physical education curricula,
- time per week of physical education, including increasing time spend in moderate to vigorous physical activity during physical education classes,
- increasing supplemental physical activity opportunities before, during, and after the school day,
- improving teacher qualification and certification requirements, as well as offering regular professional development opportunities,
- appropriate equipment and adequate facilities,
- program and student assessments with reporting requirements, and
- coordinating with additional educational or home-based components

In the preamble, USDA mentions developing recommendations for waivers and exemptions from physical education classes and physical activity. We strongly encourage USDA to provide guidance that would prohibit waivers and substitutions for physical education, including the following:

- Disallow automatic waivers or substitutions for physical education.
- Disallow using or withholding physical activity as punishment.
- Do not allow waivers for students with disabilities, but rather provide modifications or adaptations that ensure physical education courses meet the needs of students with disabilities.

- Do not allow students to opt out of physical education to participate in other classes or prepare for standardized tests.

We appreciate that USDA mentions shared use as a possible component of the local school wellness policy. Opening school buildings and grounds during non-school hours for community use is an important way to foster physical activity opportunities in communities. Incorporating shared use in the local school wellness policy can give schools a head start in developing that policy, including identifying shared-use opportunities with community members, community groups, or school or public agencies during non-school hours for use of their facilities.

We encourage USDA to offer guidance on the Presidential Youth Fitness Program and recommend that local school wellness policies encourage schools to participate in all three aspects of the program (assessment, professional development, and recognition). As part of local school wellness policies, LEAs should be encouraged to report their results from the Presidential Youth Fitness Program in an aggregate manner to the community and the relevant state agency. This data reporting will help to improve tracking of physical fitness data across the United States and inform efforts to strengthen local school wellness policies to improve student physical activity and physical fitness.

Other School-based Wellness Activities

We appreciate the excellent examples that USDA provided for other LEA activities that integrate nutrition, physical activity, and health into the school environment. These include school gardens, farm to cafeteria activities, healthy fundraisers, the HealthierUS School Challenge, outreach to families, and staff wellness activities and professional development opportunities that inspire school staff to serve as role models for students. USDA should provide these examples to schools as part of its guidance and model local wellness policies. We also think it is important that LEAs are encouraged to assess their progress on achieving their local school wellness policy goals using CDC's School Health Index or other evaluation tools, such as the Alliance for a Healthier Generation's Healthy Schools Program Inventory. USDA and CDC should offer regular trainings to schools on how to complete the School Health Index.

Nutrition Guidelines for All Foods

We fully support coordination and alignment with USDA's school meal and Smart Snack standards. We agree that LEAs should be encouraged to describe whether and how their food and beverage offerings comply with the new meal and Smart Snack standards, including whether in-school fundraisers that involve food and beverages meet the Smart Snacks standards.

USDA should provide model local wellness policy language and guidance on the promotion of nutrition information and how the school or LEA is implementing the local school wellness policy. This guidance should include recommendations regarding posting school menus on school websites, information on school meal program participation and compliance reporting, meal timing and duration (including recess before lunch and adequate seat time), and the availability of free drinking water throughout the school day and during school meals. USDA

also should encourage schools through guidance and model policies to extend the USDA standards beyond the school day to cover after school activities.

In addition, we support that local school wellness policies address standards for all foods and beverages *available* on campus, including through classroom parties and celebrations, snacks served at school that are not part of a federally reimbursed food assistance program, and food rewards and incentives. To maintain consistency, we suggest that USDA encourage schools to use the Smart Snacks nutrition standards for all foods and beverages, including those that are not automatically subject to the nutrition standards in the Smart Snacks rule. Schools should not only teach children how to make healthy choices, but also should provide an environment that fosters healthy eating. USDA should recommend that local school wellness policies clearly state that food should not be used as a reward or incentive for performance or behavior. Providing food based on performance or behavior connects food to mood. This practice encourages children to eat treats even when they are not hungry and can instill lifetime habits of rewarding or comforting themselves with food. Rewarding children with food during class also reinforces eating outside of meal or snack times.

We encourage USDA to provide guidance and model policy language to LEAs on how to address standards for all foods and beverages available on campus, including on healthy fundraisers, alternatives to serving unhealthy foods during classroom parties, alternatives to using food as rewards, and healthy snack ideas.

Policies for Food and Beverage Marketing

We are extremely pleased that the proposed rule would require schools to address food and beverage marketing and advertising in their local school wellness policies. Advertising and marketing to children in schools requires special consideration because the food and beverage industries are children in an environment where parents have little or no oversight or ability to consent, and because students should have a learning environment that does not include messages that undermine nutrition and health education.

We agree that the Smart Snack standards should be used as the minimum standard for school food and beverage marketing. However, schools, districts, or states can strengthen and build on those standards. Using the same standards for marketing as for food and beverage sales can help to facilitate implementation and reduce confusion.

We encourage USDA to assure LEAs that they are free to implement stronger standards for marketing. For example, LEAs could extend the marketing standards beyond the school day, and they should choose to use their local or state competitive foods standards if those standards go beyond the Smart Snack standards. That would allow LEAs to align their marketing standards with their food and beverage sales standards. USDA also should note that LEAs also have the discretion to restrict all marketing of food and beverages in schools.

Through guidance and model local wellness policies, USDA should help schools to understand and encourage them to address the full range of food and beverage marketing in schools, including marketing and advertising through:

- signs, scoreboards, or posters
- curricula, textbooks, or other educational materials
- vending machine exteriors, food or beverage cups or containers, food display racks, coolers
- equipment, uniforms, school supplies (ex. pencils, notebooks, textbook covers)
- advertisements in school publications, during announcements on the public announcement (PA) system, on school radio stations, in-school television (such as Channel One), computer screen savers, and/or school-sponsored Internet sites, or websites promoted for educational purposes (ex. coolmath-games.com)
- branded fundraisers and corporate-sponsored programs that encourage students and/or their families to sell, purchase, or consume products, and/or provide funds to schools in exchange for consumer purchases of those products (ex. McTeacher's night, Labels for Education, Box Tops for Education)
- corporate incentive programs that reward or provide children with free or discounted foods or beverages (ex. Pizza Hut Book It! Program)
- sponsorship of materials, programs, events, or teams
- market research activities
- corporate-sponsored scholarships
- free samples, taste-tests, or coupons

USDA could clarify in guidance which types of marketing would be exempt from the standards, including:

- Marketing or brand images on clothing worn on school grounds
- Marketing on product packaging for products not sold by the school
- Marketing that students view incidentally through media that are used for educational purposes and are not produced or controlled by the local education agency, school, faculty, or students (such as ads in magazines used in an art class)

USDA should give guidance to schools about how to address brand advertising. Brand advertising features general brand depictions, such as brand logos, product line logos, or spokescharacters, in the absence of a focus on a specific product (for example, showing the company brand or product line name or logo on a sign at a sponsored event, on a scoreboard, or a team uniform). If a brand is marketed rather than a specific product, then all the products within the marketed brand or product line should meet the Smart Snack guidelines. Alternatively, schools can replace the brand marketing with marketing for a specific product that meets the Smart Snack guidelines. Additionally, USDA also should give guidance to schools about how to address advertising for products that have been reformulated to meet Smart

Snacks standards for sales in schools but that are also available in less healthy versions outside of schools.

USDA should provide guidance, model policies, and resources to assist schools that are concerned about possible financial ramifications and help schools identify practical, and profitable ways to raise funds through fundraisers involving healthy foods and beverages or non-food products (such as <http://cspinet.org/new/pdf/schoolfundraising.pdf>).

In addition, we encourage USDA to incorporate food and beverage marketing into future School Nutrition Dietary Assessment studies to assess the implementation and impact of the food and beverage marketing provision of the local school wellness policy requirements. USDA should use the resulting data to inform its work in creating and supporting new resources and guidance for schools as they evaluate and improve their policies. Additionally, we encourage USDA to incorporate food and beverage marketing policies into all levels of the HealthierUS School Challenge.

Informing the Public

We support the requirement that LEAs provide periodic and detailed public notices on the local school wellness policy, including the policy, progress in implementation, and the extent of its impact. It is especially important to ensure that families of students in the school system receive the information. This provision will strengthen the impact of local school wellness policies by improving implementation, accountability, and transparency. We urge USDA to move quickly to propose the transparency requirements under Section 209 of the Healthy, Hunger-Free Kids Act.

Implementation, Assessment and Updates

We support the requirement that LEAs issue a detailed annual progress report, as well as triennial comprehensive assessments on its local school wellness policy. However, we encourage USDA to provide clearer guidance in the final rule on the difference between what should be included in the progress report versus the triennial assessment. We recommend the triennial assessment be utilized as an opportunity to review progress and conduct strategic planning on the local school wellness policy. While ultimately, we agree that LEAs should determine the frequency with which they update their local school wellness policies, we encourage USDA to provide guidance to LEAs recommending that they update their policy every three years in concert with the triennial assessment. Additionally, we recommend USDA encourage LEAs to incorporate their wellness policy implementation into the school district and school level strategic plan, which would further enhance implementation, impact, and accountability.

We recommend the one-year progress report be utilized as an opportunity to assess implementation of the local school wellness policy and achievement of its goals in each school and district, and determine if adjustments, resources, training, or other implementation measures are needed. USDA should offer more detail in the preamble and in accompanying guidance and model language about what constitutes minimally acceptable reporting and what

would be ideal. We recommend the Bridging the Gap Report as a resource for informing the reporting requirements.^{xiii} In addition, USDA and state child nutrition agencies should review school reporting and use the results to determine what guidance, technical assistance, and resources LEAs need.

We also support USDA's recommendations around recordkeeping, technical assistance, and offering resources that promote best practices. These should be widely available and easily accessible. To avoid added burden on schools, USDA should clarify that record-keeping can be the same as the annual and three-year assessments; with the main difference being that the assessment results are communicated to state agencies and the public.

We strongly support the requirement that an assessment of the local school wellness policy be included in the district's compliance review. The compliance review should include the official(s) designated by the LEA who is/are responsible for the local school wellness policy (in addition to the food service professional involved in implementing the school meal and Smart Snack standards). Currently, there is not adequate accountability and enforcement of local school wellness policies, which undermines the credibility and effectiveness of the policies, and contributes to their inconsistent implementation in schools. Including the local school wellness policy in the compliance review will help to reinforce with LEAs that the policies are important.

Summary

In conclusion, we commend USDA for developing a robust rule for local school wellness policies that will strengthen existing policies and lead to more effective leadership, implementation, stakeholder involvement, accountability, assessment, and transparency. We are pleased that USDA will be providing comprehensive model policies, toolkits, and technical assistance. We urge USDA to include additional definitions in the final rule for each of the key areas to be covered in the local school wellness policy and provide schools and districts with a year for compliance with the final rule.

We recommend USDA provide further guidance to schools on reporting requirements and use this reporting to inform USDA's work in supporting LEAs' wellness policies. USDA's Special Nutrition Program Operations Study (SN-OPS) can also provide important feedback to USDA that can then be translated into resources and toolkits that support local school wellness policies.

We are glad to serve as a resource if we can be of any help to USDA or LEAs moving forward in implementing these updates for local school wellness policies. If you have any questions or need additional information related to our comments, please contact Katie McMahon at 202-585-3245 or Katie.McMahon@cancer.org.

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