



Public Health  
Law Center

AT WILLIAM MITCHELL COLLEGE OF LAW



## HEALTHIER FOOD AND BEVERAGE OUTLETS

# From Small Steps to Big Leaps

## *Promoting Healthy Food & Beverage Choices in Parks & Recreation Facilities*

Parks and recreation departments across the country are realizing the important role they can play in promoting and modeling healthier food environments for kids, staff, and other community members. They already promote healthy behaviors such as physical activity and social connectivity through their sports and educational programs for people of all ages, as well as providing out-of-school time programs and activities for children and youth. They also can support the healthy choices of kids, parents, guests, and staff by providing healthy food and beverage environments.

Like schools, early learning centers, hospitals, and other organizations, parks and recreation departments can apply nutrition standards to the food and beverages they sell and serve to kids and other patrons to make sure they are offering options that support health. Organizations can approach this work in a variety of ways, tailored to their needs and situation. For example, a department could choose to apply a nutrition standard to all of the food and beverages served to kids in its out-of-school time (OST) programs, and/or in vending machines, but use a different percentage for concession food. Or a department could start by removing sugary beverages to offer 100% healthy beverages, but use a lower

percentage goal for food, perhaps gradually increasing it over time. Or a department could phase in their nutrition standards, starting with one type of venue or food outlet, or at one location, and gradually add more venues or more locations. This guide provides an overview of the key considerations that parks departments can take into account when determining what type of policy and implementation approach might work best for them.



This publication is part of a collection of resources designed to support healthier food and beverage operations. These resources are available at [www.publichealthlawcenter.org](http://www.publichealthlawcenter.org).

## What is a healthy food?

The first step is to determine the nutrition standards you will use. There are many standards to choose from, but they are not all created equal. It is important to choose standards that are evidence based and developed by a reputable public health source. It is also important to establish standards for all types of food outlets — including vending machines, cafes, cafeterias, and concession stands. The National Recreation and Park Association (NRPA), working in partnership with other national



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organizations that provide out-of-school time programs and activities for youth, has committed to a set of recommended healthy eating and physical activity (HEPA) standards, including nutrition standards (see Table A below). The nutrition standards are designed for meals and snacks served during out-of-school-time programs, but can provide guidance for vending machine products, cafes, and concession food and beverages sold to the general public as well. In 2014, the NRPA launched its Commit to Health initiative to promote implementation of these HEPA standards nationwide. NRPA's Commit to Health calls on programs to apply the standards to 100% of their food and beverages, with up to five years to phase them in. So far, about 400 parks and recreation sites have committed to implementing these standards.<sup>1</sup>

Many nutrition standards for vending and other food service facilities are modeled on the [Health and Sustainability Guidelines for Federal Concessions and Vending Operations](#),<sup>2</sup> which are based on the 2010 Dietary Guidelines for Americans. These standards limit certain nutrients and the portion size of items, and also include positive nutrients to encourage. The USDA's Smart Snacks in School standards, used for foods sold in schools during the school day,<sup>3</sup> also provide good standards, especially for settings serving children and teens.

The National Alliance for Nutrition and Activity (NANA) also has developed helpful [model standards for healthy vending](#).<sup>4</sup>

The National Recreation and Park Association’s Commit to Health initiative’s healthy eating standards are summarized below. The full set of standards includes additional information about each standard, and also includes physical activity standards. The full set can be found at <http://www.nrpa.org/committohealth>.

**TABLE A: The NRPA Commit to Health Initiative’s Healthy Eating Standards**

| Healthy Eating Standards  | Youth and Family Education  |
|---|---|
| <ul style="list-style-type: none"> <li>■ Serve a fruit or vegetable at every snack and meal.</li> <li>■ Serve only foods with no artificial trans fats.</li> <li>■ Serve only whole grain-rich products.</li> <li>■ Serve only non-fat or reduced fat yogurt and cheese.</li> <li>■ Serve only lean meat, skinless poultry, seafood, beans/legumes or eggs.</li> <li>■ Serve only packaged snacks or frozen desserts that meet the USDA Smart Snacks in School nutrition standards.</li> </ul>  | <p>Offer evidence-based nutrition education to youth.</p>   |
| <ul style="list-style-type: none"> <li>■ Provide plain drinking water at all times and at no cost to youth and staff. Offer evidence-based education materials about nutrition and physical activity to families through pamphlets, newsletters, email blasts or other means</li> <li>■ Serve only plain low-fat milk, plain or flavored nonfat milk or milk alternative limited to 8 fluid ounces per day for elementary school students and 12 fluid ounces per day for middle and high school students.</li> <li>■ Serve only 100% fruit or vegetable juice with no added sweeteners or 100% juice diluted with water with no added sweeteners, limited to 8 oz. or 12 oz. sizes depending on age.</li> <li>■ Serve no soda, sports drinks or juice drinks to elementary school or middle school students.</li> <li>■ Serve no full-calorie soda or full-calorie sports drinks, but may serve diet soda, low-calorie sports drinks or other low calorie beverages to high school students.</li> <li>■ Serve only non-caffeinated beverages.</li> </ul> | <p>Offer evidence-based education materials about nutrition and physical activity to families through pamphlets, newsletters, email blasts or other means</p> |

Once you have decided on a nutrition standard, a next step is to decide how to apply them.

### 100% Healthy or Something Else — How to Choose?

*How strong is your nutrition standard?* The strength of the nutrition standards you are using is a key consideration. If the overall standards are more lenient, then a higher percentage should be used. For example, the Chicago Park District’s nutrition standards for vending machines in its field houses are less stringent than some model standards, but they apply to 100% of the food in these machines.<sup>5</sup>

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Conducting an assessment of your existing food and beverage environment can help you figure out where to start.

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*What has your organization already achieved?* When deciding what to aim for, departments should choose a percentage that will result in measureable improvement in the nutritional quality of their food and beverage environments. Conducting an



assessment of your existing food and beverage environment can help you figure out where to start (see the Additional Resources sections for examples of assessment tools). In particular, it makes sense to develop separate standards for beverages versus food. A recent [national survey](#) of vending machines on public property found that, on average, 42% of beverages were healthier beverages (water, “diet” soda, and 100% juice), but only 5% of the food products were healthier options (fruits, vegetables, and nuts).<sup>6</sup> Given this finding, a benchmark of 50% healthy products would likely make little sense for beverages because it would not change the status quo, but a 50% standard for food could have a lot of impact if healthier foods are much less common in your vending machines right now.

*Should you treat food and drinks the same, or group them together?* No. There are scientific and practical reasons for treating these products differently. Beverages like pop, energy drinks, sports drinks, sweetened coffee and tea drinks, and the like are the biggest contributor of added sugars to our diets, not sweet desserts or snack products. Also, because healthier beverages like flavored water or carbonated fruit juices are popular, vendors usually find it easier to stock these items. For this reason, it is a good idea to avoid lumping food and beverages together — e.g., 60% of all food and beverages combined will meet the standards. Combining food and drinks this way makes it easy to meet the benchmark by using water and “diet” beverages, without making meaningful changes in the nutritional quality of food products.

*What type of food outlet is it?* While it is important to have standards that apply to all food outlets, many places use different benchmarks for different types of food outlets. For example, they may apply their standards to 100% of the food in vending machines, but use a 50% standard for concession stands. Some places apply different standards to machines depending on their location — using a 100% standard for

machines inside a fieldhouse or rec center, and a 50% standard for machines in outdoor parks. Concession stands and kiosks in particular can present challenges if they don’t have enough space to accommodate expanded healthy food storage and preparation needs. But these outlets can also present opportunities to do things like use fresh, local foods, too.

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**A less than 100% standard typically requires sustained monitoring and marketing efforts to be successful.**

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*How much time and resources do you have for monitoring and enforcement?* The different approaches require different levels of monitoring efforts. A 100% “healthy” standard may require up front promotion, educational activities, and taste tests to build buy in from consumers. But once the policy is rolled out, those activities can become occasional. In contrast, a less than 100% standard typically requires sustained effort to be successful. The product mix needs to be regularly monitored to make sure the percentage benchmarks are being maintained. Consistent, sustained marketing strategies such as placement or price promotions will be needed to promote purchases of the healthier options. Increasing the price of less healthy foods relative to the healthier options, making sure the healthier foods or drinks are positioned at eye level or in the prime purchasing positions, using countertop displays, touting the local origins of fresh food (when applicable), making sure to include healthier versions of popular products, and maintaining signage or labels to identify healthier options are effective strategies. Food companies spend billions of dollars marketing unhealthy food products to us every day; healthy products also need marketing support to successfully compete.

*We have vending contracts — does that mean we can’t do anything?* No. But contractual and financial



relationships with food and beverage vendors likely will impact the implementation of a nutrition policy, and/or the ability to apply the policy to a specific location. Existing contracts should be reviewed because they may provide flexibility to substitute healthier alternatives. Vendors are also increasingly recognizing that customers value healthy products, and can be willing to work with organizations to find available products that meet the standards. Thanks to the federal rules that require vending machine foods in schools to meet good nutrition standards,<sup>7</sup> there are many more healthy vending products available, at least during the school year (see Additional Resources for healthy product calculator tools).<sup>8</sup> If a vendor doesn't have the capacity to provide products that meet the department's policy, you may simply

have to wait and build the nutrition standards into the next request for proposal and contracts. A novel approach taken by the Kansas City parks and recreation department was to offer a discount of 50% or more on permit fees for vendors who committed to applying nutrition standards to 50% or more of their products.<sup>9</sup> Such discounts can incentivize vendors to comply with healthier standards.

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Typically, if they occur at all, any sales declines are a short-term issue, regardless of the approach.

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*What are the revenue impacts of healthy vending or concessions policies?* A healthy vending or concessions policy can affect revenue in positive ways, negative ways, or have very little effect. How a policy could impact revenue seems to largely depend on how the policy is implemented, and not as much on whether the policy applies to 100% of products or a lesser percentage. Parks and other organizations that have a 100% policy have experienced gains in sales; organizations that have used a mixed approach have experienced losses; and vice versa. The overall impact on revenue depends on a variety of factors, including whether and to what extent smart marketing strategies are used, and how and where the profits are designated. Typically, if they occur at all, any sales declines are a short-term issue, regardless of the approach. An evaluation of a new Chicago Parks District policy that applied nutrition standards to 100% of vending machine foods in field houses found that the overall monthly average sales per machine increased from \$84 in June 2011 to \$371 in August 2012.<sup>10</sup> While this is not a typical outcome, most organizations report neutral overall revenue impact, or even modest increases over baseline. For example, in Minnesota, the Edina Aquatics Center saw profits increase and the Dwan Golf Course in Richfield reduced its food costs after their concessions stands began to offer healthier food options.<sup>11</sup>

## Conclusion

Parks and recreation departments can choose from a variety of approaches in implementing healthy food and beverage policies. The best approach to take will depend on an individualized assessment of your department’s needs and circumstances. The most important things to remember are that you don’t have to start from scratch — there are good model standards and examples of policies that you can tailor to your needs, and that incremental steps can be a good way to start.

**TABLE B: 100% Healthy or Something Else — Pros and Cons**

| 100% Healthy Approach   |   |
|---|---|
| ADVANTAGES  | DISADVANTAGES   |
| <ul style="list-style-type: none"> <li>■ Offers a clear and straightforward policy that is easy to understand and monitor.</li> <li>■ Makes a bold statement underscoring the importance of a healthy food and beverage environment.</li> <li>■ Less complicated to maintain over time — does not require constant monitoring and tracking each month to ensure adherence to the policy. For example, it does not require a continual calculation of the percentage of sugary drinks being stocked in the vending machines.</li> <li>■ Promotes social norm change around what is a healthy food and beverage environment.</li> <li>■ Provides more food and beverage choices for staff and visitors who want healthy choices.</li> </ul> | <ul style="list-style-type: none"> <li>■ Some park staff or visitors may be initially resistant and complain.</li> <li>■ May be difficult to implement initially due to required contract changes and renegotiations that are complex and time consuming. Depending on the strength of the nutrition standards, potentially limits the number of vendors willing to bid on an RFP.</li> <li>■ Creates possible additional costs related to beverage and food equipment changes. For example offering more fresh foods in concessions areas creates the need for more food preparation space. Refrigerated vending machines may be necessary. While these costs may occur regardless of whether you go 100% or something else, they are likely to be greater with a 100% approach.</li> </ul>  |
| Less than 100% Approaches   |   |
| ADVANTAGES  | DISADVANTAGES   |
| <ul style="list-style-type: none"> <li>■ Supports a gradual transition to healthier food and beverages, encouraging staff and visitors to change their habits and taste preferences.</li> <li>■ Reduces the level of initial resistance and complaints.</li> <li>■ Preserves the opportunity for customers to choose products that probably are not healthy, but are appealing for other reasons.</li> <li>■ Makes a positive statement about promoting a healthy nutrition environment, but does not impose an absolute.</li> <li>■ Provides additional flexibility to allow time to modify contracts, renegotiate provisions, issue new contract bids and change other financial agreements.</li> </ul>                                 | <ul style="list-style-type: none"> <li>■ Creates possible additional costs related to beverage and food equipment changes. For example offering more fresh foods in concessions areas creates the need for more food preparation space. Refrigerated vending machines may be necessary.</li> <li>■ Requires regular monitoring to ensure proper product mix is being offered, that products are placed in appropriate positions, that labelling and educational signage is properly placed and maintained, etc.</li> <li>■ Requires more complicated tracking — 75% healthy food offerings may not result in 75% of food sold being healthy.</li> <li>■ Could limit the health impact because foods of little or no nutritional value are still available for purchase.</li> <li>■ Slower norm change around healthy food and beverage environments.</li> </ul> |

## Additional Resources

This fact sheet can be found on the Public Health Law Center’s website at [www.publichealthlawcenter.org](http://www.publichealthlawcenter.org). The Public Health Law Center also has developed several resources to support efforts to improve the food and beverage environments in worksites, hospitals, parks, government buildings, and other public spaces, including:

- Key Components of Food Procurement and Vending Policies: Drafting an Effective Policy<sup>12</sup>
- Five Steps for Food & Beverage Success<sup>13</sup>
- Tips for Better Vending<sup>14</sup>
- Healthy Beverage Policies — Key Definitions and Sample Standards<sup>15</sup>
- Healthy Vending and the Randolph-Sheppard Act<sup>16</sup>

The Fairmount Park Conservancy and the Food Trust have a resource created specifically for parks called [Creating Healthy Concessions: A Resource Guide](#).<sup>17</sup>

The Center for Science in Public Interest (CSPI) has several resources on its [Healthier Food Choices for Public Places webpage](#) to support development of food and nutrition guidelines for government, worksites, hospitals, and organizations, including a fact sheet on “How to Choose Nutrition Standards”<sup>18</sup>

The American Heart Association (AHA) has developed a [Healthy Workplace Food and Beverage Toolkit](#) to help organizations address the food and beverages available to their employees.<sup>19</sup>

### Assessment tool resources:

- The National Park Service has created a [self-assessment tool](#)<sup>20</sup> designed to help federal parks with implementing the federal [Health and Sustainability Guidelines for Federal Concessions and Vending Operations](#).<sup>21</sup>

- The Alliance for a Healthier Generation has a [webpage](#) of tools and resources for promoting healthy out-of-school time programs, including a tool to assess the food and beverage environment.<sup>22</sup>
- There are several tools to help with vending machine assessments, including the Iowa Department of Health’s [Nutrition Environment Measures Survey \(NEMS\)-V](#)<sup>23</sup>; Eat Well Work Well’s [inventory tool](#)<sup>24</sup>; and St. Paul-Ramsey County Public Health’s [Healthy Vending Options Toolkit](#).<sup>25</sup>

### Tools to identify healthier products:

- Alliance for a Healthier Generation has a [product navigator](#) webpage with tools to help identify beverages, snacks, entrees, and side items that meet the USDA’s Smart Snacks in Schools nutrition standards and the NRPA Commit to Health standards, including a product calculator.<sup>26</sup>
- John Stalker Institute in Massachusetts has a [database](#) of foods that meet the state’s “A List” standards or the USDA’s Smart Snacks in Schools standards, whichever is stricter.<sup>27</sup>
- Iowa Department of Health NEMS-V — [Healthy Choices Calculator](#)<sup>28</sup> can be used to help determine if a food or beverage meets the federal [Health and Sustainability Guidelines for Federal Concessions and Vending Operations](#).<sup>29</sup>

### Examples of policies:

The Center for Science in the Public Interest has compiled a [list of state and local healthy food policies](#), which includes several initiatives involving parks.<sup>30</sup>



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The Public Health Law Center provides information and technical assistance on issues related to public health. The Public Health Law Center does not provide legal representation or advice. This document should not be considered legal advice. For specific legal questions, consult with an attorney.

## Endnotes

- <sup>1</sup> NAT'L RECREATION AND PARK ASS'N, COMMIT TO HEALTH, <http://www.nrpa.org/committohealth/> (last visited Sept. 30, 2015).
- <sup>2</sup> CTRS FOR DISEASE CONTROL & PREVENTION ET AL., HEALTH AND SUSTAINABILITY GUIDELINES FOR FEDERAL CONCESSIONS AND VENDING OPERATIONS, [http://www.cdc.gov/chronicdisease/pdf/guidelines\\_for\\_federal\\_concessions\\_and\\_vending\\_operations.pdf](http://www.cdc.gov/chronicdisease/pdf/guidelines_for_federal_concessions_and_vending_operations.pdf)
- <sup>3</sup> See Nat'l School Lunch Prog. and School Breakfast Prog.: Nutrition Standards for All Foods Sold in School as Required by the Healthy, HungerFree Kids Act of 2010, 78 Fed. Reg. 39068 (June 28, 2013) (interim final rule) (to be codified at 7 CFR Parts 210 and 220). More information about the USDA's Smart Snacks in School standards can be found at USDA, HEALTHIER SCHOOL DAY, TOOLS FOR SCHOOLS: FOCUSING ON SMART SNACKS, <http://www.fns.usda.gov/healthierschoolday/tools-schools-focusing-smart-snacks> (last visited Sept. 30, 2015).
- <sup>4</sup> The NANA model healthy vending standards can be found at <http://cspinet.org/new/pdf/final-model-vending-standards.pdf>.
- <sup>5</sup> Maryann Mason et al., *Working With Community Partners to Implement and Evaluate the Chicago Park District's 100% Healthier Snack Vending Initiative*, PREVENTING CHRONIC DISEASE, PUB. HEALTH PRACTICE, RESEARCH, AND POLICY (Aug. 2014), [http://www.cdc.gov/pcd/issues/2014/pdf/14\\_0141.pdf](http://www.cdc.gov/pcd/issues/2014/pdf/14_0141.pdf).
- <sup>6</sup> CTR FOR SCIENCE IN THE PUB. INTEREST, VENDING CONTRADICTIONS: SNACK AND BEVERAGE OPTIONS ON PUBLIC PROPERTY (Oct. 2014), available at <http://cspinet.org/vendingcontradictions.pdf>.
- <sup>7</sup> See *supra*, note 3. The USDA's Smart Snacks in School nutrition standards are summarized in this fact sheet: [http://www.fns.usda.gov/sites/default/files/allfoods\\_flyer.pdf](http://www.fns.usda.gov/sites/default/files/allfoods_flyer.pdf)
- <sup>8</sup> Some vendors report that products that meet the USDA's Smart Snacks in Schools rules may not be consistently available all year round.
- <sup>9</sup> Kansas City Parks and Recreation Vending Policy 4.7.08, at 3, [http://kcparks.org/wp-content/uploads/2013/03/KCPR\\_Parks\\_ParksEvent-Permits\\_Vending.pdf](http://kcparks.org/wp-content/uploads/2013/03/KCPR_Parks_ParksEvent-Permits_Vending.pdf).
- <sup>10</sup> Mason et al., *supra* note 5.
- <sup>11</sup> MINN. DEP'T OF HEALTH, SHIP STORIES, HEALTHIER OPTIONS IN BLOOMINGTON, EDINA, AND RICHFIELD (May 2013), <http://www.health.state.mn.us/divs/oshii/ship/stories/pdf/healthyoptionsBER.pdf>.



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- 13 PUB. HEALTH LAW CTR, FIVE STEPS TO FOOD AND BEVERAGE SUCCESS (Nov. 2013), <http://bit.ly/1qWM2yD>.
- 14 PUB. HEALTH LAW CTR, TIPS FOR BETTER VENDING (Nov. 2013), <http://bit.ly/1uPneJ0>.
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- 17 The guide is available at [http://thefoodtrust.org/uploads/media\\_items/fairmount-concessions-guide.original.pdf](http://thefoodtrust.org/uploads/media_items/fairmount-concessions-guide.original.pdf).
- 18 CTR FOR SCIENCE IN THE PUB. INTEREST, HOW TO CHOOSE NUTRITION STANDARDS FOR YOUR STATE/LOCALITY, <http://www.cspinet.org/nutritionpolicy/How-to-Choose-Nutrition-Standards.pdf>.
- 19 AM. HEART ASS'N, HEALTHY WORKPLACE FOOD AND BEVERAGE TOOLKIT, [http://www.heart.org/HEARTORG/GettingHealthy/WorkplaceWellness/WorkplaceWellnessResources/Healthy-Workplace-Food-and-Beverage-Toolkit\\_UCM\\_465195\\_Article.jsp](http://www.heart.org/HEARTORG/GettingHealthy/WorkplaceWellness/WorkplaceWellnessResources/Healthy-Workplace-Food-and-Beverage-Toolkit_UCM_465195_Article.jsp) (last visited January 23, 2015).
- 20 The tool is available at [https://www.google.com/url?sa=t&rc=j&q=&esrc=s&source=web&cd=3&cad=r-ja&uact=8&ved=0CCoQFjACahUKEwiU0aiGhJ\\_IAhUDFz4KHUj5AXE&url=http%3A%2F%2Fwww.concessions.nps.gov%2Fdocs%2Fconcessioner%2520tools%2FHealthy\\_Foods\\_Self-Assessment.doc&usg=AFQjC-NE9ACG\\_SjsoZ4cV4vXPZ1XbRKkE-w&sig2=r9\\_Ge2kLIorbWRUH4lglgw](https://www.google.com/url?sa=t&rc=j&q=&esrc=s&source=web&cd=3&cad=r-ja&uact=8&ved=0CCoQFjACahUKEwiU0aiGhJ_IAhUDFz4KHUj5AXE&url=http%3A%2F%2Fwww.concessions.nps.gov%2Fdocs%2Fconcessioner%2520tools%2FHealthy_Foods_Self-Assessment.doc&usg=AFQjC-NE9ACG_SjsoZ4cV4vXPZ1XbRKkE-w&sig2=r9_Ge2kLIorbWRUH4lglgw) (last visited Sept. 30, 2015).
- 21 These guidelines are available at [http://www.cdc.gov/chronicdisease/pdf/guidelines\\_for\\_federal\\_concessions\\_and\\_vending\\_operations.pdf](http://www.cdc.gov/chronicdisease/pdf/guidelines_for_federal_concessions_and_vending_operations.pdf).
- 22 These tools can be found at <https://host.healthiergeneration.org>.
- 23 This tool is available at <http://www.nems-v.com/NEMS-VTools.html>.
- 24 This tool is available at <http://www.eatwellworkwell.org/pdfs/Vending%20machine%20inventory%20tool%20edits.pdf>.
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- 26 These tools can be found at [https://www.healthiergeneration.org/live\\_healthier/eat\\_healthier/alliance\\_product\\_navigator/](https://www.healthiergeneration.org/live_healthier/eat_healthier/alliance_product_navigator/).
- 27 The John Stalker Institute database can be found at <http://www.johnstalkerinstitute.org/alist/>
- 28 The NEMS-V Healthy Choices Calculator can be found at <http://www.nems-v.com/NEMS-VHealthyChoices-Calc.html>.
- 29 These guidelines can be found at [http://www.cdc.gov/chronicdisease/pdf/guidelines\\_for\\_federal\\_concessions\\_and\\_vending\\_operations.pdf](http://www.cdc.gov/chronicdisease/pdf/guidelines_for_federal_concessions_and_vending_operations.pdf).
- 30 CTR FOR SCIENCE IN THE PUB. INTEREST, EXAMPLES OF POLICIES TO INCREASE ACCESS TO HEALTHIER FOOD CHOICES FOR PUBLIC PLACES: NATIONAL, STATE, AND LOCAL FOOD AND NUTRITION GUIDELINES (April 10, 2015), <https://cspinet.org/new/pdf/Examples%20of%20National,%20State%20and%20Local%20Food%20Procurement%20Policies.pdf>.