

Board of Health Briefing Note

To: Chair and Members of the Board of Health
Date: March 3, 2021
Topic: **Endorsement of CODE-COMOH's Student Nutrition Program Recommendations**
Submitted by: Dr. Glenn Corneil, Acting Medical Officer of Health/CEO
Prepared by: Ally Zhang, Public Health Dietitian
Reviewed by: Kerry Schubert-Mackey, Director of Community Health; Amanda Mongeon, Program Manager; Rim Mouhaffel, Public Health Dietitian

Recommendations

It is recommended that the Timiskaming Board of Health:

1. Resolve to endorse the CODE-COMOH recommendations for making improvements to Ontario's Student Nutrition Programs (Appendix A) and send correspondence to:

- 1) The Honourable Doug Ford, Premier of Ontario
- 2) The Honourable Christine Elliott, Provincial Minister of Health
- 3) The Honourable Todd Smith, Provincial Minister of Children, Community and Social Services
- 4) The Honourable Stephen Lecce, Provincial Minister of Education

FURTHER that a copy of this endorsement be forwarded to:

- 1) John Vanthof, MPP Cochrane-Timiskaming
- 2) The Association of Local Public Health Agencies
- 3) The Ontario Dietitians in Public Health
- 4) The Canadian Red Cross Student Nutrition Program
- 5) Chair of the Council of Medical Officers of Health (COMOH)
- 6) Chair of the Council of Ontario Directors of Education (CODE)

Overview

COVID-19 has highlighted and amplified numerous challenges to the delivery of Student Nutrition Programs (SNPs) in Ontario schools. Since September 2020, SNPs have faced new COVID-19 restrictions in schools and continue to deal with long-standing barriers including infrastructure, staffing and funding, which negatively impacted children's access to healthy food in schools.

Ontario Public Health Standards (2018) and Timiskaming Health Unit Strategic Plan 2019-2023

Supporting improvements to student nutrition programs directly contributes to meeting requirements and expected outcomes in the [Ontario Public Health Standards \(2018\)](#). Healthy eating in schools intersects with five program standards: Chronic Disease Prevention and Well Being, Food Safety, Healthy Environments, Healthy Growth and Development and School Health. This work also supports the following [THU 2019-2023 strategic direction](#):

We collaborate with partners to make a difference in our communities

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- We nurture positive and effective relationships with community partners to improve public health
- We mobilize diverse and inclusive community resources in addressing the Social Determinants of Health and climate change to reduce health inequities
- We advocate for policy changes that make a difference in local communities

We adapt to address the diverse and changing local needs

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- Our programs and services are evidence-informed, customized and evaluated to ensure they address local needs
- We clarify roles with partners and allied agencies to reduce duplication, fill gaps and maximize our collective impact to create healthy populations
- We engage in meaningful relationships that respect and respond to our cultural and linguistic diversity

Background

Supporting Student Nutrition Programs' improvements fundamentally results in building healthy food environments by providing nutritious foods in schools. School Nutrition Programs are increasingly seen as vital contributors to students' physical and mental health. Growing research demonstrates the value of school food programs to improve food choices and support student success, including academic performance, reduced absenteeism, and improved student behaviour.^{1,2,3} Poor food choices and dietary inequities are serious public health concerns. Unhealthy eating pattern is a known contributor to a range of non-communicable diseases, notably type 2 diabetes, cardiovascular disease, and certain types of cancer.⁴ In 2015/2016, only 1 in 3 (33%) Timiskaming youth aged 12 to 17 reported eating five or more vegetables or fruit per day.⁵ Rates of chronic diseases and conditions are statistically higher in Timiskaming than in Ontario (2015-16) for diabetes, high blood pressure, and osteoporosis.⁶ To improve population health outcomes, including reducing health inequities, comprehensive government action is needed to support a food environment that contributes to healthy diets.

Recognizing the value that SNPs provide to individual students and school communities, the hurdles caused by COVID-19 could be an opportunity for Ontario to augment its investment in SNPs as a way to improve student performance and readiness to learn. The right investments can ensure SNPs become both universal and sustainable. With these as goals to drive the long-term vision for Ontario, there should be opportunities to leverage the federal commitment to building a National School Nutrition Program and benefit Ontario's learners now and in the future. Below are five recommendations presented in order of ease of implementation.

Recommendations proposed by CODE-COMOH

In Fall 2020, [CODE-COMOH](#) and [Ontario Dietitians in Public Health \(ODPH\)](#) prepared a briefing note to address Student Nutrition Program (SNP) barriers due to COVID-19. The document was sent by CODE-COMOH to the Premier, Ministers of Health, Education and Child, Community and Social Services. The Timiskaming Health Unit dietitian and other public health unit dietitians, which are members of the ODPH, were consulted during this process. As a result, the recommendations and topics below accurately reflect both the local SNP context in Timiskaming and province-wide.

Recommendation 1: The Ministry of Education’s (MEDU) Guide to Reopening Ontario’s Schools should be revised to enable Boards of Education to add enabling language in their Return to School Plans.

- **1.1.** The Guide should exempt SNPs from the list of prohibited visitors. This would lead to more Boards of Education adding statements like this: “Volunteers for SNPs will be welcome to continue their important service to our students, following the same procedures as our staff.”
- **1.2.** The COVID-19 Preparedness and Prevention in Elementary and Secondary (K-12) Schools Checklist should be revised with the following statement: “Individually portioned foods (including ready-to-eat foods, such as whole apples, cut carrots, cucumbers, and cheese, and foods from bulk or larger items such as crackers and muffins), can be safely portioned out as individual servings, in an inspected kitchen, and following appropriate food safety practices.”

Recommendation 2: Ministry of Children, Community and Social Services (MCCSS) is requested to release and post online the updated SNP Nutrition Guidelines and mandate Public Health’s participation in local implementation.

Recommendation 3: Ministry of Health (MOH) should be requested to create a free, online SNP-specific Food Handler Training and Certification for SNP volunteers across the province.

Recommendation 4: MEDU and MCCSS are requested to jointly develop a funded universal SNP program for student success. This should include funding for a paid Coordinator at each participating school.

Recommendation 5: Future considerations

- **5.1.** MEDU includes specific infrastructure criteria for capital funding projects (renovations and new builds) that support a healthy school food environment.
- **5.2.** CODE-COMOH encourages Ontario Ministries to engage with federal partners to facilitate the development of universal SNPs across Ontario.

(See Appendix A for a detailed background to each recommendation)

Local Initiatives and Next Steps

Locally, there are two student nutrition programs offered to all schools in Timiskaming. The Northern Fruit and Vegetable Program (NFVP), coordinated by Timiskaming Health Unit, and the Canadian Red Cross Student Nutrition Program (SNP). THU has been providing ongoing support to the Red Cross SNP by ensuring that menu items follow nutrition standards in the SNP guidelines as well as providing consultation for various issues. In the beginning of the fall semester, THU collaborated with Porcupine Health Unit (PHU) to develop a [COVID-19 SNP Protocol](#). This protocol helped the Red Cross SNP and its participating schools with guidance on menu ideas, volunteering/staff, food preparation and program operation during COVID. The creation of this guide directly resulted in one school board’s acceptance of continuing SNP during COVID and thus helped Red Cross advocate for ongoing, high quality student nutrition programs despite COVID. THU and PHU also developed an online resource to answer [frequently asked questions \(FAQ\)](#) about SNP operation. This FAQ helped clear up confusion on restriction levels on types of food items and food preparation allowed and offered a suggestion on what to do if volunteers are not permitted by the school board. THU has also been providing ongoing consultation and support to schools regarding food handler’s course, implementation challenges and identifying funding opportunities. Meanwhile, the NFVP has managed to gain participation from all but

one school in the THU district. The program has been adapted to suit the staff capacity and COVID measures, and is currently operating well in most schools. Despite the above efforts to mitigate, both of these programs have been affected by the many issues mentioned in CODE-COMOH's briefing note such as low staff capacity, and restrictions to volunteers and food preparation. Due to the restrictive language in Board of Education return to school plans, many schools have adapted to serve only individually packaged pre-portioned food items. This significantly increased the cost of the already underfunded student nutrition programs, and several schools had to seek for additional funding sources. These temporary solutions help keep the student nutrition programs operational, but are less than ideal in the long run. The systematic changes mentioned in the CODE-COMOH recommendations, including the future development of universal student nutrition programs, will be the long lasting changes that truly benefit student nutrition.

REFERENCES

1. Faight, E. L., Ekwaru, J. P., Gleddie, D., Storey, K. E., Asbridge, M., & Veugelers, P. J. (2017). The combined impact of diet, physical activity, sleep and screen time on academic achievement: A prospective study of elementary school students in Nova Scotia, Canada. *International Journal of Behavioral Nutrition and Physical Activity*, 14(1). doi:10.1186/s12966-017-0476-0
2. Colley, P., Myer, B., Seabrook, J., & Gilliland, J. (2019). The impact of Canadian school food programs on Children's nutrition and Health: A systematic review. *Canadian Journal of Dietetic Practice and Research*, 80(2), 79-86. doi:10.3148/cjdpr-2018-037
3. Toronto Public Health. (2012, June). Nourishing Young Minds. Retrieved from <https://www.toronto.ca/wp-content/uploads/2017/11/8f2a-tph-Nourishing-Young-Minds-rep-eng-2012.pdf>
4. Health Canada. Food, Nutrients and Health: Interim Evidence Update 2018 For Health Professionals and Policy Makers [Internet]. 2019 [Cited 2020 Nov 27]. Available from <https://www.canada.ca/content/dam/hc-sc/documents/services/canada-foodguide/resources/evidence/food-nutrients-health-interim-evidence-update-2018/pub1-eng.pdf>
5. Timiskaming Health Unit. Healthy Eating Situational Assessment. n.d
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COMOH

Council of Ontario

MEDICAL OFFICERS OF HEALTH

January 28th, 2021

The Honourable Doug Ford
Premier of Ontario
Legislative Building, Queen's Park
Toronto, ON M7A 1A1
Sent via e-mail: premier@ontario.ca

Dear Premier Ford:

Despite the challenges of opening schools in the midst of a global COVID-19 pandemic, school food programs are increasingly seen as vital contributors to students' physical and mental health.

Growing research demonstrates the value of school food programs (SNPs) to improve food choices and support student success (including academic performance, reduced absenteeism, and improved student behavior). Prior to COVID-19, Ontario's SNPs were highly variable and consistently underfunded, with parents and schools having to fundraise in order to purchase the foods that fueled their students' learning. COVID-19 has had a devastating impact on the viability of these programs.

With the contributions of the Ontario Dietitians in Public Health, the Councils of Directors of Education (CODE) and local Medical Officers of Health (COMOH) have prepared the attached submission for you and your provincial Cabinet's urgent consideration. The proposal presents four recommendations that could be operationalized immediately, and two additional recommendations for future consideration by your Ministers and their staff.

First and foremost, we are requesting that the Ministry of Education revise its current guidance to include enabling language that would allow the SNPs to operate safely and effectively.

Secondly, we are asking that the Ministries of Education and Children, Community and Social Services do two things:

- Embrace the latest evidence to ensure that SNPs operate with the latest advances in nutritional science and healthy eating recommendations, and
- Adequately fund these programs so that schools have the benefit of paid coordinators and sufficient funds to purchase food to ensure these programs are fully functional.

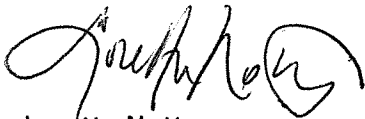
Finally, we are requesting that the Ministry of Health provide free online training to support the safe handling and safe operating of SNPs by the community volunteers who are the backbone of these programs. SNPs depend on community volunteers and schools depend on the knowledge and skills of these volunteers, especially during COVID-19, to keep students and staff safe.

Two additional actions proposed that would support the further development and growth of SNPs into a universal and sustainable investment in our students and their trajectories as life-long learners and healthy adults: we ask that going forward, the Ministry of Education include specific infrastructure criteria for capital funding projects (renovations and new builds) that support a healthy school food environment. We also ask that Ontario use the opportunity of the federal commitment to explore a national school food program to secure the policy and funding instruments to help grow our SNPs into strong and universal supports for all of our young learners.

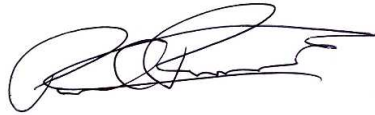
Premier, we know that there is no greater investment than the health and success of the next generation. We look forward to supporting our provincial partners with any or all of these recommended actions but we know too that, like the pandemic, they need the support from “all of government” if they are to be realized in a timely and effective way.

We thank you for your consideration and hope that we can count on your support.

Sincerely,



Loretta Notten
Chair, CODE



Dr. Paul Roumeliotis, MD, CM, MPH, FRCP(C), CCPE
Chair, COMOH

Encl.

cc: Hon. Stephen Lecce, Minister of Education
Hon. Todd Smith, Minister of Children, Community and Social Services
Hon. Christine Elliott, Minister of Health

**Priority and Proactive Steps to Ensure
Universal Access to Student Nutrition Programs**
Jointly prepared by COMOH and [Ontario Dietitians in Public Health](#)
for the [CODE-COMOH Partnership](#)
December 14, 2020

COVID-19 has exposed and amplified numerous challenges to the delivery of Student Nutrition Programs (SNPs) in Ontario schools. Since September, SNPs have faced new COVID-related restrictions in schools and continue to deal with long-standing barriers (e.g., infrastructure, staffing, funding), access to healthy food at school is being negatively impacted.

Despite these challenges, school food programs are increasingly seen as vital contributors to students' physical and mental health. Growing research demonstrates the value of school food programs to improve food choices and support student success (including academic performance, reduced absenteeism, and improved student behavior)^{1,2,3,4}.

Recognizing the value that SNPs provide to individual students and to school communities, we believe that COVID-19 presents an opportunity for Ontario to augment its investment in SNPs as a way to improve student performance and readiness to learn. The time to transform these programs is now. The right investments can ensure SNPs become both universal and sustainable. With these as goals to drive the long term vision for Ontario, there should be opportunities to leverage the federal commitment to building a National School Nutrition Program to benefit Ontario's learners now, and in the future.

We present five recommendations, in order of ease of implementation:

1. The Ministry of Education's (MEDU) Guide to Reopening Ontario's Schools should be revised to enable Boards of Education to add enabling language in their *Return to School Plans*.

1.1 The Guide should exempt SNPs from the list of prohibited visitors. This would lead to more Boards of Education adding statements like this: "Volunteers for SNPs will be welcome to continue their important service to our students, following the same procedures as our staff."

Background: The current [Guide to reopening Ontario's schools](#) directs schools to *significantly limit or prohibit visitors to limit contact in schools*. SNPs depend almost exclusively on volunteers to prepare

¹ Impacts of School Food Programs on Children and Youth, Toronto Public Health, 2019.

² [The combined impact of diet, physical activity, sleep and screen time on academic achievement: a prospective study of elementary school students in Nova Scotia, Canada](#), Faught et al, 2017.

³ [The impact of Canadian School Food Programs on Children's Nutrition and Health](#), Colley et al, 2018.

⁴ [Nourishing Young Minds](#), Toronto Public Health, 2012.

food. Restricted access to school food preparation facilities means programs no longer have volunteer capacity or space to store food purchased in bulk and to prepare food for individual servings. The statement is taken from [Peterborough Victoria Northumberland Clarington Catholic School Board's Return to School Plan](#) (page 4). As part of this change, we propose that guidelines be developed, in consultation with local public health agencies, to help ensure that SNP volunteers can enter the school and operate safely for the duration of the COVID pandemic.

1.2 The COVID-19 Preparedness and Prevention in Elementary and Secondary (K-12) Schools Checklist should be revised with the following statement: "Individually portioned foods (including ready-to-eat foods, such as whole apples, cut carrots, cucumbers, and cheese, and foods from bulk or larger items such as crackers and muffins), can be safely portioned out as individual servings, in an inspected kitchen, and following appropriate food safety practices."

Background: The [COVID-19 Preparedness and Prevention in Elementary and Secondary \(K-12\) Schools Checklist](#) currently states: *Third party food services, including nutrition programs, will be delivered in a way that any student who wishes to participate can do so. "Grab and Go format" is preferred.*

Some programs have interpreted *Grab and Go format* to mean that only items prepackaged by the manufacturer can be served (e.g., cheese strings, individual cartons of milk, mini bags of pre-cut/pre-washed produce, grain bars). It is estimated that this will unsustainably double food costs and generate significant garbage. However, in appropriate food preparation areas and when transported and served in a manner to prevent contamination, ready-to-eat foods (such as whole apples, cut carrots and cucumbers), and foods from bulk or larger items such as whole grain cereal and muffins, can be safely portioned out as individual servings. See [Toronto Public Health COVID-19 Guidance for SNPs](#).

2. Ministry of Children, Community and Social Services (MCCSS) is requested to release and post online the updated SNP Nutrition Guidelines and mandate Public Health's participation in local implementation.

SNP should be evidence-based to ensure students' priority nutritional needs are met.

Background: SNP Nutrition Guidelines, updated in March of 2020, align with the new Canada's Food Guide and capture advances in nutritional science and healthy eating recommendations (including the importance of eating together, a pillar of SNP). They have not yet been released; it is important that programs operate with the latest evidence. We request that this be done. Mandating Public Health Dietitians' involvement in local implementation of guidelines would be an asset for programs.

3. Ministry of Health (MOH) should be requested to create a free, on-line SNP-specific Food Handler Training and Certification for SNP volunteers across the province.

In accordance with Ontario Regulation 493/17 – Food Premises, and aligning with the goal of [Public Health Modernization](#), a provincially harmonized, free, online recorded class and testing feature would ensure consistent and equitable access to high quality safe food handling training services, improving public health delivery and program sustainability in Ontario.

Background: Currently, SNPs undergo the same certification as food service establishments/restaurants, even though the majority serve only "low-risk" foods. Some (not all) local public health agencies have offered free or reduced-cost Food Handler Certification for SNPs in the past. These are currently unavailable as public health staff have been redeployed to the COVID-19 response. While school-

directed funds from the MCCSS can be used to cover the cost of training, this uses funding that would otherwise be used for food costs. SNPs rely on many volunteers and there is high turnover meaning that programs would have to spend a significant amount on training. A free, on-line training program tailored for the provincially shared, unique needs of SNPs during COVID-19 and beyond would equitably address the need for food handler training for SNP volunteers across the province. Local public health agencies could provide input into the content for this new resource. Ensuring that SNP volunteers have the required knowledge and skills in infection prevention will also help dispel COVID-related concerns and fears related to the school setting.

4. MEDU and MCCSS are requested to jointly develop a funded universal SNP program for student success. This should include funding for a paid Coordinator at each participating school.

COVID-19 restrictions threaten the financial viability of most, if not all, SNPs at a time of increased food insecurity. Additional provincial funding is required in order to ensure these programs continue. Improved student success and well-being are a benefit of universal SNPs in schools. Having paid coordinators dedicated to SNP at each school would address current and pre-existing barriers to volunteer recruitment and capacity, which is an even greater issue for Francophone schools, and also ensure sustainable delivery of programs in all schools long-term. We recommend that boards of education and local public health agencies be included in the consultation phase of this work.

Background: Where school food programs exist, students show improved diet quality, academic success, and student behavior and better attendance. The Ministry of Education's (MEDU) [Foundations for a Healthy School](#) framework identifies important components to a learning environment that promotes and supports child and student well-being, one of the four core goals in Ontario's renewed vision for education. SNPs model an integrated approach where school, home and community partnerships intersect to promote student well-being. Important healthy habits students learn at SNPs reinforce curriculum teaching, are shared at home and contribute to family health and success. Having an identified coordinator as a lead for every school would help facilitate a universal approach.

For many programs, annualized, provincial funding covers approximately 15% of program costs. This year, MCCSS estimates that food and program costs will double because of additional COVID-19 food safety measures. Programs already rely heavily other sources of funding, including parent council and community fundraising efforts, efforts that will be negatively impacted with the pandemic. Inadequate funding of programs can result in closing of programs, smaller quantities of food distributed, or shift of "universal" programming to stigmatizing "on-request" programming. Additional funding for food, paid school leads and community coordination is essential in order to ensure long-term and sustainable operations.

5. Future considerations:

MEDU includes specific infrastructure criteria for capital funding projects (renovations and new builds) that support a healthy school food environment.

Background: Inadequate infrastructure limits programming in many schools. Capital funding projects provide an opportunity to ensure adequate kitchen and storage space (including a designated handwashing sink, an additional 2 or 3 sinks for food preparation, and a dishwasher); bright, non-stigmatizing eating area; and external building features such as transportation access for food deliveries and outdoor lighting to facilitate after hours food preparation for SNPs.

CODE-COMOH encourages Ontario Ministries to engage with federal partners to facilitate the development of universal SNPs across Ontario.

Background: [Federally-funded, universal school food programs](#) are being advocated for at a national level. Universally-accessible programs mean that all children and youth are eligible to participate in the SNP at a school or community location that offers the program. Canada is the only G7 country without a harmonized national school food program to guarantee the consistent delivery of nutritious meals to students. In 2017, UNICEF [raised the alarm](#) about the state of child nutrition in Canada, ranking us 37 out of 41 wealthy nations for children's access to nutritious food. Children and youth arrive hungry at school for many reasons: long bus rides, rushed mornings that do not leave enough time for a proper breakfast, and sometimes, not enough food at home. Due to Ontario's successful SNP programming, Ontario Ministries are well-poised to lend their voice and support to these advocacy efforts. In addition, the many unintended consequences of COVID-19's impact on families makes this a vital time to pilot new approaches to SNPs. Ontario could pilot hot meal programs in select schools to build evidence for federal efforts.

Other:

Reaching virtual learners has been identified as a concern by the MCCSS.

Local public health agencies and their partner boards of education could assist in data collection and analysis to help inform policy decisions.

Background: During school closures in the Spring of 2020, some programs provided grocery gift cards, food boxes/meal kits/frozen meals and partnered with food banks to help feed families of school-aged children. These approaches, however, are not sustainable or evidence-based solutions to household food insecurity. Research suggests the need for an income floor (such as a basic income guarantee) to address household food insecurity.

The scope of MCCSS-funded SNPs is limited to publicly-funded, in-school settings; home schools and private schools do not qualify. Focusing on the successful implementation of in-school programming, rather than growing the program to different settings, remains a priority at this time. The needs of children who are not in classrooms is an area of potential study as little to no data currently exists. As a first step, more needs to be known and understood in order to inform strategies and policies.