PERFORMANCE AUDIT

Office of the Washington State Auditor
Pat McCarthy

Schools Can Influence Student Eating Habits Through Lunch Scheduling Practices

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Executive Summary

Background (page 6)

Obesity in school-age children is a growing concern across the nation. Obesity rates have more than tripled since the 1970s. Washington Governor Jay Inslee championed the Healthiest Next Generation Initiative in 2015, which encouraged state and local agencies to collaborate toward an objective "to help our children maintain a healthy weight, enjoy active lives and eat well." In fiscal years 2017 and 2018, the state and federal government spent nearly $240 million on various childhood nutrition programs designed to serve nutritious meals to school-age children and promote lifelong healthful living. The state's Superintendent of Public Instruction, Chris Reykdal, has expressed concerns regarding childhood obesity, poor student health and the high monetary investment the state makes in these nutrition programs. After reviewing a list of potential performance audit topics provided by the Office of the Washington State Auditor, he asked for a performance audit examining these issues.

Ineffective lunchtime scheduling can present issues for younger students. The Office of Superintendent of Public Instruction (OSPI) and school districts play a role in influencing student lunch practices.

This audit examines lunchtime scheduling practices in elementary schools.

What lunch scheduling practices could schools implement to achieve better student outcomes, such as improved behavior and increased consumption of healthy foods? (page 9)

Research shows that the way schools schedule lunch can significantly affect students' eating habits. Students who have more time to eat their lunch consume more nutritious food and waste less food. Education and nutrition groups suggest a minimum of 20 minutes seated lunchtime. Furthermore, students who have recess before lunch also eat more fruits and vegetables and drink more milk, waste less food, and display better overall behavior. Several states have policies encouraging school districts to adopt recess before lunch.

What barriers might prevent elementary schools from using these practices? (page 13)

Nearly all 31 schools visited during the audit did not give all students the recommended minimum seated lunchtime of 20 minutes. Principals are responsible for setting school schedules, often without specific guidance around lunchtime. Most principals did not realize the actual amount of time all their students had to eat lunch and tended to overestimate it. About half of principals interviewed who allocate less than 20 minutes of seat time believe students already have enough time to eat.

Principals cited many challenges to ensuring 20 minutes of seated time at lunch for every student, including limited facilities, schedule conflicts and resource constraints. However, other schools and states have found solutions to these challenges. Schools and students would benefit if OSPI more clearly defined the recommended seated lunchtime in state regulation.

More than half of schools surveyed or observed did not schedule recess before lunch. Principals cited multiple challenges to implementing recess before lunch, similar to those noted above for ensuring 20 minutes of seated time. It is possible to overcome some of these challenges with prioritization, organization and coordination.

State Auditor's Conclusions (page 21)

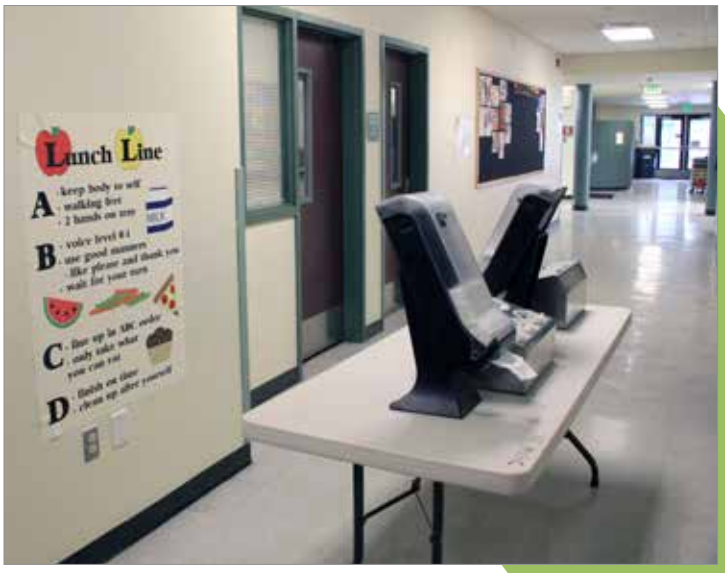
Childhood obesity and poor nutrition among Washington's elementary school students have been areas of concern for the state's Superintendent of Public Instruction. We worked with the Superintendent to identify options for a performance audit that could identify meaningful ways schools could address these issues.

Discussions of obesity and nutrition in schools tend to focus on ways to encourage children to be more active, or on the types of foods they are served at school. While those issues are clearly important, what this audit shows is that the way schools structure lunch time can also significantly affect children's eating habits and their performance in the classroom.

Photo by: State Auditor's Office.

Research suggests that two leading practices — releasing children to recess before lunch and then giving them enough time to eat — increase the likelihood that children will eat more and healthier foods. Unfortunately, our results also show that most of the schools we looked at have not adopted these practices. There can be legitimate reasons for this, including facility limitations and fiscal constraints.

But we also saw that schools whose principals made lunch-scheduling practices a priority were better able to make these practices work. In our view, OSPI can play an important role by requiring schools to give students adequate seat time to eat, as well as encouraging and facilitating the practice of recess before lunch.



Limited facility space might mean a school must run its lunch lines through a corridor meant to serve classrooms instead of sandwiches.

Photo by: State Auditor's Office.

Recommendations (page 22)

We made a series of recommendations to OSPI related to lunch scheduling structured around implementing leading practices. We also gave general guidance to all Washington school districts that can help them address the barriers that impede principals from following these leading practices.

Next steps

Our performance audits of state programs and services are reviewed by the Joint Legislative Audit and Review Committee (JLARC) and/or by other legislative committees whose members wish to consider findings and recommendations on specific topics. Representatives of the Office of the State Auditor will review this audit with JLARC's Initiative 900 Subcommittee in Olympia. The public will have the opportunity to comment at this hearing. Please check the JLARC website for the exact date, time, and location (www.leg.wa.gov/JLARC). The Office conducts periodic follow-up evaluations to assess the status of recommendations and may conduct follow-up audits at its discretion. See **Appendix A**, which addresses the I-900 areas covered in the audit. **Appendix B** contains information about our methodology.

Background

Growing concerns over childhood obesity have led to national and statewide initiatives to improve nutrition habits

Obesity in school-age children is a growing concern across the nation. Obesity rates have more than tripled since the 1970s. The Centers for Disease Control and Prevention (CDC) states that nearly one in five children is obese. Federal and state officials have responded to these trends, and to concerns over unhealthy food choices across the country, by taking steps to improve students' eating habits. The United States Department of Agriculture (USDA) has incorporated into the National School Lunch Program many policies designed to promote healthy living for children. They range from regulations related to foods sold in school outside the cafeteria menu to establishing farm-to-school food programs. At the school-district level, practices such as Safe Routes to School, which encourages walking and biking, and robust district wellness policies attempt to instill healthy habits around food and exercise in children with the hope they mature into healthy adults.

Child health and obesity is also a concern for policymakers in Washington. Governor Jay Inslee championed the Healthiest Next Generation Initiative in 2015, which encouraged state and local agencies to collaborate toward an objective "to help our children maintain a healthy weight, enjoy active lives and eat well." In fiscal years 2017 and 2018, the state and federal government spent nearly $240 million on various childhood nutrition programs designed to serve nutritious meals to school-age children and promote lifelong healthful living. The Superintendent of Public Instruction, Chris Reykdal, has expressed concerns regarding childhood obesity, poor student health and the high monetary investment the state makes in these nutrition programs. After reviewing a list of potential performance audit topics provided by the Office of the Washington State Auditor, he asked for a performance audit examining these issues.

Schools can influence student eating habits

Elementary schools are in a unique position to influence students' eating behaviors because most school-age children eat at least one meal a day on school property. How schools schedule meals and the food they serve can improve overall student health or inadvertently contribute to poor eating habits, with unhealthy consequences in the classroom or later in life. Schools are expected to maintain an environment that is conducive to learning, and how schools schedule student

meals is an important factor in how alert and ready to learn a child will be in the classroom. Aside from the content of school menus, parents, educators and health professionals have expressed concerns about the scheduling of student mealtime.

Ineffective lunchtime scheduling can present issues for younger students

While USDA standards regulate the types of food schools serve, school districts and schools have considerable leeway in how they schedule lunchtime. Sometimes this means schools limit the time that students have to eat lunch in favor of other goals and objectives related to instruction.

Many Washingtonians are concerned that elementary school children do not always have enough time to eat once seated at the lunch table. This can happen because the scheduled time is too short, the line for food is too long, or the urge to rush out to recess is too strong. Research shows that when students are given more time to eat, they tend to waste less food and consume more nutrients.

Long lines for food service can cut down on the actual time children have to eat.

Photo by: State Auditor's Office.

This audit examined multiple studies to identify leading practices in school lunch scheduling, including the timing of recess relative to lunchtime. **Appendix C** contains a bibliography of materials we reviewed.

The Office of Superintendent of Public Instruction and others play roles in influencing student lunch practices

Washington's Office of the Superintendent of Public Instruction (OSPI) is the primary agency charged with oversight of K-12 public education, including ensuring schools adhere to nutrition standards for food served in schools. OSPI works with the state's 295 school districts to administer basic education programs and implement education reform on behalf of public school students. Each school district is an independent local government with elected school board members. School boards have the authority to determine district policies, which often govern school lunch schedules.

The Washington State School Directors' Association (WSSDA) supports districts' efforts through model policies and procedures. Most school districts rely upon WSSDA and adopt the WSSDA model policy and procedure. Thus, WSSDA can also play a role in influencing student lunch practices. OSPI and individual districts may also collaborate with other education advocacy groups, such as the Washington State Parent Teacher Association (WSPTA), to ensure best possible outcomes for all students.

This audit examined lunchtime scheduling practices in elementary schools

We conducted this audit at the request of OSPI because of student health concerns. OSPI officials said many school district nutrition directors have expressed frustration in their attempts to encourage principals to use lunch scheduling leading practices. This audit compared the lunch practices of Washington elementary schools with nationally recognized leading practices that, when followed, allow for the consumption of more nutritious food, promote learning and reduce behavioral issues. The audit asked the following questions:

1. **What lunch scheduling practices could schools implement to achieve better student outcomes, such as improved behavior and increased consumption of healthy food?**
2. **What barriers might prevent elementary schools from using these practices?**

To answer these questions, we spoke with education professionals and researched lunch scheduling leading practices. In addition, we conducted an online survey of principals across the state to determine how much "seat time" – the time students have to eat their meal – they estimate their students have for lunch. We also visited elementary schools across the state and interviewed 31 principals to gain a deeper understanding of their scheduling practices, their thoughts on leading practices, and barriers to achieving leading practices.

We would like to thank the elementary schools that allowed us to photograph during student lunchtime and to use our photographs in this report: Freeman, Garfield, Hallett, Lacey, Logan and Roosevelt.

Audit Results

What lunch scheduling practices could schools implement to achieve better student outcomes, such as improved behavior and increased consumption of healthy foods?

Answer in brief

Research shows that the way schools schedule lunch can significantly affect students' eating habits. Students who have more time to eat consume more nutritious food and waste less food. Education and nutrition groups suggest a minimum of 20 minutes seated lunchtime. Students who have recess before lunch also eat healthier, waste less food, and display better overall behavior. Several states have policies that encourage their school districts to adopt recess before lunch.

Research shows that the way schools schedule lunch can significantly affect students' eating habits

Healthy mealtime experiences are essential for schoolchildren in developing good eating habits that will last through adulthood. The federal Department of Health and Human Services points out on its website: "Dietary habits established in childhood often carry into adulthood, so teaching children how to eat healthy at a young age will help them stay healthy throughout their life." Researchers who study meals in school settings often frame their work around two related issues:

- First, to discover successful strategies that encourage children to eat more nutrients – with the obvious corollary of wasting less of the food on their plates.
- Second, to see how the timing of meals and play during the school day affect student behavior and educational outcomes.

Research cited by the University of Washington states, "Development of [healthy eating] behaviors is important for optimal health, growth, and intellectual development…" while at the same time preventing "…diet-related conditions such as undernutrition, iron deficiency anemia, and obesity." Although the benefits

identified were not always the same, substantial consensus among researchers suggests that schools should build both components – seat time and recess before lunch – into their student schedules.

Students who have more time to eat lunch consume more nutritious food and waste less food

Seat time is the amount of time students have to eat their lunch after going through the lunch line and sitting down to eat, which is different than the total amount of time scheduled for lunch. Research shows that students with longer seat time during lunch eat more, and consume more nutrients, than children who have less time to eat. Researchers also observed that because children tend to eat what they like most first – like french fries or pizza, instead of fruits and vegetables – the latter are left behind if they run out of time to finish eating. The amount of time students have to eat lunch thus directly affects their nutritional well-being.

For example, a 2015 report in the Journal of the Academy of Nutrition and Dietetics stated that a substantial number of students they studied in Massachusetts have insufficient time to eat, which is associated with significantly decreased entrée, milk and vegetables consumption compared to students who had more time to eat. A 2017 article in the University of Michigan's Journal of Public Affairs advocated for mandated minimum lunch times in school to combat the rising childhood obesity problem in that state. The authors further stated that giving schoolchildren more time to eat has the potential to reduce obesity because students will have time to make more thoughtful decisions and try a variety of foods.

Logically, more food eaten correlates with less food wasted. A 2015 study by the University of Washington's School of Public Health Nutritional Sciences Program showed students with shorter seat times threw away, on average, 44 percent of their food, compared to students with more seat time during lunch, who threw away 27 percent of their food.

Furthermore, some researchers suggest that allowing children more time at the lunch table can help them develop beneficial habits around food and eating. In 2000, the USDA and five other national organizations developed a program called Prescription for Change: Ten Keys to Promote Healthy Eating in Schools.

Photo by: State Auditor's Office.

It suggests giving students "lunch periods of sufficient length to enjoy eating healthy foods with friends." This one recommendation incorporates two aspects of healthy eating habits promoted today: eating more slowly allows the brain to process the feeling of fullness and enjoy the social aspects of mealtimes.

Younger students are likely to need more time to choose from this counter of fruit and vegetables, which may nibble into their seated lunchtime.

Photo by: State Auditor's Office.

Education and nutrition groups suggest a minimum of 20 minutes of seated lunchtime

The Academy of Nutrition and Dietetics has reported that there is enough evidence that might warrant policies at the district, state or national level to ensure all children have sufficient time to eat their meals in schools. The idea of a minimum 20-minute seated lunchtime, with the clock starting when the last student sits down to eat, is also incorporated in the framework of best practices for healthy schools issued in 2016 by the Alliance for a Healthier Generation. Five states (Connecticut, Mississippi, New Mexico, South Carolina, West Virginia) and the District of Columbia already specifically require schools to give students at least 20 minutes of seated lunchtime.

The Washington State Parent Teacher Association (WSPTA) supports school policies and state regulations that use CDC and USDA recommendations to more clearly define a minimum lunch period for students that includes at least 20 minutes of seated time. It supports amendments to Washington Administrative Code (WAC) 392-157-125, "Time for Meals."

Students who have recess before lunch also eat healthier, waste less food, and display better overall behavior

Scheduling recess before lunch has many of the same benefits as longer seat times. For example, some studies found that students ate healthier foods, with higher intakes of fruits and vegetables, when they had recess before lunch than those who had recess after lunch. These students also ate two-thirds more of their food overall. Results from another study also showed that students eating lunch after recess threw away significantly less food, which may be attributable to the fact that students were under no pressure to hurry out to the playground. Other researchers found recess before lunch can lead to fewer disciplinary referrals, and students who eat before recess often complain of stomach discomfort.

Student behavior improves when schools schedule recess before lunch. A 2013 statement issued by the American Academy of Pediatrics said, "When students have recess before lunch…teachers and researchers noted an improvement in student behavior at mealtime, which carried over into the classroom in the afternoon." BioMed Central Public Health, an open-access, peer-reviewed health journal, reported that students eating after recess return to the classroom calmer and ready to begin lessons. Teachers interviewed by BioMed said students were better able to settle into their work when transitioning to the classroom from the lunchroom rather than the playground.

Along with many researchers, health advocates and federal agencies, OSPI and the WSPTA support the leading scheduling practice of recess before lunch.

Several states have policies that encourage their school districts to adopt recess before lunch

Twelve states have official guidance or policy that strongly encourages their local school districts to adopt recess before lunch: California, Colorado, Kansas, Maryland, Maine, Michigan, Montana, New Jersey, New Mexico, Nevada, Vermont and West Virginia. For example, New Jersey's statewide lunchtime policy states, "Whenever possible, schedule Physical Education or recess before lunch. Research has shown that students eat better when recess is scheduled before lunch."

Helping students understand which foods are healthier to choose is just one aspect of the lunchtime puzzle that school administrators must solve.

Photo by: State Auditor's Office.

What barriers might prevent elementary schools from using these practices?

Answer in brief

Nearly all 31 schools visited during the audit do not give all students the recommended minimum seated lunchtime of 20 minutes. Principals are responsible for setting school schedules, often without specific guidance around lunch times. Most principals did not realize how much time all of their students have to eat lunch and tended to overestimate it. About half of the principals interviewed who allocate less than 20 minutes of seat time believe students already have enough time to eat.

Principals cited many challenges to ensuring 20 minutes of seated lunchtime for every student, including limited facilities, schedule conflicts and resource constraints. Other schools and states have found solutions to the challenge of scheduling 20 minutes of seat time. Schools and students would benefit if OSPI more clearly defined the recommended seated lunchtime in state regulation.

More than half of schools surveyed or observed do not schedule recess before lunch. Principals cited multiple challenges to implementing recess before lunch. It is possible to overcome some of these challenges with prioritization, organization and coordination.

Nearly all of the 31 schools visited do not give all students the recommended minimum seated lunchtime of 20 minutes

We visited 31 elementary schools across the state and found that most of them did not give their students the recommended amount of time to eat. We observed seat time for selected groups of students and found:

- While 17 schools scheduled at least some students 20 minutes of seat time, only one of these schools ensured all students received the recommended 20 minutes
- In 14 schools, all students we observed had less than 20 minutes of seat time

We also conducted an online survey of 1,043 principals across the state to find out how much seat time students have for lunch. The survey asked principals to estimate how much time their students have at the table to eat during lunch, excluding transferring from class or waiting in line.

Of the 126 principals who responded, 82 said they estimate their students experience less than 20 minutes of seat time. We also timed students at the schools we visited to record actual time students had to eat. **Exhibit 1** shows the results of surveys and timings.

Exhibit 1 – Lunch schedules described by principals and actual student experiences varied

	Schools surveyed (121 responses[1])	Schools visited (31 observed)
All students had at least 20 minutes of seated lunch time	39[2]	1
Some students had at least 20 minutes of seated lunch time		16
No students had at least 20 minutes of seated lunch time	82	14

[1] Five of 126 survey respondents did not answer this question.
[2] The survey did not distinguish between 'all' or 'some.'
Note: Each of the 31 schools visited were respondents of the survey

Principals are responsible for setting school schedules, often without specific guidance around lunch times

Principals are responsible for creating and implementing daily schedules for their schools, but without much guidance for the task. Most principals interviewed said their school district was available if they needed support. However, few principals said they reached out to their district. This indicates principals typically make scheduling decisions on their own. One district nutrition director said that when she asked a couple of new principals if they had received any guidance about creating a building schedule, they said they had not. This lack of guidance, paired with competing priorities, often results in school lunch schedules that do not follow leading practices.

Most principals did not realize how much seat time their students have to eat lunch and tended to overestimate it

Twelve of the 31 principals we visited responded in the survey that their students received at least 20 minutes of seated time for lunch. However, when we observed the actual lunch period, we found this was not accurate. As Exhibit 1 showed, at some schools, only a portion of the student body had 20 minutes of seated lunchtime. At other schools, none of the students had at least 20 minutes to sit and eat lunch. **Appendix D** shows an illustration of where time can be lost.

The time scheduled for lunch differs from the time actually available to sit and eat it, sometimes significantly.

Photo by: State Auditor's Office.

About half of principals interviewed who allocate less than 20 minutes of seat time believe students already have enough time to eat

Both surveyed and interviewed principals said they do not allocate 20 minutes of seat time for lunch. About half of the 31 interviewed principals who did not allocate 20 minutes of seated lunch time believed the time provided was sufficient for children to eat lunch. One principal said that 15 minutes for lunch is enough because more time can lead to students waiting around to go to recess. Five principals said that while they do not ensure 20 minutes of seat time, they did offer students the opportunity to stay in the lunchroom and finish their meal if they choose. However, during a visit to one of these schools, we observed a teacher rush a student out of the lunchroom even though the student clearly wanted more time to eat.

Principals cited many challenges to ensuring 20 minutes of seated lunchtime for every student, including limited facilities, schedule conflicts and resource constraints

Principals face many challenges to implementing lunchtime leading practices. When we asked principals about barriers they faced in ensuring 20 minutes of seat time, they described an array of issues. (Survey respondents also provided some information about barriers.) Among the issues they raised were:

- **No cafeteria** – Rather than a dedicated eating space, some schools have multi-purpose rooms, gymnasiums, or only their classrooms to eat lunch. Shared spaces, like a gym, mean principals must accommodate other schedules for those areas. Some schools serve lunch in hallways or a serving room, while children eat in classrooms. Seat time can be lost as children walk from food service back to the classroom to eat.

Lunch-trays crowd out crayons: Eating in the classroom may be the only for solution for schools that lack a cafeteria or have too many students for their cafeteria's capacity.

Photo by: State Auditor's Office.

- **Overcrowding** – Some schools exceeded capacity by 150 students or more. Trying to feed more children than the school was designed to accommodate can lead to longer lunch lines, in turn shaving minutes from seat time.
- **Too few supervisory staff** – Some principals said they are limited in the number of available supervisory staff. One school principal said the amount of time students have to eat is directly related to the amount of staff allotment they can afford to spare for lunch. At some schools, para-educators or support staff were assigned to monitor lunch, which made them unavailable to assist with academic or other school activities.
- **Insufficient funds to pay cafeteria staff for longer work hours** – Cafeteria staff can be part-time employees, hired to work from breakfast through lunchtime. The time needed to prepare, serve and clean up after breakfast and lunch varies from school to school. Adding time to each lunch period increases staff hours and the school's food-service budget. For example, if cafeteria staff start at 7:30 a.m. and work only four hours, their shift ends at 11:30 a.m. Extending lunch periods by even a few minutes may lead to longer hours and higher cafeteria staff costs or, conceivably, a longer school day for everyone, which would also increase teaching costs.
- **Legal obligations** – State law requires teachers receive duty-free break periods and lunchtime, which principals must factor in when developing schedules. Duty-free break times mean teachers are rarely required to supervise children during lunch.
- **Scheduling conflicts** – Principals mentioned having to balance different educational needs in the schedule, such as instructional time, music or P.E. Principals may thus lack flexibility in scheduling sufficient lunchtime. For example, if the art teacher must come in the morning and the physical education instructor in the afternoon, the principal is left with a tight window in which to schedule lunch for several classes or grades.

A school may have plenty of pizza to serve, but a limited time to place it on the trays of all those students who want some.

Photo by: State Auditor's Office.

Other schools and states have found solutions to the challenge of scheduling 20 minutes of seat time

Several Washington principals have made progress in finding solutions, which we learned about through interviews or direct observation of students at lunchtime. The most commonly cited solutions include:

- Making lunch a high priority when developing daily schedules. This helps ensure lunch period minutes are not used for other things.
- Making minor schedule changes. Changes might include staggering certain classes or lunch periods to shorten lunch line wait times.
- Monitoring and evaluating the efficiency of the lunch line. These principals are willing to make changes when necessary, such as changing how student payment information is entered into the point-of-sale cash register.

Other states have published materials to help principals and districts address similar challenges. For example, the California Department of Education reiterates some of the solutions Washington principals already use, and adds many ideas to help ensure adequate seat time during lunch. Among its suggestions:

- Assign students to sit at the same table daily. This eliminates the time lost when students look around for an open seat or a place to sit near friends.
- Encourage children to finish their meal. Have a few minutes of quiet time at the end of the eating period.
- Install timers in the cafeteria. Start a timer when the last student in line sits down; students must stay seated until the time counts down to zero

Appendix E includes a longer excerpt from California's list.

One principal said he was able to cut down time spent in line by creating structure for students. He came in on the weekend and laid down different colored tape so students had clear indicators of where to walk and stand.

Schools and students would benefit if OSPI more clearly defined the recommended seated lunchtime in state regulation

OSPI's current rule (WAC 392-157-125) for seated lunchtime does not specify how much time schools should give to students to eat. The rule says schools "shall allow a reasonable amount of time for each child to take care of personal hygiene and enjoy a complete meal." Without defining a "reasonable" amount of time to meet requirements, schools may reduce seat time to accommodate other priorities, which may not align with leading practices.

District policies are also often silent on the precise amount of time principals should aim for in preparing lunch schedules. Almost all of the 28 district policies we reviewed reflected state regulations, in that they also lacked specifics. Only 14 district policies addressed seated lunchtime at all, stating children should have an "adequate" amount of time to eat. Only one district had a policy requiring 20 minutes of actual seat time for students to eat lunch.

OSPI acknowledges that principals may encounter scheduling limitations. The sample schedule in **Appendix F** provides an illustration of the many constraints a principal might have in designing a schedule that prioritizes lunchtime.

More than half of schools surveyed or observed do not schedule recess before lunch

Most of the schools we reviewed do not schedule recess before lunch. As **Exhibit 2** shows, of the 126 principals who responded to our survey, 71 reported not scheduling recess before lunch for any students, and 17 of the 31 schools we visited did not. Of the schools that do schedule recess before lunch, some have mixed lunch schedules that also include recess after lunch. Principals said they did so to maximize schedule efficiency.

Exhibit 2 – Few schools scheduled recess before lunch for all students

	Schools surveyed (126 responses[1])	Schools visited (31 observed)
All students have recess before lunch	55	7
Some students have recess before lunch		7
No students have recess before lunch	71	17

[1] *The survey did not distinguish between 'all' or 'some.'*
Note: Each of the 31 schools visited were respondents of the survey

Only seven of the schools we visited schedule recess before lunch for all students; another seven scheduled recess before lunch for some students. For example, one school scheduled recess after lunch for kindergarten through second grade, while third through fifth graders have recess before lunch. Of the seven schools that schedule recess before and after lunch, five said they do so because it is more efficient and ensures all students are fed by a certain time, not because they value it as a leading practice.

Principals cited multiple challenges to implementing recess before lunch

Principals told us the following barriers prevent them from scheduling recess before lunch. Many are closely related to the issues driving seat times during lunch.

- Scheduling conflicts – Principals mentioned having to balance different educational needs in the schedule, such as instructional time, music or P.E. Principals may thus lack flexibility in when to schedule recess and lunch. For example, if the art teacher must come in the morning and the P.E. instructor in the afternoon, the principal is left with a tight window in which to schedule lunch for several classes or grades.
- Previous attempts at scheduling recess before lunch failed – In such situations, negative feelings towards the practice remain.
- Additional staff to monitor students – Some schools were limited in the number of available supervisory staff. Often, para-educators or support staff were assigned to monitor lunch, which made them unavailable to assist with academic or other school activities.
- Preferences of staff – Teachers and principals did not want to make the change because they were comfortable with the way they have always scheduled lunch or they did not believe in the research.
- Size of property – A couple of principals said their campuses are too big. When recess takes place before lunch, and non-classroom teachers are trying to gather the children, students take too long to come in, which shortens their lunchtime.
- Handwashing – A couple of principals said it is difficult to get children coming in from recess to wash their hands before lining up to have lunch. Six principals surveyed also noted this as a barrier.

It can be a challenge for younger students to line up quietly, whether before or after they have eaten lunch.

Photo by: State Auditor's Office.

Prioritization, organization and coordination can help overcome some challenges

Several Washington principals cited one or more factors that contributed to their success in implementing recess before lunch:

- Their own commitment to the practice, and making it a priority when scheduling
- Having additional advocates to support the practice
- Sharing research related to leading practices, to support the decision as they communicated it to staff

Principals said one or more of these factors helped them make the decision to change their schedules, and to convince teachers to accept and support the practice.

Montana has been recognized by the USDA for their work in implementing recess before lunch. Montana State University (MSU), working with the Montana Office of Public Instruction, developed and published online an extensive tool kit, including sample school schedules, to help schools put the practice into action. Montana and others suggest the following to help schools implement recess before lunch:

- Develop a handwashing plan that makes time for children to wash up after recess and before entering the cafeteria. For example, one Washington state elementary principal said they installed hand-sanitizing stations in the cafeteria, although this is not Montana's preferred solution.
- Develop transition procedures that address the school's unique needs and add efficiencies. For example, planning efficient ways to store coats when students come in from recess and to transfer food brought from home to the lunchroom.
- Meet with all staff involved and work together to develop solutions to implement recess before lunch.
- Increase the level of staff during the implementation phase of recess before lunch to ensure all students and staff learn the new process. Once the new lunchtime schedule becomes routine, Montana's experience suggests staffing and volunteer levels can return to previous levels.

Montana also recommends coupling recess before lunch with a minimum seat time of 20 minutes to maximize the benefits of the lunchtime experience.

One principal explained that to be successful with scheduling recess before lunch, he ensures lunch is the first thing scheduled and is non-negotiable.

Learn more about Montana's Recess Before Lunch initiatives on the USDA's website at: bit.ly/32ZhLW7

State Auditor's Conclusions

Childhood obesity and poor nutrition among Washington's elementary school students have been areas of concern for the state's Superintendent of Public Instruction. We worked with the Superintendent to identify options for a performance audit that could identify meaningful ways schools could address these issues.

Discussions of obesity and nutrition in schools tend to focus on ways to encourage children to be more active, or on the types of foods they are served at school. While those issues are clearly important, what this audit shows is that the way schools structure lunch time can also significantly affect children's eating habits and their performance in the classroom.

Research suggests that two leading practices — releasing children to recess before lunch and then giving them enough time to eat — increase the likelihood that children will eat more and healthier foods. Unfortunately, our results also show that most of the schools we looked at have not adopted these practices. There can be legitimate reasons for this, including facility limitations and fiscal constraints. But we also saw that schools whose principals made lunch-scheduling practices a priority were better able to make these practices work. In our view, the Office of the Superintendent of Public Instruction can play an important role by requiring schools to give students adequate seat time to eat, as well as encouraging and facilitating the practice of recess before lunch.

Recommendations

For the Office of Superintendent of Public Instruction

To address the issue of scheduling lunchtime to reflect leading practices, we recommend OSPI:

1. Update the WAC related to seat time during lunch, changing a "reasonable" amount of time for a student to enjoy a meal to a defined minimum amount that aligns with leading practices, as discussed on pages 14-15.
2. Develop and share guidance to help schools overcome barriers to implementing a minimum of 20 minutes of seat time during lunch for every student and scheduling recess before lunch, as discussed on pages 13-17.
3. Work with stakeholders and advocacy groups to identify solutions to help schools overcome the barriers to 20 minutes of seat time and recess before lunch as identified in the audit. Consider working with the following groups:
    - Association of Washington School Principals
    - Early Learning & K-12 Education Committee representatives
    - Washington Association of School Administrators
    - Washington Education Association
    - Washington School Nutrition Association
    - Washington State Parent-Teacher Association
    - Washington State School Directors Association

Guidance for all Washington School Districts

We consider the audit results so broadly applicable that it is in the state's best interest for every school district to undertake any relevant and repeatable practices reported by districts that participated directly in the audit. We therefore suggest all Washington state school districts consider implementing the practices highlighted in this report.

To help schools implement school lunch scheduling leading practices, we recommend school districts:

4. Adopt district policies that ensure all students get the minimum lunch seat time recommended by leading practices.
5. Adopt district policies that require schools to implement recess before lunch, providing exemptions on a case-by-case basis after district review.

6. Periodically monitor schools, for example once or twice a year, to ensure schools have
    a. Implemented recess before lunch
    b. Given all students the minimum seated lunchtime recommended by leading practices
7. Work with OSPI, school district nutrition directors and the organizations listed above in recommendation 3 to identify and provide strategies to overcome barriers that prevent schools from giving students the minimum recommended seated lunchtime and implementing recess before lunch.

Agency Response

August 16, 2019

The Honorable Pat McCarthy
Washington State Auditor
Insurance Building, Capitol Campus
302 Sid Snyder Avenue SW
Olympia, WA 98504-0021

Re: SAO Performance Audit Response

Dear State Auditor McCarthy:

Thank you for the opportunity to review and respond to the Child Nutrition performance audit. As the audit report indicates, lunch scheduling practices can achieve better student outcomes including improved behavior and increase consumption of healthy foods.

At the Office of Superintendent of Public Instruction (OSPI), our work related to child nutrition is guided by the goals and requirements set by the United States Department of Agriculture (USDA) and the National School Lunch Act. While these requirements outline specific meal patterns and nutrient levels, there is only the general lunch scheduling guidance of "provide sufficient lunch periods." The Washington Administrative Code (WAC) also provides very general guidance of "school lunch periods shall allow a reasonable amount of time for each child to take care of personal hygiene and enjoy a complete meal."

As noted in the report, the way schools schedule lunch can significantly affect student eating habits and health outcomes, including:

- Students who have more time to each lunch (at least twenty minutes of seated lunch time) consume more nutritious food and waste less food; and
- Students who have recess before lunch eat healthier, waste less food, and display better overall behavior.

This audit supports the OSPI value of "Focus on the Whole Child." Students who have access to nutritious meals and the time to consume those meals are better equipped to meet educational milestones. We plan to move forward with the rule process to define a twenty-minute seated lunch time for all students and require recess before lunch for elementary students.

State Auditor McCarthy
August 19, 2019
Page 2

Sincerely,

Chris Reykdal
Superintendent of
Public Instruction

CR/le

cc Jamila B. Thomas, Chief of Staff, Office of Superintendent of Public Instruction
T.J. Kelly, Chief Financial Officer, Office of Superintendent of Public Instruction
Leanne Eko, Child Nutrition Services Director, Office of Superintendent of Public Instruction

Appendix A: Initiative 900 and Auditing Standards

Initiative 900 requirements

Initiative 900, approved by Washington voters in 2005 and enacted into state law in 2006, authorized the State Auditor's Office to conduct independent, comprehensive performance audits of state and local governments.

Specifically, the law directs the Auditor's Office to "review and analyze the economy, efficiency, and effectiveness of the policies, management, fiscal affairs, and operations of state and local governments, agencies, programs, and accounts." Performance audits are to be conducted according to U.S. Government Accountability Office government auditing standards.

In addition, the law identifies nine elements that are to be considered within the scope of each performance audit. The State Auditor's Office evaluates the relevance of all nine elements to each audit. The table below indicates which elements are addressed in the audit. Specific issues are discussed in the Results and Recommendations sections of this report.

I-900 element	Addressed in the audit
1. Identify cost savings	**No.** The audit did not identify cost savings.
2. Identify services that can be reduced or eliminated	**No.** Lunch and recess are core services required by law. Scheduling time for students to eat lunch and have active playtime enhances their ability to learn, therefore we did not review the reduction or elimination of these services.
3. Identify programs or services that can be transferred to the private sector	**No.** Because we focused on lunch scheduling practices, we did not evaluate whether school lunch services should be transferred to the private sector.
4. Analyze gaps or overlaps in programs or services and provide recommendations to correct them	**Yes.** The audit identified gaps in implementing leading lunch scheduling practices at schools and made recommendations to correct them.
5. Assess feasibility of pooling information technology systems within the department	**No.** Information technology is not directly related to school lunch times and therefore was not reviewed.

I-900 element	Addressed in the audit
6. Analyze departmental roles and functions, and provide recommendations to change or eliminate them	**Yes.** This audit reviewed the roles of school principals and school district nutrition directors but did not recommend making any changes to or eliminating their roles.
7. Provide recommendations for statutory or regulatory changes that may be necessary for the department to properly carry out its functions	**Yes.** This audit recommended that OSPI update the Washington Administrative Code rule to specify the amount of seated time students should have for lunch.
8. Analyze departmental performance data, performance measures and self-assessment systems	**No.** Because the audit focused on analyzing school lunch scheduling practices, we did not review the schools' performance measures and self-assessment systems.
9. Identify relevant best practices	**Yes.** The audit identified leading practices in two areas: scheduling at least 20 minutes of seated time for students to eat lunch and scheduling recess before lunch rather than after. The audit made recommendations to address barriers on implementing these practices.

Compliance with generally accepted government auditing standards

We conducted this performance audit under the authority of state law (RCW 43.09.470), approved as Initiative 900 by Washington voters in 2005, and in accordance with generally accepted government auditing standards as published in Government Auditing Standards (December 2011 revision) issued by the U.S. Government Accountability Office. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

The mission of the Office of the Washington State Auditor

To provide citizens with independent and transparent examinations of how state and local governments use public funds, and develop strategies that make government more efficient and effective.

The results of our work are widely distributed through a variety of reports, which are available on our website and through our free, electronic subscription service. We take our role as partners in accountability seriously. We provide training and technical assistance to governments and have an extensive quality assurance program.

For more information about the State Auditor's Office, visit www.sao.wa.gov.

Appendix B: Scope, Objectives and Methodology

Scope

The audit focused on lunch scheduling practices at public elementary schools in Washington. We did not review these practices at middle schools, high schools, private schools or charter schools. Our audit period included the 2018-2019 school year.

We did not audit the nutritional value of lunches served by public elementary schools because OSPI audits this area.

Objectives

The audit was designed to answer the following questions:

1. What lunch scheduling practices could schools implement to achieve better student outcomes, such as improved behavior and increased consumption of healthy foods?
2. What barriers might prevent elementary schools from using these practices?

Methodology

Identifying leading practices

Auditors reviewed academic journal articles, materials from professional associations and foundations, and relevant policies from other states. See Appendix C for a bibliography of sources.

Identifying elementary school recess and lunch scheduling practices

We developed a survey to find out current recess and lunch scheduling practices at Washington elementary schools. The survey was sent electronically to schools that have students in kindergarten through fifth grade. Of the 1,043 surveys that were distributed, 126 principals responded for a 12 percent response rate. We matched the survey results with school demographic and enrollment information from OSPI, and used auditor judgment to select schools for site visits.

OSPI conducted a separate survey about lunch schedule practices at Washington schools, and shared the results with the audit team, which gave us additional schools to choose from.

Selecting schools for site visits

The audit team visited 31 schools in 12 counties, with a mix of characteristics: urban and rural, small and large, in eastern and western Washington (five in the east and 26 schools in the west). We split the 31 schools nearly evenly in terms of their self-reported use of leading practices, as specified in their responses to our survey. The practices included having recess before lunch and having at least 20 minutes of seated lunchtime. **Figure 1** lists the schools we visited for this audit.

Figure 1 – Schools and counties visited during the audit

Elementary school	County
Beverly	Snohomish
Carson	Pierce
Columbia Crest Academy	Pierce
Freeman	Spokane
Garfield	Thurston
Gilbert	Yakima
Graham	Pierce
Hallett	Spokane
Julia Butler Hansen	Thurston
Hockinson Heights	Clark
Lacey	Thurston
Logan	Spokane
Maple Grove School	Clark
Mountain Way	Snohomish
Mukilteo	Snohomish
Prosser Heights	Benton

Elementary school	County
Purdy	Pierce
Raymond	Pacific
Renton Park	King
Robert Gray	Grays Harbor
Roosevelt	Clark
Sacajawea	King
Soos Creek	King
Southworth	Thurston
Stevens	King
Suquamish	Kitsap
Thompson	Pierce
Toutle Lake	Cowlitz
Washington	King
West Mercer	King
Willapa	Pacific

Visiting schools to verify survey responses and to collect additional information

On scheduled dates, school principals were visited by audit staff and asked about their lunch scheduling practices, including how much time their students have to eat lunch and if they have recess before or after lunch. We also asked principals about school discipline in relation to lunch scheduling practices, their existing lunchtime structure, how they make lunchtime decisions and if things have changed over time. Auditors used an interview template, and all principals were asked a standard set of questions.

During school site visits, the auditors asked each school principal to verify their survey answers and reviewed a copy of each school's schedule. We also spoke with at least one member of school nutrition staff at each school visited to verify the school lunch schedule and other information shared by the school principal.

The audit team developed a method to observe students during lunch periods to measure seat time, and used the results to compare what principals said in their survey responses with actual student seat times.

Student observation method

Auditors observed students during at least two lunch periods for each site visit. Auditors only observed the times of students who received lunch from the school, and did not track the movements of children who brought their own food.

Timing for each lunch period observation started when the first student in line of each lunch period picked up a lunch tray or the first food item. We used stopwatches to measure the time spent:

- In serving lines (including the cashier's station)
- The time it took for students to gather items such as condiments, utensils and napkins, and then walk to the eating area
- Eating while sitting at a table in the cafeteria or classroom

Each observer randomly chose two to six students per lunch period, from various points in the lunch line, to observe and record timing data. Auditors also noted the number of lunch lines and the number of cashiers. In addition, we recorded other unique observations about the lunch periods, such as the number of adult supervisors present, if students had assigned seating, the noise levels of the room, and whether students seemed rushed. Once we collected the data, calculations were made for:

- Official time for lunch
- Time each observed student spent in the lunch line
- Time each observed student spent seated
- The time from which the first student of the lunch period took a tray or food item until an announcement or cue was given for students to clear their trays and move on to the next activity

Comparing site visit information with survey results and leading practices

After completing the site visits, we compiled the interview and timing information for analysis and to identify any differences between what principals said about their planned lunch schedules and what they do in practice.

Some of the interviewed principals described barriers to using the leading practices. We summarized these barriers, and followed up with interviewees to ask them what changes they would have to make in order to start using the leading practices. Additionally, we used the results of our analysis to identify schools that appeared to be following leading practices and the methods their principals used to overcome any barriers.

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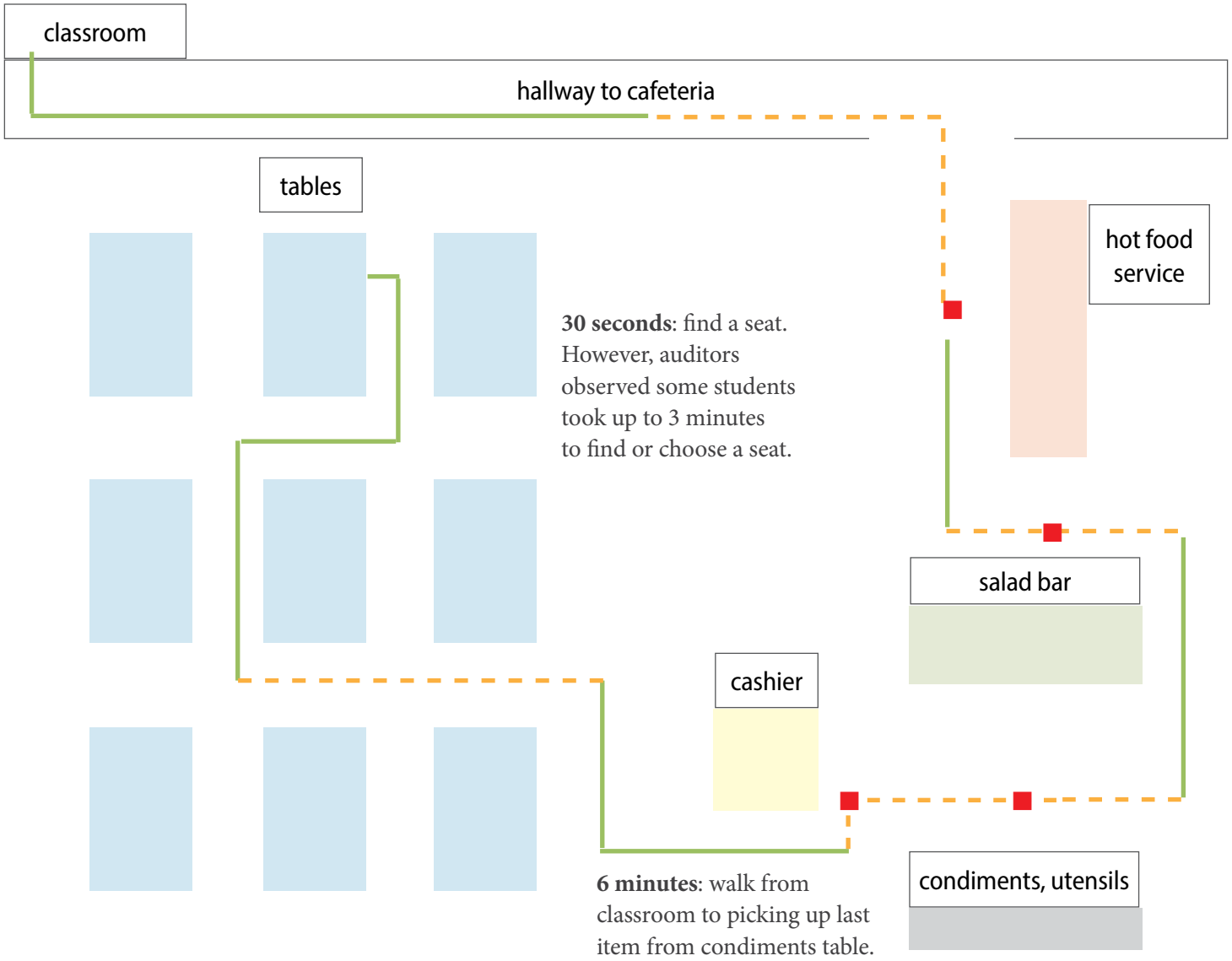
Appendix D: Where Do Lunch Schedules Lose Time?

Auditors conducted time studies at schools they visited to check how closely actual student behavior aligned with the time scheduled for lunch. The green line in **Figure 2** illustrates how long it could take a first grader to get from the classroom to the table for seated lunchtime. Places where the line slowed or stopped are shown in dashed yellow and red squares. In this illustration, the child takes 6.5 minutes to walk from class, through the service line, to a seat; the student was dismissed about two minutes before the end of the 20-minute scheduled lunchtime. This student had just over 12 minutes to eat lunch.

Figure 2 – An example of a first-grade student's walk to the lunch table



Appendix E: An Excerpt from California's Resource "Ensuring Adequate Time to Eat"

California's Department of Education offers a web page of "resources and information to help school local educational agencies (LEA) ensure that students have adequate seated time to eat their meal after being served." The full resource list is online at: www.cde.ca.gov/ls/nu/sn/timetoeat.asp#practices.

Figure 3 lists the challenges and barriers California noted; **Figure 4**, on the following page, lists the possible solution.

Figure 3 – Challenges and Barriers

- Long and/or slow lines
- Inadequate points of service
- Large student population
- Scheduling issues
- Not enough time in the school day
- Too many/not enough lunch periods
- Minimum days
- Instructional minute requirements
- Teacher contract requirements
- Not enough cafeteria space and/or seating
- Insufficient student supervision
- Student behavior
- Food service staffing issues
- Kitchen delays (slow prep, running out of food)
- Pizza day (long lines due to popular items)
- Lack of funding and/or budget difficulties

Figure 4 – Best Practices

Points of service

- Upgrade or add points of service to speed up or shorten the lunch line
- Rearrange or spread out points of service for better access for students
- Speed up service with barcode scanners, photo IDs, lanyards with lunch cards, etc.
- Have students line up alphabetically

Lunch periods

- Add a lunch period or institute staggered/ overlapping lunches
- Lengthen the lunch period by adding time at the end of the school day
- Discontinue morning recess and add that time to the lunch period

Supervision at lunch

- Add additional staff to supervise in the cafeteria or on the lunch line
- Ask for parent volunteers to help provide lunchtime supervision
- Have the principal on daily lunch duty to improve student behavior and school morale
- Assign students to sit at the same table daily

Recess or free time

- Implement recess before lunch
- Alternate lunch and recess: some students are out playing while others eat
- Split the lunchtime recess: students have 15 minutes of play, eat lunch, then have another 15 minute recess

Ensuring seat time

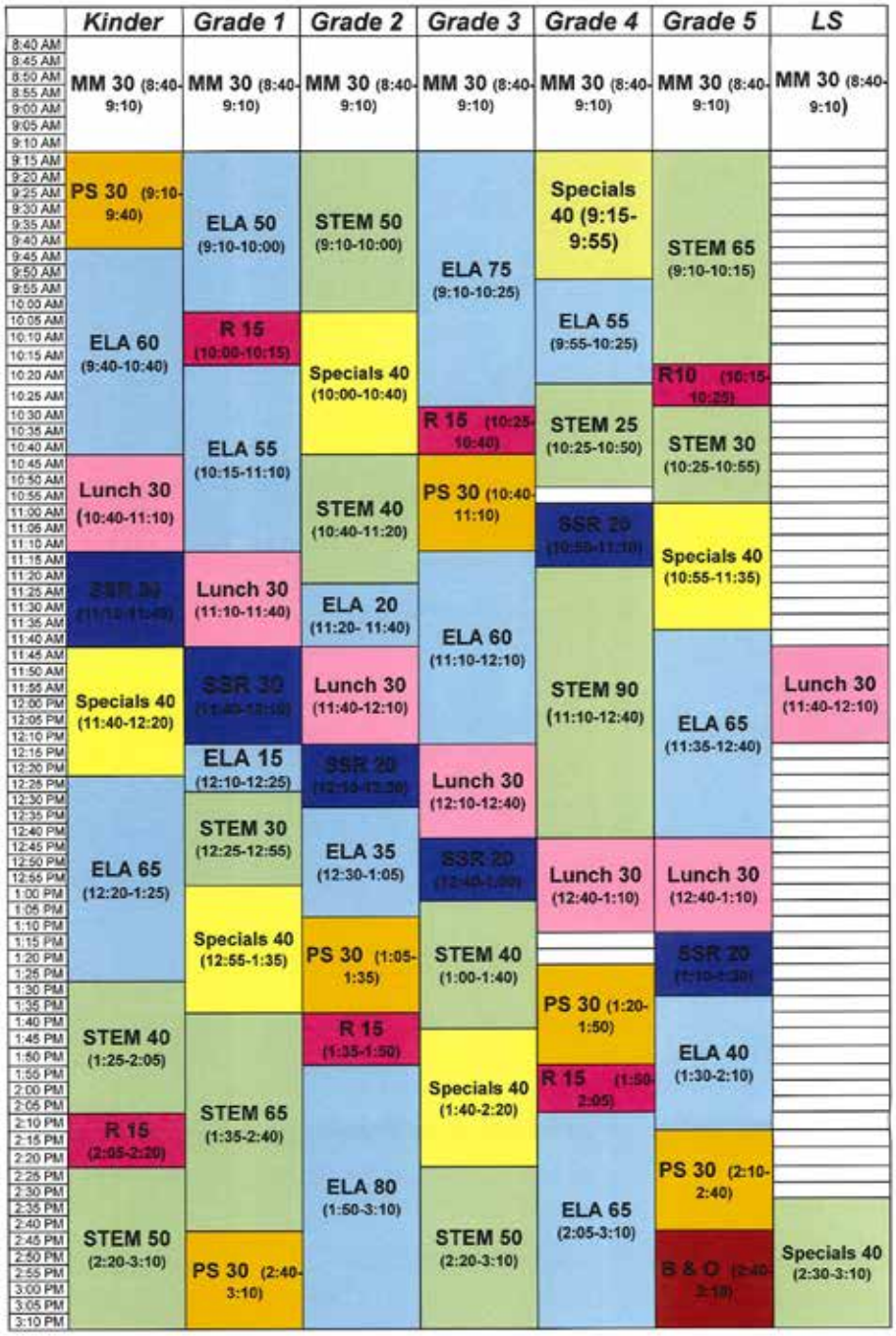
- Dismiss students individually instead of allowing them to get up and leave when finished
- Require a specific amount of time for sitting and eating before going out to play
- Encourage children to finish their meal by having a few minutes of quiet time at the end of the eating period
- Install timers in the cafeteria that start when the last student in line sits down; students must stay seated until the timer counts down to zero

Additional solutions

- Promote collaboration at the school and district level; school administration and nutrition staff can work together to ensure all students have enough time to eat
- Award front of the line passes to students at the end of the line or as an incentive for good behavior
- Reward students with extra time added onto a lunch period
- Improve food quality and variety, pay attention to student preference
- Cut up fruits and vegetables to make them easier to eat
- Implement a local school wellness policy (LSWP) that supports time to eat

Appendix F: An Example of School Lunch Scheduling Challenges

School principals must consider many different variables and challenges when crafting their school schedule. Below is a sample schedule from an elementary school in Washington, showing how many competing priorities a school principal must weigh when designing a schedule.



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– Pat McCarthy, State Auditor

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