

**The Role of Information Networks in the Federal System:
School Nutrition and the Healthy, Hunger-Free Kids Act of 2010**

by

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A dissertation submitted to the Graduate Faculty of
Auburn University
in partial fulfillment of the
requirements for the Degree of
Doctor of Philosophy

Auburn, Alabama
December 14, 2019

Keywords: Public Policy, Federalism, School Nutrition,
Networking, Implementation, Healthy Hunger-Free Kids Act

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Abstract

Actors, both inside and outside of government, play prominent roles in policy implementation of federal system. Utilizing information networks and structural mechanisms, these actors influence, shape, and implement federal policies. The purpose of this dissertation is to further understand how local, state, and national networks affect the implementation of federal policies at the state and local levels. To address this question, this paper explores the Healthy, Hunger Free Kids Act (HHFKA) of 2010 from conception in the President's Task Force on Childhood Obesity (chaired by First Lady of the United States (FLOTUS) Michelle Obama), subsequent passage in Congress, codification by the lead agency (United States Department of Agriculture (USDA)), and implementation by the states through local school districts. School nutrition has gained public recognition from a 2014 social media campaign, and more recently due to calls to repeal the act as an Obama legacy program. This issue has a greater implication as the entire school nutrition program is currently funded through supplemental legislation (since 2015) and is due for reauthorization in 2020. The 2010 reauthorization of the School Nutrition Act was the Healthy Hunger Free Kids Act (HHFKA), and elements are included in the current and contentious Farm Bill. The importance of this inquiry lies not only in the study of power relationships that exist in networks but also has substantive relevance in the exploration of school nutrition in the United States. The very notion of whether or not public schools have the responsibility to feed children is still debated not only for the cost, but the merits of such a program. The latest controversy, besides the desirability of the food served and its nutritional value, surrounds the political ownership of programs reflecting the primacy of the federal government versus devolution to the states. While the significance of networks is established (Agranoff 2007; Agranoff and McGuire 2003, Berry et al. 2004; Hale 2011; Kickert, Klijn, and

Koppenjan 1999; Lipnack and Stamps 1993; Milward, Provan and Else 1993; O'Toole 1997; Provan and Milward 1995, 2001), the study of these complex relationships is recent and underdeveloped (Adam and Kriesi 2007; Agranoff, 2007; Hale 2011). In this project I gather original information from the fifty states and District of Columbia directors of nutrition and through in-depth analysis of case studies in three states. This analysis utilizes these case studies and uses mixed methods to analyze original data obtained in three levels: local and state levels in the form of surveys, and semi-structured interviews for the federal level. The survey, nearly identical for both the state and local levels, focuses on three areas of emphasis: identification, relationship, and values. The surveys were sent to all 50 state directors and the District of Columbia, and all local directors in the selected states of North Carolina, Virginia, and West Virginia. Interviews focusing on the federal level, but also including state and local directors, provide further insight and create a rich narrative of the federal policy implementation process as well as informational networks that exist and influence policy implementation. The implications of this dissertation lie in furthering the knowledge of informational networks and their influence on the policy process and implementation and furthers the awareness of the current state of federalism in the United States today.

Acknowledgments

Behind every title page of any dissertation is a list of people that were necessary for the successful authoring and defense. I would like to acknowledge my advisor, Dr. Kathleen Hale, who took me on when it seemed no one else was up to the task. I would also like to acknowledge my committee for their support and avalanche of helpful suggestions in my completion: Dr. Mitchell Brown, Dr. Bridgett King, Dr. Nick Howard, and Dr. James Witte. I would also be remiss if I didn't acknowledge my Department Chair, Dr. Paul Harris, who cheerfully gave me unwavering encouragement and guidance. To Dr. Cynthia Bowling: none of this would be possible without your taking a chance on me. Thank you!

To my family: Mom, you provided the intellectual curiosity, echoing Kennedy's challenge "Some men see things as they are, and ask why. I dream of things that never were, and ask why not." Dad, you have been my anchor, always supportive, always calm, and always there for me. If Mom provided the "why," you provided the "how." To my siblings: I have always looked up to you, always been inspired by you, and still look to make you proud of your little brother.

To my children, Maggie and Terry: I love you, and am so incredibly proud of you. Thank you for supporting me through this long process with constant encouragement...anything is possible. I love you more than you know!

Finally, to Debbie: You have been here for me throughout, at times lifting me up and when needed a firm kick in the rear. When others said I shouldn't, you admonished me that I shouldn't quit. When I dwelled on my limitations, you emphasized my possibilities. Thank you for being my muse and biggest supporter; this accomplishment is as much yours as mine!

Table of Contents

Abstract.....	ii
Acknowledgements.....	iv
List of Figures and Tables.....	vi
List of Abbreviations	viii
Chapter 1: Introduction.....	1
Chapter 2: Literature and Empirical Theory.....	19
Chapter 3: Methodology	35
Chapter 4: Data Analysis	50
Chapter 5: Discussion and Conclusion	68
Tables and Figures	84
References.....	116
Appendix 1 Instrument Measurements	126
Appendix 2 Instrument, Survey Questions for Local School Nutrition Directors	133
Appendix 3 Instrument, Survey Questions for State School Nutrition Directors	146

List of Figures and Tables

- Figure 2.1 Child Nutrition Timeline 2004-2018
- Figure 2.2 Flowchart of 2010 Childhood Nutrition Policy, NC Example
- Figure 2.3 The Politics of Implementation and Financial Issues
- Figure 3.1 Identified Interest Groups
- Figure 3.2 Influence Perception Coding Model
- Figure 4.1 Tenure in Current Job
- Figure 4.2 Demographics Self-Identification
- Figure 4.3 District Demographic Size Self-Identification
- Figure 4.4 Values Self-Identification, Profitability vs. Nutrition
- Figure 4.5 Values Self-Identification, Practical Experiences
- Figure 4.6 Values Self-Identification of Job
- Figure 4.7 2010 Job Ability Self-Assessment
- Figure 4.8 2011 Job Ability Self-Assessment
- Figure 4.9 2012 Job Ability Self-Assessment
- Figure 4.10 2013 Job Ability Self-Assessment
- Figure 4.11 2014 Job Ability Self-Assessment
- Figure 4.12 2016 Job Ability Self-Assessment
- Figure 4.13 2017 Job Ability Self-Assessment
- Figure 4.14 2018 Job Ability Self-Assessment
- Figure 4.15 Network Mapping, Childhood Nutrition Network
- Figure 4.16 Network Mapping, State Directors
- Figure 4.17 Network Mapping, Local Directors

Figure 5.1 Combined Overall Trends in Director Opinions of Job Achievability

Figure 5.2 Letter of Past SNA Presidents to Congress

Table 3.1 Demographic Data Template, Presidential Votes

Table 3.2 Demographic Data Template, State Politics

Table 3.3 Demographic Data Template, November General Election Turnout 2008-2016

Table 3.4 Demographic Data Template, Wealth and Education Level

Table 4.1 Analysis of Network Centralization, All Levels

Table 4.2 Analysis of Network Centralization, State Level

Table 4.3 Analysis of Network Centralization, Local Level

List of Abbreviations

ACA	Affordable Care Act
CACFP	Child and Adult Care Food Program
CEO	Chief Executive Officer
CNA	Child Nutrition Act
CNN	Cable News Network
CSPI	Center for Science in the Public Interest
DC	District of Columbia
EBT	Electronic Benefits Transfer
FADA	Fellow of the American Dietetic Association
FLOTUS	First Lady of the United States
FRAC	Food Research and Action Center
HHFKA	Healthy, Hunger-Free Kids Act
HHS	The U.S. Department of Health and Human Services
LDN	Licensed Dietitian/Nutritionist
MS	Master of Science
NC	North Carolina
NC DPI	North Carolina Department of Public Instruction
NSLP	National School Lunch Program
OMB	Office of Management and Budget

RD	Registered Dietitian
RDN	Registered Dietitian Nutritionists
SNA	School Nutrition Association
SNAP	Supplemental Nutrition Assistance Program
SNAP-ed	Supplemental Nutrition Assistance Program-Education
USDA	United States Department of Agriculture
VA	Virginia
WV	West Virginia

Chapter One: An Introduction

What roles do the actors, both inside and outside of government, play in policy implementation of federal decisions? What mechanisms do state and local levels use to influence, shape, and finally implement federal policy? The purpose of this dissertation is to further understand how local, state, and national networks affect the application of federal guidelines at the state and local levels. To address these questions, this dissertation explores a multiple case study of the Healthy, Hunger Free Kids Act (HHFKA) of 2010 from conception in the President's Task Force on Childhood Obesity (chaired by First Lady of the United States (FLOTUS) Michelle Obama), subsequent passage in Congress, codification by the lead agency (United States Department of Agriculture, USDA), and implementation by the states through local school districts. School nutrition has gained public recognition due to a famous social media campaign in 2014, and more recently due to calls to repeal the act as an Obama legacy program. This issue has a greater implication as the entire school nutrition program is currently funded through supplemental legislation (since 2016) and is overdue for reauthorization. The 2010 reauthorization of the School Nutrition Act was the Healthy Hunger Free Kids Act (HHFKA), and elements are included in other legislation such as the contentious Farm Bill. The importance of this inquiry lies not only in the study of power relationships that exist in networks but also has substantive relevance in the exploration of school nutrition in the United States. The very notion of whether or not public schools have the responsibility to feed children is still debated not only for the cost, but the merits of such a program. The latest controversy, besides the desirability of the food served and its nutritional value, surrounds the political ownership of programs reflecting the primacy of the federal government versus devolution to the states. While the significance of networks is established (Agranoff 2007; Agranoff and McGuire 2003, Berry

et al. 2004; Hale 2011; Kickert, Klijn, and Koppenjan 1999; Lipnack and Stamps 1993; Milward, Provan, and Else 1993; O'Toole 1997; Provan and Milward 1995, 2001), the study of these complex relationships is recent and underdeveloped (Adam and Kriesi 2007; Agranoff 2007; Hale 2011).

To analyze these questions, I utilize a case study of the HHFKA using methodology focusing on the local and state levels in three states (North Carolina, Virginia, and West Virginia), drawing on archival data along with surveys of school and state nutrition directors. To gain further insight, I have conducted interviews with stakeholders which are used to analyze factors that influence diffusion and create a rich narrative. These data are intended to 1) illuminate different approaches to implementation in the states, 2) examine the role of non-governmental organizations, and 3) study the evolution of substantive school nutrition policy to the present.

The first studies of measuring policy diffusion focus on the adoption of a certain policy (Agranoff 2003; Baumgartner 2012; Baumgartner and Jones 1993; Berry and Berry 1990, 1999; McGuire 2006; Meier and O'Toole 2001; Mooney and Lee 1995; O'Leary et al. 2006; Sabatier 1987; Sabatier and Jenkins-Smith 1993; Shipan and Volden 2012; Steelman 2010). Current research about diffusion moves beyond adoption to consider implementation (Hale 2011). The case of HHFKA is interesting because adoption was accepted universally as most USDA guidelines are in a system that has existed for decades. Why is implementation an issue nearly a decade later for this specific policy? Policy diffusion takes more than a linear path leading to a binary answer; diffusion occurs in a complex network influenced by myriad actors leading to implementation that is anything but static. These actors--which can include not only government officials (both elected, appointed, and career) and agencies, but also non-governmental

organizations such as nonprofits, private companies, professional associations, and advocacy groups across each level of federalism, as well now organized social and news media-- collaborate to create, shape, and implement policy (Agranoff 2003; Hale 2011; Milward and Provan 2000; Sandstrom 2008).

In intergovernmental relations, networks of collaboration and information are extremely complex and have become more important in the understanding of policy implementation due to the recognition of their influence (Agranoff 2007; Agranoff and McGuire 2003; Berry et al 2004; Hale 2011; Kickert, Klijn, and Koppenjam 1999; Lipnack and Stamps 1993; Milward, Provan, and Else 1993; O'Toole 1997; Provan and Milward 1995, 2001). Public administration has evolved from linear analysis to recognition of complexity. O'Toole and Christenson (2012) describe the interdependence (power shared among branches and layers of government, even within policy sectors) and complexity accompanying these relationships (also O'Toole 1997). By complexity they mean that "the intergovernmental network is large and differentiated; no one participant can possibly possess enough information about its components and dynamics to consistently make rational decisions on its own or to operate in isolation from the rest" (O'Toole and Christenson 2012, 18).

I have gathered original information from the fifty state and District of Columbia directors of nutrition and through in-depth analysis of cases in three states. Following Hale (2011), by information, I mean information "...as specific knowledge or data that reflects the expertise and judgment of professionals engaged in a particular policy realm. Information is more sophisticated than a random collection of facts; information includes the values and ideologies reflected in an area of public concern, how problems are defined, how solutions are

crafted, how policy is put into action, and how to decide whether particular solutions are worthwhile.” (Hale 2011, 1)

In recognition of the networked intergovernmental environment, public administration scholars are looking at information, and more specifically networks, rather than focusing on hierarchy or authority by themselves. Kettl acknowledges that the focus on networks goes beyond traditional analysis of the structure of such networks, and more importantly examines the purposes of the networks (Kettl 2002). These networks are not necessarily fixed, but evolve, change, and even fall away. Complexity and interconnectedness are not fixed—as what “worked” yesterday may not work, or even be possible today. Knowing why (a fixed solution) something works is less important than knowing how (understanding the complexities of the system) in the context present.

Agranoff (2007; 2017) and Hale (2011) analyze not only the traditional federalism levels of federal, state, and local governments, they expand the idea of a network to look at regional as well as for-profit and non-profit non-governmental organizations, which they argue are critical to understanding a whole of government approach. Agranoff (2007; 2017) defines such networks as public management networks and describes that some of the most important information is exchanged outside of the formal networks. These information diffusion networks that policy actors and public administrators create are crucial to understanding how information is transmitted, received, and synthesized, and how policy is formulated and even transformed (Hale 2011). Network-based analysis offers a new resource in understanding the connections between political power and representative democracy, but while providing a framework for defining a central problem, but not yet approached the status of theory. It is beginning to frame the first steps toward providing effective tools for managing the networks and may in turn improve public

policy. Kettl (2017) argues that further work is required in developing and confirming theoretical propositions about the way networks behave.

This dissertation builds on the bodies of literature in the fields of federalism and policy implementation, informed through analysis utilizing informational and relational networks. While the contemporary policy has been prominently featured in the media as a sensational piece that exemplifies disfunction of the federal system, analysis of this issue has been anemic at best. Utilizing an existing model of relationship typologies to facilitate network mapping, the methodology created can be used to examine any federal implementation and network influences.

Chapter 2 reviews the existing pertinent bodies of literature while introducing the policies involved with school nutrition leading to the legislation introduction and passage in 2010. Beginning with federalism, progressing through implementation, the review examines networks and policy diffusion before a review of school nutrition and the issues surrounding the current legislation. The literature logically leads to the research questions that will be examined in this dissertation.

Chapter 3 introduces the methodology utilized to analyze the HHFKA; a multiple case study with an embedded design is used to ascertain the values and actions of the different levels in the federal system. This multiple case study design reveals information specific to the unique level and locale being analyzed; in addition, by comparing and contrasting shared and unique phenomena of different levels, a clearer picture of the structure and processes will expand understanding of the roles actors play within the information networks inherent to policy implementation, and discern the current state of relationships in federalism.

Chapter 4 describes the data collection techniques utilized. In addition to review of the secondary documents to ascertain structures involved, primary data is obtained through individual interviews at all levels and surveys to the state and local level directors. The foundations of each element are designed to measure identification, values, and relationships. Qualitatively, the data serves to define the characteristics of the actors involved in the implementation process and their activities and roles, as well as discerning their strategies and thinking. In these activities and roles, what relationships exist that shape the environment and impact the opinions and decision making in the process? Quantitatively, can we discover and map the importance and influence of actors in the network?

Chapter 5 builds and interprets the data collection of chapter 4 by discussing, as well as offering explanations and theories of framed analysis. What alliances and conflicts exist that shape the environment? Do these relationships matter, and if so, how? What are the implications for this policy, as well as for federalism today?

The foundation of this dissertation lies in several areas: That of federalism, policy diffusion and implementation, networks and information, and in the legislation itself of school nutrition. Any national legislation originates in the legislature as a law, passes to the lead agency for codification, and then is passed to the states for local implementation. In this process there is interpretation and differences in the networks that exit from state to state, and locality to locality. Networks are heavily used for interpretation and assistance, in advice to material means. Often the ways policy is implemented relies on precedence as well as the structures that already exist. The study of networks provides a model that will be utilized for analysis in chapter 3 to examine the phenomenon of school nutrition that has culminated in the passage of the HRFKA of 2010.

The review of school nutrition from its inception provides a frame for the contemporary legislation.

The Federal System in the United States

O'Toole and Christensen (2012) describe the American intergovernmental system as a focal point of controversy in contemporary times. They argue that this is not a new phenomenon, but one that was intended by the founders when they created the system (the experiment) in the 18th century. In this adaptable system, competing values and philosophies as well as issue positions are engaged and debated, and ideally where participatory democracy results in compromise to avoid alienation or marginalization. This framework has undergone changes in interpretation as well as having been “dramatically altered under forces of political, economic, and social development.”

The American government is a federal system. Federalism is constitutionally apportioned authority between central and regional governments. The study of what the various absolute and relative roles, responsibilities, and levels of influence of government and their relationship with each other are, and should be, constitutes intergovernmental relations. Intergovernmental relations include the full spectrum of federal-state-local relations (encompassing federal, or national government as well as state, county, city, municipal and township governments, and schools and special districts) (O'Toole and Christensen 2012). Recent analysis reflects the networks that accompany this structure to include non-governmental entities as well (Agranoff 2007; Hale 2011).

Alexis de Tocqueville writes of his admiration for the decentralized nature of America's federalism as it left the myriad of “secondary affairs” to lower levels allowing the national government to focus on primary public obligations. After more than two centuries, American

federalism is still a work in progress. The overarching question in the academic field of federalism and intergovernmental relations is, “What pattern dominates federal (state-national) relationships, conflict or cooperation?” (Cho and Wright 2004, 448).

The chronology of federalism in the United States can be viewed in distinct time periods. The first period from 1760-1860 includes the Founding to Civil War, 1880-1920s was the Post-Bellum Expansion and Progressive Era, the 1930s-1960 was the New Deal and World War II period (Postwar Prosperity), 1960s-1970s marks the Great Society and Vietnam War periods, and the 1970s-1999 is referred to as New Federalism. These periods are summarized briefly below.

1760-1860 Founding to Civil War.

The Supreme Court establishes itself as an equal branch in practice with *Marbury v. Madison* (1803) and judicial review, and the nation struggled with its dual identity, and the notion of dual federalism in which the national and state government were equal partners. This period is marked by the struggle between federalists and anti-federalists for primacy in this system. In 1819 the Supreme Court uses the necessary and proper clause (a power rather than a limitation) in deciding *McCulloch v. Maryland* (1819), which establishes the primacy of the federal government through implied (rather than explicitly stated) constitutional powers. This idea was tested by the Doctrine of Nullification, the Internal Improvement Debate, and the Hartford Convention following the War of 1812.

1860-1880s Testing the Idea of Dual Federalism.

The Civil War brought to the forefront the addressal of the role of the federal government and the very idea of the union of states itself. Centered ostensibly around these questions, the issue of slavery led to conflict that was resolved in the military defeat of the Southern states

attempting to secede. The period of Reconstruction that followed provided a concrete measure of federal primacy in the form military occupation. The Supreme Court during this period reinforced the federal government's primacy in areas such as the regulation of commerce, but also passed rulings that afforded the states a measure of sovereignty in local jurisdictional matters in their borders.

1880-1920s Post-Bellum Expansion and Progressive Era.

In post-bellum expansion of 1880-1920s, the question of federalism is far from settled and continued to reflect a rapidly growing nation. The Progressive movement shapes the end of the dual federalism (often portrayed as a layer cake) period leading up to the Great Depression and election of Franklin D. Roosevelt in 1932.

1930s-1960 New Deal and World War II, Postwar Prosperity.

The period of the 1930s-1960 is shaped by the Great Depression and results in cooperative federalism (often portrayed as a marble cake or picket fence (Wright 1974). The New Deal, enacted by the Roosevelt administration, is a progressive federal response to the economic crisis. The federal government responds to the emergency by expanding federal purview in spending for programs and grants-in-aid and intergovernmental transfers, and the establishment of the Social Security Act in 1935. World War II and beyond saw an explosion of federal expansion, continuing to President Lyndon B. Johnson and the Great Society/ War on Poverty of the 1960s.

1960s-1970s Great Society and Vietnam War.

President Johnson ushers in the era of centralized government (1960-1970) (Corwin 1950). In this era, the federal government forces states to implement policy through the use of intergovernmental transfers and grants-in-aid. Programs such as Medicare/Medicaid, federal

food stamps, and the Job Corps as well as federal regulations in consumer safety and infrastructure acts increases the role of the federal government and collaboration with other partners (Elazar 1962).

1970s-1999 New Federalisms.

The period from 1970-1990s is a period of devolution or scaling back of federal power. Originally championed by President Nixon and furthered by President Reagan, this period sees a scaling back of central control and cuts of federal spending to the states and on social programs. Some political scientists claim that this period ushers in coercive federalism. (Cho and Wright 2001; Kincaid 1990; 1993; 1996; 1998; 1999; Walker 2000; Wright 1988; American Commission on Intergovernmental Relations (ACIR) 1984, 1993 in regard to regulatory federalism) This highlights the Paradox of the Middle Tier, where states rose while being further regulated and coerced by the federal government (Derthick 2001).

2000-Present.

Because Americans are used to social programs, the idea of federal spending becomes divorced from the argument of federalism—Americans (and states) expect it, regardless. Because of this, the current model of federalism is conflicted. Donald Kettl (2015) asks if federalism is breaking down, and whether or not poor intergovernmental relations have the United States headed for fiscal disaster, while Posner and Conlan (2011) describe polarized federalism, or fend for yourself federalism. Posner (2007) highlights the unique nature following 9/11 in coercive federalism of the Bush (W) era. In the Obama era, the federal government mandated the Affordable Care Act (ACA) to the states, and the states respond in large numbers by opting out or watering down participation. Further, states are pushing back on immigration and refusing federal grant money (grants-in-aid as depicted by Monypenny (1960), and block grants) or

ignoring unfunded mandates (Posner 1998) and choose to exercise sovereignty on issues such as the legalization of marijuana. In addition, the Supreme Court ruled in support of New Federalism, siding with the states in *United States v. Lopez* (1995) and *United States v. Morrison* (2000).

Donald Kettl (2002) offers that this debate has led to a core issue of an emerging gap between government and governance, with government referring to the structure and function of public institutions, and governance being the way government gets its job done. His argument is that this problem is inherent not only in the structures of government, but also in the interpretations of this relationship in the historical traditions of the United States. He defines the traditions as the Hamiltonian, Jeffersonian, Madisonian, and Wilsonian. He describes these as:

a Hamiltonian tradition that seeks an effective government, and that promotes top-down government, and that favors a strong executive; a Jeffersonian tradition that celebrates America's agrarian roots, that promotes bottom-up government, and that seeks a weak executive; a Madisonian tradition that tries to balance political power among competing forces; and a Wilsonian tradition that prefers to concentrate administrative power in hierarchically structured organizations" (Kettl 2010, p. 29).

These four intellectual traditions, he claims, have led to administrative (hybrid) traditions that are "radically different, and fundamentally irreconcilable" (Kettl 2010).

Deil S. Wright explains three models of intergovernmental relations in his work *Understanding Intergovernmental Relations* (Wright 1978). The coordinate-authority model shows a clear separation between national and state/local relationships, as well as distinct boundaries separating the various levels of government. In the inclusive-authority model, he presents a system in which intergovernmental relations are depicted as a hierarchical set of relationships, with emphasis on the dominant role of the federal level. Compare this to the overlapping authority model, which represents a newer way of analyzing and depicting the relationships that exist in intergovernmental relations. In this model, these relationships are

presented as a series of overlaps of federal, state, and local levels that exist and function simultaneously. In it, a single jurisdiction has constrained autonomy and discretion. Because of this, the power and influence available are significantly limited to any one level and necessitates bargaining as an authority pattern. Wright (1988) defines bargaining as:

negotiating the terms of a sale, exchange, or agreement. Wide areas of IGR involve exchanges or agreements. For example, the national government offers scores of assistance programs to states and localities in exchange for their agreement to implement a program, carry out a project, or pursue any one of a wide variety of activities” (Wright 1988).

In his overlapping-authority model he describes six chief characteristics that exist: limited and dispersed power, modest and uncertain areas of autonomy, high degree of potential or actual interdependence, simultaneous competition and cooperation, bargaining-exchange relationships, and finally negotiation as a strategy for reaching agreement

Wright’s model of over-lapping authority has evolved to analyze specific relationships between the three levels of government in individual states, as well as examining behaviors of specific policy areas holistically, such as the programs which entail matching state and federal funds. In this sense the behavior and patterns analyzed indicate substantial and quantifiable differences between states, presenting the relationships as ones in which autonomy and discretion in a single jurisdiction are constrained, and power and influence available to any one level are significantly limited (Wright 1988). This represents “essentially a new way of depicting intergovernmental relationships,” and “seems much more consistent with the dynamism and complexity of the U.S. system of shared powers than either of the other two views” (Agranoff and Radin 2014, 139-140). Wright lays the foundation for contemporary developments in IGR, providing conceptually the basis that moves beyond linear, binary/static analysis of federalism

and IGR and begins to better reflect not only the dynamic and complex ideas but practices as well.

American federalism is in a state of flux corresponding to governmental and societal turmoil. The role of government and federalism in the United States is polarized and emotionally charged (Posner and Conlan 2016). Although it has been reported that the federal government takes in record revenues (Long 2015), there are still substantial issues in public confidence in governance in federal social programs (and an aging population demographic) and state infrastructure support (Kettl 2015). In the United States, government, and therefore governance, has become more complex (in size, scope, and reach). O'Toole and Christenson (2013) describe the nature of the founders' system of federalism that was designed to adapt in order to accommodate not only the variance of opinion but also the evolving social values, one that has greatly increased the interdependence and complexity (both in structure, policy, and reach) within agencies. There are inferences that, while the system has grown in complexity and size, there is a problem understanding contemporary intergovernmental relations with traditional models and theories (O'Toole and Christenson 2013).

Kettl (2015) asserts a widening dissonance between government (the structure and function of public institutions) and governance (the way government performs its functions). Milward (1994) details the trend towards a hollow state where government bureaucracies provide essential services but defer production of services to outside resources. Rather than providing all services themselves, there has been a shift to increasingly non-governmental partners to perform required functions as well as a growing reliance on processes that rely less on authority for control. With this, the structure of any agency is not as important as the framework of the relationship and informational network. (In fact, this shift to the informationally adept

bureaucracy may be shaping the structure to adapt accordingly (Borins 1997, Lynn 1997, 1998). This gap of theory in understanding the relationship between government and non-governmental partners is lacking in cognition and analysis, despite having philosophical roots in the original ideas of governance of the nation's founders. Fundamentally, Americans desire more government services without the corresponding costs; just how to deliver these services and which problems need to be addressed have changed constantly.

Rittel and Weber (1973) describe social policy as being a wicked problem. A wicked problem is one that is difficult or impossible to solve because of contradictory, incomplete, and changing requirements that are often difficult to define and impossible to solve. The use of the term "wicked" is not a value judgement denoting evil, but rather denotes resistance to resolution. Because of the interdependencies that exist in a complex environment, the effort to define and solve one aspect of a wicked problem may reveal or create other problems (2nd and 3rd order effects). O'Toole (1997) argues that the lack of familiarity and even awareness in operating in a network is problematic. Because of the expanding complexity confronted by public administrators, using normative theories can be counterproductive when applied inappropriately or without cognizance beyond linear thought. In the 21st century, information is even more critical to public administration and has exponentially increased to overwhelming levels.

Policy Implementation

I analyze these data through an examination of the factors that influence information diffusion in implementation. Research in the field has traditionally focused on adoption as a binary result—was the policy adopted or not? As research continued, people began realizing that adoption was not enough. There was more that needed to be clarified to understand the process

further—adoption is enough to satisfy elucidation with the realization that hierarchy is not sufficient in explanation of growing awareness in complexity of the policy environment.

Walker's (1969) influential work asserts that networks of state officials and professional organizations facilitate state innovations through shared information such as ideas, problem issues, and solutions. It is this interaction of information with other states, professional organizations and associations that influence state officials in the adoption of particular policy innovations (Balla 2001; Cigler 1999; Mintrom and Vergari 1998) as well as (according to the area of policy) patterns of adoption shift (Gray 1973; Savage 1985). Geography does play a role as states tend to adopt policies following adoption by adjacent or regional neighbors (Berry and Berry 1990; Mintrom 2000; Mooney 2001; Mooney and Lee 1995). However, the policy environment is more than hierarchy.

As the field began analyzing networks, it became apparent that the traditional models of hierarchy were insufficient to holistically explain this complexity. Yes, bureaucratic hierarchies exist, but they are not the total sum of the public environment. The focus of contemporary analysis is the empirically more difficult task of identifying the roles of connections through networks both inside and outside these hierarchies that facilitate and shape the information (Desmarais, Harden, and Boehkme 2015; Hale 2015). It is in these collaborations that actors utilize the information that can be observed through the associated interactions, collaborations, and decisions manifested in policy outcomes (Desmarais, Harden, and Boehkme 2015). Agranoff (2017) stated that public managers increasingly must participate in the network environment as a matter of necessity to survive both the complexity and uncertainty that are always present.

Networks and Diffusion

Networks are connected structural arrangements that encourage the exchange of information and facilitate policy diffusion (Agranoff 2012; Hale 2011; Kettl 2002; O'Toole and Christensen 2012). O'Toole highlights the complexity of networks and relationships within the network by stating that these relationships concern "all or part of multiple organizations where one unit is not merely the formal subordinate of the other in some larger hierarchical arrangement" (O'Toole 1988, 414). Walker (1969) defines diffusion as a process where an innovation is communicated through specific channels by members of a social system over a specified period of time. Shipan and Volden (2012) broadly define policy diffusion as "one government's choices being influenced by the choices of other governments." (Shipan and Volden 2012, 788) It is the spread of new ideas and the resulting actions that are of interest; actors, as they interact, can either converge or diverge with the exchange of information or communication. Based on this, not only is policy shaped and implemented, but relationships are established, formed, and maintained that facilitate (or impede) future diffusion. The connection between new ideas and network actors encourage the exchange of information that facilitates policy diffusion (Graham, Shipan, and Volden 2013; Mossberger and Hale 2002; Shipan and Volden 2008; Rogers 1962).

Earlier work focuses on policy diffusion between neighboring states, where states are more likely to adopt a policy of an adjacent state has implemented (Rogers 1962; Walker 1969). The idea of geography is now not just physical location, but proximity in networks and spheres of influence. Hale (2011) finds that the greater the access and interactions between actors (in this case nonprofit and professional organizations) in a network will result in an increased probability of policy diffusion. The likelihood of innovation and policy adoption is directly linked to shared network synthesized information that manifests itself as ideas such as model programs, best

practices, and published results. The increase of information across the network results in multi-jurisdictional communication across domains and layers of government.

Information flows both vertically and horizontally. Vertical policy diffusion is that which flows across the levels of federalism between federal, state, and local governments (Shipan and Volden 2008). Horizontal diffusion occurs among actors in the subnational level (Mossberger 2000; Mossberger and Hale 2002), such as state to state, or district to district. Hale (2011) shows that this vertical and horizontal diffusion works simultaneously both as polydiffusion, in that information flows simultaneously in a complex environment to create a bounded rationality condition for the actors in decision making and policy adoption (Simon 1986; Mossberger 2000). This supports Walker's (1969) assertion that actors take information shortcuts in rational policy decisions by emulating peers (both competitive and cooperative) rather than creating a new policy decision. Hale includes entities outside of the formal governmental structure as information channels. Hale, with Mossberger (2002), in evaluating state school-to-work policies found "State administrators looked to the federal government to provide information about grants and program requirements; however, states looked to nonprofit organizations for synthesized information about best practices, model programs, and program evaluation." (Hale 2011, 14-15).

Determinants influence the complexity of this bounded rationality. Determinants are those means and factors that provide impetus in the policy diffusion process. This adoption model can take the form of either internal determinants or regional diffusion. Internal determinants focus on the instruments of political, social, and economic conditions present in the adopting state (Berry and Berry 1990; Walker 1969). Regional diffusion models take into consideration the intergovernmental influence of one or more states inherently similar to the adopting state (Berry and Berry 1990; Walker 1969). Whitaker et al. (2012) states that

contemporary studies incorporate elements of both schools of thought, both internal determinants and regional diffusion.

Hale (2011) provides a network model of information diffusion for conceptualizing a national nonprofit information network called the Information Position Typology. This approach is useful to identify and quantify the non-governmental actors, and to provide a framework to characterize the nature and role of these elements. Hale states that “Through contacts in the information network, public administrators access this information and use it to design and implement policy change” (Hale 2011, 23), and that administrators and their relationships with non-governmental organizations provide a mechanism that shapes the information to drive policy change.

Hale (2011) asserts “the network arrangement has consequences,” where networks add to the complexity of policy implementation by introducing competing and cooperating stakeholders that have their own agendas, different levels of allegiance, and independent resources (to include financial as well as information and influence). As illustrated in Figure 1, these varying levels of commitment are defined as Champions, Challengers, Supporters, and Bystanders, and positioned according to preference and engagement (low to high). Because of this raised complexity and interdependence, results of implementation and accountability are diffused (Agranoff and McGuire 1998, 2003; Kettl 2002; Kickert, Klijn, and Koppenjan 1999; Provan and Milward 2001; Radin 2006). Hale explains that this complex environment can work counter to public administrators’ efforts to administer programs with diffused authority and program accountability. Rhodes (1996) describes governance without government in which these functions are undertaken by a myriad of actors at various levels which further contributes to this diffusion.

Chapter Two: Literature and Empirical Theory

Introduction - Background on the United States Public School Lunch Program and Relevant Policy Literature

School lunches are a source of controversy in the United States today, and the crux of the argument today is largely political and philosophical as well as practical. Time magazine in 2016 asserted that this discussion has changed with the prosperity of the country. Today, the program has been caught up in the political arguments of role of government and federalism, of socialism vs. less government, and of the Democrat vs. Republican power struggle. During the burgeoning industrial age of the late 19th century, social inequality and poverty conditions led reformers to suggest protections for children. Among these were labor laws and compulsory public education. By the turn of the century 34 states (of the 45 in 1900) made compulsory education law. (Rude 2016) The earliest programs originated in cities (notably New York, Philadelphia, Boston, Cleveland, Cincinnati, St. Louis, Los Angeles, and Milwaukee), provided by progressive private organizations invested in children's welfare and education. At this time, "it did not gain sufficient momentum to convince other organizations or municipalities to do likewise." (Gunderson 1971, 5) Rural schools generally suffered the same poverty conditions that befell their students. Children generally brought cold sandwiches, which later might be augmented by soup prepared by teachers, with utensils donated by parents. Gunderson recounts that Robert Hunter authored a statement that would become a refrain that is readily quoted and exists today: "Children can't learn if they are hungry."

Guidance and supervision of the parents are impossible because they must work; the nurture is insufficient because there are too many hungry mouths to feed; learning is difficult because hungry stomachs and languid bodies and thin blood are not able to feed the brain. The lack of learning among so many poor children is certainly due, to an important extent, to this cause. There must be thousands -very likely sixty or seventy thousand children-in New York City alone who often arrive

at school hungry and unfitted to do well the work required. It is utter folly, from the point of view of learning, to have a compulsory school law which compels children, in that weak physical and mental state which results from poverty, to drag themselves to school and to sit at their desks, day in and day out, for several years, learning little or nothing. If it is a matter of principle in democratic America that every child shall be given a certain amount of instruction, let us render it possible for them to receive it, as monarchical countries have done, by making full and adequate provision for the physical needs of the children who come from the homes of poverty. (Hunter 1965, 217)

The Great Depression of the 1930s created widespread poverty and further exacerbated existing poverty conditions. The Roosevelt government launched notable social programs (school lunch being assigned to the Works Progress Administration (WPA) and assisted later by the National Youth Administration (NYA); Congress passed The Agricultural Act Amendment of 1935 (74 P.L. 320, 49 Stat.230), aimed to aid both farmers and starving children. This became the beginning of the USDA's commodity programs, where crops and livestock were diverted from the market (which was sorely lacking), bought by the government, and distributed to schools. Gunderson cited the success of the program noting that in March 1937 there were 3,839 schools and 342,031 children that received these commodities; in 1939 the figures were 14,075 and 892,259. By 1942 the participation increased by 5,272,540. World War II would see excess farm commodities diverted to the Armed Forces, and the social programs such as the WPA as well. This reality led to Congress passing the Department of Agriculture Appropriations Act of 1943 (78 P.L. 129) authorizing \$60 million to maintain school lunch programs, but only in the form of currency subsidization. With this came the first program guidelines, namely that payments could not exceed the cost of the food, and that accurate records had to be maintained (Gunderson 1971). Despite these early attempts to keep children fed, poverty persisted and food scarcity for some demographics increased necessitating a new round of policies aimed at providing nutrition for children.

Passed on June 4, 1946, the Richard B. Russell National School Lunch Act (79 P.L. 396, 60 Stat. 230) was a United States federal law signed by President Harry S. Truman that created the National School Lunch Program (NSLP) to provide low-cost or free school lunch meals to qualified students through subsidies to schools. During the Congressional discussion, Major General Lewis B. Hershey (incidentally a former school principal prior to joining the Army) testified that malnutrition was a matter of national security, in that 16% of draftees in World War II were classified unfit for service, and of those 40-60% were due to being underfed. (Hinrichs 2010) “Whether we are going to have war or not, I do think that we have got to have health if we are going to survive,” he stated. (Confessore 2014) His testimony, combined with the experiences prior to World War II, led directly to wording in the bipartisan Act:

It is hereby declared to be the policy of Congress, as a measure of national security, to safeguard the health and well-being of the Nation’s children and to encourage the domestic consumption of nutritious agricultural commodities and other food, by assisting the States, through grants-in-aid and other means, in providing an adequate supply of foods and other facilities for the establishment, maintenance, and expansion of non-profit school-lunch programs.
(National School Lunch Act 1946)

On October 11, 1966, the Child Nutrition Act (CNA) (42 U.S.C. 1771, amended through P.L. 111–296) was created as a result of the "years of cumulative successful experience under the National School Lunch Program (NSLP) to help meet the nutritional needs of children," and signed by President Lyndon B. Johnson. As part of this legislation, the Special Milk Program (Public Law 86-478), which had been functioning since fiscal year 1954 under a separate authorization, was extended to June 30, 1970 and made a part of the Child Nutrition Act.

The William F. Goodling Child Nutrition Reauthorization Act of 1998 (P.L. 105-336) extended expiring authorizations for child nutrition and Commodity Assistance Programs and the Women, Infants, and Children (WIC) program through fiscal year 2003, significantly expanding

the availability of federal subsidies through the school lunch program for snacks served in after-school programs and authorized demonstration projects providing free breakfasts for elementary school children without regard to family income.

The Child Nutrition and WIC Reauthorization Act of 2004 (P.L. 108-265) amended the Richard B. Russell National School Lunch Act and the Child Nutrition Act of 1966 to provide children with increased access to food and nutrition assistance, to simplify program operations and improve program management, to reauthorize child nutrition programs, and required that all school districts with a federally-funded school meal program develop wellness policies that address nutrition and physical activity.

Former Chairmen of the Joint Staff John M. Shaliakashvili and Hugh Shelton penned an article in the *Washington Post* that stated “As of 2005, at least 9 million young adults -- 27 percent of all Americans ages 17 to 24 -- were too overweight to serve in the military, according to the Army's analysis of national data. And since then, these high numbers have remained largely unchanged.” They further added that obesity is the greatest cause of being unfit for military service, increasing nearly 70%. Along with 130 other retired flag officers and senior officials, they called for Congress to pass legislation in school nutrition, invoking the testimony given in 1946 by General Hershey (Shalakashvili and Shelton 2010). The Healthy, Hunger-Free Kids Act of 2010 (P.L. 111-296 (through 2015, reauthorized in 2016) introduced changes to both the Summer Food Service Program and the Afterschool Meal Program. Included in this legislation were the National School Lunch and Breakfast programs, the Special Supplemental Nutrition Program for Women, Infants and Children (WIC), the Child and Adult Care Food Program (CACFP), the Summer Food Service Program, the Afterschool Meal Program, and the Supplemental Nutrition Assistance Program Education (SNAP-Ed). The change to the Summer

Food Service Program was to make the eligibility rules for nonprofit and public sponsors the same. Prior to passage of this act, private non-profit Summer Food sponsors were limited to 25 sites with no more than 300 children per site. Essentially, the law eliminates the rules limiting the number of sites private non-profit summer meal program sponsors can operate.

Further, the act also authorizes \$10 million in grants for the establishment and maintenance of the summer food programs. Regarding the Afterschool Meal Program, the law expanded the program to all 50 states through the Child and Adult Care Food Program (CACFP) and Increases the School Lunch and School Breakfast per meal reimbursement by six cents, the first increase in 15 years. In what would prove to be a contentious element, the schools must meet the new outlined nutrition standards in order to receive the meal increase (National Conference of State Legislatures website). Also required is that school districts would gradually increase paid lunch charges so that the revenue generated from paid lunches is equal to the amount reimbursed by the federal government at the federal free reimbursement level. In addition to establishing nutrition standards for the School Lunch and Breakfast programs, the Secretary of Agriculture now has the authority to set nutrition standards for all food products sold on school grounds during the day, increased authority over food safety, and is required to develop guidelines for recalling or putting administrative holds on suspect food products. In addition to acting as lead agency for the school nutrition program, this increases the amount of authority granted to the Secretary of Agriculture over these programs. (HHFKA)

The Healthy Hunger-Free Kids Act

The Problem: The Politics of Policy Diffusion

Over the past 30 years, there has been a cultural, nutritional, operational and financial shift in priorities surrounding the school nutrition program. In many NC school districts, the philosophy of “What is the right thing to do for children” has

been replaced with the administration's priority of "How much revenue can be generated?"

Success in the school nutrition program is often measured by its financial solvency, not high quality, nutritious meals for students. While the philosophy suggests the school nutrition program is a program that promotes the optimal growth, development and health of students while supporting their academic success, the reality is that the program is a food service enterprise program housed on the school campus that generates enough money to support its operations and/or generate revenues for the district.

--Lynn Harvey, Ed.D., RD, LDN, FADA
Child Nutrition Services, NCDPI
Testimony before the House Select Committee on Childhood Obesity
December 8, 2011

On February 9, 2010 President Barack Obama convened the Childhood Obesity Task Force. Comprised famously of FLOTUS Michelle Obama, and whose membership included the Secretaries of the Interior, Agriculture (USDA), Health and Human Services (HHS), Education; the director of the Office of Management and Budget (OMB), assistant to the President and Chief of Staff to FLOTUS, assistant to the President for Economic Policy, and the White House domestic council, the Task Force was charged by the President to "solve the problem of obesity among our Nation's children within a generation" (Barack Obama 2010 Presidential Memorandum). Chaired by the Assistant to the President for Domestic Policy, the task force released its findings in May 2010. The 120-page document laid out recommendations for implementation in five goals, four of which specifically dealt with nutrition. The third goal addressed "providing healthy foods in schools." Margo Wootan, director of nutrition policy for the Center for Science in the Public Interest, states "It's very comprehensive with lots of detailed recommendations that could make a real dent in childhood obesity. It lays out steps that the federal government, schools, parents and food companies can take. These are not pie-in-the-sky recommendations. They are doable" (Hellmich 2010).

The work of the task force became the foundation of the Healthy, Hunger-Free Kids Act of 2010 (Pub.L. 111–296) (HHFKA). Introduced in the Senate by the chairwoman of the Senate Agriculture Committee, Blanche Lincoln, a Democrat from Arkansas, the vote passed unanimously, demonstrating the bipartisan nature of the National School Lunch Program. Although the vote in the House of Representatives was split largely along party lines, the bill enjoyed enough bipartisan support and passed 264-157 (House Vote #603, 2010). The act coincided with the Five-year reauthorization of entitlements with the school lunch program. The act designated the USDA as the lead agency for implementation and enforcement. According to the USDA website, “The Healthy, Hunger-Free Kids Act allowed USDA, for the first time in over 30 years, opportunity to make real reforms to the school lunch and breakfast programs by improving the critical nutrition and hunger safety net for millions of children.” Besides setting down nutritional guidelines, the act allocated \$4.5 billion additional dollars over ten years and delineated the guidelines for schools’ reimbursement for participation in the National School Lunch Program to help defray the local expenses incurred by rising costs and encourage voluntary local participation.

The run-up to 2010

The HHFKA is the culmination of efforts prior to 2010 by various organizations interested in improving the nutritional quality of school meals (as well as snacks and beverages) that solidified in the early 2000s. Margo Wootan, from the Center for Science in the Public Interest, describes it as the culmination of more than 20 years of advocacy and research beginning in the 1990s. In 1993 The USDA published The School Nutrition Dietary Assessment Study (Burghardt and Devaney 1993) utilizing USDA Dietary Guidelines for Americans as the measure for total fat and saturated fat, but utilized the recommendations of the National Research

Council as the measure for sodium, cholesterol, and carbohydrates (as the USDA guidelines did not provide a quantitative value in these areas), and found that schools were meeting the requirements for vitamins, minerals, and protein but were deficient in calcium while high in saturated fat and almost twice exceeding the sodium recommendation (target: 800mg for lunch, average amount 1,479 mg). The Dietary Standards Used in the School Nutrition Dietary Assessment Study were derived from the National School Lunch Program, School Breakfast Program, Dietary Guidelines for Americans, and the National Research Council's Diet and Health Recommendations. From the National School Lunch Program and the School Breakfast Program, lunch would constitute one-third of the recommended daily allowance, while breakfast would comprise one-fourth for respective age groups. Per the Dietary Guidelines for Americans, total fat is to be limited to 30% or less of calories with saturated fat comprising less than 10% of calories. Finally, from the National Research Council's Diet and Health Recommendations, the standards called for limiting daily sodium intake to 2,400 milligrams or less, limiting daily cholesterol intake to 300 milligrams or less, and increasing daily carbohydrate intake to more than 55 percent of calories. The study also presented a picture of the state of school nutrition programs:

Inside schools, vending machines, school stores, and snack bars are available, and beverages are the food they offer most commonly (soft drinks are the most commonly available beverage). High schools are more likely than either middle or elementary schools to allow students to eat at restaurants and to offer food from vending machines or school stores. More than half the school cafeterias offer some foods that can be purchased separately (a la carte) in addition to an NSLP meal. This type of arrangement is much more prevalent in middle and high schools than elementary ones. Baked goods (such as cookies and cakes), beverages, frozen desserts, and snack foods are the most commonly offered a la carte items. Nearly 40 percent of high schools participating in the NSLP offer at least one a la carte entree, however, Pizza, cold cut sandwiches, and hamburgers are the a la carte entrees offered most often. (Burghardt and Devaney 1993, 6-7)

The guidelines in place since 1979 on competitive foods were incredibly loose, only prohibiting items with less than 10% of the Recommended Daily Allowance (RDA) of certain vitamins of minerals. Margo Wootan pointed out that Skittles and sugary drinks could be sold because they met the requirement of vitamin C while other candies and seltzer water were prohibited.

Furthermore, the National Soft Drink Association brought a lawsuit against the USDA (specifically John R. Block, USDA Secretary) in 1983 and limited the USDA's ability to regulate foods outside of meal times. (the Time and Place rule). Advocates for health were facing public opinion, the food industries, and even the schools themselves, as outside sales are often profitable and are popular with kids. This study, and subsequent studies, galvanized organizations to advocate for healthier standards.

The standard for change, however, did not come from the federal level, but from the state level. According to the Robert Wood Johnson Foundation, in the 2000s states began to adopt policies restricting a la carte and outside sales, specifically setting limits in regard to “sugar, fat, calories, sodium, and sugary drinks.” In 2006-07, over half of the states had implemented laws on the books, with over 20 considered “strong,” or closely in line with the guidelines presented by the HHFKA in 2010. (bridgingthegapresearch.org). One of the perceptions, even among local nutrition directors, is that the guidelines that have come out were forced upon them from the federal level. Obviously, this is incorrect. In state director interviews, it was admitted that the initial guidelines in 2010 from the HHFKA upon passage were not a concern because their own state regulations were stricter.

Responses in the Federal System

Figure 2.1 displays a timeline of significant events in childhood nutrition from 2004 until 2018 to include the runup to, passage of, and notable events that occurred after the passage of the

HHFKA. This timeline aids in providing a holistic view of the policy implementation process, and was critical in formulation of the surveys distributed to the school nutrition directors. Figure 2.2 presents a flowchart tracing the policy from inception to implementation using North Carolina as an example.

Insert Figure 2.1 about here

Insert Figure 2.2 about here

The USDA, as the regulatory agency in charge of implementing and enforcing compliance, issued the proposed regulations comprising meal pattern and nutrition standards in January 2011. The guidelines, which as general recommendations were initially “doable,” were now difficult and onerous regulations, prompting an unprecedented amount of comments to the USDA (over 130,000) (Harvey, 2012). According to Debra McKenzie (MS, RDN, LDN), a local North Carolina school nutrition director to Chatham county schools in 2010,

The overarching ideas and policy were doable in that we want kids making healthier choices- less fat, less sodium, fewer calorically dense foods, more fruits and veggies and whole grains. But when it came down to the nuts and bolts of implementing- how do you set specific (and they were VERY specific in the beginning) recommendations for all students when everyone’s needs are different- it really left states and districts scrambling to make sense of it all” (interview).

The Final rule was published on January 26, 2012, with an estimated cost of the new meal requirements costing \$3.2 billion. The regulations ensured students were offered both fruits and vegetables every day, significantly increased offerings of whole-grain rich foods, and offered only fat-free or low-fat milk varieties. Furthermore, the USDA regulations limited calories based on the grade of children served to ensure proper portion size, increased the focus on reducing the amounts of saturated fat, trans fats and sodium, and allowed for a three-year, gradual implementation period. The Consolidated and Further Continuing Appropriations Act of 2012, authored by Representative Jack Kingston, a Republican from Georgia, not only provided

appropriations for a myriad of government programs (passing in the Senate 70-30, and in the House of Representatives 298-121), but also amended the HHFKA with no maximum weekly limit on starchy vegetables (or other vegetable subgroups- it should be noted that Sen. Ted Cruz, campaigning for President in 2016 in Des Moines, Iowa, referenced the school lunch program initiatives and made French fries a plank of his campaign and, referencing his wife, promised that “If Heidi’s First Lady, French Fries Return to the Cafeteria” (Siegel, 2016). The Act also ordered an evaluation of studies on sodium intake prior to implementing second and final sodium targets, credits tomato paste as a vegetable serving, and amended whole grain to a narrower definition.

The state departments of education tasks fell to the directors of school nutrition to decipher and implement compliance with the law. According to Dr. Lynn Harvey, president of the School Nutrition Association, “The broad recommendations were nothing surprising; in fact, most of them were recommendations that the states were already in the process of implementing in their own initiatives” (Interview, 2017). This doable act and subsequent guidelines, however, was causing panic and a bit of scrambling by districts, school nutritionists, and consultants to attempt to plan and pay for school meals. In addition to the strict nutritional guidelines, the regulations called for an increased requirement for monitoring: instead of every five years, the state education agencies were required to conduct administrative reviews every three years.

The states became ground zero for what Dr. Harvey described as the perfect storm: deciphering and implementing the Farm Bill (Food, Conservation, and Energy Act of 2008, 2008), the reauthorization of the school lunch program, and the new requirements of the HHFKA. Any school found not in compliance with the regulations would be required to return the granted federal nutrition funds. The estimated costs of the final rule were estimated to be 10

cents for lunch and 27 cents for breakfast by 2015, while including a provision for an additional 6 cents per reimbursable school lunch served (Harvey, 2012). The Final Ruling in 2012 stated “School districts will be required to make a substantial investment to improve the quality of school meals.”

At the last minute, the USDA proposed a rule interpretation of the law that dictated that the calories had to be spread across different food groups, and to do so instituted a limitation on grains and proteins at 12 ounces of each per week. This forced cafeterias to reduce the size of the entrée item (such as hamburgers and pizza) and require a larger fruit or vegetable. Students were not happy and rebelled by refusing the increased portions offered. When students did not take the federally required components, the school would not meet the requirements for reimbursement for the meals. As a result, some districts were forced to raise prices on the paying students. It was reported in 2013 that roughly one million fewer students were participating in the national school lunch program, the first decrease in participation in decades (USDA). A 2013 study from Just and Price asserted that the regulation requiring the increased fruit and vegetable portion created an increase of nearly 100% waste. The study concluded that this resulted in \$684 million (\$3.8 million daily) worth of produce being thrown away.

The School Nutrition Association (SNA), a non-profit organization that advocates for state and local nutrition programs, reported that in the 2012-2013 school year 47% of school meal programs reported revenue declined while more than nine of ten reported food costs were up. In addition, 54.3% of school nutrition district directors anticipated that reimbursement rates would be insufficient to cover the costs of producing school lunches this school year, with another 23.6% reporting they were “not sure” reimbursements would cover costs” (May 22, 2014 press release, 2014).

The SNA, once an ardent supporter of the HHFKA, was beginning to actively voice objections to the regulations. Lynn Harvey, the current president of SNA, outlined the fiscal realities the districts faced under the new regulations in Figure 2.3.

Insert Figure 2.3 about here

In September 2012 students at Wallace County High School in Sharon Springs, Kansas, produced a video on YouTube called “We are Hungry” (a spoof on the song “We are Young” by Fun featuring Janelle Monáe). By 2014 the video had gone viral, producing over a million hits and today has over 1.6 million views. Pictures of anemic and alarming school lunches published under #thanksmichelleobama along with organized school lunch walkouts captured public attention, fueled by headlines on news outlets such as Drudge Report.

In February 2013 the USDA issued new Smart Snacks guidelines that regulated the a la carte menu, a money-making segment for many districts. In this, individual items could be sold separate from the offered meal, and often it was seen as a way to skirt the stricter regulations. The ire from the local level was directed to the Obama administration and fueled by right-wing sentiments of federal overreach. The Consolidated and Further Continuing Appropriations Act, 2013 (P.L. 113–6, H.R. 933) by Representative Harold Rogers, a Republican from Kentucky, contained non-binding language allowing a waiver for local school districts. The language, sponsored by Representative Robert Aderholt, a Republican from Alabama, was rebuffed by Secretary Vilsack himself. Representative Aderholt, in response, wrote the waiver (for a year) into the 2014 appropriations budget. For Congress, it appeared that Secretary Vilsack was overstepping his authority, and to the administration it was perceived that elements of Congress were using appropriations to usurp Executive national nutrition policy. In stated support of its rank and file members, SNA endorsed the waiver. Michelle Obama, in a rare press conference, called them out and the President threatened to veto the appropriations bill if the language stood. In the end, the Republicans caved, and the waiver language was removed from the continuing resolution omnibus bill.

The Presidential election of 2016 signaled possible changes in the gulf between the SNA and the Executive. The Trump administration campaigned on rolling back Obama platforms, among them the HRFKA. In a 2017 press release, the SNA asserted that they were for “...preserving robust federal rules, the Association has continued to advocate for practical flexibility under federal nutrition standards to help ease menu planning challenges and appeal to diverse student tastes.” Then SNA CEO Patricia Montague further stated:

School Nutrition Association is appreciative of Secretary Perdue's support of school meal programs in providing flexibility to prepare and serve healthy meals that are appealing to students. School nutrition professionals are committed to the students they serve and will continue working with USDA and the Secretary to strengthen and protect school meal programs. Members of SNA have advocated for flexibility to address overly prescriptive regulations that have resulted in unintended consequences, including reduced student lunch participation, higher costs and food waste. The Association recognizes that providing schools practical flexibility has been supported by Senator Pat Roberts, Chairman of the Senate Committee on Agriculture, Nutrition, and Forestry, and Congressmen Robert Aderholt, Chairman of the Subcommittee on Agriculture, Rural Development, Food and Drug Administration and Related Agencies for the House Appropriations Committee. In addition to requests for practical flexibility under federal nutrition regulations, SNA has called for protecting school meal programs from block grant proposals and expanding USDA Foods to support the School Breakfast Program
(May 1, 2017 press release, 2017).

On September 12, 2017 Representative Jim McGovern (Democrat, Massachusetts) and Rodney Davis (Republican, Illinois) introduced H.R. 3738, the Healthy Breakfasts Help Kids Learn Act of 2017. Supported by the SNA, this bill would provide commodity (in the form of United States-grown foods) support, local support in the form of a six cent per meal support raise in addition to the six-cent support offered to lunches, and increased access to students. This combined with a new president at SNA (Dr. Lynn Harvey) as well as Secretary of Agriculture (Sonny Purdue), portended a greater cooperation between the levels of government and bureaucracy in regard to school nutrition.

Research Questions

Based on the literature of federalism, policy diffusion and implementation, a framework for analysis is utilized to examine policy and its implementation. By examining a multiple element case study of one recent policy, the Healthy, Hunger Free Kids Act of 2010, process and outcome attributes are identified and the relationships among them quantified, traced, and displayed through network mapping in Gephi software. By utilizing Hale's information typology (2011) actors and their relationships can be classified, quantified, and analyzed in data collection for this quantitative analysis. Specific attention will be paid to those structurally related characteristics that influence implementation decision-making and selection of strategies intended to influence policy decisions on the state and local level.

1. What are the roles of the actors of and around the federal system in legislation implementation? Are non-governmental organizations influential on policy implementation? What implications exist on the state of federalism?
2. What are the information networks and relationships between positions taken and the actions of the actors that are identified?
 - a. How do organizational characteristics impact decision-making of actors, alliances, and directions in implementation?
 - b. Do these relationships have a systemic effect or legacy implications?
3. How is effectiveness defined within the context of the implementation of the legislation in relation to the goals originally envisioned? Was the HHFKA a failure?
 - a. What are the legacy effects on the legislation?
 - b. What are the potential effects on the program of child nutrition?

Summary

These research questions are the guidelines to examine the multiple case study of the HHFKA. In the next chapter, methodology will be outlined that will be utilized to examine the policy. Federal agencies and school nutrition organizations do not exist in a closed and isolated system, but are dynamic, complex, and extremely interconnected with their environment. It will be evident that the actors in this arena depend on other actors and collaboration in the network as they work to define and implement policy decisions. Furthermore, the complexity of the political environment shapes this process and influences the system holistically.

King, Keohane, and Verba (1994) define scientific research, specifically good research, as having certain characteristics. The goal of scientific research is inference, either descriptive or causal; the procedures are public (and therefore replicable), the conclusions are uncertain, and the content is the method. Because the conclusions are uncertain, the researcher strives to always improve and maximize certainty. Along with these four characteristics, the authors state reliability and validity as the foundation of scientific research in the social sciences. The next chapter will outline the methodology of this dissertation.

Chapter Three: Methodology

Introduction

The purpose of this dissertation is to further the understanding of how local, state, and national networks affect the application of laws and federal guidelines at the local and state levels. What mechanisms do actors at the state and local levels use to influence, shape, and finally implement federal policy? What roles do the actors, in networks both inside and outside of government, play in policy implementation of federal decisions that diffuse to subnational jurisdictions? To analyze policy implementation in the federal system, informational networks and relationships are analyzed in a multiple case study of the HHFKA. Interviews of key actors from all levels are intended to create a narrative that is validated through data collected from the surveys measuring the identification, relationship, and values of the local nutrition directors in North Carolina, Virginia, and West Virginia; similar (adjusted for position) surveys were also sent to all 50 state nutrition directors (and District of Columbia). Finally, the data from the survey are weighted using Hale's information typology to discern gradients of influence, and then networked mapped with Gephi software (Bastian et al. 2011), an open-source network analysis and visualization software platform, to analyze and display relationships through a graphic representation of the federal network involved with the HHFKA and school nutrition.

Case Study

Robert K. Yin (2009) describes a case study as an empirical inquiry that investigates in depth a contemporary, social phenomenon in a real-life context. Yin emphasizes that the greatest concern is the lack of rigor in case study research and offers three principles of data collection that addresses reliability and validity. These three principles are to use multiple sources of evidence, construct a case study database, and maintain the chain of evidence gathered. By using

multiple sources of evidence, a researcher can “address a broader range of historical and behavioral issues,” but more importantly conduct triangulation (data, investigator, theory, and methods) to develop converging lines of inquiry through corroboration and multiple measures of interval validity. In addition to construct validity, the researcher should create a thorough, well-organized case study database that not only allows for easy retrieval, but also provides transparency and external replicability. Finally, maintaining the chain of evidence logically traces the methodology from question to conclusion providing clarity not only to the data but also to the protocol utilized in the case study.

To analyze the theoretical points outlined, I employ as a research strategy an empirical inquiry of the case study investigating the conception and implementation of the Healthy, Hunger Free Kids Act of 2010 within the context of the federal system. Semi-structured interviews on all levels provide background and create a narrative in which to analyze not only the values of actors in the system, but also as a starting point for the realities that exist that either justify or contradict opinions. By surveying actors in the state and local levels of implementation, it may be possible to discern fact from opinion and bias as well as analyze the narratives that exist.

Utilizing multiple cases is considered more robust and offers more compelling data (Herriott and Firestone 1983). Yin (1988) describes theoretical and literal replication. In theoretical replication, the cases examine different theoretical conditions. In literal replication, the cases are designed to corroborate each other. I intend to utilize both theoretical and literal replication because I predict that even with a common policy, the cases will yield contrasting findings for anticipated reasons of role differences in each level. With three different areas within the overall case study, I can compare and contrast findings to isolate the policy diffusion

and discern the role of informational networks. The three states are geographically co-located. While Pacheco (2012) described the influence of neighboring, similar states for policy choices in the social contagion model, Desmarais et al concluded that the “overwhelming majority of policy diffusion relations exist between states that are not geographically contiguous” (2015, 397). By utilizing geographically contiguous states, the semi-structured interviews with state (and possibly local) directors can be utilized to critically examine the anticipated importance of informational networks over geographically similar, but demographically different, states.

The three states, North Carolina, Virginia, and West Virginia were chosen based on demographic data in political leanings, income, and education. Tables 2 through 5 provides a comparison of three states across the various factors thought to influence the diffusion of innovation, and by extension, policy implementation.

Insert Table 3.1 about here

Virginia and West Virginia represent opposites in this regard; Virginia leans solidly Democratic in national elections, and West Virginia has been solidly Republican. North Carolina, while tending to be more like Virginia in demographics, still falls in between the other two states enough to represent a median in these figures. For instance, in the last three Presidential elections, Virginia voted for three Democrats, West Virginia voted for three Republicans, and North Carolina split with one Democrat and two Republicans.

Insert Table 3.2 about here

Insert Table 3.3 about here

As depicted in table 3., Virginia elected two Democrat governors, West Virginia has had two Republicans (the recent governor switched from Democrat to Republican in office), and North Carolina was Republican then Democrat. All the legislatures tend to be split, indicating

that this condition is not uncommon. Tables 3.2 and 3.3 depict the state positions as being politically three distinct states, representing the spectrum of political choices.

Insert Table 3.4 about here

Table 3.4 displays wealth and education levels of the three states, again representing distinctly dissimilar demographics. North Carolina and Virginia tend to be closer in rankings, but still with enough offset to represent different ranges. Virginia tends to be in the more affluent demographics, with West Virginia among the poorest. The Median Income ranks are Virginia (9), North Carolina (40), and West Virginia (50). The Education Levels show a similar spread. While high school completion is similar (Virginia (29), North Carolina (36), and West Virginia (50) by comparison), the spread solidifies with Bachelor's degree (Virginia (6), North Carolina (25), and West Virginia (50) by comparison) and advanced degrees (Virginia (4), North Carolina (28), and West Virginia (50) by comparison). The overall poverty ranks are (Virginia (41), North Carolina (14), and West Virginia (6) by comparison). Besides the diversity of demographics, the three states are also geographically co-located. As stated previously, there is an assertion that adjacent states are more likely to adopt like policies (Rogers 1962; Walker 1969). Hale (2011) maintains that informational proximity is also significant in that increased interactions between actors (with the bridge being nonprofit and professional organizations) will result in an increased probability of policy diffusion. Part of my research will analyze this aspect through the surveys of state and local actors measuring opinions regarding adoption of ideas, modeling, and program management.

Surveys

This dissertation utilizes survey data and interviews for a comprehensive comparison case study in three states to analyze the conception, construction, diffusion, and implementation

of public policy, in this case the Healthy, Hunger-Free Kid Act of 2010. For primary data to support the narrative, I conducted surveys of all 50 state education nutrition directors, and the District of Columbia. After gathering data from these surveys, I conducted further interviews of key stakeholders in three states (North Carolina, Virginia, and West Virginia) in order to more fully explore the context of implementation. In addition to these interviews, I sent surveys to all of the local nutrition directors in North Carolina, Virginia, and West Virginia. In these surveys, I gathered data about the perceptions of local district nutrition directors. Finally, on the federal level, I have conducted interviews of key actors, both governmental and private, in the related policy process. The significance of non-governmental entities has emerged a rich picture of public management networks (Agranoff 2007) and non-profits including their roles in supporting and opposing various aspects of implementation. I was interested in discovering not only who these actors are, but what role they play in terms of the information that they generate and utility in their information position with other actors (Hale 2011). Secondary sources will include archival data from case histories and a policy timeline.

This analysis uses original data obtained in three levels: local and state levels in the form of surveys, and semi-structured interviews for the federal level. The survey, nearly identical for both the state and local levels, will focus on three parts: identification, relationship, and values. Again, I intended for the survey to reach all state directors, and all local directors in the states of North Carolina, Virginia, and West Virginia.

Identification addresses the organizations that may or may not influence the policy process. Hale (2011) identified the prevalence of non-profit organizational influence on diffusion with the various levels of governmental bureaucracies. There is a possibility to determine the importance of these organizations to the different levels through these interviews,

and to assess whether they influence each equally. Because this examines a different and unrelated field than other authors, that of school nutrition, this work may add to the knowledge already discovered in network analysis.

The relationship questions look to define the interaction with the actors involved, as well as defining the cooperation that exist, or do not exist, in federalism. As stated earlier, "...the very nature of the American system of federalism with its distinct and separate, yet interconnected layers, policy diffusion is the mechanism that not only determines the efficacy of policies but defines the nature of the system itself." I intend to build on the existing body of literature to analyze whether or not the relationships that exist help to define the efficacy of diffusion in federalism. Is Kettl (2015) correct in describing a widening dissonance between government (the structure and function of public institutions) and governance (the way government performs its functions)? Does this speak to Milward (1994) who described a trend towards a hollow state where government bureaucracies provide essential services but defer production of services to outside resources? In a twist, is the relationship between levels in communication and catalysts for change also being deferred to non-governmental organizations to navigate this dissonance?

Finally, and perhaps the most importantly, is the measure of values which is defined as the beliefs held or perceived by the actor. The questions that form the values portion are intended to define the motivations and positions of the actors involved, their perceptions of the other actors that exist in the system, and their opinions of the relationships that exist. By asking about various facets of the legislative/regulatory process, as well as their motivations, it may be possible to discern information about the process itself and the past and current state of these relationships. In my preliminary investigations, the question of nutrition vs. profitability seemed to be a crucial facet of this specific policy process. The last question is an open-ended question

concerning block grants, which has been mentioned as especially relevant in this policy discussion and determine if this is indicative of current relationships in federalism. Also, this question sheds light on policy information dissemination throughout the levels of federalism.

I constructed two on-line surveys (Appendix 2 and 3). The surveys were conducted utilizing the Auburn University licensed Qualtrics, an online survey application where the user can logon and complete the survey with a minimal time expenditure. The invitations were solicited utilizing email addresses obtained from the states' education websites and distributed en masse. In the case of erroneous (there were quite a few that were out of date due to turnover) emails, I googled the district or county to ascertain the correct address. One week later, I sent a reminder email. Besides a memory aid, it reinforced the validity of the survey as an authentic academic effort. In the case of the state directors, I was able to identify the state of origin of responses and removed their address from the reminder. The local directors' identification was by state, and I was not able to use such discretion in the reminder.

The first survey is directed to local nutrition directors in North Carolina, Virginia and West Virginia. The second survey is addressed to state level directors from 50 states and District of Columbia. The two surveys are essentially the same instruments with level specific narrative for familiarity. Originally, I only created one survey (Appendix 1). Upon piloting the survey to a sample local director, there was confusion and a recommendation to create separate surveys for each level. Another recommendation was to create the tables for Supporter/ Information (as opposed to bystander) / Challenger/ Champion as opposed to a text block after listing sample entities. The definitions of each were also rewritten for clarity, addressing ambiguity expressed by the subjects. By using these button tables, the pilot survey participant agreed that the survey flowed smoother and quicker. The next pilot was utilizing two local directors and one state

director. The data that was returned provided consistent data with some recommendations of wordsmithing, such as clarifications of questions to include internet link explanations of each historical event. While the questions appear to yield the information desired, I had to adjust some of the Qualtrics settings to yield a smoother mobile device experience, as well as adjust some settings to allow for easier data analysis collection within the program. Because of the geographical separation of the subjects and the size of the pool, I felt that an electronic version would reach a better N (and field a better n) through less mechanical interaction required from the participants. One recommendation from a PhD respondent was to combine the responses to the questions regarding experience into 4 categories for ease of data collection, recounting her own experiences. I rejected this method anticipating greater fidelity in the evolution of the regulations from 2010-present, to ascertain a possible correlation between position turnover and the policy.

My goal for surveys was to capture at least 30% sampling participation for the state directors, as well as for each of the three states' local directors. What is an adequate response rate? Baruch, in his 1999 study, analyzed the top five management journals in 1975, 1985, and 1995 (141 studies and 175 surveys) and discovered that the average response rate was 55.6%. Richardson (2005), citing Babbie (1973) and Kidder (1981), asserted that the acceptable social research response rate as 50%. Nulty (2008) examined the rates obtained online versus paper-based surveys and found that electronic surveys yielded 23% lower responses (33% versus 56%). This study looked at teaching evaluation studies, and I would contend that the circumstances yield different results and preferred methodology. He also noted Richardson's citation of "the Australian Vice Chancellors' Committee & Graduate Careers Council of Australia (2001) regarded 'an overall institutional response rate for the Course Experience Questionnaire (CEQ)

of at least 70% [to be] both desirable and achievable” (Nulty 2008, 306). Practically, if you keep the members of the class the last period where they need to fill out the survey before they leave, you can obtain 100%--but are the responses valid? In a large set, the ability to obtain a fixed number is obtainable by continuing to randomly solicit until the number is satisfied. In a limited set, such as with state directors, and local directors in three states, one is limited by the willingness of the participants. I was fortunate to exceed my 30% goal of each category.

FluidSurveys, acquired by the popular service SurveyMonkey in 2017, cited the e-mail average response rate to be 24.8%. “When surveying the general public, a response rate of 24.8% looks great when compared to the telephone surveying standard of around 8-12%.” (FluidSurvey, 2014) According to Andrea Fryrear, “Generally speaking, it’s preferable to get a high response rate (80% or higher) from a small, random sample rather than a low response rate from a larger pool of potential respondents.” However, she adds, “But even this general guideline breaks down when we look at the differences between survey audiences. Surveys that you distribute internally (i.e. to employees) generally have a much higher response rate than those distributed to external audiences (i.e. customers). Internal surveys will generally receive a 30-40% response rate (or more) on average, compared to an average 10-15% response rate for external surveys.” (Fryrear, 2015) I set my goal to yield the internal response rate.

For the state directors, out of 50 states and the District of Columbia I obtained 29 participants for a 57% sampling. In North Carolina, out of 119, I obtained 40 for a 34% sampling. Virginia yielded 49 out of 136, for a sampling rate of 36%. Finally, West Virginia yielded 42%, garnering 22 out of 52 possible participants. I credit the response rate to the passion and personal investment of the field, and more importantly to a well-piloted instrument (that not only clearly defined the low time investment), but actually yielded a more simple and concise

survey that in each case that (upon average) required approximately 11.5 minutes to complete. After launch, I sent out reminder e-mails thanking participants for their responses and requesting others' consideration. In each case, I observed significant response returns. Part of the reasoning for this was in that the reminder e-mails underscored the validity of the surveys to the audience.

Policy Network Approach

Utilizing a policy network approach facilitates analysis between the actors and the linkages with organizations that attempt to influence policy. Network analysis examines the relationships between elements, known as nodes. Relationships can be either directed (indicating hierarchical or flow, "direction matters") or indirect (indicating no direction or hierarchy). While hierarchy does exist in this analysis, the relationships examined are in relation to the state and local directors. In our exercise, indirect relationships are used to show information transmission rather than instruction. Holden and Lin (2012) assert that simply mapping individuals in a network regarding resources and strategies fail to capture interaction and the nuances of influence between the nodes.

Newman (2010) defined centrality as indicating the most important vertices in a graph, identifying and characterizing the most influential entity in a social network. Freeman (1977, 35) defined centrality in betweenness as "a point in a communication network is central to the extent that it falls on the shortest path between pairs of other points [,] introduced by Bavelas (1948) in his first paper on the subject. He suggested that when a particular person in a group is strategically located on the shortest communication path connecting pairs of others, that person is in a central position. Other members of the network were assumed to be 'responsive' to persons in such central positions who could influence the group by 'withholding information (or) coloring or distorting it in transmission.'" (Bavelas, 1948; Sabidussi, 1966; Brandes 2001)

Using the identified interest groups depicted in Figure 3.1, non-governmental organizations in the child nutrition field are delineated by Laraia et. al. (2003).

Insert Figure 3.1 about here

The literature was valuable for existing information, and proved to be quite accurate from survey responses (There were no additions except for local actors). Respondents were asked to give their perceptions in the form of values for the entities. These values are modeled on Hale's Information Position Typology, with identification being that of Champion and Challenger, Supporter or Information (The category Information is Bystander in Hale's model, which I changed after the pilot for clarity). The categories are positioned according to low and high engagement along the X axis, and low to high preference on the y axis. The identified field was comprehensive: only 26 other inputs were identified, and of those only three received multiple responses. The majority of these inputs were local in nature, and one common input in "cooperatives" are regional but grouped together as a category. Further, each of these categories was given a specific relationship weight: Champion (4), Challenger (3), Supporter (2), and Information (1). No effect, of course, was 0. This valuation will be used to network map the complexity of the relationships of the school nutrition network. By using this weighting, differentiation is achieved among actors according to perceived importance by the respondents. By using this weighting, we have created an eigenvector centrality, which acknowledges that all nodes are not equal in a network. This measured connection of greater influence lends itself to increasing the influence of others by association (Newman). Because the system is a closed system, there are finite actors available. Because of the survey system utilized, there is an artificiality introduced. For instance, if a respondent represents information relationships with 21 others, the weighted value equals 21. If another respondent didn't take the survey as serious or

more hurriedly, but only listed the first five contacts as champions, then their influence is measured 21 to 20. In an open network, the quantity of edges is significant in measuring influence. In this type of closed network, we strive to measure beyond the quantity to the quality of influence as cited by the actors involved.

To differentiate influence, Hale's information typology provides a framework based on preferences, assigning titles according to low to high engagement and preference. By assigning values to each category, it is possible to examine the amount of influence wielded by a node in the network by measuring quantitatively the centrality of nodes, specifically the structural property of betweenness. By use of a nuanced survey, it is possible to not only add this context but gain better fidelity of the network itself beyond direct questioning of influential actors (interviews provide further context and narrative; mapping only provides a truer background and support/refutation of the narrative recorded). This dissertation utilizes a bank of recognized field organizations (Laraia et. al., 2003) to ascertain influence that exists. If the actor is inconsequential, the respondent will indicate this by selecting "no influence." If there is enough of an occurrence then the actor does, in fact, exert influence over the network.

Insert Figure 3.6 about here

By adapting Hale's information typology, as shown in Figure 3.6, values are assigned to edges signifying not only relationship, but the strength or weakness of exchange within a network. This operationalization makes it possible to assign value and weight to relationships to differentiate and quantify influence and significance in a network by actor perception rather than merely by connection.

Assumptions are that significance exists structurally based on position; reporting and regulatory actors, either directing or directed, should have significant influence and importance.

In the federal system, actors should have close connectivity, at most three degrees of separation (federal-state-local and connected nodes). This assumption lends itself to traditional analysis of federalism in conflicts and cooperation. By adding the added element of non-governmental organizations as sources of influence and information to this examination, networks become more complex adding to the narrative of policy implementation.

Interviews

Yin (2009) states “one of the most important sources of case study evidence is the interview.” I decided to interview, rather than survey, officials from the federal level. Besides the difficulty in getting respondents to participate, it is difficult to delineate categories and like comparisons; a Secretary of the USDA is not the same level of purview as an assistant director. As envisioned, I looked to interview key figures from the past administration as well as presently serving officials targeting actors from the White House Task Force on Childhood Obesity, Congress, the USDA, and non-governmental organizations. The semi-structured interview, administered to officials on the federal level, measures the same three values as reflected on the state/local level, but also will be used to create the overall narrative (along with secondary sources) and gather opinions on the policy process. Brown and Hale state that the semi-structured interview “...strikes a balance between the limitations of structured and unstructured interviews” (Brown and Hale 2014). This style of interview, because of an underlying knowledge of the subject by the interviewer, allows for more flexibility and flow, but provides prompts to ensure coverage of pertinent topics. Because of the results obtained from these meetings, further interviews were conducted on the state and local levels to further enhance the narrative. Beginning with a grand tour question (Leech 2002), while appearing neutral, sprung the respondents to discussion that could be steered by prompts as necessary for coverage. This

open-ended questioning style of interview led quickly to general saturation but served to further emphasize the major points gained from previous interviews. The open-ended questions allowed the respondents to answer freely concerning other actors without steering and relatively at ease with disclosure.

I was fortunate in my location to be situated near the majority of the federal actors in the Washington, DC area and was able to utilize an in-person method of interview. This personal touch encourages communication, and I often exceeded my allotted appointment times. As a standard practice, I requested 30 minutes from each contact. The interviews lasted 1:36, 2:45, 1:45, 2:45, 3:30, 1:30, and 48:41, exceeding the allotted time. These interviews snowballed to other contacts, and I was fortunate to gain the respondents' trust enough to be recommended to others for further and more elusive interviews. Without an introduction, I am certain I would not have had the access and level I enjoyed. My association with Debra McKenzie gave me access to Dr. Lynn Harvey, Dr. Janey Thornton, and Cindy Marion. After my phone interview with Dr. Thornton, she wrote emails that led to interviews with Dr. Cindy Long and Tom Vilsack. Upon the recommendation of Secretary Vilsack, Sam Cass agreed to speak to me. My interview with Dr. Harvey led to an interview with Dr. Sandra Curwood, Virginia state director of school nutrition. Marshall Matz and Roger Szemraj, two prominent District of Columbia attorneys and lobbyists, agreed to speak with me merely for their passion in the subject. I attended various conferences to include the North Carolina School Nutrition Association (SNA) Conference, the School Nutrition Association Legislation Action Conference, and Food Research and Action Council (FRAC) National Anti-Hunger Policy Conference. These conferences allowed me to identify persons in an organization, to give a face to a bureaucracy, as well as the positions of various groups. This background knowledge gave me legitimacy in my manner of

communication. For instance, in one interview my knowledge of indirect costs by schools to the nutrition program led the interviewee to remark that most people outside the field had no idea of this topic, and led to a level of legitimacy and greater trust; the resulting deeper dive into the topic by the respondent added to the richness of the data obtained. It was at the School Nutrition Association conference that I identified block grants as a topic of interest in this field and added it to my purview and surveys. Also, these conferences highlighted actors to be interviewed.

Conclusion

In order to gain an understanding of how local, state, and national networks affect the application of laws and federal guidelines at the local and state levels, this dissertation will utilize a multi-case study to examine actors in the federal system to determine what information exchanges occur at the state and local levels that are used to influence, shape, and finally implement federal policy. By operationalizing Hale's information typology and assigning value to these relationships it is possible to measure, differentiate, and map the influence of actors in a network based not only positionally, but on the opinions and perceptions of the actors themselves. The analyses of the multi-case study are presented in the following chapter.

Chapter Four: Data Analysis

Introduction

The HHFKA of 2010 was the largest review of the national school lunch program in over 30 years. Passed unanimously in the Senate, the program received overwhelming support. Within four years, the program was under fire from many sides, and the renewal vote in 2016 was described as the most divisive in the program's history. Using the methodology described in chapter 3, this dissertation uses a multiple case study to discern the state and local actors' characteristics and beliefs through surveys measuring identification, values, and relationships. The data from the surveys will also be used with the policy network approach, informed by Hale's information typology, to identify and measure influence and relationships within the network. The network visualizations measure all directors, state directors, and local directors for structure, cliques within the network, and centralization and framing analysis. Using the data from the analysis, the research questions will be answered in the final chapter.

Identification

The identification portion of the surveys is to ascertain support for threads in the narrative, specifically a view that there has been a great deal of turnover in the field, possibly caused by difficulties arising from the HHFKA of 2010. To measure this, a question asked, "How long have you been in your current job?" Turnover is endemic to this field, as directors move from district to district, and move up into state positions as well as federal positions. The state directors interviewed began in local districts, and in the case of Dr. Janey Thornton, a career that started locally in a small district culminated in becoming president of SNA and subsequently appointed Deputy Undersecretary of Agriculture for Food, Nutrition and Consumer Services in USDA.

Insert Figure 4.1 about here

Figure 4.1 asks how long the state director respondent has been in their current job. In the 28 state director responses, only 14 directors have been in their current position for 9 or more years. In the years of the HHFKA, 50% of directors who responded assumed their duties during this time. The highest period of turnover occurred 3 and 5 years prior, corresponding to 2014 and 2016, anecdotally recognized as the greatest period of tumult. Following 2014, 25% of positions changed. Since it is assumed experience is required for the state director position, I did not ask the question of total time in the nutrition field.

The local director's responses depicted in Figure 4.1 concerning time in the current job was similar. Of 112 respondents, 54 responded that they have been in their current job 9 or more years, corresponding to a turnover rate in the period at 51.79%. In the same period between 3 and 5 years prior, 31 people assumed their current duties, nearly 28%.

Further identification is ascertained in the local director's survey according to USDA classification in regard to location and size. Using the National Center for Education Statistics, USDA regulation assigns value to City, Suburb, Town, or Rural classification based on census data (there are further delineations: City: Large, Midsize, and Small; Suburb: Large, Midsize, and Small; Town: Fringe, Distant, and Remote; Rural: Fringe, Distant, and Remote).

The National Center for Education Statistics (NCES), a program of the U.S. Department of Education, assigns Locale Codes to schools and districts. In 2006–07, NCES introduced new Urban-Centric Locale Codes that designate schools and districts based on their relationship to an Urbanized Area. Note: districts are designated (with some exceptions) according to the locale code of the school/s which 50% of students attend; different schools within the district may have different locale codes. City and Suburban schools are located in Urbanized Areas (core population of 50,000 or more with population density of at least 500 people per square mile) and defined as Large, Midsize, or Small, depending on the size of the city. Town schools are located in Urban Clusters (population 2,500 to 50,000) and defined as Fringe, Distant, or Remote, based on their distance from an Urbanized Area. Rural schools are in census-defined rural territory and defined as

Fringe, Distant, or Remote, based on their distance from both Urbanized Areas and Urbanized Clusters. (www.ruraledu.org)

Insert Figure 4.2 about here

Figure 4.2 asks respondents to self-identify within this delineated framework. In the three states surveyed, 66.96% self-identified as Rural, 19.64% City, 7.14% Suburb, and 6.25% as Town.

This delineation becomes important in contrast to the state directors, who tend to be located in larger cities. The Rural and Community Trust characterizes rural communities as being sparsely populated and isolated in both distance and information, as well as concentrated poverty in dispersed locales with lower education and less access to health care. (ruraledu.org website) This information can shed light into the values held on each level, especially in access to resources and money. Because of this isolation in information and resources, nutrition concerns are held differently in rural areas.

Insert Figure 4.3 about here

USDA delineates size into Large, Midsize, and Small. Figure 4.3 reflects the question of self-identification of district size under these designations. 48.65% identified as Small, 39.64% identified as Midsize, and 11.71% identified as large. This delineation is less informative, as there can be small, wealthy schools and large schools with a substantial population requiring government assistance in the form of free or reduced priced lunches. Future research may explore the idea of size (and perhaps corresponding resources) further, and the relationships with SNAP and government assistance to school populations.

Values

The study of the viability of the HHFKA lies in values. The foundation for the HHFKA, conceived at the IOM (2009) and advocated by the nutrition community at large in the form of the National Alliance for Nutrition and Activity Coalition (NANA), a coalition of over 500

organizations on the federal, state, and local level, was predicated on the values of healthier children. Since the unanimous passage in the Senate of the HHFKA, have these values changed?

To measure values, questions reflected the researched apparent dichotomy, that of nutrition vs. profitability. Figure 4.4 shows the most applicable statement regarding this emphasis.

Insert Figure 4.4 about here

Figure 4.4 shows that 51.85% of state directors expressed that nutrition was the most important value in regard to their job. A substantial percentage, 44.44%, stated that a compromise is required to balance nutrition and profitability. 3.7% expressed the importance of profitability, and none said that profitability was the most important factor.

The local directors had different results than the state directors, as displayed in Figure 4.4. While still espousing nutrition, profitability played a more prominent role in the execution of local directors' jobs. Overwhelmingly at 62.5%, most felt that a compromise was necessary between nutrition and profitability. While more directors stressed nutrition (30.36%), more of a percentage (7.14%) espoused profitability as the most important aspect of their job with one stating that profitability was the most important aspect.

Insert Figure 4.5 about here

This dichotomy is a reality in the field as suggested by Figure 4.5, which asks if the respondent has ever observed programming choices that had to decide between nutrition and profitability. Both state and local directors reported that they had observed this occurrence in overwhelming numbers. State directors saw occurrences of nutrition vs. profitability programming choices in 85.72% of responses. Local directors encountered occurrences of nutrition vs. profitability programming choices in 69.64% of responses. Figure 4.5 moves

beyond whether or not the respondent had observed this choice and asks whether or not this issue had personally presented itself in programming decisions. It's significant that there is a 16.08% difference between the two groups.

With the narrative of greater turnover in the field, is there a feeling that the job has become more difficult? In both cases, state and local, there is a majority perception that the job has become more difficult. Figure 4.6 asks state directors to choose the most applicable statement concerning their ability to do their job:

Insert Figure 4.6 about here

As displayed in Figure 4.6, 57.14% of state directors surveyed claimed that their job has become more difficult, while 32.14% reported that their job hasn't changed, and 10.71% expressed that their job was easier. The survey followed up by asking participants to state the reasons for their answer. The HHFKA was the most comprehensive overhaul in the school lunch program since its inception, and the time frame for compliance was perceived as rather aggressive. State agencies are tasked with interpreting and disseminating requirements to local districts, and fielding questions as well. Concurrently, state officials are running state wellness programs and other projects. On top of these changes, requirements for the administrative review cycle cycling from 5 years to 3 years added to the feeling of complexity and uncertainty as well as an increased workload and travel schedule. In the case of Virginia, there are 136 districts, equating to 45 reviews a year or nearly 4 a month. Each review takes a week, with corresponding time to write up and present the findings. Afterwards, there is follow-up and questions to the district to be addressed. This creates a greater burden on the state agency without a corresponding increase in funding or personnel.

In the case of local directors being asked the same question of the ease or difficulty to do their job as displayed in Figure 4.6, 67.57% said that their job has become more difficult, 22.52% claimed the difficulty in performing their job hasn't changed, and 9.91% expressed that their job has gotten easier. Local directors, like the state directors, felt the enormity of the legislation and perceive a much greater amount of complexity. In addition to complying with new menus, this complexity also increased sharply regarding cost and procurement. "4500 pages of regulations between 2012-2015, various interpretations by USDA regions, 3-year review gives state little time for good technical guidance. Constant pressure to have positive financial position with no control over labor, time to eat." (sic) Because of the aggressive implementation, there was a feeling that there was no way to test menus and coordinate with students and parents. Companies were forced to dump existing product, and the hurriedly produced food products lacked flavor. "Try a whole wheat, reduced sodium, low fat biscuit – disgusting!" Also, "The amount of paperwork has increased tremendously, and I feel like I am constantly doing paperwork instead of interacting with the students. This takes away from what I think makes a good working nutrition program. Interacting with students and finding out their thoughts, likes and dislikes, and getting them involved would accomplish much more than filling out reports for the state." On top of this many SFAs with food service management companies must also be reviewed every three years, not necessarily synched with the program review. One director reported "Between the federal, state, USDA, and summer feeding program, I have a review every year." Eating healthy requires added cost, and the amount of (and requirements for) federal funding is perceived as insufficient to cover costs and maintain a buffer. In addition, indirect costs levied by the schools became more of a concern.

Perceptions of HHFKA Implementation by Year

In order to analyze this feeling of overwhelming complexity in implementation, the surveys asked a series of questions by year from 2010 to the present to ascertain feelings and perceptions as the phased implementation progressed and amended due to feedback. According to Congressman Mark Meadows in 2016, “The regulations have proven to be burdensome and unworkable for schools to implement. Schools are throwing food away that students are not eating.” (Meadows 2016) If this is the case, the data should reflect the unworkable nature of the regulations.

Insert Figure 4.7 about here

In 2010 the White House Task Force on Childhood Obesity is established and the Healthy, Hunger-Free Kids Act is signed after unanimous passage in the U.S. Senate. From the state director perspective the initial guidelines in 2010, as shown in Figure 4.7, were overwhelmingly perceived as achievable. 80% reported that the guidelines were achievable, but difficult. 8% reported totally achievable, and only 12% said that the proposal was not achievable without effort. (Not one person had the opinion that the program was unworkable.) The perspective from the local directors, as displayed in Figure 4.7, was a bit different. While a majority still believed the guidelines were achievable, 8.05% believed the changes to be unworkable. Contrary to this view, 16.09% believed the implementation to standards was totally achievable. 49.43% indicated achievable, but difficult, and 26.44% said it was not achievable without effort.

Insert Figure 4.8 about here

In 2011, USDA issues the Interim Rule (HHFKA) to include: USDA issues Salad Bars rules to schools, vegetable subgroups minimum (color) and limited starches, ½ whole grain rich

requirement, fat free milk (flavored and un-flavored), Specific calorie ranges, single food-based menu planning, a fruit & vegetables serving minimum requirement for reimbursement, and the requirement for a three-year (vice five) review of programs was announced for future implementation. The guidelines had been issued and moved to the interim rule, adjusting the regulations to tighter standards. The figures adjusted as well in Figure 4.8, with state directors' perceptions adjusting slightly: 73.08% reported achievable, but difficult, and 7.69% thought the rules were totally achievable. Not achievable without effort rose 3% to 15.38%, and one reported that the rules were unworkable. (it should be noted that somehow, they did.) The figures for the local directors displayed in 4.16 actually remained stable for 2011. While the figure for totally achievable dropped by one to 13.54%, achievable, but difficult rose by five to 50%. Not achievable without effort rose slightly to 31.25%, and unworkable dropped two to 5.21%.

Insert Figure 4.9 about here

2012 saw the implementation of the USDA final rule. USDA issues Final Rule (HHFKA) which included six cents reimbursement (with a change to offer v. serve), milk 1% unflavored or fat free flavored/non-flavored, color requirements for vegetables, maximum starchy vegetables, 2oz requirement for meat/ substitute, juice restriction, and sodium target maximums. Surprisingly, despite more restrictive guidelines, the perceptions of the state directors trended upwards. As displayed in Figure 4.9, 77.78% perceived the regulations to be achievable, but difficult, and 7.41% still viewed the implementation as totally achievable. 14.81% saw the guidelines as not achievable without effort, and none saw it as unworkable. In contrast to the state directors, in Figure 4.9 the local directors trended downwards in their perceptions of this time period. While achievable, but difficult remained fairly constant at 49.48% and totally

achievable at 12.37%, not achievable without effort rose fell 10 to 20.62% and extremely difficult rose to 17.53%.

Insert Figure 4.10 about here

USDA, in 2013, issued A memorandum for the 2013-2014 school year issuing Food Nutrition Services (FNS) flexibilities in which schools are compliant if they meet minimums in grains and meat/ meat alternate (regardless of exceeding maximums) for additional six cent reimbursement. The requirement for all grains to be whole grain rich by 2014 in the final rule was adjusted according to feedback to the USDA with contentious limits being removed, and the whole grain rich target being set at 100%. Surprisingly, Figure 4.10 shows 25.93% of state directors viewed this as totally achievable, with 62.96% stating that the guidelines were achievable, but difficult. Only 11.11% viewed this stage as not achievable without effort, and none perceived it as unworkable. In Figure 4.20 The local directors also perceived an improvement of satisfaction with the regulations. 16% of local directors saw this year as totally achievable, with the majority, 57%, describing this period as achievable, but difficult. Only 20% saw this as not achievable without effort, and 7% viewed these guidelines as unworkable.

Insert Figure 4.11 about here

In 2014, USDA issues interim rule on Smart Snacks, instituted the requirement for all grains to be 100% whole grains, articulated new minimum professional standards for school nutrition directors, introduced new increased annual training, required school wellness policy programs and new reporting standards. The state directors noticeably trended downwards in their perceptions in Figure 4.11, with only 14.81% seeing these regulations as totally achievable. The amount of achievable, but difficult remained the same, but not achievable without effort grew to 22.22%. Even with these new, stricter initiatives, none saw the program as unworkable. The

local data displayed in Figure 4.11 was much the same as the state, in that the percentage believing the regulations totally achievable dropped to 9.90%. The amount considering this achievable, but difficult remained the same at 57 corresponding to 56.44%. Not achievable without effort grew to 28.71%, while those perceiving the 2014 rules to be unworkable fell to 4.95%. 2015 was not queried due to the School Lunch Program up for re-authorization and subsequently no significant changes in regulations issued during this year.

Insert Figure 4.12 about here

In 2016 Congress issued the Improving Child Nutrition Integrity and Access; Reauthorization Act of 2016 (Issues new guidance on grains- 80% whole grains), sodium (delaying target II for two years), review milk allowances, (set up working groups on a la carte); removed competitive foods (fundraisers) and al a carte from standards. The amount of state directors, as seen in Figure 4.12, view this as totally achievable doubling to eight and 32%, along with achievable but difficult to 64%. No one saw the regulation as not achievable without effort, and only one person viewed it as unworkable. The local directors viewed in Figure 4.12 positively as well. The amount viewing regulations as totally achievable surged to 29.41%. Achievable but difficult fell slightly to 50.98% with an accompanying drop in not achievable without effort following to 17.65%. Only two saw this period as unworkable, at 1.96%.

Insert Figure 4.13 about here

In 2017 Secretary of Agriculture Tom Vilsack departs USDA and Sonny Purdue appointed in his stead. Congress passed The Tracking the Next Child Nutrition Reauthorization Act. This year school administrative reviews officially adopted a three-year cycle. The new legislation provided for a competitive food exemption – fund raisers and the al a carte standard were waived, and school Meal Flexibilities guidelines were issued SY 2017-2018. These

flexibilities allowed exemptions for 50% grain rich requirements, sodium target 1 as the guideline, milk allowances of 1% with flavored milk being allowed to serve. Despite regulations being relaxed, the numbers in this year remained fairly static as shown in Figure 4.13 with the state directors, with totally achievable remaining at 32%, and achievable but difficult falling to 48%. Not achievable without effort grew 10% to 16%, and unworkable remained the same at 4%. The local directors in Figure 4.13 saw changes in the first two categories, with totally achievable rising to 38.83% and achievable, but difficult decreasing to 43.69%. Not achievable without effort and unworkable remained the same at 15.53% and 1.94%, respectively.

Insert Figure 4.14 about here

In 2018 USDA issued the Final Rule Flexibilities which allowed for flavored Low-Fat Milk, 50% of grains whole grain rich, and more time for sodium reduction level compliance. The state directors saw a significant difference, with all believing that these guidelines were either totally achievable or achievable, but difficult. Figure 4.14 reflects that 71.43% of respondents felt this was achievable and 28.57% indicated achievable, but difficult. Both not achievable without effort and unworkable saw 0%. The local directors also saw a similar trend displayed in Figure 4.14, with 91% seeing this as totally achievable and achievable, but difficult (59.43% and 32.08%, respectively). 8.49% still viewed this as not achievable without effort, but none found it unworkable. In both cases, this year marked the lowest level of dissatisfaction of the entire period.

Relationships

“Information is more sophisticated than a random collection of facts; information includes the values and ideologies reflected in an area of public concern, how problems are defined, how solutions are crafted, how policy is put into action and how to decide whether

particular solutions are worthwhile.” (Hale 2011, 1) When asked questions concerning the primary source for information, both state and local directors stated overwhelmingly that they relied upon the internal governmental spheres of influence. State directors inquiring about national school nutrition program requirements and reimbursements turned to the federal government 89.29%, and state government 10.71% of the time. 0% consulted with the local level, outside government and private organizations, or other. Like the state directors, local directors tended to look up a level for information, consulting state government 75.68% of the time, with 16.22% seeking assistance from the federal level directly. 0% consulted local government, .9% looking to outside government and private organizations, and 7.21% turning to other entities. (the other entities listed were School Nutrition Association (a non-governmental organization), the state Department of Education and Nutrition Department (state governmental organizations), and the director of state school nutrition (again, state government)).

In the subject of best practices and model programs, it is expected that there would be more communication outside of official government channels in the dissemination of information, particularly with nearby directors. State directors stated they looked to the federal government 35.71% of the time, and the state level 39.29% of occurrences (7.14% said they looked to the local level to adjust and shape their programs). One director summed this up in “other” by stating “[I look to] state level for state guidance, [and the] local level for model food service programs. Outside government and private organizations accounted for 10.71% of consultations, with School Nutrition Association being prominent in mention. Local directors looked to state leadership for guidance, accounting for 65.45% of respondents. 5.45% looked to the federal government for modeling, while outside government and private organizations accounted for 11.82% (and other at 15.45%). The list of information sources was richer,

prominently citing School Nutrition Association, but also peers, trade magazines and food trends, Institute of Child Nutrition (formerly NFSMI), county cooperatives, and Sodexo.

All Directors Data

Figure 4.16 presents a network visualization of all directors manifesting a tight, localized network with the directors located centrally and the government and the most influential non-government organizations located on the periphery.

Insert Figure 4.16 about here

Because of the complexity portrayed, there is a lot of information, and the edges appear to be a mass of spaghetti. The visualization differentiation of size helps to discern the more influential actors. Traditional implementation looks towards the governmental influence; it makes intuitive sense to rely on the lead and supporting agencies for information and guidance, as well as peers in the field. Networks, as envisioned of late, comprise more than the government structures to comprise non-governmental organizations. The analysis looks to establish quantitatively the influence of these entities to the policy implementation process.

Network Structure

The network map in Figure 4.16 contains 195 nodes that are connected by 2592 edges. Graph Density is a measure of completeness, or a proportion of all possible connections between nodes. This is calculated by $PC = \frac{E}{n(n-1)/2}$ (Rosenblatt, 2013). In the case of all directors, the potential number of connections is 18,915. If the network was completely connected, the density would be 1. In this case, the density is .147 signifying a low network density. For example, in the case of two nodes connected, the potential connection is 1, the actual connection is 1, and the density is 1. In the case of three (where all are connected) that appears graphically as a triangle, the potential connections are 3, the actual connections are 3, and again the density is 1. In the

case of three nodes that graphically appear as a straight line (a-b-c), and a and c are not directly connected, the density is .667. In the case of all nodes and given a network diameter of 4, I attribute the low measure to the directors not citing a relationship with each other, and to a lesser extent connection with local (and thus not relevant to the general population) actors.

Cliques Within the Network

The degree to which nodes within a network can be grouped into connected clusters of connected nodes is called modularity. Modularity is a fraction of these grouped connections subtracting the expected, randomly distributed edges, with a range value of -1 to 1. (Li and Schuurmans 2001, 1367) The values become positive when the observed exceeds the expected random possibilities. Provan et al. identified this modularity tendency as cliques. (Provan et al, 2007. Chu et al, 2013) The modularity is very low at .11, possibly due to the low-density attributes listed above or the structure of the framing involved in the analysis. Because of the closed nature of the group, quantitatively the mass is its own clique with differentiation in categories. Because the nucleus of the mapping is centered on the directors and influence upon them, cliques are less important than the overall noted influence that exists in the outer ring of actors towards state and local directors, the street-level bureaucrats.

Network Centralization and Framing Analysis

Insert Table 4.1 about here

Analysis of Network Centralization illustrates the significance of individual actors in the network. Closeness centrality is the reciprocal of the sum of the length of the shortest paths between the node and all other nodes in the graph. The closer a node is to all other nodes, the more central it is. (Bavelas, 1950; Sabidussi, 1966) Figure 4.17 provides the centrality values calculated by Gephi for the top ten most central actors in the network. Lewis (2006) defined

betweenness centrality as the strategic importance of an actor to act as a gatekeeper for information that passes to other actors in the network. Authority measures how valuable information stored at that node is by the value of links of other nodes. The measures calculated are the degree centrality, the closeness centrality, betweenness centrality, and authority centrality.

The ratings for all directors are consistent, with the only deviation in rankings occurring in authority centrality after the fifth position, and in closeness centrality ranking the Local Superintendent and Food and Beverage Industry group lower (below Share Our Strength/ No Kid Hungry, Parents, and Students). Overall, the top three actors are United States Department of Agriculture (USDA), the state school/ child nutrition departments (led by the state directors), and School Nutrition Association (SNA). The first two are expected due to their structural and supervisory position, but the ranking of a non-governmental organization may be surprising, especially given the closeness to the authority positions. The data also indicate the importance of local structures to implementation due to the number listed in the top ten. Except for Share Our Strength/ No Kid Hungry, the rest of the positions are local in nature and local in influence. This data are therefore not applicable between states, and the centrality indicated is tied to degrees and the number of extra influences disclosed.

State Directors Data

Insert Figure 4.16 about here

The network visualization of state directors presents again a tight, localized network but a bit more muddled with location. Because of the complexity portrayed, there is a lot of information, and the edges, while clearer, still appear to be a mass of spaghetti. The visualization differentiation of size in this case does not help discern the more influential actors.

Network Structure

The network map in Figure 4.17 contains 80 nodes that are connected by 594 edges. Again, the network diameter is four, and I attribute the low measure to the directors not citing a relationship with each other, possibly a constraint of the instrument.

Cliques Within the Network

The modularity of the state director network is very low at .127, again possibly due to the low-density attributes listed above or the structure of the framing involved in the analysis.

Network Centralization and Framing Analysis

Insert Table 4.2 about here

The centrality values in the state directors' case requires interpretation. In using Betweenness as a measure, four states top the list of influence. I attribute this to the low number of nodes with a high influence answer rate. These states are uncommon from the other states in that the directors also answered the "other" column for organizations (state or region specific organizations) that influenced their work, which were entered into the spreadsheets giving them more edges. This null centrality, while mathematically sound, provides a significance that isn't pertinent to the question at hand. This idea, whether more connected actors have greater efficacy, is a possibility for future research. Beyond the states, the top betweenness centrality actors are SNA, Anti-Hunger Organizations/ Food Banks, and USDA all at identical values of 50.489, If the data is measured for closeness, the list reads SNA, Anti-Hunger Organizations/ Food Banks, and USDA (with identical values at .646) for the first three positions. 4th is the State School/ Child Nutrition Departments at .633. Degree centrality lists a null centrality at number 1, then the three with identical degrees of 28. Authority values rate the three at the top positions with identical values of .165.

It is surprising that the structural organization, USDA, has equal informational influence with two non-governmental organizations, suggesting that the structure may be unduly swayed by non-traditional entities. This does support the narrative, which will be discussed further in the next chapter.

Local Directors Data

Insert Figure 4.17 about here

The network visualization of local directors presents again a tight, localized network more resembling the all directors' data. The information portrayed has the directors central to the network, with the more influential organizations larger and pushed to the periphery. Interspersed among the directors are organizations and people named in the other question. The edges again to be a mess of spaghetti, displaying only an idea of complexity.

Network Structure

The network map in Figure 4.17 contains 167 nodes that are connected by 2032 edges. Again, the network diameter is four, and I attribute the low measure to the directors not citing a relationship with each other, again possibly a constraint of the instrument. Because of the number of data points entered into the analysis, size differentiation is important to discern influence.

Cliques Within the Network

The modularity of the state director network is very low at .107, again possibly due to the low-density attributes listed above or the structure of the framing involved in the analysis. Again, this measure is less significant due to the focus of the analysis being the organizations upon the combined state actors.

Network Centralization and Framing Analysis

Insert table 4.3 about here

Betweenness centrality rates State School/ Child Nutrition Departments as the most influential actor at this level. This is more in line with conventional thinking, being the direct structural authority to this level. Next, by a very small number is USDA, the indirect structural authority above the state level. By degree centrality, The State School/ Child Nutrition Departments and USDA have the same value of 113. There is a margin of difference between the two structural authorities and SNA with .0536 and 109, respectively. These figures (with different values) are repeated in the closeness centrality. In authority centrality, School Administration/ Principals/ teachers rate above SNA. An interesting note, five of the top ten positions in this list are held by local entities, suggesting an influence on implementation comes not only at the federal and state level, but may be present at the local level as well. This fact is reflected in the narrative and will be discussed further in the next chapter.

Chapter Five: Discussion and Conclusions

Introduction

This chapter synthesizes the results of the cross analysis of the multiple case study from the 50 state directors and local directors from North Carolina, Virginia, and West Virginia. The purpose of this section is to address the research questions posed earlier:

1. What are the roles of the actors of and around the federal system in legislation implementation? Are non-governmental organizations influential on policy implementation? What implications exist on the state of federalism?
2. What are the information networks and relationships between positions taken and the actions of the actors that are identified?
 - a. How do organizational characteristics impact decision-making of actors, alliances, and directions in implementation?
 - b. Do these relationships have a systemic effect or legacy implications?
3. How are these relationships defined and what are their significance within the context of the implementation of the legislation in relation to the goals originally envisioned? Was the HHFKA a failure?
 - c. What are the legacy effects on the legislation?
 - d. What are the potential effects on the program of child nutrition?

The following discussion will trace the narrative from interviews of key figures on all levels and offer explanations of these questions.

Discussion

What roles do the actors, both inside and outside of government, play in policy implementation of federal decisions? What mechanisms do state and local levels use to

influence, shape, and finally implement federal policy? The purpose of this dissertation was to further understand how local, state, and national networks affect the application of federal guidelines at the state and local levels. As stated in previously, the overarching question in the academic field of federalism and intergovernmental relations is, “What pattern dominates federal (state-national) relationships, conflict or cooperation?” (Cho and Wright 2004, 448). The reality is that in a complex environment, both patterns exist simultaneously. In the case study of the HHFKA, actors displayed both patterns repeatedly prior to, during, and after implementation. Cho and Wright’s question is a moot point—conflict and cooperation ebbs and flows in a never ending and repeating cycle. As a field, we must move beyond linear thinking and work on a cognition of an environment of complexity and understand the dynamic involved. Interestingly enough, the dynamic that most influenced the federal relationship in the case of the HHFKA was the position change of SNA from an ardent supporter and author of the guidelines to a partisan opposition to the administration advocacy of the nutrition program in general.

To address these questions, this paper explored the case study of the Healthy, Hunger Free Kids Act (HHFKA) of 2010 from conception in the President’s Task Force on Childhood Obesity, subsequent passage in Congress, codification by the lead agency (United States Department of Agriculture (USDA), and implementation by the states through local school districts. Policy implementation is both a complicated and complex process that involves both structure and agency occurring simultaneously, shaped by layers of bureaucracy, personal and organizational values, and the financial realities of providing healthy meals to millions of children while balancing work and family. By utilizing network analysis theory and mapping, this dissertation provides insight into the players and their motivations involved in the policy implementation process. As John Kerry famously opined (paraphrased), “I was for it before I

was against it.” Self-interested parties create conflict and cooperation and inflict it on the system, not conversely. Further, by focusing on the Federal-state relationship, the field neglects the most important element of policy implementation, those who actually are charged to carry out the policy. It is at this level that a policy ultimately fails or succeeds and is the level of greatest complexity. Lipsky (1969) states "policy implementation in the end comes down to the people [(the street-level bureaucrats)] who actually implement it."

Feeding our children, as in the case of the National School Lunch Program, has always been considered a bipartisan endeavor. Not only does feeding our children appeal to our better values but is a matter of national security as evidenced by Congressional testimony of military leaders in 1946 and re-emphasized in 2010 with a letter signed by over 100 former Chairmen of the Joint Chiefs and Flag Officers. In 2010, the Healthy Hunger Free Kids Act passed unanimously in the U.S. Senate as a testimony to this fact. Between this passage and today, that dynamic was changed through the actions of actors involved in the conception and implementation of this important legislation, perhaps irrevocably. What happened to facilitate this change?

Michelle Obama, former FLOTUS, was the face of the HHFKA. During her tenure, she advocated on behalf of many causes to include the homeless, pay equity, and military families. She described her primary advocacies as Let’s Move, Reach Higher, Let Girls Learn, and Joining Forces. (Obama, 2018) After two decades of advocacy the National Alliance for Nutrition and Advocacy (NANA), an association of nutrition groups, found itself in a position with the 2010 NSLP reauthorization to make a difference and found an opportunity in Obama’s Let Move initiative. The Task Force on Childhood Obesity adopted as part of its recommendations the standards advocated by the nutrition community. The findings of the commission were released

in May 2010, and the legislation followed soon after with the HHFKA being signed December 13, 2010. The nutrition element was a natural fit, and a no-brainer: no one voiced any opposition to the need for such standards, and the effort would produce a noticeable result. Arguably, without the First Lady's sponsorship, the most comprehensive overhaul of the National School Lunch Program (and two decades of advocacy by the nutrition community) since its inception would not have taken place. The price of this championing, however, was that the legislation was now seen as an Obama administration legacy program.

From their website, "The School Nutrition Association is a national, nonprofit professional organization representing more than 58,000 members who provide high-quality, low-cost meals to students across the country," whose vision is that "Every student has access to nutritious meals at school, ensuring their optimal health and well-being." (School Nutrition Association website) Previously known as The American Food Service Association, SNA was very heavily involved in NANA and well-respected in the nutrition community. Dr. Janey Thornton, president of SNA from 2006-2007, described in her interview the role the organization played in the passage of the HHFKA.

In 2006, the year I was getting ready to go in to the president at SNA, we appointed a task force to work on recommendations that we were going to present to USDA for the 2010 reauthorization. We talked to districts across the country; we got feedback from large, small, urban, rural, and recognized that the changes we needed to make would not be easy, but also, we needed to focus what was best for the kids and ultimately the country. So, we started this process way back then and presented them to USDA.

Dr. Thornton outlined the platform of SNA and their then emphasis on nutrition, as well as the position of the organization in the passage of the HHFKA.

In about 2008, we started more and more about obesity and how it was becoming an epidemic among kids, and yet the challenge was there was about 16-17 million kids that lived in food insecure households. It's hard for people to understand that until they go to the grocery store and understand that a bag of chips is cheaper than

buying healthy foods, which are expensive, and that's hard. So, in 2008 SNS contracted with the Institute of Medicine to review the current meal pattern and provide scientific research that would provide us to move on and be a little more specific. They contacted SNA, and I actually testified at a hearing to say to them what SNA had recommended. While the new meal pattern came out under the Obama administration, the work had been done prior. It wasn't something that was brand new. I met with industry representatives who told me, "we don't care what the recommendations are, we just need a standard so we can move forward." At that time, the states set the standards, and even individual districts that had set standards—so they showed me that there were literally hundreds of different standards which were not only difficult, but expensive to try to meet. Surely there was something we could come up with so they could develop products. We also met with retired military officers and their concern with the obesity epidemic. Two years later they wrote an op-ed to the New York Times.

Dr. Thornton also stated that what came out in the interim and final guidelines wasn't as strict as SNA had previously recommended. This perspective gives insight into the position advocated by SNA after implementation and the subsequent leadership and positional change by a CEO who is not a dietitian, but rather one with a business background.

It turns out that kids didn't know how to eat healthy; they weren't learning it at home, and they weren't learning it in schools. By 2010, the U.S. was spending \$140 billion dollars (with a B) in obesity health related issues, and also in skyrocketing health insurance premiums. We were at a point where we needed to do something as a country, and everyone was on board. Besides eating healthy, America had to be educated on *how* to eat healthy. In 2010 when I became deputy undersecretary for food, nutrition and consumer services at the USDA, there was no opposition to the guidelines and SNA was in the forefront of this movement. (interview)

In 2012, Barack Obama was reelected for a second term in office. Vowing to make him a lame duck president in his second term, Republicans gained control of both houses of Congress in 2014. USA Today quoted Sara Fagen, the White House political director under President George W. Bush, "He's a lame duck and it's not even lame duck time." The article continues with her acknowledging that their administration had to deal with growing resistance, but not as early in the term as the Obama administration. (Page, 2014) The Republicans opposed the single payer health care initiative known as Obamacare but fell short in bids to overturn the legislation.

They turned to opposing Obama's executive orders on stemming illegal immigration and fixed their sights as well on the HHFKA in 2012. Representative Mark Meadows and the House Freedom Caucus released "First 100 Days: Rules, Regulations, and Executive Orders to Examine, Revoke and Issue." Fox News reported, "The regulations have proven to be burdensome and unworkable for schools to implement,' reads a related report from the House Freedom Caucus, of which Meadows is a member. 'Schools are throwing food away that students are not eating.'" Further, the article stated "The study's conclusions comport with widespread complaints from school officials and parents that the program encourages food waste. It also has drawn criticism for cost, implementation difficulties and unpopularity with students." (Fox News, 2017)

As the data and interviews show, implementation was extremely difficult. As much as officials admitted that society itself did not know how to eat, and was not eating, healthy the timeline for implementation was incredibly ambitious: The interim rule was to be met after a year and the final rule in place two years after passage. As one response to the survey read, "The government allowed car companies 15 years or more to raise their MPG's to new EPA levels. They also allowed over 7 years for the phase-out of the sale of incandescent light bulbs." The NANA coalition patiently strove for change over two decades; it would have served the overall goal to have allowed more time in implementation. The data overwhelmingly shows that the policy was achievable, but that implementation was as best, difficult. This dissertation supports the 2016 claim of the USDA data that demonstrated that 90% of all school districts had successfully implemented the new guidelines when opposition began mounting attacks on the program as a face of the administration.

The data displayed in Figure 5.1 shows that half of directors, both state and local, feel their jobs have in fact gotten more difficult.

Insert Figure 5.1 about here

However, these figures, when combined with nearly a half and a third of each category stating their job has gotten easier or stayed the same, leads one to believe that the statement from Congressman Mark Meadows is inaccurate and alarmist. Figure 5.1 tracks the overall state and local director attitudes per year from 2010 to present. These criteria utilized achievable versus unachievable as positive and negative, respectively. Based on the data received, the peak years of unhappiness with the HHFKA were in 2011 and 2014. In 2011, the data indicates that the percentage of directors, both state and local, that viewed the regulations as not achievable without effort and unworkable at 35.475%. In 2014, that figure fell to 27.94%. The statistic in 2011 can be interpreted as the initial adjustment to new regulations and the interim rule threshold being in effect. If the regulations were indeed problematic, it would reason that the stricter final rule in 2012 would cause a greater rise in dissatisfaction. Based on the data, however, the level of measured dissatisfaction fell to 26.48% and further in 2013 to below 20% at 19.055%. Part of the reason for decreased dissatisfaction, anecdotally, was the USDA adjusting and scrapping maximum nutritional values (If the schools met the minimums, they were considered compliant). The rise of dissatisfaction in 2014 was partly due to the 100% whole grain rich requirement taking effect. Many directors stated that it was nearly impossible to make palatable food items such as biscuits or tortillas with this requirement in place. At no time did I gain a feeling that these rules were easy to implement—these directors work very hard and long to execute their jobs. In 2014, USDA issued minimum professional standards for school nutrition directors,

increased annual training, and new school wellness policy programs and reporting. The result was increased burdens on already saturated directors and kitchen staffs.

The School Lunch Program reauthorization expired on September 30, 2015 but continued to operate until passage of the Improving Child Nutrition Integrity and Access Reauthorization Act of 2016 in Congress (there were no substantial changes issued in 2015, and so no accompanying survey question). In this, the act issued new guidance on grains (80% rich whole grains), sodium (delaying target II for two years), reviewed milk allowances, (set up working groups on a la carte) and removed competitive foods (fundraisers) and a la carte from standards. 2016 marked the lowest level of dissatisfaction measured (11.085%), and matches the USDA cited figure of 90% compliance, and .15% dropping out of the programs due to the perception it was unworkable (USDA 2014) (The total was two in the local level for 1.96%).

Despite the easing of regulations, dissatisfaction rose to 18.735% in 2017, possibly in reaction to the change in school review cycles from five years to three years. This requirement is seen as a burden to both state and local directors. The workload and financial cost of this change can be illustrated in North Carolina. There are 136 districts, requiring 45 inspections per year. This translates to 3-4 per month; each inspection lasts one week. The requirements for an inspection necessitate preparation, notification, travel, the inspection itself, and administrative results being compiled and disseminated. There are also follow up visits in some cases. With this added requirement there is no increase in staff or funding, creating a greater burden to staff in addition to additional duties and programs. This increased burden also eliminated the technical assistance visits, wherein the state inspectors would show up at the school and provide a “no penalty” look and offer advice for compliance, facilitating a smoother inspection.

2018 results reflect the greatest satisfaction measured in regard to job execution. In this, not one director (state or local) saw the program as unworkable. Despite a relaxation of standards, the regulations are still viewed as an improvement to standards pre-2010. Rather than debating the merits of nutrition, the issue has become politicized: The 2016 Freedom House Caucus listed the HHFKA as an Obama-legacy program to be rolled back (Meadows, 2016), and a recent lawsuit reported in the New York Times against the Trump Administration for “its rollback of school nutritional standards championed by the former first lady Michelle Obama that required students be served healthier meals.” (Green and Piccoli 2019)

The data of the local directors also highlighted that local officials, as well as parents and children, presented significant challenges to implementation. When directors had support of their schools, districts, and public, the guidelines were achievable. When conflict came from one or more of these sources, implementation was exceedingly difficult and resulted in policy opposition. It was at this level that the social media campaigns of 2014 were initiated and focused, shaping national opinion.

In 2014, SNA released a position paper in opposition to the HHFKA final standards implemented in 2012. This reversal reverberated in the nutrition community, as SNA called for a repeal to the whole grain requirement 50%, suspending the Target 2 sodium requirements, repeal of the requirement that all students must select a ½ cup serving of a fruit or vegetable as part of a reimbursable breakfast and/or lunch, and nearly every aspect of the legislation was in question. (SNA, 2014) Multiple sources, including former SNA presidents, commented that SNA lost all credibility at this point. Sam Kass, Obama's Senior Policy Advisor for Nutrition Policy as well as Executive Director for First Lady Michelle Obama's Let's Move! Campaign commented that the reversal by SNA took everyone by surprise--SNA had been an ardent supporter of the nutrition

initiatives since inception. He also stated that even more worrisome was the organization stopped talking to administration and USDA officials, and instead began to lobby through Republican Congressmen for change in the 2015 reauthorization. Officials present at the USDA, including then Secretary Tom Vilsack, confirmed this point. Kass, once an invited keynote speaker at SNA's annual conference, was refused to even attend the conference in 2014. SNA's claims that revenue and participation were down as a result of the guidelines were refuted in 2016 by a widely cited study in the American Journal of Preventive Medicine with the conclusion, "Schools experienced initial revenue losses after implementation of the standards, yet longer-term school food revenues were not impacted and school meal participation increased among children eligible for reduced-price meals. Weakening the school meal or competitive food guidelines based on revenue concerns appears unwarranted." (Cohen et al 2016, 485)

Marshall Matz, a lobbyist with the OFW law firm and previously employed by SNA, emphasized that the school lunch program existed because of bi-partisan support from Congress. In his 40 years working in Congress and as a lobbyist, he enjoyed access to the White House and had a strong working relationship with USDA. A 2014 New York Times article started with the comment "The lunch ladies loved Marshall Matz." (Confessore, 2014) In 2012, the CEO of SNA, Frank DiPasquale, left under pressure from the board of trustees, heavily invested in industry representatives. In June 2013, Marshall Matz was fired from his representation at SNA. In a 2013 press release, SNA President Sandra Ford stated "School Nutrition Association extends our deepest thanks and appreciation to Marshall Matz for more than 30 years of dedicated service to SNA and its members. Marshall's work on behalf of SNA has strengthened school nutrition programs for the millions of children who rely on healthy

school meals.” This release also announced the retention of services of Barnes & Thornburg LLP for its advocacy and legislative services. (SNA, 2013)

In our interview, Matz refused to say anything bad about the organization, even though after being fired SNA moved to have him and his partner, Roger Szemraj, disbarred in Washington, DC. To facilitate this, SNA’s legal expenses more than doubled in 2014. In 2013, the firm spent \$148,640 on lobbying expenses, and \$145,650 in 2015. In 2014, the year SNA sued Matz and Szemraj for disbarment with the Office of Bar Counsel, their lobbying expenses were \$406,600. (OpenSecrets.org) In the end, the DC courts found no merit in the ethics charges of improper communication with the Department of Agriculture and conflict of interest and dismissed them. This break, and the events in SNA, signaled a fundamental shift in SNA’s advocacy, as stated in the 2013 press release announcing the firing of Matz. “In light of the historic regulatory challenges facing school nutrition professionals and with Child Nutrition Reauthorization on the horizon, SNA’s Board of Directors agreed that it was an ideal time for SNA to reflect on its advocacy strategies,” said SNA President Sandra Ford, SNS. (SNA, 2013) This reflection included the retention of a law firm with “extensive ties to the Republican party.” (Lakhani, 2017)

In 2014, a Slate article commented “Republicans have their own high-profile ally in the waiver fight: The School Nutrition Association, a group that includes both the cafeterias that serve the food and some of the companies that produce it. The organization was a big booster of the first lady’s campaign to push through the new standards in 2010. But four years later the SNA, under new leadership, has switched sides. ‘These over prescriptive regulations have made it really difficult for a lot of our members,’ SNA president Leah Schmidt told NPR last week.” (Voorhees, 2014) In 2013, Robert Aderholt, a Congressman from Alabama serving on the

Committee on Appropriations, introduced into a 2013 appropriation bill a rider requesting the USDA allow schools to apply for waivers in regard to the Smart Snack Program. Secretary Vilsack declined, as the request was non-binding and went against what the nutritionists told him. Vilsack stated that he was working with state officials for policy adjustment when the bill came out, and that it was “a fix for something that wasn’t broken.” Aderholt responded by introducing in a 2014 appropriations bill binding wording instituting a one-year waiver process. When asked to address the concern that USDA was unresponsive, he replied “At no time did we stop working with state and local officials, and at no time did we receive such an indication.” The New York Times reported that Patricia Montague arrived at SNA’s 2014 Legislative Action Conference (LAC) with the Schwan Foodservice representative, who urged her to bypass the USDA and lobby the appropriations committee “to force the administration’s hand.” (Confessore, 2014)

SNA’s infamous position paper in 2014 endorsed the waiver. They saw it as a way to shore up and provide relief for districts that were losing money due to the HHFKA. Many nutritionists, including members of SNA, saw the endorsement as a request to sell junk food.

Insert Figure 5.2 about here

Figure 5.2 shows a direct repudiation to SNA’s claims, as 19 past SNA presidents wrote a letter to the House Appropriations Committee urging members to “reject calls for waivers, maintain strong standards in all schools, and direct USDA to continue working with school leaders and state directors to find ways, including technical assistance, that will ensure all schools can meet the HHFKA standards. Specific concerns regarding whole grains and sodium can be addressed as technical corrections. We must not reverse the progress that was sought by school leaders and is well on its way to success in most schools.” (Past Presidents Initiative Letter, 2014) The New

York Times called the vote in committee (which passed) “the most partisan vote in the history of the National School Lunch Program.” (Confessore, 2014) Did SNA, in fact, irrevocably aid in changing the bipartisan platform of school nutrition to a political and partisan issue?

In the end, SNA, at best, chose the most expedient route of looking to change the system by altering the process in its and its stakeholders’ interests. Rather than working with USDA to extend the timeline for implementation and allow society to learn and become comfortable with healthy nutrition changes as well as giving state and local directors breathing room to maintain viability, they chose to work with Republican legislators looking to oppose the administration in power at the time. The end result is that while in the aggregate there are healthier standards than existed prior to the HHSFKA, the effects are far less than the nutritionists (of which SNA was an profoundly integral part) had hoped for. SNA bought the changes it had sought, but the price paid (as is the consensus of not only government officials but also SNA past presidents and nutrition field experts) is the loss of credibility and, according to myriad of sources I interviewed, the health of our children. There is more analysis that can be done beyond the scope of this dissertation to measure the influence of the food industry on SNA itself and by extension the national School Lunch Program. Did industry, that largely comprised the board of directors, institute an organizational coup installing a Republican-friendly leadership as anecdotally stated? Was industry behind the sudden about face of this organization, as presented in the media? The pay of the average school cafeteria worker is \$10.20 average hourly rate (payscale.com, 2019), yet the CEO of SNA “received about \$420,000 between the Association and the [School Nutrition] Foundation,” derived from the IRS Form 990 submitted by SNA (Paddock, 2018). CEO Patricia Montague was recently awarded the FAME Silver Friend of Child Nutrition Award (an award where membership in SNA is required), sponsored by industry, presented during

SNA's School Nutrition Industry Conference (SNA Press Release, 2018). This linkage between industry and organizations, especially in the context of policy implementation, may be a topic for further investigation outside the scope of this dissertation.

When Dr. Lynn Harvey became SNA president in 2017-2018, she worked hard to mend the divides that had grown between the bureaucracies and SNA. This was aided by a Republican administration assuming office, and Secretary Sonny Perdue assuming the head of the USDA. The true test will come when a Democrat President wins the White House and the leaderships of the cabinet again changes, and the reauthorization of the National School Lunch Program is up for debate. In January, new guidelines were issued by the USDA for directors. In this, whole grain requirements were reduced to 50% rich, milk allowances were set at 1% both flavored and unflavored, and the sodium requirements were frozen at greatly relaxed levels. At face value, these are merely standards set by the system. In the greater picture, the headlines either read "The Trump Administration's Tone-Deaf School Lunch Move: The USDA is Loosening School Nutrition Standards as Childhood Obesity Soars," (Belluz 2018) or "Make Lunches Great Again: Trump Administration Rolls Back Obama Era School Lunch Restrictions." (Dibble 2018) The once non-partisan platform of childhood nutrition, featuring a unanimous passage of the HFFKA in 2010, is now yet another politically partisan battleground where the issue is secondary to winning or losing meaningless skirmishes in the press.

Conclusion

This dissertation has illustrated and explored the complex interrelationships of information process, relationships, and networks that exist and are instrumental in the conception, formation, and implementation of policy. These networks are formed in the traditional hierarchies, but also expand to include the influence of non-governmental entities.

The data shows that these actors have as much influence on policy implementation as the actors charged with the actual implementation themselves and can form and shape policy implementation as well as the federal system itself. By recognizing this fact, these connections can be recognized, identified, and accounted for in policy implementation. It was the synthesis of collaboration and relationships in these interdependent networks that formed the foundation of the HHFKA leading to a unanimous passage of the most comprehensive reauthorization of the National School Lunch Program since its founding in 1946.

Utilizing network analysis and mapping, this dissertation discerned that SNA wielded significant influence in the implementation network. This is demonstrated in the survey; where SNA had less centrality in the local directors, they had more in the state directors. The state directors, however, were the decidedly central influence among the local directors. Across the levels of federalism on the federal, state, and local levels, actors synthesized and implemented information in the form of practical policy and government capacity. Just as it is simple to dismiss the influence of information and actors beyond government, it is also easy to look at the influence of non-governmental organizations and assign them equal weight as government. In the end, though, it is government that implements policy and is held responsible for the consequences of such action. In this sense, these relationships are a facet in the study of government and should be viewed in both positive and negative as to their effects and their overall roles in networks.

The legacy influence of SNA on the system is that what was once considered a non-partisan issue is now among the most partisan and contentious of issues. SNA was essential in the adoption of standards in the HHFKA. With a leadership change and subsequent reversal of platform, several federal key actors have stated their opinion that the organization has

irrevocably politicized and hurt the very platform they espouse to represent. The HHFKA was created to establish a uniform standard of nutrition across the states. While many of the original standards have been diminished, the legacy of the HHFKA is a greater awareness of school nutrition, and many dietitians admit to a legacy of more healthy practices for the majority of school districts.

Figure 2.1 Child Nutrition Timeline 2004-2018

Administration	Year	Date	Federal Action
Bush	2004	(Jun 30)	Child Nutrition and WIC Reauthorization
	2009	(Jan 20)	Tom Vilsack appointed Secretary of Agriculture
Obama	2010	(Feb 9)	Establish White House Task Force on Childhood Obesity
		(May)	Release White House Task Force on Childhood Obesity report
		(Dec 13)	Healthy, Hunger-Free Kids Act signed SNAP Certification Targets: SY 2011-2012 80% SY 2012-2013 90% SY 2013-2014 95%
Obama	2011	(Jan)	USDA issues Interim Rule (HHFKA)
		(Jan 21)	USDA issues salad bar rules (supplements previous memo, Oct 8)
Obama	2012	(Jan)	USDA issues Final Rule (HHFKA)
Obama	2013	(Feb)	SY 2013-14 SY Memo – schools compliant if meet mins, scrapped maximums
Obama		(Jul)	Requirement, all grains to contain ½ whole grains
Obama	2014	(Jul)	USDA issues interim rule on Smart Snacks
		(Jul)	Requirement for all grains to be 100% whole grains
Obama	2015	***NO CHILD NUTRITION AUTHORIZATION PASSED***	
Trump	2016	(Mar)	Congress issues the Improving Child Nutrition Integrity and Access Reauthorization Act of 2016 (Issues new guidance on grains, sodium, new milk allowances, and setting up advisory groups)
		(Apr)	USDA exemptions for whole grain requirements
Trump	2017	(Jan)	Tom Vilsack departs USDA
		(Jan 24)	Congress passes The Tracking the Next Child Nutrition Reauthorization Act (Trial 3 state Block Grants, school reviews go to 3 years, competitive foods exemption – fund raisers, a la carte standard waived). EBT eligibility
Trump		(Apr)	Sonny Perdue appointed Secretary of Agriculture
		(May 1)	School Meal Flexibilities guidelines issued SY 2017-2018. Exemptions for ½ grain requirements, sodium target 1, milk 1%/ flavored
Trump	2018	(Dec)	USDA Issues Final Rule Flexibilities (Flavored Low Fat Milk, ½ grains, more time for sodium reduction levels). Farm Bill Passed (elements, especially concerning SNAP)

Figure 2.2 Flowchart of 2010 Childhood Nutrition Policy, NC Example



Figure 2.3 The Politics of Implementation and Financial Issues

A Substantial Decrease in Program Revenue

- Federal Reimbursement did not cover the cost of preparing/serving the meal
- Commodity entitlement was limited
- A la Carte sales plummeted as less healthful foods and beverages were been replaced with more healthful options, resulting a diminished profit margin for more healthful foods
- There were no state or local funds to support the program

Examples:

\$2.98 Average cost to produce a school lunch

\$2.77 Federal reimbursement for “free” meal

\$.21

\$2.98 Average cost to produce a school lunch

\$2.00 Average cost to a paying student

\$.26 Federal reimbursement for “paid” meal

\$.72

\$2.98 Average cost to produce a school lunch

\$2.37 Federal reimbursement for “reduced price”

\$.40 Amount owed by student

\$.21

But what if the child does not have the \$.40 to pay for the meal? In some districts, Board-approved meal charge policies deny meals to students who do not have money for their meals. *Also, per regulation if the student did not take the required nutritional items, the school would not be reimbursed for the meal.*

Meal Participation Drives Federal Reimbursement

Breakfast participation in 2011 was “low:”

- 37% in Elementary School
- 19% in Middle School
- 12% in High School

Lunch Participation in 2011 was rated as “moderate:”

- 77% in Elementary School
- 69% in Middle School
- 42% in High School

Source: Harvey, 2011

Figure 3.1 Identified Interest Groups

- School Nutrition Association (SNA)
 - National School Boards Association
 - Food Research and Action Center (FRAC)
 - The Center on Budget and Policy Priorities
 - Anti-hunger organizations/food banks
 - Share Our Strength/ No Kid Hungry
 - Center for Science in the Public Interest (CSPI)
 - Institute of Medicine
 - Academy of Pediatrics
 - Academy of Nutrition & Dietetics
 - Pew Charitable Trust/Robert Wood Johnson Foundations-research foundations
 - Parents/Students
 - American Heart Association
 - National Education Associations/ Teachers Associations/ Food and Beverage Industry (lobbying arms, including food processors, distributors, service management companies, soft drink makers, and agricultural giants)
-

Source: Laraia et. al 2003

Figure 3.2 Influence Perception Coding Model

Low preference to high	2 (Supporters) High preference, low engagement	4 (Champions) High preference, high engagement
	1 (Information) Low preference, low engagement	3 (Challengers) Low preference, high engagement
Low engagement to high		

High engagement, high preference (Champions) = 4 (edge value)

High engagement, low preference (Challengers) = 3

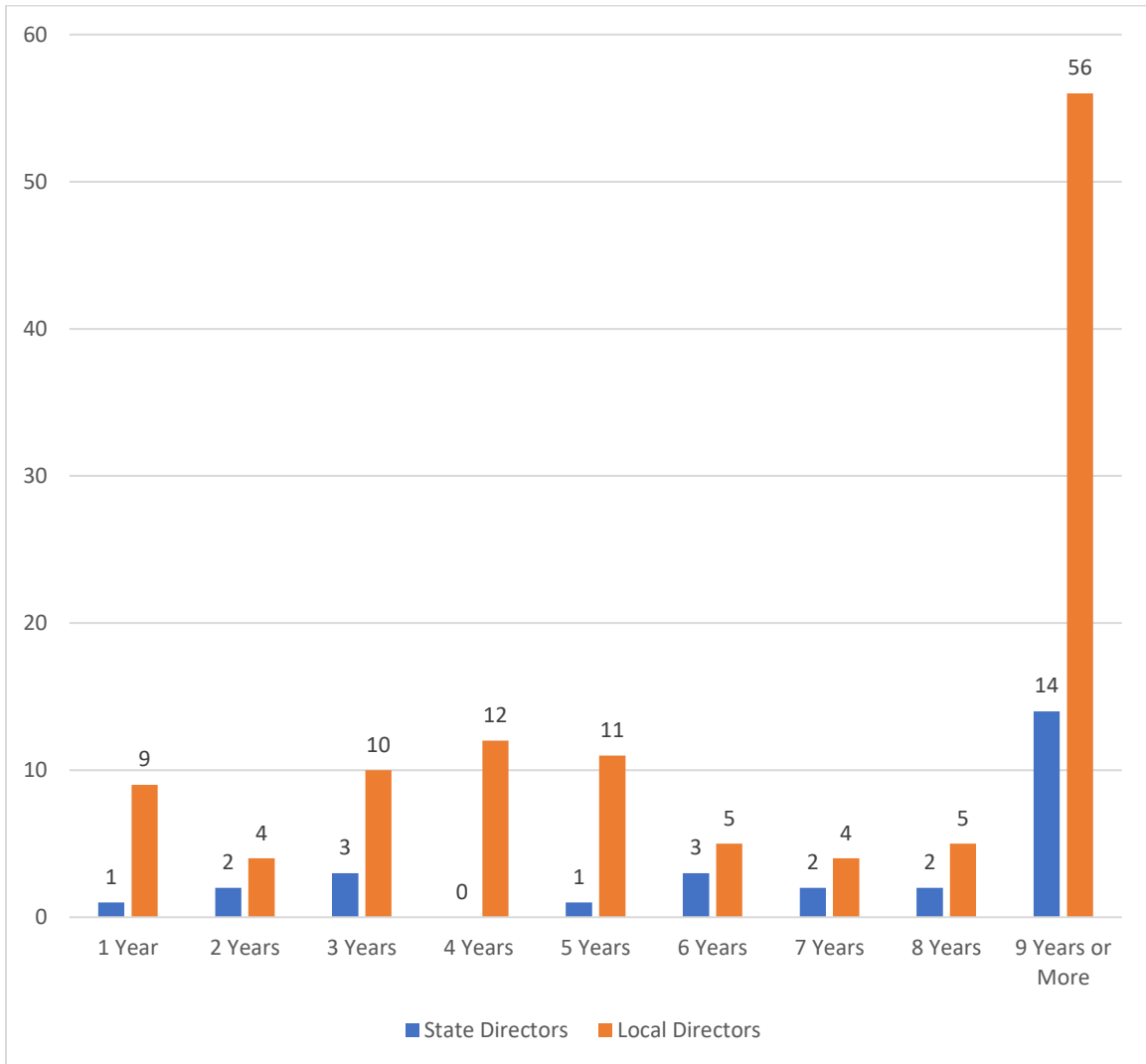
High preference, low engagement (Supporters) = 2

Low preference, low engagement (Information) = 1

No Impact not recorded

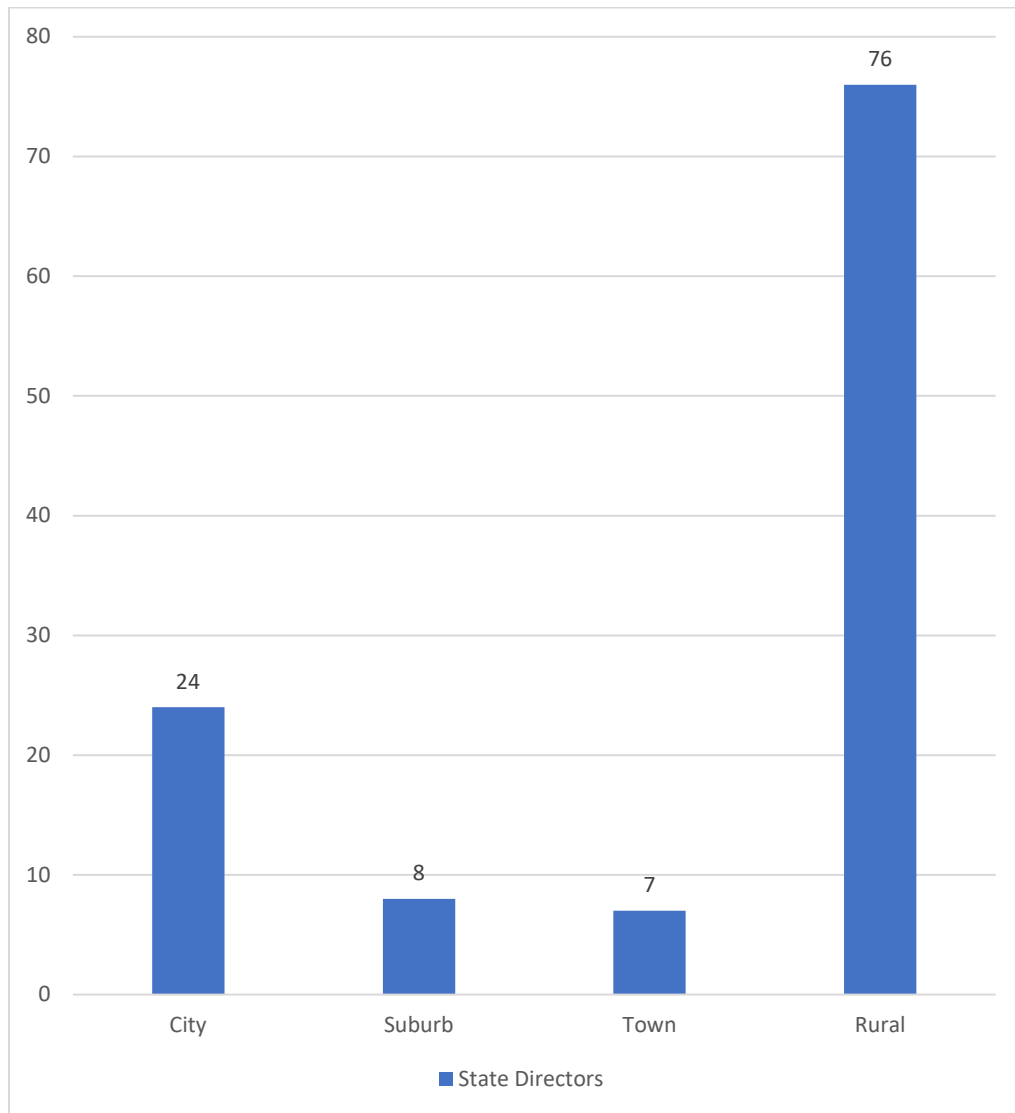
Source: Adapted from Hale (2011)

Figure 4.1. Tenure in Current Job (years)



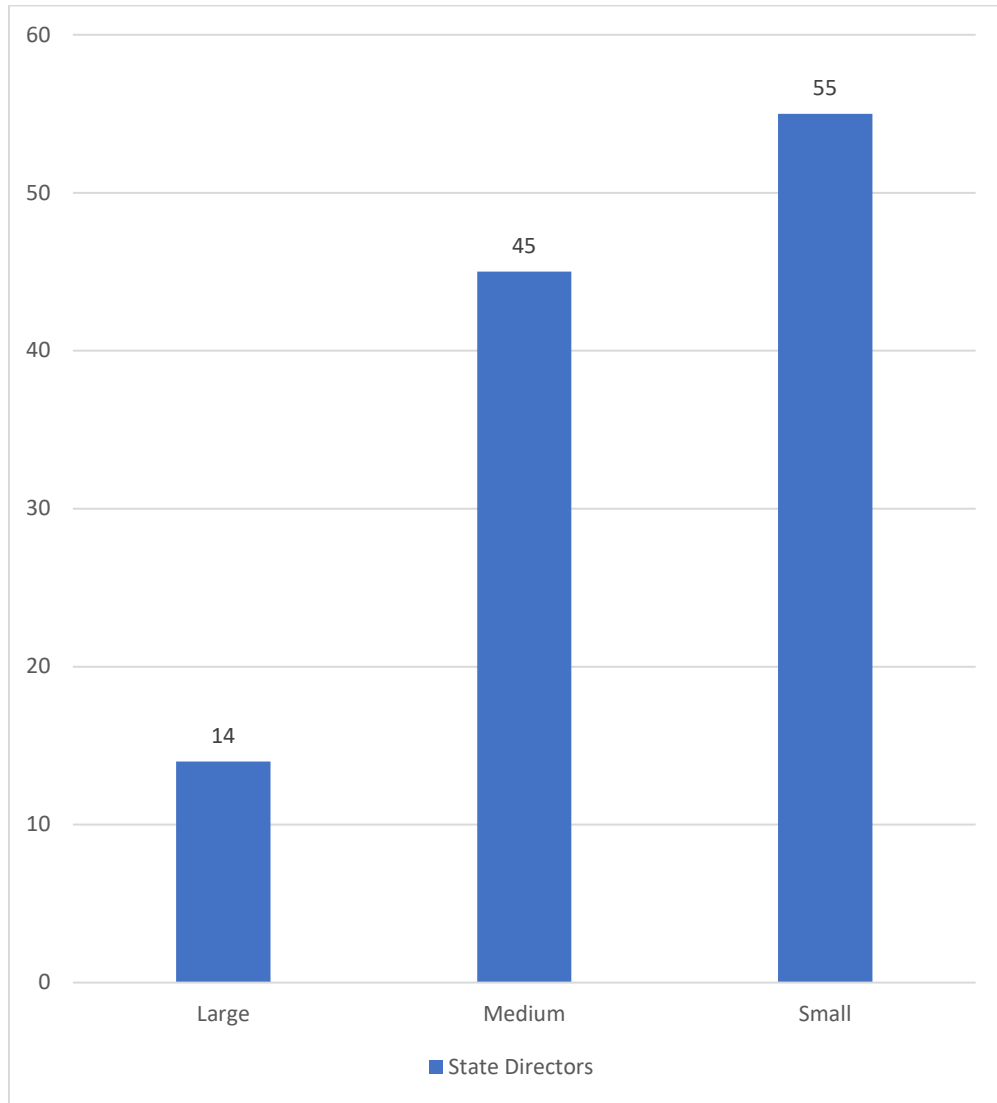
Q2, Q2: How Long Have You Been in Your Current Job?

Figure 4.2. Demographics Self-Identification



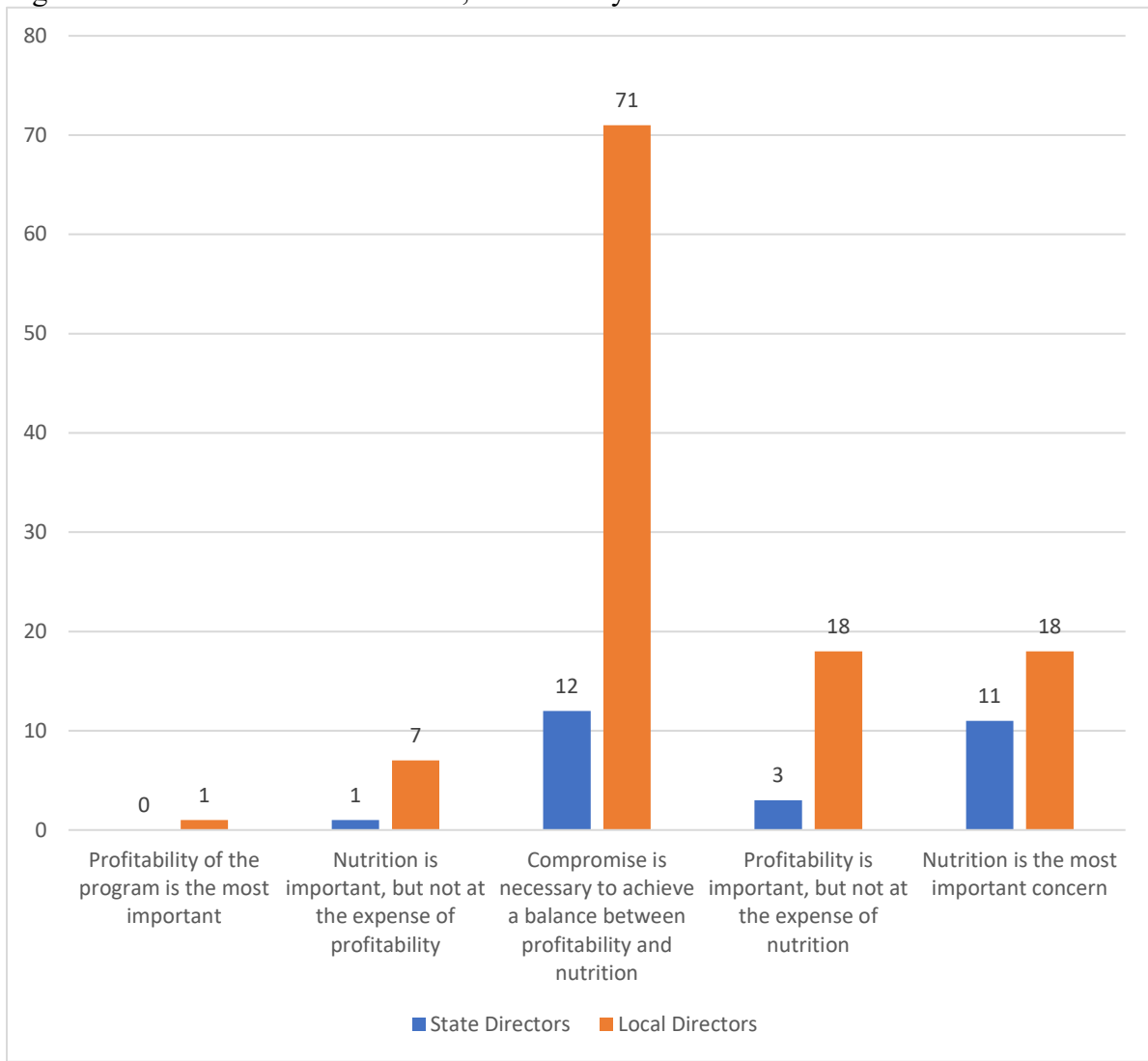
Q4 - Do you consider your district to be city, suburb, town, or rural?

Figure 4.3. District Demographic Size Self-Identification



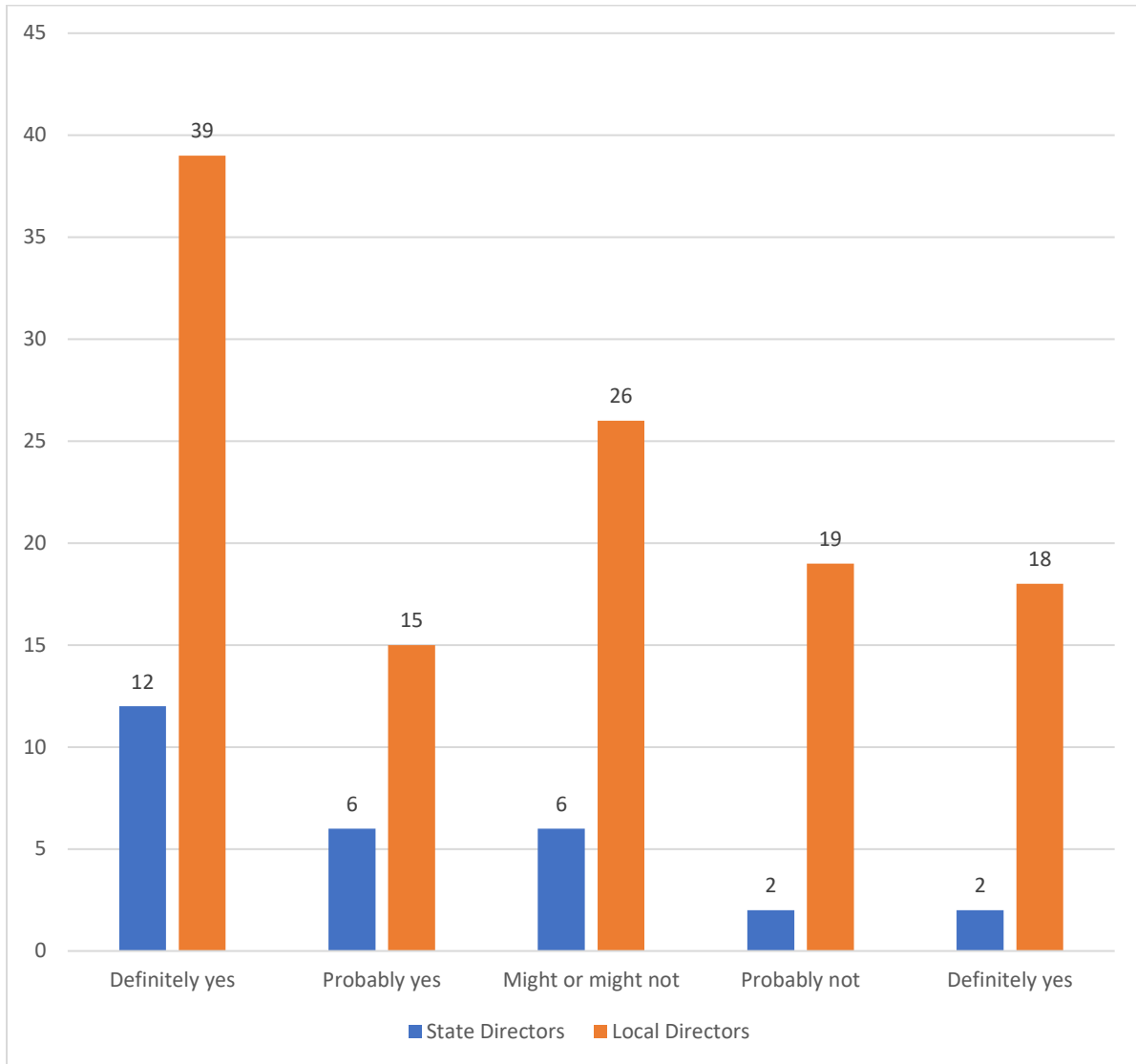
Q5 - Self-Identification: What size is your district?

Figure 4.4 Values Self-Identification, Profitability vs. Nutrition



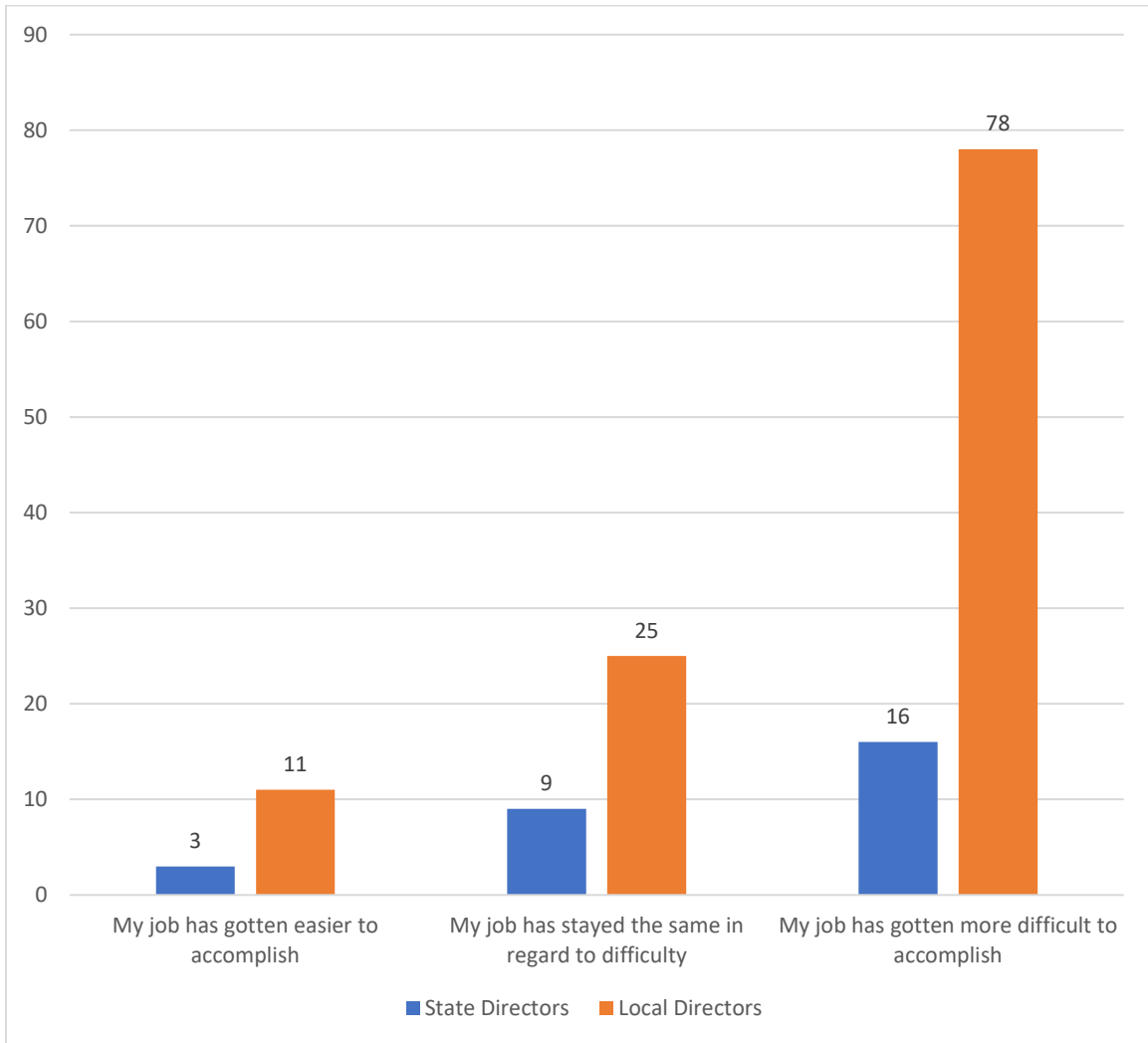
Q8, Q12: Choose the most applicable statement in regards to your job:

Figure 4.5. Values Self-Identification, Practical Experiences



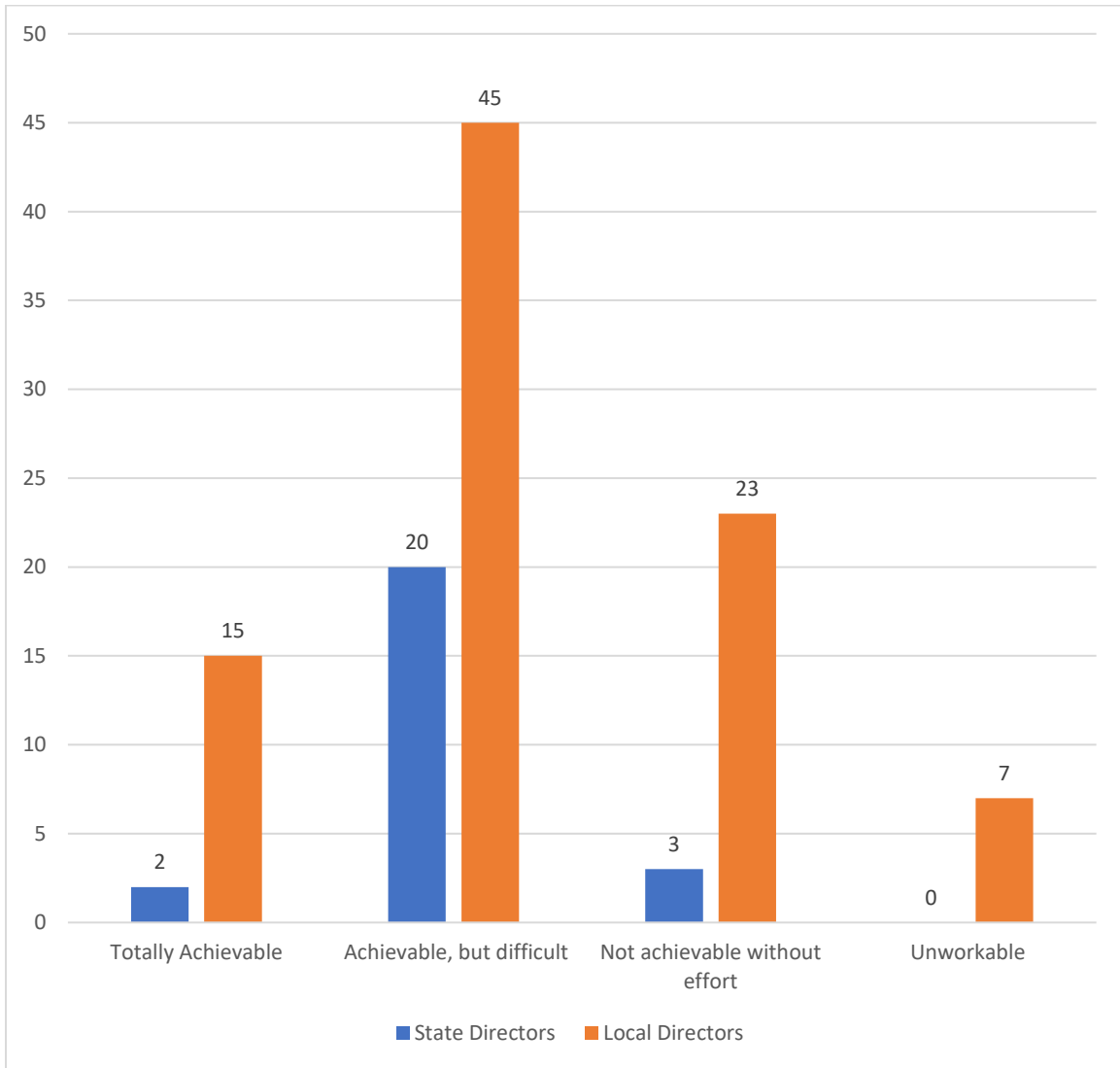
Q10, Q14: Have you ever had to choose between optimal nutrition and profitability?

Figure 4.6. Values Self-Identification of Job



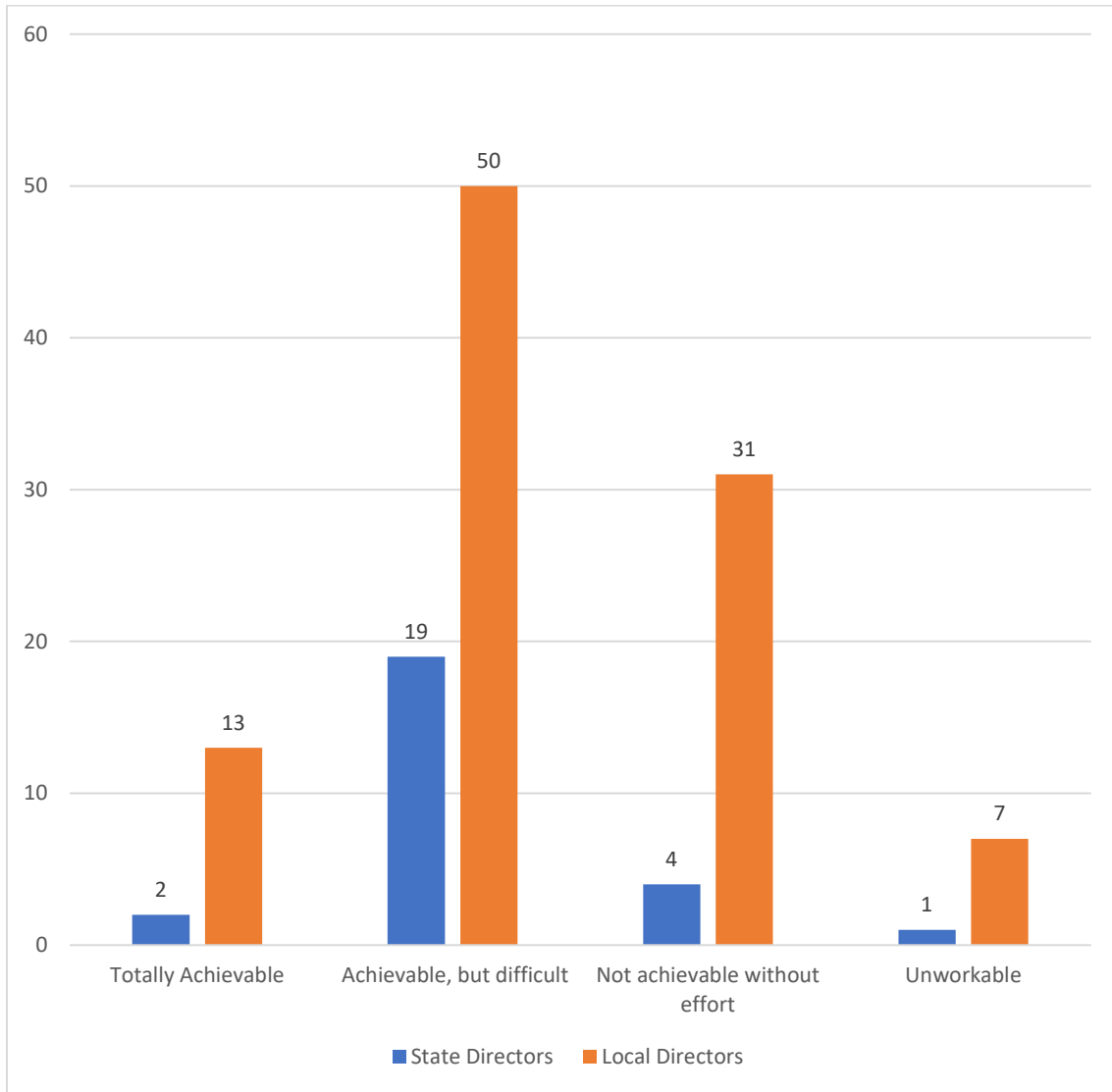
Q24, Q29: Choose the most applicable statement that applies today:

Figure 4.7. 2010 Job Ability Self-Assessment



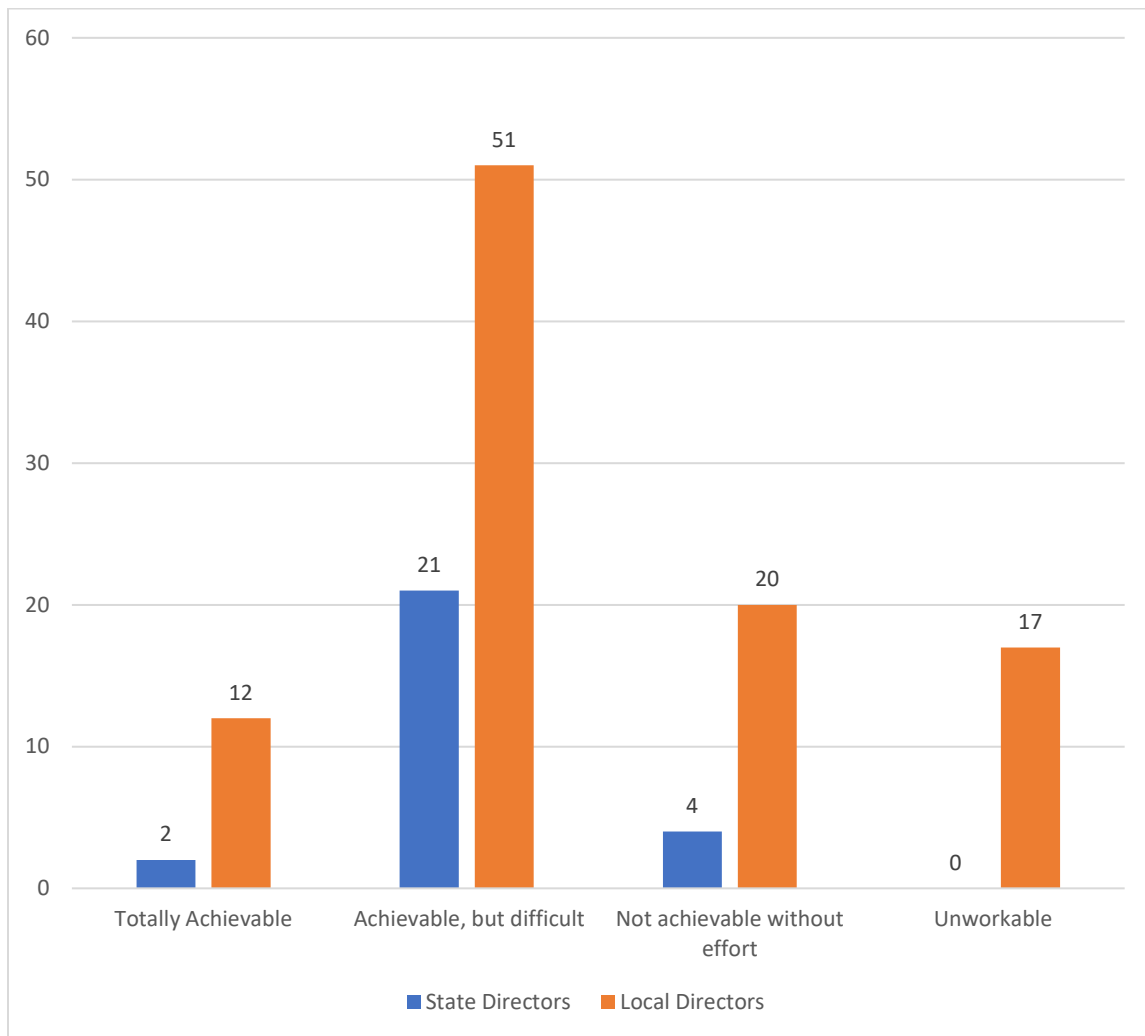
Q14, Q19: 2010 - White House Task Force on Childhood Obesity Established; Healthy, Hunger Free Kids Act signed. What was the impact of the guidelines/ regulations on you job during this time frame?

Figure 4.8. 2011 Job Ability Self-Assessment



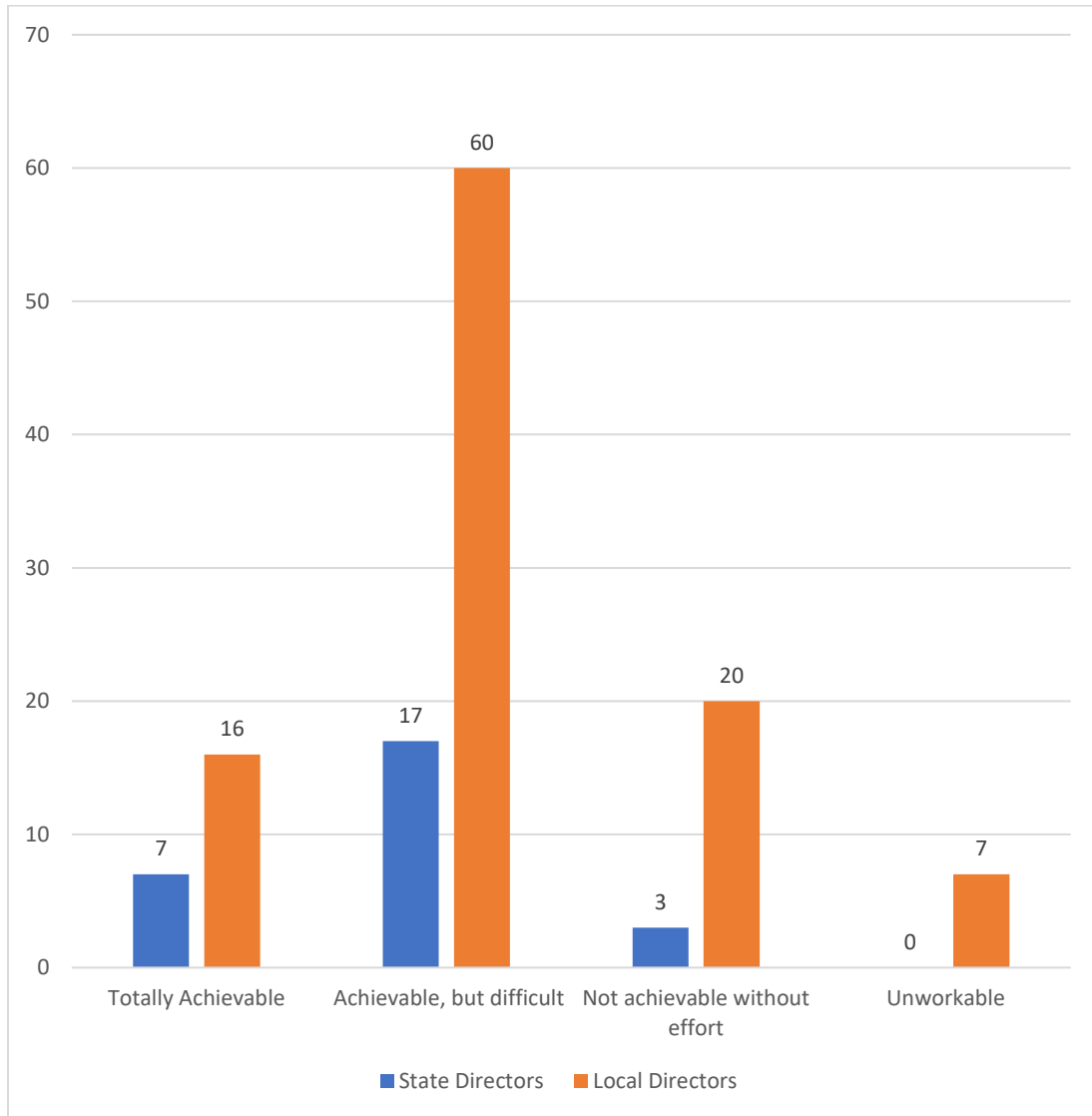
Q15, Q20: 2011 - USDA issues Interim Rule (HHFKA) to include: vegetable subgroups minimum (color) and limited starches, 1/2 whole grain requirement, fat free milk (flavored and unflavored), Specific calorie ranges, single food-based menu planning, fruit & veggie minimum requirement for reimbursement, 3-year review of programs

Figure 4.9. 2012 Job Ability Self-Assessment



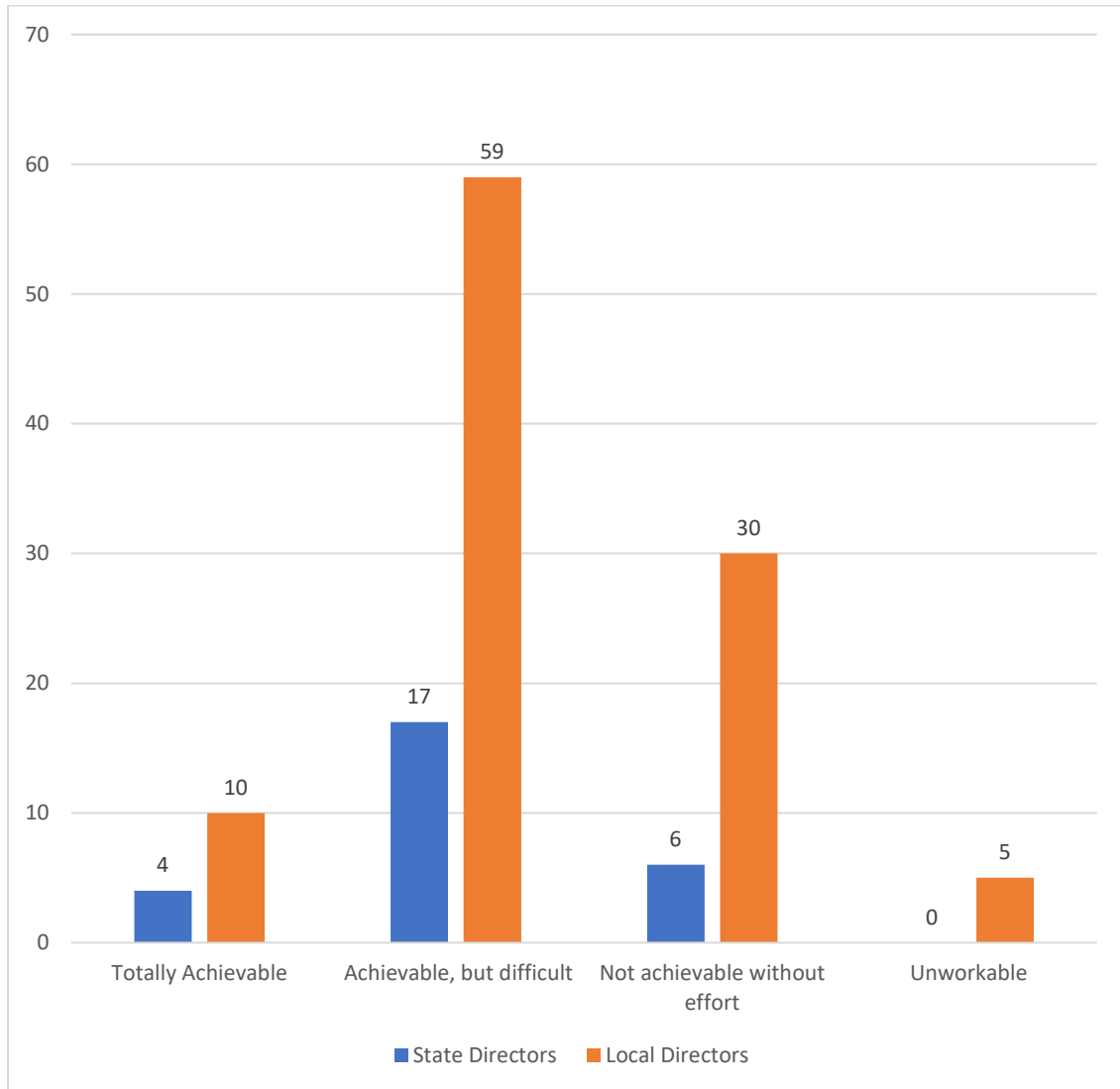
Q16, Q21: 2012 - USDA issues Final Rule (HHFKA), 6 cents reimbursement (offer v. serve), milk 1% unflavored or fat free flavored/non-flavored, color reqs for veggies, maximum starchy veggies, 2 oz req meat/ substitute, juice restriction, and sodium max targets, <10% sat. fat total cal, age groups change/ restrictions, 3-year review/ 1-week menu nutrient analysis. What is the impact on your job during this time frame?

Figure 4.10. 2013 Job Ability Self-Assessment



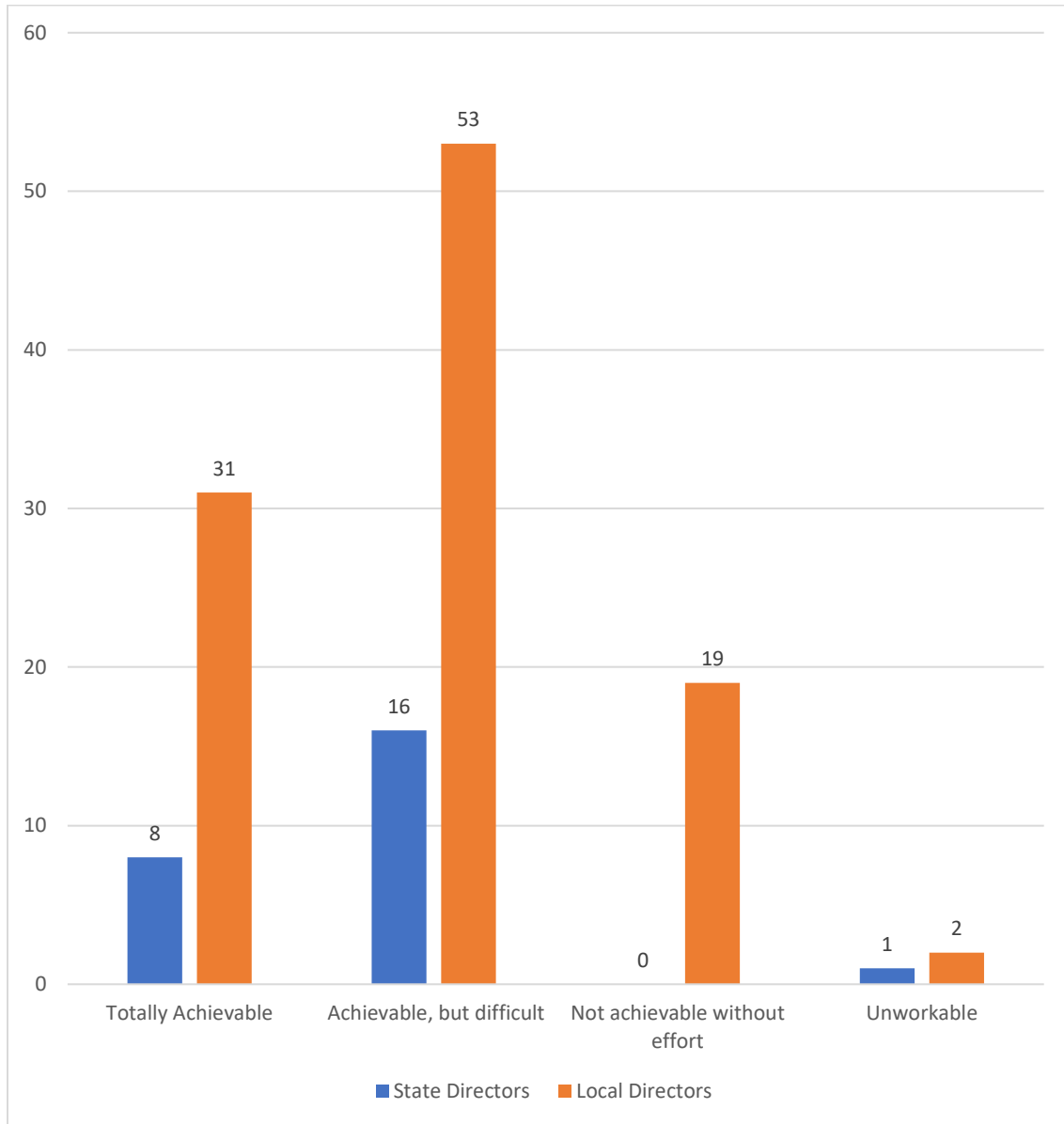
Q17, Q22: 2013 - (2013- 14 SY Memo) - FNS flexibilities: schools compliant if meet mins in grains and meat/ meat alternate (regardless of exceeding maximums) for additional 6 cents reimbursement, requirement for all grains to be whole grain by 2014. What is the impact on your job during this time frame?

Figure 4.11. 2014 Job Ability Self-Assessment



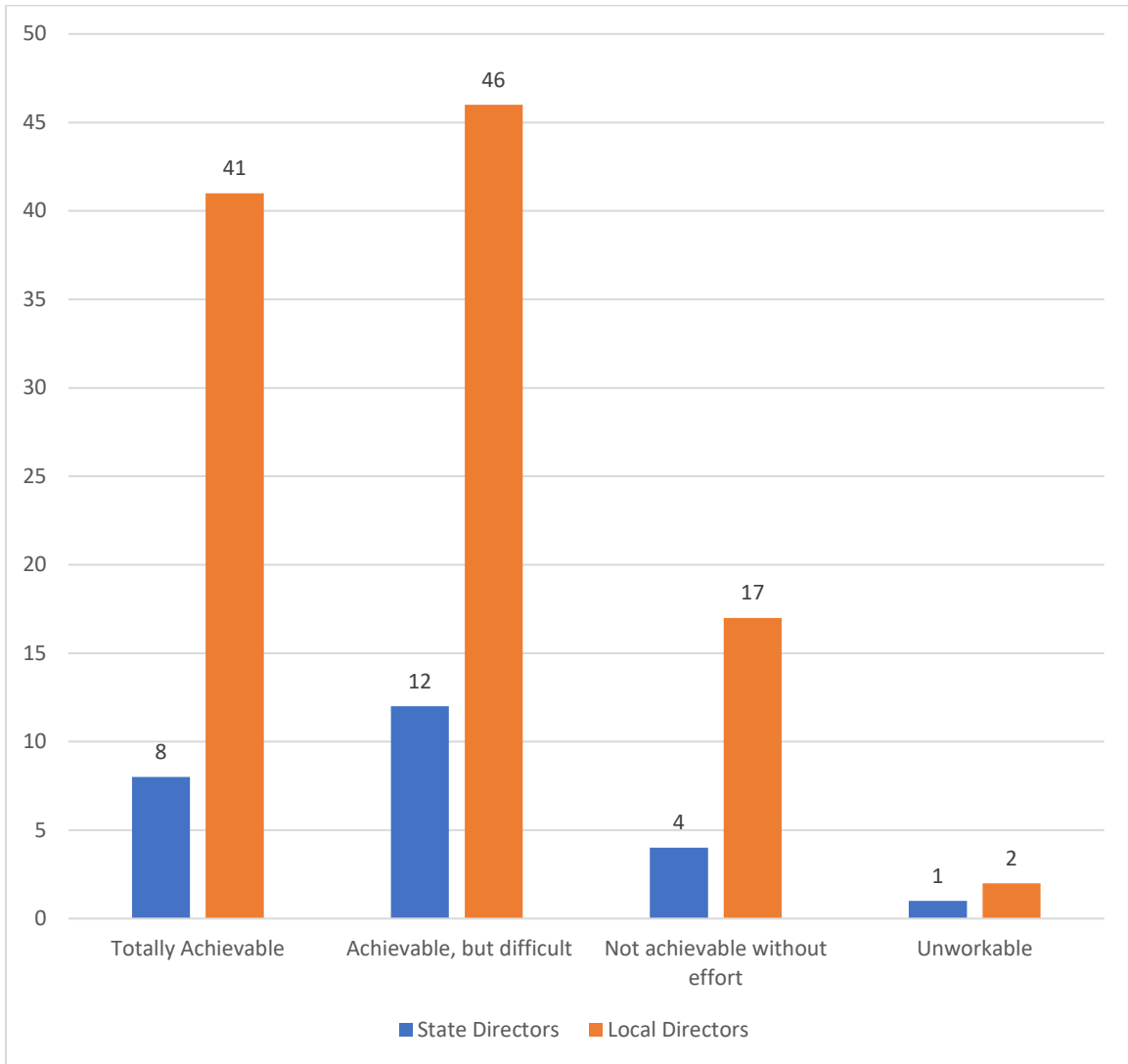
Q18, Q23: 2014 - USDA issues Interim Rule on Smart Snacks, institutes requirement for all grains to be 100% whole grains, minimum professional standards for school nutrition directors, increased annual training, and school wellness policy programs and reporting. What is the impact on your job during this time frame?

Figure 4.12. 2016 Job Ability Self-Assessment



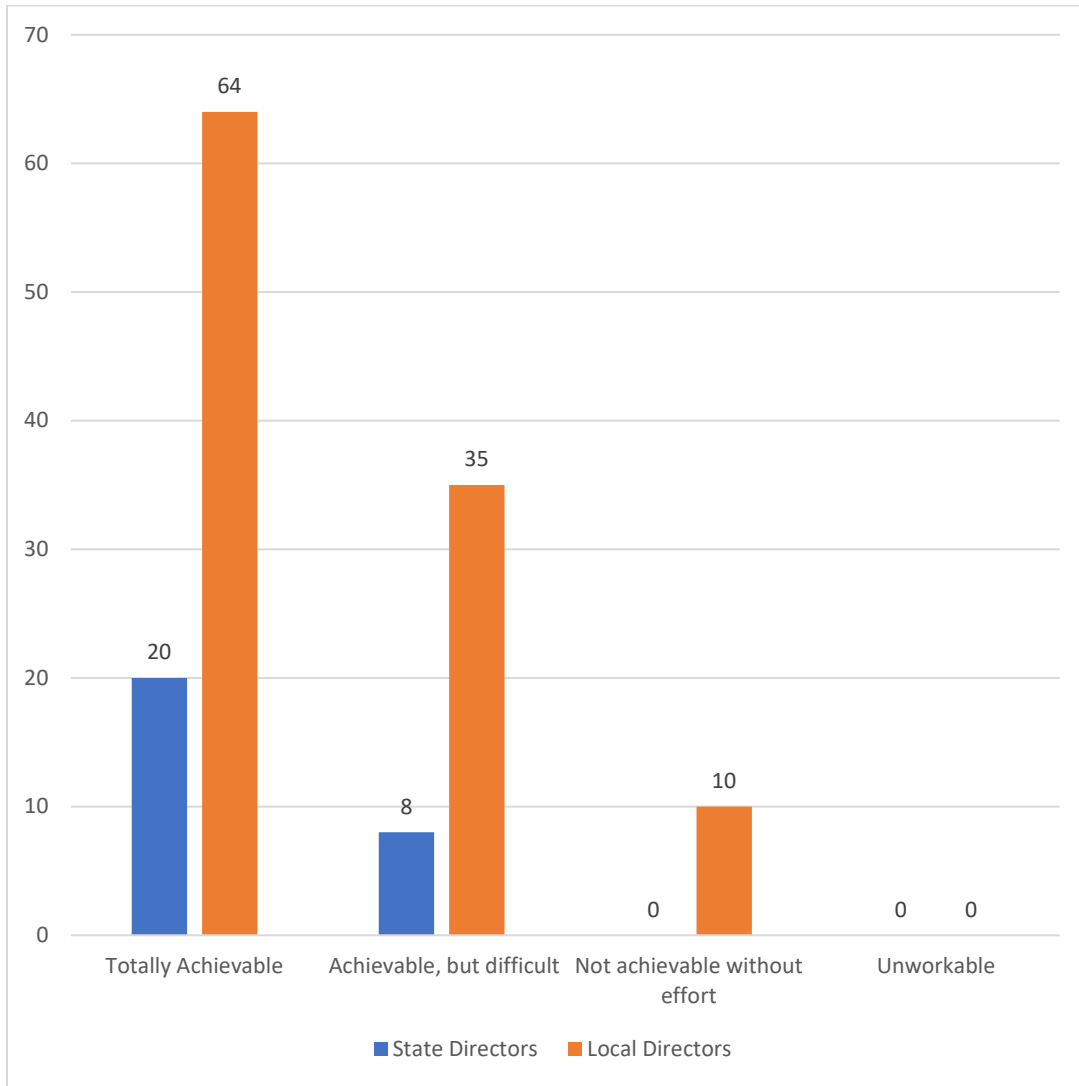
Q19, Q24: 2016 - Congress issues the Improving Child Nutrition Integrity and Access Reauthorization Act of 2016 (issues new guidance on grains - 80% whole grains), sodium (delaying target for two years), review milk allowances, (set up working groups on al a carte); removed "competitive foods" (fundraisers) and al a carte from standards. What was the impact on your job during this time frame?

Figure 4.13. 2017 Job Ability Self-Assessment



Q20, Q25: 2017 - Tom Vilsack departs USDA (Sonny Purdue appointed), Congress passes the Tracking the Next Child Nutrition Reauthorization Act (Trial 3 state block grants). School reviews go to 3 years, "competitive" foods exemption - fund raisers, a la carte standard waived), school Meal Flexibilities guidelines issued SY 2017-2018, exemptions for ½ grain requirements, sodium target 1, milk 1% (flavored allowed). What is the impact on your job during this time frame?

Figure 4.14. 2018 Job Ability Self-Assessment



Q21, Q26: 2018 - USDA issues Final Rule Flexibilities (flavored of low-fat milk, 1/2 of grains whole grains, more time for sodium reduction levels. What was the impact of the guidelines/regulations on you job during this time frame?

Figure 4.15 Network Mapping, Childhood Nutrition Network

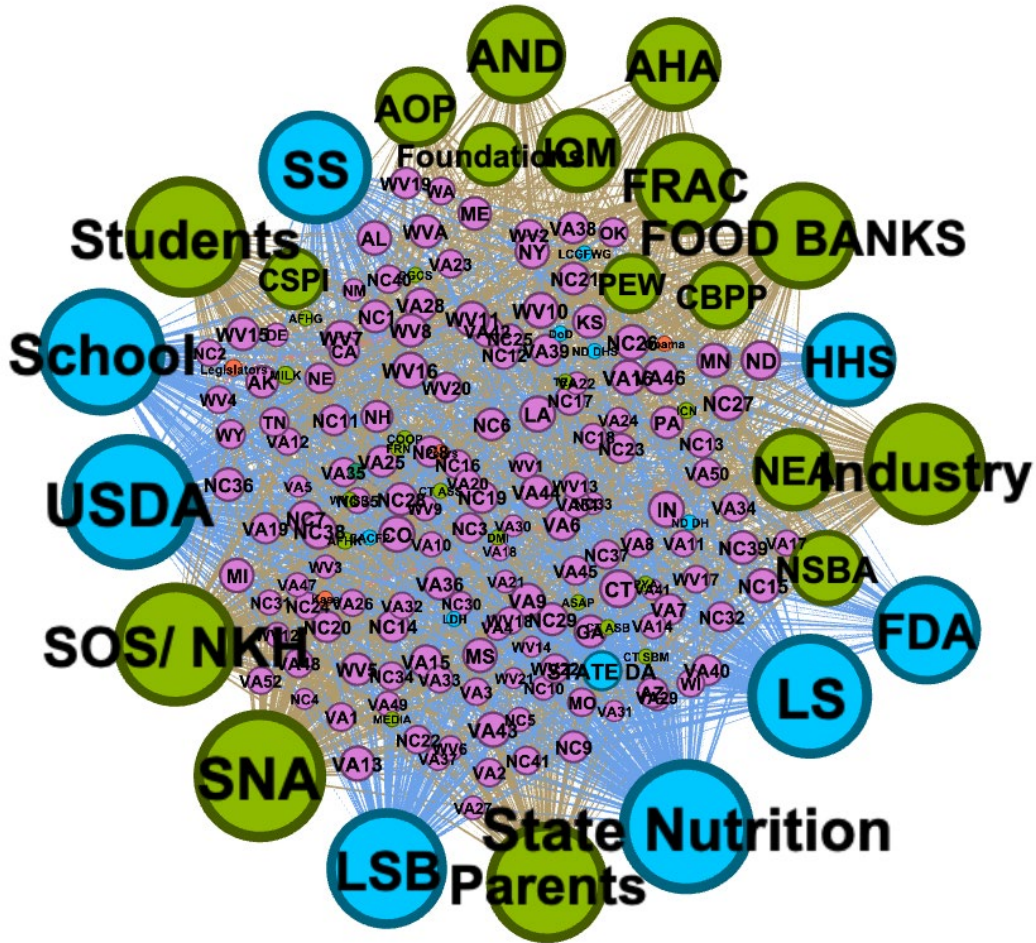


Figure 5.1. Combined Overall Trends in Director Opinions of Job Achievability

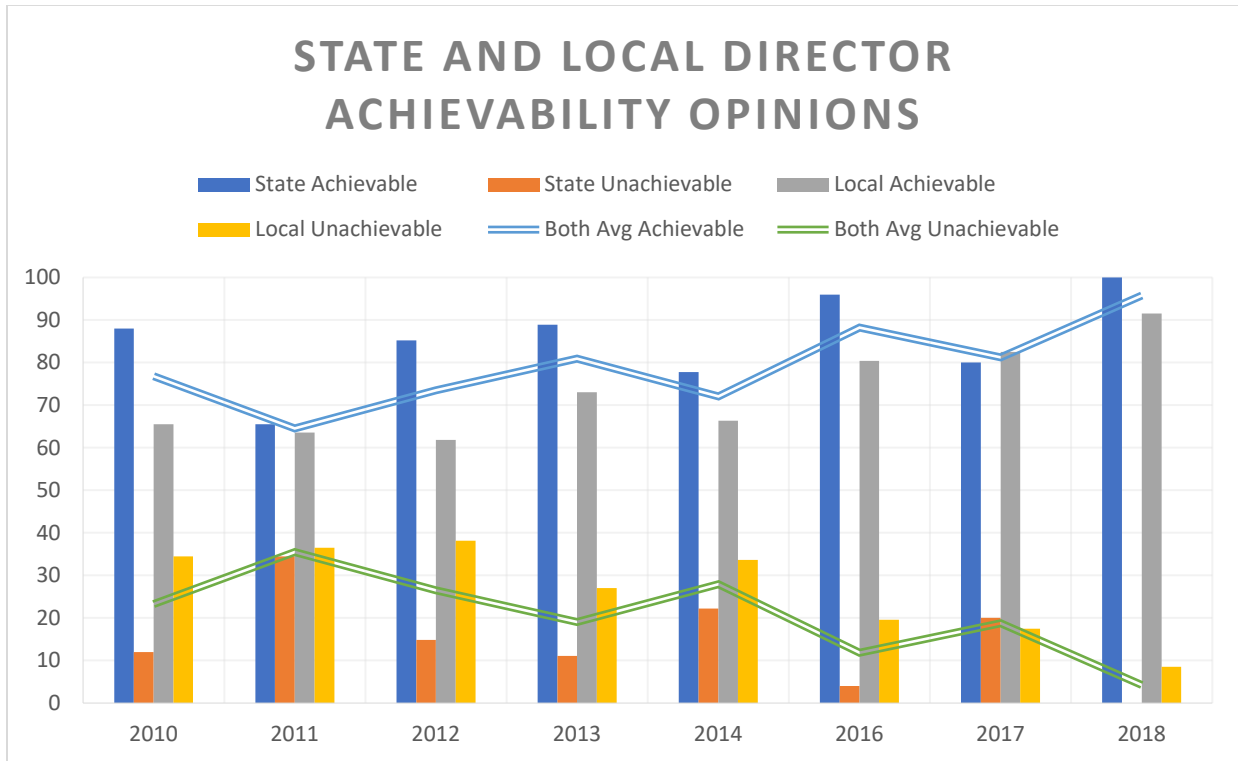


Figure 5.2 Letter from Past SNA Presidents to Congress

School Nutrition Association
Past Presidents Initiative

May 27, 2014

The Honorable (Senate and House Members of Committees on Agriculture Appropriations)

Dear Agriculture Appropriations Conference Committee:

Thank you for passing the Healthy Hunger Free Kids Act of 2010 that is helping school nutrition programs be part of a strong response to the nation's obesity epidemic. Most schools are having success implementing the HHFKA. However some schools report difficulty meeting the requirements and are requesting waivers.

We the undersigned past presidents of the School Nutrition Association, understand that major change takes time and a commitment to the goal that prompted the change. We believe most communities and schools want school nutrition programs that help children learn to enjoy healthy foods. We are confident that the broad public support for HHFKA and USDA's demonstrated willingness to work with school leaders to solve implementation issues will prevail and create stronger school nutrition programs.

We urge you to reject calls for waivers, maintain strong standards in all schools, and direct USDA to continue working with school leaders and state directors to find ways, including technical assistance, that will ensure all schools can meet the HHFKA standards. Specific concerns regarding whole grains and sodium can be addressed as technical corrections.

We must not reverse the progress that was sought by school leaders and is well on its way to success in most schools. Should you need additional information please contact Jane Wynn at 954-545-4873(h) or 954-830-0777(c) or Shirley Watkins at 301-520-8558 (c).

Sincerely,

Shirley Watkins, former USDA Under Secretary FNCS

Katie Wilson, PhD, Executive Director National Food Service Management Institute Josephine Martin, PhD, former Executive Director National Food Service Management Institute

Dorothy Caldwell, former USDA Deputy Administrator of FNS

Mary Nix former Cobb County, GA School Nutrition Director

Jane Wynn, former Broward County, FL School Nutrition Director
Anne Gennings, former New Hartford, NY School Nutrition Director
Mary Hill, Director of School Nutrition, Jackson, MS
Dora Rivas, Executive Director Food & Child Nutrition Services Dallas ISD, TX
Helen Phillips, Senior Director School Nutrition Norfolk, VA
Elizabeth McPherson, Former Food Service Director Caswell, NC
Phyllis Griffith, Former Child Nutrition Services Director Columbus, OH
Nancy Rice, State Director GA Child Nutrition Programs
Gene White, President Global Child Nutrition Foundation School Nutrition Association
Past Presidents Initiative
Marcia Smith, PhD, former Food Service Director, Polk County, FL
Gaye Lynn MacDonald, Consultant & Former Food Service Director Bellingham, WA
Penny McConnell, Director of Food Service Fairfax County, VA
Beverly Lowe, Consultant, Former Food Service Director Hampton, VA
Thelma Becker, Retired Former Food Service Director PA

Cc: Honorable Agriculture Secretary Tom Vilsack
Honorable FNCS Under Secretary Kevin Concannon
Dr. Janey Thornton, USDA FNCS Deputy Under Secretary

Table 3.1 Demographic Data Template, Presidential Votes

Election Year	NC	VA	WV
2016	xTrump 2,362,631 (49.83%)	Trump 1,769,473 (44.43%)	xTrump 489,371 (67.85%)
	Clinton 2,189,316 (46.17%)	xClinton 1,981,473 (49.75%)	Clinton 188,794 (26.18%)
2012	xRomney 2,270,395 (50.39%)	Romney 1,822,522 (47.28%)	xRomney 417,655 (62.14%)
	Obama 2,178,391 (48.35%)	xObama 1,971,820 (51.16%)	Obama 238,269 (35.45%)
2008	McCain 2,128,474 (49.38%)	McCain 1,725,005 (46.33%)	xMcCain 397,466 (55.58%)
	xObama 2,142,651 (49.70%)	xObama 1,959,532 (52.63%)	Obama 303,857 (42.49%)

Source: [Source: http://www.electproject.org/](http://www.electproject.org/)

Table 3.2 Demographic Data Template, State Politics

Category	NC	VA	WV
Party of most recent governor (R)	2012 R 2016 D	2014 D 2018 D	2012 R 2016 R (Elected D)
Legislative Control (R)	1999-2010 D 2011-2016 R	2008-2011 Split 2012-2013 R 2014 Split 2015-2016 R	2000-2014 D 2014-2018 R,

Sources: https://ballotpedia.org/Party_control_of_Virginia_state_government,
http://www.wvlegislature.gov/Educational/Publications/Manual_PDF/Political_Composition.pdf

Table 3.3 Demographic Data Template, November General Election Turnout 2008-2016

Turnout by year	NC	VA	WV
2008	66.1%	67.6%	51.2%
2010	39.8%	39.1%	37.2%
2012	64.8%	66.1%	46.3%
2014	40.8%	36.6%	31.2%
2016	65.2%	66.1%	50.1%

Source: <http://www.electproject.org/>

Table 3.4 Demographic Data Template, Wealth and Education Level

Measures	NC	VA	WV
Median income	\$50,584 (40)	\$68,114 (9)	\$43,385 (50)
Income inequality	.464 (36)	.459 (31)	.451 (24)
Poverty Level	Poverty Rate 15.4% Worst to Best (14)	Poverty Rate 11.0% Worst to Best (41)	Poverty Rate 17.9% Worst to Best (6)
National School Lunch Program (School Year 2016-2017)	Average Daily Student Participation 859,850 Free and Reduced-Price Students 682,885 Paid Students 176,965 Number of Schools Participating 2,560 Federal Funding for School Lunch \$380,905,872	Average Daily Student Participation 689,367 Free and Reduced-Price Students 437,401 Paid Students 251,966 Number of Schools Participating 1,964 Federal Funding for School Lunch \$242,035,269	Average Daily Student Participation 189,447 Free and Reduced-Price Students 138,828 Paid Students 50,619 Number of Schools Participating 738 Federal Funding for School Lunch \$76,434,001
% reduced and free lunch	79.4%	63.4%	73.3%
Education level	HS 85.8% (36) Bach 28.4% (25) Adv Deg 9.9% (28)	88.3% (29) 36.3% (6) 15.4% (4)	85% (42) 19.2% (50) 7.4% (50)

Source: 2015 U.S. Census, Food and Research Council (FRAC, 2017)

Table 4.1 Analysis of Network Centralization, All Levels

ID	Degree	Closeness	Betweenness	Authority
USDA	141	0.777	1229.382	0.233
State School /Child Nutrition Dept	140	0.771	1200.076	0.232
SNA	137	0.753	1129.297	0.228
School Admin/ Principals/Teachers	131	0.709	984.635	0.221
Local Superintendent	128	0.679	921.576	0.215
SOS/ NKH	127	0.689	909.901	0.216
Food and Bev Assoc	125	0.679	880.700	0.213
Parents	124	0.684	872.659	0.213
Students	124	0.684	872.659	0.213
Local School Board	123	0.657	831.020	0.208

Table 4.2 Analysis of Network Centralization, State Level

ID	Degree	Closeness	Betweenness	Authority
ND	30	0.626	266.143	0.159
CT	28	0.602	205.460	0.153
AZ	20	0.521	73.047	0.121
WY	18	0.504	70.239	0.110
SNA	28	0.646	50.489	0.165
Anti-Hunger Orgs/ Food Banks	28	0.646	50.486	0.165
USDA	28	0.646	50.489	0.165
State School /Child Nutrition Dept	27	0.633	44.909	0.162
SOS/ NKH	26	0.620	41.807	0.157
FRAC	25	0.608	41.652	0.148

Table 4.3 Analysis of Network Centralization, Local Level

ID	Degree	Closeness	Betweenness	Authority
State School /Child Nutrition Dept	113	0.768	0.059	0.233
USDA	113	0.768	0.059	0.233
SNA	109	0.740	0.053	0.227
School Admin/ Principals/Teachers	109	0.740	0.052	0.228
Local Superintendent	105	0.694	0.048	0.218
Local School Board	103	0.682	0.044	0.216
Parents	102	0.694	0.044	0.219
Students	102	0.694	0.044	0.219
SOS/ NKH	101	0.677	0.043	0.215
Food and Bev Assoc	100	0.671	0.042	0.212

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Appendix 1–Instrument Measurements
 Survey Questions for Local School Nutrition Directors in North Carolina, Virginia, and West
 Virginia and State Directors

#	Concept Measured	Question
1	Identification	Q1 What state are you from? <input type="radio"/> North Carolina <input type="radio"/> Virginia <input type="radio"/> West Virginia
2	Identification	Q2 How long have you been in your current job? (years) 1 2 3 4 5 6 7 8 9 or more <input type="radio"/> <input type="radio"/> <input type="radio"/> <input type="radio"/> <input type="radio"/> <input type="radio"/> <input type="radio"/> <input type="radio"/> <input type="radio"/>
3	Identification	Q3 How long have you worked in school nutrition? (years) 1 2 3 4 5 6 7 8 9 or more <input type="radio"/> <input type="radio"/> <input type="radio"/> <input type="radio"/> <input type="radio"/> <input type="radio"/> <input type="radio"/> <input type="radio"/> <input type="radio"/>
4	Identification	Q4 Do you consider your district to be urban or rural? <input type="radio"/> City <input type="radio"/> Suburb <input type="radio"/> Town <input type="radio"/> Rural
5	Identification	Q5 Self Identification: What size is your district? <input type="radio"/> Large <input type="radio"/> Midsize <input type="radio"/> Small
6	Identification	Q6 How many schools are in your district, and how many students? (Estimate) Number of Schools _____ Number of Students _____
7	Relationship	Q7 What non-governmental organizations have had an effect on you and your ability to do your job, either helpful or detrimental? (chart follows)
8	Relationship	Q8 If you answered "other" in question 7, what other organizations have had an effect, and how?

- 9 Relationship Q9 What governmental organizations have an effect on you? (chart follows)
- 10 Relationship Q10 If you answered "other" in question 5, what other organizations have had an effect, and how?
- 11 Relationship Q11 What 3 organizations most advocates for you, either governmental or non-governmental?
- 12 Values Q12 Choose the most applicable statement in regard to your job:
- o Profitability of the program is the most important
 - o Nutrition is important, but not at the expense of profitability
 - o Compromise is necessary to achieve a balance between profitability and nutrition
 - o Profitability is important, but not at the expense of nutrition
 - o Nutrition is the most important concern
- 13 Relationship Q13 Think of the colleagues you consult with most often or your “go to” colleagues when you have a problem with the school nutrition program. How would you best describe them and their impact on your decision-making process? (chart follows)
- 14 Values Q14 Have you ever had to choose between optimal nutrition and profitability?
- o Definitely yes
 - o Probably yes
 - o Might or might not
 - o Probably not
 - o Definitely not
- 15 Values Q15 If you answered "Yes," can you provide an example?
- 16 Values Q16 Have Smart Snack requirements impacted the profitability of your program?
- o Yes
 - o No
 - o I don't know
- 17 Values Q17 If you answered "yes" to the last question (16), can you provide an example?

- 18 (explanation) Q18 The following seven questions will ask you to recall difficulties encountered in doing your job during the year 2010 through the present with regard to changes around USDA child nutrition guidelines. The questions will begin with a baseline in 2010 followed by each year (accompanied by highlights of the USDA guidelines on school nutrition to aid your memory). If you were not in a director position for the year listed, answer "Not applicable".
- 19 Values Q19 2010 - White House Task Force on Childhood Obesity Established, Healthy, Hunger-Free Kids Act signed
- What is the impact of the guidelines /regulations on your job during this time frame?
- o Totally achievable
 - o Achievable, but difficult
 - o Not applicable
 - o Not achievable without effort
 - o Unworkable
- 20 Values Q20 2011 - USDA issues Interim Rule (HHFKA) to include: USDA issues Salad Bar to Schools, vegetable subgroups minimum (color) and limited starches, ½ whole grain requirement, fat free milk (flavored and un-flavored), Specific calorie ranges, single food-based menu planning, fruit & veggie minimum requirement for reimbursement, for 3-year review of programs
- What is the impact of the guidelines /regulations on your job during this time frame?
- o Totally achievable
 - o Achievable, but difficult
 - o Not applicable
 - o Not achievable without effort
 - o Unworkable
- 21 Values Q21 2012 - USDA issues Final Rule (HHFKA), 6 cents reimbursement (offer v. serve), milk 1% unflavored or fat free flavored/non-flavored, color reqs for veggies, maximum starchy veggies, 2oz req meat/ substitute, juice restriction,

sodium max targets, <10% Sat. fat total cal, age groups change/ restrictions, 3 Year review/ 1-week menu nutrient analysis

What is the impact of the guidelines /regulations on your job during this time frame?

- o Totally achievable
- o Achievable, but difficult
- o Not applicable
- o Not achievable without effort
- o Extremely Difficult

22 Values

Q22 2013-- (2013-14 SY Memo) – FNS flexibilities: schools compliant if meet mins in grains and meat/ meat alternate (regardless of exceeding maximums) for additional 6 cent reimbursement, requirement for all grains to be whole grain by 2014

What is the impact of the guidelines /regulations on your job during this time frame?

- o Totally achievable
- o Achievable, but difficult
- o Not applicable
- o Not achievable without effort
- o Unworkable

23 Values

Q23 2014 - USDA issues interim rule on Smart Snacks, instituted requirement for all grains to be 100% whole grains, minimum professional standards for school nutrition directors, increased annual training, school wellness policy programs and reporting

What is the impact of the guidelines /regulations on your job during this time frame?

- o Totally achievable
- o Achievable, but difficult
- o Not applicable
- o Not achievable without effort
- o Unworkable

- 24 Values Q24 2016 - Congress issues the Improving Child Nutrition Integrity and Access; Reauthorization Act of 2016 (Issues new guidance on grains- 80% whole grains), sodium (delaying target II for two years), review milk allowances, (set up working groups on a la carte); removed "competitive foods" (fundraisers) and al a carte from standards

What is the impact of the guidelines /regulations on your job during this time frame?

- o Totally achievable
- o Achievable, but difficult
- o Not applicable
- o Not achievable without effort
- o Unworkable

- 25 Values Q25 2017-- Tom Vilsack departs USDA (Sonny Perdue appointed), Congress passes The Tracking the Next Child Nutrition Reauthorization Act (Trial 3 state Block Grants).

School reviews go to 3 years, “competitive” foods exemption – fund raisers, al a carte standard waived), school Meal Flexibilities guidelines issued SY 2017-2018, exemptions for ½ grain requirements, sodium target 1, milk 1% (flavored allowed)

What is the impact of the guidelines /regulations on your job during this time frame?

- o Totally achievable
- o Achievable, but difficult
- o Not applicable
- o Not achievable without effort
- o Unworkable

- 26 Values Q26 2018-- USDA Issues Final Rule Flexibilities (Flavored Low Fat Milk, ½ of grains whole grains, more time for sodium reduction levels

What is the impact of the guidelines /regulations on your job during this time frame?

- o Totally achievable
 - o Achievable, but difficult
 - o Not applicable
 - o Not achievable without effort
 - o Unworkable
- 27 Relationship Q27 Who would you consider your primary information source concerning national school nutrition program requirements and reimbursement? (Choose one)
- o Federal level (government)
 - o State level (government)
 - o Local level (government)
 - o Outside government and private organizations
 - o Other _____
- 28 Relationship Q28 Who would you consider your primary information source concerning subjects such as best practices or model programs? (Choose one)
- o Federal level (government)
 - o State level (government)
 - o Local level (government)
 - o Outside government and private organizations
 - o Other _____
- 29 Values Q29 Choose the most applicable statement that applies today:
- o My job has gotten easier to accomplish
 - o My job has stayed the same in regard to difficulty
 - o My job has gotten more difficult to accomplish
- 30 Values Q30 To what do you credit this change?
- 31 Values Q31 Would you welcome block grants for school nutrition?
- o Yes
 - o Maybe
 - o No
 - o I'm not sure what block grants entail

32 Values Q32 In regard to the last question concerning block grants, why or why not?

33 Relationship Q33 Where have you received your information regarding block grants?

End of Block: Default Question Block

Appendix 2 – Instrument
Survey Questions for Local School Nutrition Directors in North Carolina, Virginia, and West
Virginia

School Nutrition (Local- NC, VA, WV)

Department of Political Sciences
7080 Haley Center
Auburn University, AL 36849
Phone: (703)895-5140
Email: dtb0012@tigermail.auburn.edu

(Note: This document has been approved by an Auburn University Internal Review Board (IRB)
and complies with stated University guidelines)

INFORMED CONSENT

For a research study entitled “The Role of Information Networks in the Federal System: School
Nutrition and the Healthy, Hunger-Free Kid Act of 2010”

You are invited to participate in a research study that explores the policies in school nutrition.
The focus of this study is not only to gain a better understanding of the federal system, but also
to analyze the issues and complexities facing the implementation of the school nutrition program.
This study is being conducted by David Beans, a PhD student at Auburn University under the
direction of Dr. Kathleen Hale, Professor in the Auburn University Department of Political
Science. You were selected as a possible participant for your position in school nutrition or as
someone who works closely with the process and are age 19 or older.

What will be involved if you participate? If you decide to participate in this research study, you
will be asked to answer a series of questions about who you work with, how you work with
them, and the policies of school nutrition. Your total time commitment will be approximately 15
minutes.

Are there any costs, risks, or discomforts? The risk associated with participating in this study is
that personal or sensitive information may be shared during the interview process. To minimize
these risks, I will keep all interviews strictly confidential and no personal identifiers of you or the
people you work with will be included in the dissertation, presentations, publications, or shared
with others. Your information may be identifiable, however, by the generic office, organization,
or agency you work with (i.e., “a local nutrition consultant.”).

Are there any benefits (to include compensation) to yourself or others? If you participate in this study, you can expect to be part of a meaningful study about school nutrition policy. I cannot promise you any further benefits or compensation.

Your participation is completely voluntary. If you change your mind about participating, you can withdraw at any time during the study. If you choose to withdraw, your data can be withdrawn as long as it is identifiable. Your decision about whether or not to participate or stop participating will not influence any relations with Auburn University or the Department of Political Science. Your privacy will be protected. Any information obtained with this study will remain confidential. Information obtained through your participation will be included in the researcher's dissertation, presentations, and future publications.

David Beans can be reached at dtb0012@tigermail.auburn.edu. The faculty advisor for this study is Dr. Kathleen Hale at halekat@auburn.edu.

A copy of this document is available for you to keep.

- I consent, begin the study
- I do not consent, I do not wish to participate

Q1 What state are you from? (This will not be disclosed, it is for classification purposes only)

- North Carolina
- Virginia
- West Virginia

Q2 How long have you been in your current job?

- | | | | | | | | | |
|-----------------------|-----------------------|-----------------------|-----------------------|-----------------------|-----------------------|-----------------------|-----------------------|-----------------------|
| 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 or more |
| <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |

Q3 How long have you worked in school nutrition?

- | | | | | | | | | |
|-----------------------|-----------------------|-----------------------|-----------------------|-----------------------|-----------------------|-----------------------|-----------------------|-----------------------|
| 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 or more |
| <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |

Q4 Do you consider your district to be urban or rural?

- Urban
- Rural

Q5 Self Identification: What size is your district?

- Small
- Medium
- Large
- Extra Large

Q6 How many schools are in your district, and how many students? (Estimate)

- Number of Schools _____
- Number of Students _____

Q7 What non-governmental organizations have had an effect on you and your ability to do your job, either helpful or detrimental?

	Information (a source of information only)	Supporter (provides information and material support)	Champion (not only supports, but actively advocates on your behalf)	Challenger (whose actions diminish your position)	No Impact
School Nutrition Association (SNA)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
National School Boards Association	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Food Research and Action Center (FRAC)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The Center on Budget and Policy Priorities	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Anti-hunger organizations/food banks	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Share Our Strength/ No Kid Hungry	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Center for Science in the Public Interest (CSPI)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Institute of Medicine	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Academy of Pediatrics	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Academy of Nutrition & Dietetics	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Pew Charitable Trust/Robert Wood Johnson	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Foundations-research foundations	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Parents	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Students	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
American Heart Association	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
National Education Association	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Food and Beverage Industry	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Q8 If you answered "other" in question 3, what other organizations have had an effect, and how?

Q9 What governmental organizations have an effect on you?

	Information (a source of information only)	Supporter (provides information and material support)	Champion (not only supports, but actively advocates on your behalf)	Challenger (whose actions diminish your position)	No Impact
United States Department of Agriculture (USDA)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Health and Human Services (HHS)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Food and Drug Administration (FDA)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
State Superintendent	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
State School/Child Nutrition Department	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Local Superintendent	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Local School Board	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
School Level Admin (to include					

Principal and teachers)

Other

Q10 If you answered "other" in question 5, what other organizations have had an effect, and how?

Q11 What 3 organizations most advocates for you, either governmental or non-governmental?

Q12 Choose the most applicable statement:

- Profitability of the program is the most important
- Nutrition is important, but not at the expense of profitability
- Compromise is necessary to achieve a balance between profitability and nutrition
- Profitability is important, but not at the expense of nutrition
- Nutrition is the most important concern

Q13 Think of the colleagues you consult with most often or your "go to" colleagues when you have a problem with the school nutrition program. How would you best describe them and their impact on your decision-making process?

Significant (I will adjust my programs after consultation or model after)	Little (I use their information as a reference only)	None (I do not consult)
--	--	-------------------------------

Location

(proximity;
adjacent districts
or within region)

Acquaintance
(Is not in an
adjacent district or
within region , but I
have contact)

Physical Similarity
(their size is like
mine, i.e. number of
students, number of
schools,
urban/rural, etc.)

Q14 Have you ever had to choose between optimal nutrition and profitability?

- Definitely yes
- Probably yes
- Might or might not
- Probably not
- Definitely not

Q15 If you answered "Yes," can you provide an example?

Q16 Have Smart Snack requirements impacted the profitability of your program?

- Yes
- No
- I don't know

Q17 If you answered "yes" to the last question (16), can you provide an example?

Q18 The following seven questions will ask you to recall difficulties encountered in doing your job during the year 2010 through the present with regard to changes around USDA child nutrition guidelines. The questions will begin with a baseline in 2010 followed by each year (accompanied by highlights of the USDA guidelines on school nutrition). If you were not in a director position for the year listed, answer "Not applicable".

Q19 2010 - White House Task Force on Childhood Obesity Established, Healthy, Hunger-Free Kids Act signed

What is the impact of the guidelines /regulations on your job during this time frame?

- Totally achievable
- Achievable, but difficult
- Not applicable
- Not achievable without effort
- Unworkable

Q20 2011 - USDA issues Interim Rule (HHFKA) to include: USDA issues salad bar rules, vegetable subgroups minimum (color) and limited starches, ½ whole grain requirement, fat free milk (flavored and un-flavored), Specific calorie ranges, single food-based menu planning, fruit & veggie minimum requirement for reimbursement, for 3-year review of programs

What is the impact of the guidelines /regulations on your job during this time frame?

- Totally achievable
- Achievable, but difficult

- o Not applicable
- o Not achievable without effort
- o Unworkable

Q21 2012 - USDA issues Final Rule (HHFKA), 6 cents reimbursement (offer v. serve), milk 1% unflavored or fat free flavored/non-flavored, color reqs for veggies, maximum starchy veggies, 2oz req meat/ substitute, juice restriction, sodium max targets, <10% Sat. fat total cal, age groups change/ restrictions, 3 Year review/ 1-week menu nutrient analysis

What is the impact of the guidelines /regulations on your job during this time frame?

- o Totally achievable
- o Achievable, but difficult
- o Not applicable
- o Not achievable without effort
- o Extremely Difficult

Q22 2013-- (2013-14 SY Memo) – FNS flexibilities: schools compliant if meet mins in grains and meat/ meat alternate (regardless of exceeding maximums) for 6 cent reimbursement, requirement for all grains to be whole grain by 2014

What is the impact of the guidelines /regulations on your job during this time frame?

- o Totally achievable
- o Achievable, but difficult
- o Not applicable
- o Not achievable without effort
- o Unworkable

Q23 2014 - USDA issues interim rule on Smart Snacks, instituted requirement for all grains to be 100% whole grains, minimum professional standards for school nutrition directors, increased annual training, school wellness policy programs and reporting

What is the impact of the guidelines /regulations on your job during this time frame?

- o Totally achievable
- o Achievable, but difficult
- o Not applicable

- o Not achievable without effort
- o Unworkable

Q24 2016 - Congress issues the Improving Child Nutrition Integrity and Access; Reauthorization Act of 2016 (Issues new guidance on grains- 80% whole grains), sodium (delaying target II for two years), review milk allowances, (set up working groups on a la carte); removed "competitive foods" (fundraisers) and al a carte from standards

What is the impact of the guidelines /regulations on your job during this time frame?

- o Totally achievable
- o Achievable, but difficult
- o Not applicable
- o Not achievable without effort
- o Unworkable

Q25 2017-- Tom Vilsack departs USDA (Sonny Purdue appointed), Congress passes The Tracking the Next Child Nutrition Reauthorization Act (Trial 3 state Block Grants).

School reviews go to 3 years, "competitive" foods exemption – fund raisers, al a carte standard waived), school Meal Flexibilities guidelines issued SY 2017-2018, exemptions for ½ grain requirements, sodium target 1, milk 1% (flavored allowed)

What is the impact of the guidelines /regulations on your job during this time frame?

- o Totally achievable
- o Achievable, but difficult
- o Not applicable
- o Not achievable without effort
- o Unworkable

Q26 2018-- USDA Issues Final Rule Flexibilities (Flavored Low Fat Milk, ½ of grains whole grains, more time for sodium reduction levels

What is the impact of the guidelines /regulations on your job during this time frame?

- o Totally achievable
- o Achievable, but difficult

- Not applicable
- Not achievable without effort
- Unworkable

Q27 Who would you consider your primary information source concerning national school nutrition program requirements and reimbursement? (Choose one)

- Federal level (government)
- State level (government)
- Local level (government)
- Outside government and private organizations
- Other _____

Q28 Who would you consider your primary information source concerning subjects such as best practices or model programs? (Choose one)

- Federal level (government)
- State level (government)
- Local level (government)
- Outside government and private organizations
- Other _____

Q29 Choose the most applicable statement that applies today:

- My job has gotten easier to accomplish
- My job has stayed the same in regard to difficulty
- My job has gotten more difficult to accomplish

Q30 To what do you credit this change?

Q31 Would you welcome block grants?

- Yes
- Maybe
- No

- o I'm not sure what block grants entail

Q32 In regard to the last question concerning block grants, why or why not?

Q33 Where have you received your information regarding block grants?

End of Block: Default Question Block

Appendix 3 – Instrument
Survey Questions for State School Nutrition Directors

School Nutrition (State Directors)

Department of Political Sciences
7080 Haley Center
Auburn University, AL 36849
Phone: (703)895-5140
Email: dtb0012@tigermail.auburn.edu

(Note: This document has been approved by an Auburn University Internal Review Board (IRB) and complies with stated University guidelines)

INFORMED CONSENT

For a research study entitled “The Role of Information Networks in the Federal System: School Nutrition and the Healthy, Hunger-Free Kid Act of 2010”

You are invited to participate in a research study that explores the policies in school nutrition. The focus of this study is not only to gain a better understanding of the federal system, but also to analyze the issues and complexities facing the implementation of the school nutrition program. This study is being conducted by David Beans, a PhD student at Auburn University under the direction of Dr. Kathleen Hale, Professor in the Auburn University Department of Political Science. You were selected as a possible participant for your position in school nutrition or as someone who works closely with the process and are age 19 or older.

What will be involved if you participate? If you decide to participate in this research study, you will be asked to answer a series of questions about who you work with, how you work with them, and the policies of school nutrition. Your total time commitment will be approximately 15 minutes.

Are there any costs, risks, or discomforts? The risk associated with participating in this study is that personal or sensitive information may be shared during the interview process. To minimize these risks, I will keep all interviews strictly confidential and no personal identifiers of you or the people you work with will be included in the dissertation, presentations, publications, or shared with others. Your information may be identifiable, however, by the generic office, organization, or agency you work with (i.e., “a local nutrition consultant.”).

Are there any benefits (to include compensation) to yourself or others? If you participate in this study, you can expect to be part of a meaningful study about school nutrition policy. I cannot promise you any further benefits or compensation.

Your participation is completely voluntary. If you change your mind about participating, you can withdraw at any time during the study. If you choose to withdraw, your data can be withdrawn as long as it is identifiable. Your decision about whether or not to participate or stop participating will not influence any relations with Auburn University or the Department of Political Science.

Your privacy will be protected. Any information obtained with this study will remain confidential. Information obtained through your participation will be included in the researcher's dissertation, presentations, and future publications.

David Beans can be reached at dtb0012@tigermail.auburn.edu. The advisor for this study is Dr. Kathleen Hale at halekat@auburn.edu.

A copy of this document is available for you to keep.

- o I consent, begin the study
- o I do not consent, I do not wish to participate

Q1 What state are you from? (This will not be disclosed, it is for classification purposes only)

Q2 How long have you been in your current job?

	1	2	3	4	5	6	7	8	9 or more
Years	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Q3 What non-governmental organizations have had an effect on you and your ability to do your job, either helpful or detrimental?

	Information (a source of information only)	Supporter (provides information and material support)	Champion (not only supports, but actively advocates on your behalf)	Challenger (whose actions diminish your position)	No Impact
School Nutrition Association (SNA)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
National School Boards Association	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Food Research and Action Center (FRAC)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The Center on Budget and Policy Priorities	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Anti-hunger organizations/food banks	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Share Our Strength/ No Kid Hungry	o	o	o	o	o
Center for Science in the Public Interest (CSPI)	o	o	o	o	o
Institute of Medicine	o	o	o	o	o
Academy of Pediatrics	o	o	o	o	o
Academy of Nutrition & Dietetics	o	o	o	o	o
Pew Charitable Trust/Robert Wood Johnson	o	o	o	o	o
Foundations- research foundations	o	o	o	o	o
Parents	o	o	o	o	o
Students	o	o	o	o	o
American Heart Association	o	o	o	o	o
National Education Association	o	o	o	o	o
Food and Beverage					

Industry	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Q4 If you answered "other" in question 3, what other organizations have had an effect, and how?

Q5 What governmental organizations have an effect on you?

	Information	Supporter	Champion	Challenger	No Impact
	(a source of information only)	(provides information and material support)	(not only supports, but actively advocates on your behalf)	(whose actions diminish your position)	
United States Department of Agriculture (USDA)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Health and Human Services (HHS)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Food and Drug Administration (FDA)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
State Superintendent	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
State School/Child Nutrition Dept	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Local Superintendent	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Local School Board	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
School Level Admin (to include Principal and teachers)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Q6 If you answered "other" in question 5, what other organizations have had an effect? How?

Q7 What 3 organizations most advocates for you, either governmental or non-governmental?

Q8 Choose the most applicable statement:

- Profitability of the program is the most important
- Nutrition is important, but not at the expense of profitability
- Compromise is necessary to achieve a balance between profitability and nutrition
- Profitability is important, but not at the expense of nutrition
- Nutrition is the most important concern

Q9 Think of the colleagues you consult with most often or your “go to” colleagues when you have a problem with the school nutrition program. How would you best describe them and their impact on your decision-making process?

Significant (I will adjust my programs after consultation or model after)	Little (I use their information as a reference only)	None (I do not consult)
--	--	-------------------------------

Location
(proximity;
adjacent districts
or within region)

<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
-----------------------	-----------------------	-----------------------

Acquaintance
(Is not in an
adjacent district or
within region , but I
have contact)

<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
-----------------------	-----------------------	-----------------------

Physical Similarity
(their size is like
mine, i.e. number of
students, number of
schools,
urban/rural, etc.)

<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
-----------------------	-----------------------	-----------------------

Q10 Has there ever been an occasion where you have observed a programming choice made between optimal nutrition and profitability?

- Definitely yes
- Probably yes

- o Might or might not
- o Probably not
- o Definitely not

Q11 If you answered "Yes," can you provide an example?

Q12 How would you describe the a la carte program in regards to profitability?

- o Profitable
- o Adds profits, but not crucial
- o Not applicable
- o Not necessary
- o It detracts from my programs

Q13 The following seven questions will ask you to recall difficulties encountered in doing your job during the year 2010 through the present with regard to changes around USDA child nutrition guidelines. The questions will begin with a baseline in 2010 followed by each year (accompanied by highlights of the USDA guidelines on school nutrition). If you were not in your current position for the year listed, answer "Not applicable".

Q14 2010 - White House Task Force on Childhood Obesity Established, Healthy, Hunger-Free Kids Act signed

What is the impact of the guidelines /regulations on your job during this time frame?

- o Totally achievable
- o Achievable, but difficult
- o Not applicable
- o Not achievable without effort
- o Unworkable

Q15 2011 - USDA issues Interim Rule (HHFKA) to include: USDA issues salad bar rules, vegetable subgroups minimum (color) and limited starches, ½ whole grain requirement, fat free milk (flavored and un-flavored), Specific calorie ranges, single food-based menu planning, fruit & veggie minimum requirement for reimbursement, for 3 year review of programs

What is the impact of the guidelines /regulations on your job during this time frame?

- Totally achievable
- Achievable, but difficult
- Not applicable
- Not achievable without effort
- Unworkable

Q16 2012 - USDA issues Final Rule (HHFKA), 6 cents reimbursement (offer v. serve), milk 1% unflavored or fat free flavored/non-flavored, color reqs for veggies, maximum starchy veggies, 2oz req meat/ substitute, juice restriction, sodium max targets, <10% Sat. fat total cal, age groups change/ restrictions, 3 Year review/ 1 week menu nutrient analysis

What is the impact of the guidelines /regulations on your job during this time frame?

- Totally achievable
- Achievable, but difficult
- Not applicable
- Not achievable without effort
- Unworkable

Q17 2013-- (2013-14 SY Memo) – FNS flexibilities: schools compliant if meet mins in grains and meat/ meat alternate (regardless of exceeding maximums) for 6 cent reimbursement, requirement for all grains to be whole grain by 2014.

What is the impact of the guidelines /regulations on your job during this time frame?

- Totally achievable
- Achievable, but difficult
- Not applicable
- Not achievable without effort
- Unworkable

Q18 2014 - USDA issues interim rule on Smart Snacks, instituted requirement for all grains to be 100% whole grains, minimum professional standards for school nutrition directors, increased annual training, school wellness policy programs and reporting

What is the impact of the guidelines /regulations on your job during this time frame?

- Totally achievable
- Achievable, but difficult

- o Not applicable
- o Not achievable without effort
- o Unworkable

Q19 2016 - Congress issues the Improving Child Nutrition Integrity and Access; Reauthorization Act of 2016 (Issues new guidance on grains- 80% whole grains), sodium (delaying target II for two years), review milk allowances, (set up working groups on a la carte); removed "competitive foods" (fundraisers) and al a carte from standards

What is the impact of the guidelines /regulations on your job during this time frame?

- o Totally achievable
- o Achievable, but difficult
- o Not applicable
- o Not achievable without effort
- o Unworkable

Q20 2017-- Tom Vilsack departs USDA (Sonny Purdue appointed), Congress passes The Tracking the Next Child Nutrition Reauthorization Act (Trial 3 state Block Grants).

School reviews go to 3 years, “competitive” foods exemption – fund raisers, al a carte standard waived), school Meal Flexibilities guidelines issued SY 2017-2018, exemptions for ½ grain requirements, sodium target 1, milk 1% (flavored allowed)

What is the impact of the guidelines /regulations on your job during this time frame?

- o Totally achievable
- o Achievable, but difficult
- o Not applicable
- o Not achievable without effort
- o Unworkable

Q21 2018-- USDA Issues Final Rule Flexibilities (Flavored Low Fat Milk, ½ of grains whole grains, more time for sodium reduction levels

What is the impact of the guidelines /regulations on your job during this time frame?

- o Totally achievable
- o Achievable, but difficult
- o Not applicable
- o Not achievable without effort

- Unworkable

Q22 Who would you consider your primary information source concerning national school nutrition program requirements and reimbursement? (Choose one)

- Federal level (government)
- State level (government)
- Local level (government)
- Outside government and private organizations
- Other _____

Q23 Who would you consider your primary information source concerning subjects such as best practices or model programs? (Choose one)

- Federal level (government)
- State level (government)
- Local level (government)
- Outside government and private organizations
- Other _____

Q24 Choose the most applicable statement that applies today:

- My job has gotten easier to accomplish
- My job has stayed the same in regard to difficulty
- My job has gotten more difficult to accomplish

Q25 To what do you credit this change?

Q26 Would you welcome block grants?

- Yes
- Maybe
- No
- I'm not sure what block grants entail

Q27 In regard to the last question concerning block grants, why or why not?

Q28 Where have you received your information regarding block grants?

End of Block: Default Question Block

Appendix 4 – Semi-Structured Interview for Federal Actors

My research traces the implementation of policies surrounding the school lunch program. I am specifically focusing from 2010 beginning with the White House Task Force on Childhood Obesity, the Healthy Hunger Free Kids act of 2010 (and subsequent regulation from the lead agency, the USDA), to the present-day debate on the reauthorization encompassed in the Farm Bill. I would like your impressions about the body of federal legislation that addresses school nutrition.

1. I am interested in learning about the organizations involved in this discussion and how people in positions like yours are connected to them, learned from them, and were involved in them. Who have been the groups (both governmental and non-governmental) actively involved, and what are your perceptions of them?
2. How did these groups line up with your positions?
3. Were there any groups that were particularly valuable for you?
4. Were there any groups that were particularly troublesome for you?

Timeline items for discussion:

5. The Farm Bill
6. 2017 Tracking the Next Child Nutrition Reauthorization Act. What are your impressions of this legislation?

Background on Act guidelines:

- Trial 3 state Block Grants
- School reviews go to 5 years
- “Competitive” foods exemption (fund raisers, a la carte standard waived)
- School Meal Flexibilities
- Exemptions for ½ whole grain requirements
- Sodium Target 1 compliant
- Milk 1%, flavored

7. 2016 Improving Child Nutrition Integrity and Access Reauthorization Act (2016) and USDA exemptions. What are your impressions of this time period?

Background on Act guidelines:

- Review guidelines
- Reducing 100% whole-grain requirement to 80% whole-grain, (amended to 50%)
- Delaying the Target II sodium requirements for two years (2019)
- Review fluid milk requirements
- \$35 million infrastructure upgrades, \$30 million in grants

8. 2014 seems to have been a period where discontent appears to have reached a crescendo with the social media campaigns (#thanksmichelleobama) and vocal opposition to the direction of the school lunch program. In this period, there is public disagreement

philosophically between SNA and the administration on the regulations that came out of the USDA Final rule. What are your impressions of this time period?

9. 2011 USDA Interim Rule and 2012 USDA Final Rule

Background on USDA guidelines:

Proposed rule in 2011, Final in 2012

Fruit and vegetable requirements (Offer vs. Serve provision, subgroups such as Dark green, red/orange, etc.)

Meat alternates

100% whole grains

Milk fat free / 1% unflavored

Sodium targets

Caloric restrictions (750-850 grade 9-12)

0 trans fat

Require students to select a fruit or vegetable as part of the reimbursable meal

Meat alternates encouraged.

Meal pattern	Breakfast meal pattern			Lunch meal pattern		
	Grades K-5 ^a	Grades 6-8 ^a	Grades 9-12 ^a	Grades K-5	Grades 6-8	Grades 9-12
Amount of food ^b per week (minimum per day)						
Fruits (cups) ^{c,d}	5 (1) ^e	5 (1) ^e	5 (1) ^e	2½ (½)	2½ (½)	5 (1)
Vegetables (cups) ^{c,d}	0	0	0	3¾ (¾)	3¾ (¾)	5 (1)
Dark green ^f	0	0	0	½	½	½
Red/Orange ^f	0	0	0	¾	¾	1¼
Beans/Peas (Legumes) ^f	0	0	0	½	½	½
Starchy ^f	0	0	0	½	½	½
Other ^{f,g}	0	0	0	½	½	¾
Additional Veg to Reach Total ^h	0	0	1	1	1	1½
Grains (oz eq) ⁱ	7-10 (1) ^j	8-10 (1) ^j	9-10 (1) ^j	8-9 (1)	8-10 (1)	10-12 (2)
Meats/Meat Alternates (oz eq)	0 ^k	0 ^k	0 ^k	8-10 (1)	9-10 (1)	10-12 (2)
Fluid milk (cups) ^l	5 (1)	5 (1)	5 (1)	5 (1)	5 (1)	5 (1)
Other Specifications: Daily Amount Based on the Average for a 5-Day Week						
Min-max calories (kcal) ^{m,n,o}	350-500	400-550	450-600	550-650	600-700	750-850
Saturated fat % of total calories) ^{n,o}	< 10	< 10	< 10	< 10	< 10	< 10
Sodium (mg) ^{n,p}	≤ 430	≤ 470	≤ 500	≤ 640	≤ 710	≤ 740
Trans fat ^{n,o}	Nutrition label or manufacturer specifications must indicate zero grams of trans fat per serving.					

10. 2010 White House Task Force on Childhood Obesity and The Healthy Hunger Free Kids Act

Background on Task Force:

Update Federal nutritional standards for school meals and improve the nutritional quality of USDA commodities provided to schools.

The Federal government should increase program reimbursements to support the provision of healthier foods, States and local communities should ensure that only costs that support preparation and service of school meals are charged to food service accounts and seek opportunities to focus additional resources on meal improvements as budgets permit.

Local communities should review their school meal pricing policies to ensure that revenue for meals only partially subsidized by USDA (i.e. “paid meals”) keeps pace with free meals, in order to support full and prompt implementation of updated meals.

School food service companies and other suppliers should constantly seek ways to improve the nutritional quality of the food they provide without increasing prices.

Increase the alignment of foods sold at school, including in the a la carte lines and vending machines, with the Dietary Guidelines.

Schools should be encouraged to make improvements in their school meal programs through the Healthier US Schools Challenge in advance of updated Federal standards.

Assuming new Federal standards for the nutritional quality of all foods in schools are in effect by 2013, Schools should achieve full substantive compliance by that date.

Background on HHFKA:

Unanimously passed in the Senate.

Provided extra \$4.5 billion for reauthorization of funding for child nutrition, directed 18-month regulatory compliance with 2011 USDA "MyPlate" nutrition standards in schools as directed by USDA.

Encouraged the use of direct certification through performance awards to states.

Authorized additional funds for the new standards for federally subsidized school lunches (6 cent additional reimbursement).

Provided resources for schools and communities to utilize local farms and gardens to provide fresh produce.

Provided resources to increase nutritional quality of food provided by USDA.

Set minimum standards for school wellness policies.

Increased the number of eligible children for school meal programs by 115,000.

Required school districts to be audited every 3 years to see if they have met nutrition standards.

11. General items for discussion:

- a) What are your thoughts on the school lunch program as a whole?
- b) What level do you feel that nutrition guidelines should be set? (federal, state, local) Why
- c) Do you see a relationship between nutrition and profitability of programs?
- d) What are your opinions of federal reimbursement for school meals? Are they sufficient?
- e) What are your thoughts on block grants?

Is there anything I may have missed, or that you would like to add?