

# ROLE OF FOOD BANK NUTRITION POLICIES: A GUIDE TO ACTION

*A Section from the Nutrition in Food Banking Toolkit*



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**Acknowledgements:** The 2015 Guide to Drafting a Food Bank Nutrition Policy, on which this section of the toolkit is based, was written by Karen Webb, PhD, MPH; Elizabeth Campbell, MA, RD; Michelle Ross, MPH; and Laura Vollmer, MPH, RD. Many individuals reviewed and contributed to the original guide and the online course including Marla Feldman, MAZON; Kenneth Hecht, Nutrition Policy Institute; Heather Hudson, Food Bank of Central New York; Rita Mitchell; Michelle Berger Marshall, formerly with Feeding America; Bethany Slater, University of Albany; Tom Slater, former executive director, Food Bank of Central New York; and Hilary Seligman, MD, University of California San Francisco.

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To access the comprehensive Nutrition in Food Banking Toolkit, visit [Hunger + Health](#).  
Questions can be directed to [nutritionteam@feedingamerica.org](mailto:nutritionteam@feedingamerica.org).

## EXECUTIVE SUMMARY

Extensive research reveals food insecurity is a complex problem and does not exist in isolation - nor does it impact communities in the same ways. Low-income families are affected by multiple, overlapping issues like lack of affordable housing, social isolation, chronic or acute health problems, high medical costs, and low wages. Collectively, these issues are important social determinants of health, defined as the “conditions in the environments in which people are born, live, learn, work, play, worship and age that affect a wide range of health, functioning and quality-of-life outcomes and risks.” Effective responses to food insecurity must address the overlapping challenges posed by social determinants of health, and to be successful, this work must be done in partnership across community groups, organizations and sectors.

The Feeding America network, made up of 200 food banks and 60,000 food pantries and meal programs, works to get nourishing food—from farmers, manufacturers and retailers—to people in need. More specifically, Feeding America is focused on transforming the charitable food experience so all people facing hunger can lead healthy, active lives. As food banks develop and refine strategic plans, data collection and analysis, and nutrition guidance, education, and policies serve as significant tools for achieving transformation within the sector and in actualizing desired outcomes. Throughout this strategic process, cultural competency-building and engaging stakeholders (e.g., people experiencing food insecurity, pantry staff, donors, etc.) is imperative.

Each of these tools, as well as others, are part of this Nutrition in Food Banking Toolkit, developed by [Feeding America](#) and the Nutritious Food Revisioning Task Force; [Healthy Eating Research](#); [MAZON: A Jewish Response to Hunger](#); [CDC’s Nutrition and Obesity Policy Research and Evaluation Network](#); [Partnership for a Healthier America](#); [UConn Rudd Center for Food Policy and Obesity](#); [University of California Nutrition Policy Institute](#); and [Academy of Nutrition and Dietetics](#). These organizations, specifically the individuals on page 5, came together to share organizational expertise and research on nutrition efforts in food bank and pantry settings. Their goal is to help the charitable food sector continue to enhance systems and programmatic efforts geared at understanding and meeting nutrition needs of neighbors experiencing food insecurity.

Each toolkit section is available as a standalone resource, as well as part of the combined toolkit found on [Hunger + Health](#). Should you have any questions pertaining to the overall toolkit, contact [nutritionteam@feedingamerica.org](mailto:nutritionteam@feedingamerica.org). Contacts of individual contributors can be found within the sections themselves.

**To food banks and hunger-relief advocates utilizing this toolkit:  
Thank you for your dedication to engaging communities and other partners  
in creating a more just and equitable country for all.**

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# HEALTHY EATING RESEARCH (HER) NUTRITION GUIDELINES FOR THE CHARITABLE FOOD SYSTEM

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Utilize the links below  
to learn more about  
the HER Nutrition  
Guidelines and access  
supplementary  
materials:

- [HER Nutrition Guidelines Expert Panel Report](#)
- [HER Nutrition Guidelines Overview](#)
- Materials in Spanish available [here](#) and [here](#).
- [Food Bank FAQ](#)
- [Yammer Board \(Feeding America members only\)](#)

Federal food programs like the Supplemental Nutrition Assistance Program (SNAP) and the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) are the first line of defense against food insecurity in the United States. However, these benefits are often not sufficient to meet all of the food needs of people living in food insecure households. The charitable food system—a network of food banks, food pantries, and meal programs—fills this gap by distributing billions of pounds of food annually. In 2019, Healthy Eating Research convened a panel of experts in the charitable food system, nutrition, and food policy fields to create clear, specific recommendations for evidence-based nutrition guidelines tailored to the unique needs and capacity of the charitable food system. The intent of these recommendations is to improve the quality of foods in food banks and pantries in order to increase access to and promote healthier food choices across the charitable food system, allowing all people in the United States—regardless of income—access to the foods necessary for an active, healthy life.

## Nutrition Guidelines for Ranking Charitable Food

Healthy Eating Research

Source: Schwartz M, Levi R, Lott M, Arm K, Seligman H. Healthy Eating Research Nutrition Guidelines for the Charitable Food System. Durham, NC: Healthy Eating Research; 2020. Available at <https://healthyeatingresearch.org>.

Food Category*	Example Products	Choose Often			Choose Sometimes			Choose Rarely		
		Saturated Fat	Sodium	Added Sugars**	Saturated Fat	Sodium	Added Sugars**	Saturated Fat	Sodium	Added Sugars**
Fruits and Vegetables	Fresh, canned, frozen, and dried fruits and vegetables, frozen broccoli with cheese sauce, apple sauce, tomato sauce, 100% juice, 100% fruit popsicle	≤2 g	≤230 mg	0 g	All 100% juice and plain dried fruit			≥2.5 g***	≥480 mg	≥12 g
					≥2.5 g***	231-479 mg	1-11 g			
Grains	Bread, rice, pasta, grains with seasoning mixes	First ingredient must be whole grain AND meet following thresholds:			≥2.5 g***	231-479 mg	7-11 g	≥2.5 g***	≥480 mg	≥12 g
		≤2 g	≤230 mg	≤6 g						
Protein	Animal (beef, pork, poultry, sausage, deli meats, hot dogs, eggs) and plant proteins (nuts, seeds, veggie burgers, soy, beans, peanut butter)	≤2 g	≤230 mg	≤6 g	2.5-4.5 g	231-479 mg	7-11 g	≥5 g	≥480 mg	≥12 g
Dairy	Milk, cheese, yogurt	≤3 g	≤230 mg	0 g	3.5-6 g	231-479 mg	1-11 g	≥6.5 g	≥480 mg	≥12 g
Non-Dairy Alternatives	All plant-based milks, yogurts and cheeses	≤2 g	≤230 mg	≤6 g	≥2.5 g	231-479 mg	7-11 g	≥2.5 g	≥480 mg	≥12 g
Beverages	Water, soda, coffee, tea, sports drinks, non-100% juice products	0 g	0 mg	0 g	0 g	1-140 mg	1-11 g	≥1 g	≥141 mg	≥12 g
Mixed Dishes	Frozen meals, soups, stews, macaroni and cheese	≤3 g	≤480 mg	≤6 g	3.5-6 g	481-599 mg	7-11 g	≥6.5 g	≥600 mg	≥12 g
Processed and Packaged Snacks	Chips (including potato, corn, and other vegetable chips), crackers, granola and other bars, popcorn	None			If a grain is the first ingredient, it must be a whole grain AND meet following thresholds:			≥2.5 g	≥141 mg	≥7 g
		0-2 g	0-140 mg	0-6 g						
Desserts	Ice cream, frozen yogurt, chocolate, cookies, cakes, pastries, snack cakes, baked goods, cake mixes	None			None			All desserts		
Condiments and Cooking Staples	Spices, oil, butter, plant-based spreads, flour, salad dressing, jarred sauces (except tomato sauce), seasoning, salt, sugar	Not ranked								
Miscellaneous Products	Nutritional supplements, baby food	Not ranked								

\* Definitions of food product categories are included in the text of the full report.

\*\*Use the added sugars value when available on the Nutrition Facts Label. If it is not available, use the total sugars value. The thresholds are the same for all categories except fruits and vegetables and dairy. For both fruits and vegetables and dairy, the thresholds for total sugar are ≤12 grams for the “choose often” tier, 13 to 23 grams for the “choose sometimes tier,” and ≥24 grams for the “choose rarely” tier.

\*\*\* The threshold for saturated fat is the same for the “choose sometimes” and “choose rarely” categories. All saturated fat values ≥2.5 grams should be ranked as “choose sometimes.” The overall ranking is based on the lowest tier of any nutrient. Thus, a grain with 3 grams of saturated fat (“choose sometimes”), 300 milligrams of sodium (“choose sometimes”), and 13 grams of added sugars (“choose rarely”) would fall into the “choose rarely” tier, while a grain with 3 grams of saturated fat (“choose sometimes”), 300 milligrams of sodium (“choose sometimes”), and 10 grams of added sugars (“choose sometimes”) would fall into the “choose sometimes” tier.

Notes: Tiers can be communicated as “choose often,” “choose sometimes,” and “choose rarely,” or with green, yellow, and red visual cues, according to local preference. Overall food product rankings are determined by the lowest tier of any nutrient. For example, a product that is ranked green (“choose often”) for saturated fat, yellow (“choose



# INTRODUCTION

This section of Feeding America's Nutrition in Food Banking Toolkit is focused on helping food banks assemble working groups, create and implement nutrition policies, and track success in achieving policy goals that lead to a more nutritious food supply for communities experiencing food insecurity. This section also focuses on outlining the various purposes and benefits of a food bank nutrition policy, the key elements of such a policy, and some considerations in staging the implementation of the policy depending on food bank organizational readiness.

## WHY HAVE A FOOD BANK NUTRITION POLICY?

Food bankers may ask why a nutrition policy is needed when we have the Healthy Eating Research (HER) Nutrition Guidelines for the Charitable Feeding System. While the HER Nutrition Guidelines provide clear nutrition standards, the purpose of a nutrition policy is to guide decisions around sourcing and distribution. A nutrition policy can serve as an important tool for food banks as they plan and prioritize their strategic goals.

Food banks with experience setting nutrition policies have shared the importance of the local customization of their nutrition policy. A local or community-based approach supports food banks in emphasizing practices that fit their community's circumstances and cultures, outlining priorities of short- and long-term goals, and focusing on specific food categories. The nutrition policy development and implementation process can help food banks understand and respond to their own communities, contexts and systems. This results in a living, evolving document that grows with the goals of the organizations.



- ★ The main purpose of policy for an organization is, usually as an official statement of the organization's intent or objectives in a particular area of its core business; it is a **guide to action** and a set of specific details to guide these actions in line with its policy goals, and the organization's mission and vision.
- ★ In the case of a nutrition policy, it is a **commitment** made by the food bank to their stakeholders; specifically, to the people they serve, their food suppliers and their agencies to provide food that protects and supports individual and community health.
- ★ It is a **formal written tool** to ensure clear communication with stakeholders—for food banks that is staff, member agencies, people they serve, food suppliers, and donors—about the food bank's intentions and decision-making. It provides a historical record for reference when new food bank staff come on board recognizing a nutrition policy is a living document, evolving to include changes to goals and intent over time.
- ★ The most important user group of a food bank nutrition policy is the management and staff of a food bank; the main purpose of a written food bank nutrition policy is to **guide food procurement decisions by the food bank and to promote consistent decision-making** by staff to acquire and distribute more healthful foods.
- ★ Other nutrition-related activities and practices of food banks, such as cultural competency training and nutrition education, may be included in the policy but should serve to complement its main focus: to improve the nutrition quality of the foods and beverages distributed.



# Benefits of a Nutrition Policy



## Key benefits for the food bank include:

Conveying a commitment to change on the part of the leaders of the organization and helping the food bank <u>own</u> nutrition as key to their central goal of serving the community	Enabling staff to prioritize work on nutrition quality of foods during their work time and in the course of their duties	Giving staff permission to change food sourcing practices in line with the policy	Communicating clearly with all staff and food donors exactly which types of foods and beverages are encouraged and prioritized to promote consistent decisions about food procurement
Providing institutional memory through changes of management and staff about the commitment to provide nutritious foods	Providing a basis for modifications to strategic and operational plans, policy and procedures manuals, job descriptions and other management documents	Providing a kind of a contract to which staff, management and the board are accountable to all stakeholders and a basis for reporting on how the food bank is achieving policy goals	Providing a more customized look into the organization's nutrition system; for the food banks who may be using Feeding America's "Foods to Encourage" nutrition guidelines as their de facto nutrition policy, this will be a step forward.



## Key benefits for other stakeholders linked to or served by the food bank include:

Conveying responsiveness to <b>clients</b> about their health concerns, food preferences and cultural connections, and generating client confidence that their needs and views have been taken into consideration	Demonstrating to the wider <b>community</b> that the food bank is a responsible food provider, supplying healthful foods to address health inequities in disadvantaged communities	Assisting in communication with donors and other suppliers of the food bank's intentions, details of the types of foods prioritized, and foods which are less desirable to the food bank	Providing a tool for communication with and encouragement of pantries and other agencies affiliated with the food bank to follow suit and improve the nutritional quality of the foods they supply to communities, including food they purchase or acquire from local donations
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**Client** - Throughout this toolkit, client is used to reference people accessing food and other services from the charitable food system. Terms such as "neighbors" or "recipients" may also be used to reference the same population.

## ONE FOOD BANKER REPORTED ...

“We had an informal ‘policy’ where we all kind of had the idea of sourcing more nutritious foods. But when we went around and talked to staff, we found that everyone had a different idea about what that meant. We decided we needed a formal written policy.”



# HOW TO DEVELOP A FOOD BANK NUTRITION POLICY



External stakeholders include community members affected by the policy and invested in its success, especially clients representing the interests of various community subgroups, as well as representatives of partner agencies, donors, wholesale food vendors, and local health authorities.

There are many ways to develop a nutrition policy, but experience from a number of food banks tells us that how the policy is developed is key to its successful implementation. Food bankers indicate that policies developed solely by the nutrition department or health-conscious staff members rarely succeed without a process to create buy-in from staff, management, clients, donors, and partner agencies.

Food bankers have achieved success using one model that begins by creating a working group to develop the policy, in consultation with all stakeholders affected by the policy.

A working group should include both internal and external stakeholders. Internal stakeholders include representatives from a range of food bank departments, like food sourcing, warehousing, finance, IT, development, agency relations, as well as a representative from senior leadership (like the CEO or COO) and a board member.

The policy development process is best led by the working group. During the policy development, the scope and specifics of the policy should be determined, often by reviewing client-level data on health concerns, food preferences, cultural connections, food bank inventory data, and any existing food bank commitments. Working group members will provide feedback and work with their colleagues and clients to identify challenges, objections, and likely consequences of the policy that must be thoroughly discussed—with solutions found to frame a workable policy. Compromises are sometimes necessary for the starter policy in order to ensure buy-in from all key stakeholders; this approach is further discussed in the section “A Staged Approach to Food Bank Nutrition Policy” on page 13. A post-implementation review at six months or one year affords the working group another chance to revisit the policy based on the food bank experience and stakeholder feedback.

Most individuals have had frustrating experiences with committees or groups trying to get agreement and to get things done. Common challenges are efficient group management and handling and resolving conflicts within a reasonable time frame. Food bankers have found useful detailed guidance on how to identify and engage stakeholders and how to effectively chair/facilitate a policy development working group in this resource: “Guide to Convening a Working Group for a Food Bank Nutrition Policy” available in the online course [Developing a Food Bank Nutrition Policy](#).

# WHAT'S IN A FOOD BANK NUTRITION POLICY?

A good policy is short enough to be accessible and useful to all stakeholders and long enough to provide the detail for decision-making about food procurement. Typically, strong nutrition policies include:

- The rationale for the policy
- Food inventory sources covered by the policy
- Food categories/foods covered by the policy
- Nutrition standards that guide food bank decisions in implementing the policy
- Implementation target dates and milestones
- A list of those who developed the policy, those who reviewed and agreed to the policy and the board and management supporting statements.



## Rationale for the Policy

- \* A brief but clear rationale spells out the main purpose and benefits of having a policy, giving a good grounding to all stakeholders about the food bank's position on the importance of making specific commitments. It explains the benefits internally for the food bank's managers and staff, and externally for clients, food suppliers and donors, and the wider community it serves. Points such as those in the "Key Benefits" section on page 6 typically appear in a rationale section.
- \* A convincing rationale helps to facilitate support from senior management and the board of directors. Donors and other food suppliers, too, may be more amenable to changing the foods they provide when the food bank links the new direction with their aspirations for making a positive difference in the community's health and well-being.
- \* A slide presentation resource is available for food banks to adapt and use in presenting the rationale and benefits of a policy to their stakeholder groups, including policy development groups, boards of directors, staff, member agencies, etc. This downloadable resource can be found in the online course, Developing a Food Bank Nutrition Policy.

## Food Inventory Sources Covered by the Policy

Food bank nutrition policies need to specify which sources of their food inventory they are targeting with their policy. (See page 13 on incrementally staging the scope of nutrition policies.)

- ★ **A comprehensive food bank nutrition policy covers all of the three main sources of foods and beverage inventory including:**
  1. Donated foods
  2. Government-supplied foods  
(e.g., The Emergency Food Assistance Program - TEFAP)
  3. Foods purchased by the food bank
- ★ **Fiscal year 2020 data<sup>1</sup> from Feeding America's Quarterly Poundage Report shows that for most food banks across the country, over half of inventory (about 55%) comes from donations, around a third (32%) from government commodities and a low percentage (usually about 13%) from food bank purchases, usually wholesale. As fundraising revenue increases, food banks may choose to increase their purchases of food - an opportunity to be more selective than with other sources of food inventory.**
- ★ **A comprehensive policy covering all food sources is the best way to increase the supply of healthful foods for clients. If a comprehensive policy is initially impractical, it may be helpful to start with just one of the sources of food inventory. For example, developing a policy for purchased foods is a good place to start since food banks have control over their own purchasing decisions and less control over what foods are donated or available from government sources. A focus on purchased foods may also enable food banks to shore up efforts to support local farmers and food suppliers and prioritize culturally relevant food options.**
- ★ **See page 13 for more information about a staged approach to implementing a nutrition policy.**

## Food Categories Covered by the Policy

- ★ **The policy must be specific enough to inform and guide decisions and actions that lead to the policy goals. Anyone reading it should know exactly which food categories are targeted by the policy. (See next section on nutrition standards to be achieved in the policy.)**
- ★ **The categories of foods recommended in the Dietary Guidelines for Americans<sup>2</sup>, and specified in the HER Nutrition Guidelines are those which may be targeted or highlighted in a food bank nutrition policy for change.**

<sup>1</sup> Note: Due to the COVID-19 pandemic and public and private support, poundage in fiscal year 2020 was atypical.

<sup>2</sup> U.S. Department of Agriculture and U.S. Department of Health and Human Services. Dietary Guidelines for Americans, 2020-2025. 9th Edition. December 2020. Available at [DietaryGuidelines.gov](https://www.dietaryguidelines.gov).

The categories listed below are separate from the 31 categories that are currently in use by Feeding America in the Quarterly Pulse Report (QPR). These are the 11 food categories in the [Healthy Eating Research \(HER\) Nutrition Guidelines](#); many of these categories directly align with USDA MyPlate categories and the remainder represent product groups commonly found in the charitable food system.



Fruits and vegetables  
Grains  
Protein  
Dairy  
Non-dairy alternatives  
Beverages  
Mixed dishes  
Processed and packaged snacks  
Desserts  
Condiments and cooking staples  
Miscellaneous products

Many food banks will choose to focus their initial efforts on a few of these food categories to start, for example fruits and vegetables, beverages, etc. (See page 13 below for more information about taking a staged approach to nutrition policy.)

- \* Food banks that developed and implemented nutrition policies noted the importance of specifying food groups to which the policy does NOT apply (e.g., special diet foods like baby formula and those included in “Other Miscellaneous items”).



## Nutrition Standards to be Achieved with the Policy

- ★ The HER Nutrition Guidelines outline nutrition criteria for classifying foods into ranks: “Choose Often”, “Choose Sometimes”, and “Choose Rarely”. Consistent with current public health concerns, the guidelines aim to reduce consumption of sugar, saturated fat and sodium, and increase consumption of high-quality protein, fiber, and nutrients in fruits and vegetables. The nutrition standards are specific to each food category.
- ★ These criteria were developed to identify foods in each category that are nutritionally preferable to others. In other words, not all meats, grains and dairy foods are considered equally healthful.
- ★ Foods that are nutritionally superior to others are those that contain more vitamins, minerals, fiber and/or protein and minimal added fat, sugar or sodium.
- ★ It is not the expectation of Feeding America or other stakeholders that all food inventory in a food bank will be in the highly nutritious “Choose Often” category or that policies should seek to achieve nutritional perfection. A policy may focus on certain food categories, such as proteins and grains, and specify the aim to increase the proportion of those foods that meet the “Choose Often” or the “Choose Sometimes” standards. For example, a policy could focus on increasing the proportion of nutrient-dense fresh fruits and vegetables, seeking to ensure that at least 80% of that category aligns with “Choose Often” standards.
- ★ Ranking and classifying foods as healthful or nutritious has been a challenge for food bankers, in part due to limited information about the nutrients in a variety of food products and inconsistent criteria for judging them. The HER Nutrition Guidelines provide a set of rational, scientifically based criteria that can be practically applied when using resources to identify the nutrition profile of various foods and to classify them consistently.
- ★ One key to the success of a food bank nutrition policy is agreement on the exact foods that the policy is targeting to be increased and/or decreased. Since there are thousands of different types and brands of foods acquired by food banks, this is no easy task. Several resources have been developed to support nutrition policy implementation. A key resource is the HER Nutrition Guidelines.
- ★ Use of nutrition criteria is crucial to the success of the policy as it helps:
  1. Procurement staff identify products to be ordered that do (and do not) align with the policy.
  2. Receiving staff identify and document basic nutrition details about products received.
  3. Inventory monitoring staff to create regular reports that summarize trends in food categories and nutritional groupings.

## A Staged Approach to a Food Bank Nutrition Policy

- \* Given the significant operational changes that implementing a nutrition policy can entail, a staged approach may be preferred.
- \* We suggest that the policy identify priority food groups or sources where the food bank wants to focus its initial effort.
- \* Having a section to identify priority work:
  - Draws attention to select food groups where food bank staff and management can focus their efforts.
  - Maximizes chances of success by not spreading effort too thinly.
  - Identifies limited food categories or food sources that have significant potential to improve client nutrition quality.
  - Allows time to focus on improving inventory data and tracking, including documentation and reporting.
  - Offers the opportunity for staff to provide input on policy implementation.
  - Allows the food bank to celebrate success as they go.
- \* Priority foods or food sources highlighted in the policy can be further described in operational plans, strategic plans and other documents that guide the food bank's operations and reporting. Food banks have learned firsthand the benefit of sticking with the timelines they have laid out. Speeding through milestones can often be challenging and frustrating for operations staff.
- \* There is an opportunity to update this section each time the policy is reviewed (e.g., every six to 12 months) without modifying the main policy.
- \* If, after discussion, stakeholders do not endorse a comprehensive policy, (i.e., one that applies to all “Choose Often”, and/or all sources of inventory) a good starter policy might cover the less controversial food groups, such as fruits and vegetables. The policy can be reviewed after a period of time to expand it to other food groups and sources once stakeholders are comfortable with the initial implementation of the starter policy.





★ **Priorities can be set based on many different criteria such as:**

By food group:

- Healthful foods where the food bank is already focusing effort, such as fruits and vegetables, yet has more changes to make, like increasing the nutrient-dense varieties of fruits and vegetables.
- Foods most wanted by community members facing food insecurity (e.g., fresh fruits and vegetables, dairy, lean meats) and those least wanted (e.g., sugar-sweetened beverages and snacks).
- Foods that would contribute to improvements in health for individuals with diet-related illnesses such as diabetes (i.e., prioritizing an increase of vegetables and decrease in sweetened beverages and snacks).
- Foods where inventory trends suggest food procurement is heading in the wrong direction in relation to the policy, such as decreasing or leveling off of fruit and vegetables or increasing snack foods.

By source:

- An inventory source you have control over, like purchased food, can be a good place to start while you deepen relationships with donors to impact donated food options, or work with government agencies on commodity options.

★ **Increasing fruits and vegetables, particularly fresh forms that have appeal to the people you serve and nutrient-dense varieties, could easily be a priority for most food banks. We advise food banks to include all the key food groups of the HER Nutrition Guidelines in the main policy and select one or two groups as initial focus priorities.**



- \* **A case study of the inventory of selected food banks in California pointed to a need to consider improvements within the groups of even non-controversial food groups like fruits and vegetables. Suggestions follow:**
  - Surveys of client preferences for charitable food assistance showed that healthful fresh foods were ranked as most preferred, headed by fresh vegetables, fresh meat, poultry, fish and fresh fruits.<sup>1,2,3</sup> These foods were preferred because they are more healthful, appealing and cost more to purchase than other foods. Thus, such foods from the pantry help to increase household access to healthful basic foods.
  - While fresh produce donations increased, potatoes and onions comprised the majority of the fresh vegetables procured. This suggested an opportunity to diversify the types of vegetable donations and purchases to incorporate more nutrient-dense varieties<sup>4</sup>. More colorful vegetables such as dark green, red and orange varieties are more nutrient-dense—high in vitamins, minerals and fiber—and will contribute to improved diet quality of people served.
  
- \* **An important reason for staging policy implementation is to ensure that all staff responsible for implementation buy in and support the policy changes. When we evaluated one food bank’s nutrition policy two to three years after introduction, we found that the inventory of sugar-sweetened beverages actually increased in the first year. A key staff member was not initially supportive of the policy, but after the first year became convinced it was workable and in the two subsequent years, the sugar-sweetened beverage inventory decreased substantially.**

1 Campbell E, Hudson H, Webb K, Crawford PB. Food preferences of users of the emergency food system. *J Hunger Environ Nutr.* 2011; 6(2):179-187.

2 Webb K, Campbell E, Ross M, Crawford P. Improving the Nutritional Quality of Foods Distributed to Lower-Income Families Through Emergency Food Services: A Study of Nutrition-Related Policies and Practices of Food Banks and Food Pantries. Available at: [http://cwh.berkeley.edu/sites/default/files/primary\\_pdfs/Improving\\_the\\_Nutritional\\_Quality\\_of\\_Foods\\_Distributed\\_to\\_Lower-Income\\_Families\\_through\\_Emergency\\_Food\\_Services\\_6.12\\_0.pdf](http://cwh.berkeley.edu/sites/default/files/primary_pdfs/Improving_the_Nutritional_Quality_of_Foods_Distributed_to_Lower-Income_Families_through_Emergency_Food_Services_6.12_0.pdf). Accessed January 26, 2015.

3 Weinfeld NS, Mills G, Borger C, Gearing M, Macaluso T, Montaquila J, Zedlewski S. Hunger in America 2014, National Report Prepared for Feeding America. Available at: <http://www.resourcelibrary.gcyf.org/sites/gcyf.org/files/resources/2014/hunger-in-america-2014-full-report.pdf>. Accessed January 26, 2015.

4 Ross M, Campbell E, Webb KL. Recent trends in the nutritional quality of food and beverage inventory of food banks; case studies of six California food banks. *J Hunger Environ Nutr.* 2013;8(3):294-309.

## Optional: Foods to Deprioritize Covered by The Policy

- 1 The Dietary Guidelines for Americans (DGA) specifies foods and food components to limit in the diet, including calories from added sugars and saturated fat that supply considerable calories and few nutrients. The DGA advise that these foods should be limited to small amounts occasionally. Commonly consumed sources of added sugars and fats in the American diet include sugar-sweetened beverages, sweet snacks and desserts (such as candy, cakes and cookies) and processed and packaged savory snack foods (such as chips). This is why these foods are identified as “Choose Rarely” in the HER Nutrition Guidelines.
- 2 An increasing number of food providers, such as schools, hospitals and workplaces, have introduced guidelines to limit or exclude these foods to protect the health and prevent excess weight gain among the populations they serve.
- 3 Americans consume, on average, about 170 calories daily (8% of total calories) from sugar-sweetened beverages, with soda being the largest contributor to these calories. Fruit drinks, sweetened tea and coffee, energy/sport drinks and flavored milks are other main sources.<sup>1</sup>
- 4 Even among food banks that discourage sugar sweetened-beverages and have a low inventory of them, these beverages still contribute surprisingly high amounts of calories to client diets. In one food bank we studied with a low average annual inventory of sugar-sweetened beverages, these drinks contributed over 1 billion calories annually to the low-income households they serve.
- 5 Experts in nutrition and public health agree that programs and policies most likely to improve people’s diets involve making healthful choices *more easily available* and *at the same time* making less healthful choices *less readily available*.<sup>2,3</sup>
- 6 Clients give a low ranking to foods high in sugar and fats among their preferences for foods from the pantry. In at least three studies, foods that ranked the lowest were sugar-sweetened beverages, salty snacks and sweet desserts.
- 7 Example policy language on “foods to deprioritize” is included in the appendices.

1 Miller PE, McKinnon RA, Krebs-Smith SM, Subar AF, Chiqui J, Kahle, L, Reedy, J. Sugar-Sweetened Beverage Consumption in the US: Novel Assessment Methodology. *American journal of preventive medicine*. 2013; 45(4):416-421.

2 Brownell, KD & Horgen, KB. *Food fight: The inside story of the food industry, America’s obesity crisis, and what we can do about it*. Chicago: Contemporary Books. 2004.

# BRIEF OVERVIEW OF POLICY IMPLEMENTATION AND REVIEW

Including information about the implementation of the policy indicates a commitment by the food bank to act on the policy. A separate implementation guide can be created to accompany a formal nutrition policy. The implementation guide could provide more logistical details than the policy. While the nutrition policy requires approval from leadership or the board of directors, the implementation guide can be adjusted more frequently and take into consideration lessons learned along the way.

**The following information is useful for all stakeholders to receive about the food bank's intentions:**

- Timing for when the policy will take effect including an official date noting when it will be added to the food bank's official policy and procedures manual.
  - When the policy will be disseminated and communicated to internal and external stakeholder groups, and which staff position are responsible for overseeing the plan.
  - Who has signatory authority to approve the policy (e.g., board of directors, the executive director/CEO).
  - The staff member(s) that should be contacted with questions about the policy
  - Staff positions and departments responsible for the implementation of different aspects of the policy. For example, the procurement staff in the operations department is responsible for sourcing priority foods, the receiving and inventory staff in the operations department is responsible for developing and implementing new documentation procedures on priority foods, etc.
  - Training information, including when and how it will be provided to ensure staff has the skills needed to implement and track the policy.
  - Reporting process to understand progress toward policy goals (e.g., using information from improved inventory records on particular types of foods in the HER Nutrition Guidelines).
  - Frequency for when and how the policy will be reviewed and updated.
- ★ **Food banks have indicated the benefits of having an official review date to consider feedback from stakeholders regarding how well the policy is being implemented. The review enables the food bank to:**
- Expand the policy if the initial policy was limited to one source or one type of food.
  - Keep working toward improved documentation of the types of foods coming in so progress can be better monitored.
  - Evaluate and monitor nutrition policy achievements in terms of changes to food bank inventory and of client satisfaction.

A woman with long blonde hair, wearing a blue t-shirt and dark jeans, is leaning into the back of a white food bank truck. She is smiling and holding a large cardboard box labeled 'Cheerios'. The truck is filled with other boxes, some with handwritten labels like 'B' and 'LIFE'. A woman with short blonde hair is visible on the right side of the truck, looking towards the woman loading the boxes. The scene is set outdoors, and the truck's rear wheel and door are visible in the foreground.

## ONE FOOD BANK GROUP TOLD US ...

“The food bank staff was more open to conversations and improvements after having worked with the initial policy. Including a review date in the policy helped provide an official opportunity to review staff experience with the policy and strengthen it, after initial caution and resistance.”



## EXAMPLE POLICIES AND NUTRITION POLICY CHECKLIST

Two example policies are included in this section. The first is a model/sample developed for use by food banks as part of the project “A Guide to Developing a Food Bank Nutrition Policy,” available as part of the online course [Developing a Food Bank Nutrition Policy](#). The second example is a policy developed by Foodshare in Bloomfield, CT.

A third resource in this section, The Nutrition Policy Checklist is a tool food banks can use to review and strengthen their draft policies. It was developed as part of the online course, [Developing a Food Bank Nutrition Policy](#), and further instruction is available there.



## EXAMPLE 1: Food Bank Nutrition Policy for Food Procurement

Using Healthy Eating Research's Nutrition Guidelines for the Charitable Food System, March 2020 to guide procurement of purchased, donated and government foods

Prepared by: Nutrition Policy Working Group on behalf of the board of directors

Policy Title: Nutrition Policy for Food Procurement

### 1. Statement of Purpose

The purpose of this nutrition policy is to guide food bank decisions about the foods to acquire and distribute that will contribute to more healthful diets of our clients.

Our nutrition policy communicates to clients, affiliated local pantries and other agencies, donors, government programs and the community-at-large that we are committed to providing healthful foods to clients. The policy provides clear information about the types of foods to acquire and distribute.

### 2. Policy Rationale and Benefits

[Food Bank Name] has a history of service to the community, supplying foods to help families in hard times. In recent years, the food bank has become concerned about the increasing rates of diabetes, obesity, high blood pressure and other serious diet-related diseases and conditions in the community.<sup>1</sup>

Our food bank has a strong commitment to providing healthful foods to clients to help prevent these diet related conditions.. We are working with donors and government programs to make this happen.

We want our clients to know that their health concerns, food preferences and cultural connections are among our highest considerations in acquiring more healthful food. We recognize that the cost of healthier food items, the ability to access healthful, local foods and many other considerations affect what clients want and need.<sup>2,3</sup>

We recognize the increasing role that food banks play in providing healthful foods to community members in need. Our policy to procure and distribute foods of high nutritional quality demonstrates to the community that we take our role and responsibility seriously.

This policy ensures that our organizational commitment to distribute healthful foods is a part of our institutional memory and provides staff with a basis for clear and consistent decision-making about the types of foods and beverages they should procure, encourage and prioritize in their work. The policy also serves as a tool for management and accountability on moving toward the provision of more healthful foods.

1 Seligman, HK, Laraia, BA, Kushel MB. Food insecurity is associated with chronic disease among low-income NHANES participants. *The Journal of Nutrition*, 2010; 140.2: 304-310.

2 Campbell E, Hudson H, Webb K, Crawford PB. Food preferences of users of the emergency food system. *J Hunger Environ Nutr*. 2011;6(2):179-187.

3 Webb K, Campbell E, Ross M, Crawford P. Improving the Nutritional Quality of Foods Distributed to Lower-Income Families Through Emergency Food Services: A Study of Nutrition-Related Policies and Practices of Food Banks and Food Pantries. Available at: [http://cwh.berkeley.edu/sites/default/files/primary\\_pdfs/Improving\\_the\\_Nutritional\\_Quality\\_of\\_Foods\\_Distributed\\_to\\_Lower-Income\\_Families\\_through\\_Emergency\\_Food\\_Services\\_6.12\\_0.pdf](http://cwh.berkeley.edu/sites/default/files/primary_pdfs/Improving_the_Nutritional_Quality_of_Foods_Distributed_to_Lower-Income_Families_through_Emergency_Food_Services_6.12_0.pdf). Accessed January 26, 2015.

### 3. Food Inventory Sources Covered by This Policy

This policy applies to all foods acquired by the food bank including:

- Foods and beverages donated by food manufacturers, distributors, retailers, organizations, producers/growers and community members
- Foods and beverages obtained from government programs
- Foods and beverages purchased by the food bank

### 4. Healthful Foods to Increase by [Food Bank Name] Covered by This Policy

This policy is based on the Dietary Guidelines for Americans and the Healthy Eating Research (HER) Nutrition Guidelines for the Charitable Food System<sup>4</sup>, and research about client-food preferences. In accordance with this nutrition policy, we aim to actively seek, procure and distribute the following foods when appropriate and possible:

**Fruit and Vegetables**, including:

- a. **Fresh produce, including** more colorful varieties, because they are rich in nutrients and low in calories. Examples include but are not limited to fresh carrots, cabbage, broccoli, spinach, brussels sprouts, bell peppers and berries.
- b. **Frozen fruits and vegetables** with no added sugar or sodium
- c. **Fruits canned** in water or 100% juice
- d. **Vegetables canned** with no added salt or reduced sodium
- e. Nutrient guidelines for this food group:
  - i. Saturated fat  $\leq$  2 g
  - ii. Sodium  $\leq$  230 mg
  - iii. Total sugar  $\leq$  12 g
  - iv. Added sugar 0 g

**Whole Grain and Whole Grain-Rich Foods**, particularly:

- a. **100% whole grains such as quinoa, brown rice, barley**
- b. **Whole wheat pasta**
- c. **Whole grain breads**
- d. **Whole grain cereals with  $\leq$  6 grams added sugar**
- e. **Plain oatmeal**
- f. Nutrient guidelines for this food group:
  - i. Saturated fat  $\leq$  2 g
  - ii. Sodium  $\leq$  230 mg
  - iii. Total sugar  $\leq$  6 g
  - iv. Added sugar  $\leq$  6 g

**Protein Foods**, including:

- a. **Dried beans**
- b. **Low-sodium canned beans**
- c. **Some nut butters**
- d. **Nuts**
- e. **Fresh poultry**
- f. **Fish**
- g. **Eggs**

<sup>4</sup> HER Nutrition Guidelines shown where they are based on detailed criteria for nutrients or other food components.

- h. Tofu
- i. Low-sodium canned tuna
- j. Canned salmon
- k. Nutrient guidelines for this food group:
  - i. Saturated fat  $\leq$  2 g
  - ii. Sodium  $\leq$  230 mg
  - iii. Total sugar  $\leq$  6 g

**Dairy Foods**, including:

- a. Fat-free or low-fat unsweetened yogurt
- b. Skim, 1%, 2% milk
- c. Fat-free and reduced-fat cheeses
- d. Light sour cream
- e. Nutrient guidelines for this food group:
  - i. Saturated fat  $\leq$  3 g
  - ii. Sodium  $\leq$  230 mg
  - iii. Total sugar  $\leq$  12 g
  - iv. Added sugar 0 g

**Non-Dairy Alternatives**, including:

- a. Unsweetened almond, rice, cashew, oat and pea milk
- b. Unsweetened soy, almond, rice, cashew and oat milk yogurts
- c. Some plain non-dairy alternative products with  $\leq$  6 g of added sugar
- d. Nutrient guidelines for this food group:
  - i. Saturated fat  $\leq$  2 g
  - ii. Sodium  $\leq$  230 mg
  - iii. Total sugar  $\leq$  6 g
  - iv. Added sugar  $\leq$  6 g

## 5. Healthful Foods to Prioritize in This Policy

Food pantry research clearly indicates that the people served prefer receiving healthful foods—particularly fresh fruits and vegetables. Although our policy aims to increase all of the “Choose Often” foods outlined in the HER Nutrition Guidelines, we will put considerable effort and emphasis initially on procuring more fresh fruits and vegetables, particularly those that are more colorful, nutrient-dense varieties.

## 6. Foods to Deprioritize at [Food Bank Name]

The HER Nutrition Guidelines recommend “Choose Rarely” foods and beverages that contribute mainly saturated fat, sodium and added sugar. Such foods tend to be high in calories and low in nutrients. An increasing number of schools, hospitals and workplaces have introduced guidelines to limit or exclude these foods to protect the health of the people they serve. This nutrition policy aims to deprioritize the procurement and distribution by food banks of the “Choose Rarely” foods and beverages as outlined in the HER Nutrition Guidelines. When appropriate and possible, we will not actively seek or procure foods in this category and will work toward reducing our inventory of these types of items:

**Processed/packaged snacks**, including, but not limited to:

- a. **Chips** (corn, potato, puffed cheese, tortilla; not including lower/reduced fat or baked)
- b. **Crackers** (not including lower/reduced fat or baked)
- c. **French fries**
- d. **Onion rings**
- e. **Pork rinds**
- f. **Bars** (including granola, cereal, energy, snack bars)

**Desserts** - including, but not limited to:

- a. **Cakes**
- b. **Candy**
- c. **Chocolate**
- d. **Cookies**
- e. **Donuts**
- f. **Frozen desserts**
- g. **Ice cream**
- h. **Fruit snacks**
- i. **Muffins**
- j. **Pastries**
- k. **Pies**
- l. **Popsicles**
- m. **Pudding**

**Sugar-sweetened beverages**<sup>5</sup>, including but not limited to:

- a. **Energy drinks:** Examples are Full Throttle Energy Drink<sup>®</sup>, Monster Energy Drink<sup>®</sup>, Mountain Dew AMP Energy Drink<sup>®</sup>, Red Bull Energy Drinks, Rockstar Energy Drink<sup>®</sup>
- b. **Fruit drinks:** Examples are coconut water with caloric sweetener, fruit-flavored drink or water with caloric sweetener, fruit nectars, fruit punch, fruit smoothies with caloric sweetener
- c. **Sodas:** Examples are regular soft drinks (not including diet), sugar cane beverage, sugar-sweetened carbonated water
- d. **Sports drinks:** Examples are Gatorade Sports Drinks<sup>®</sup>, Powerade Sports Drink<sup>®</sup>
- e. **Sweetened coffees:** Examples are blended iced coffee drinks, café mocha, presweetened powdered coffee mix, pre-sweetened ready-to-drink coffee
- f. **Sweetened teas:** Examples are pre-sweetened ready-to-drink tea, pre-sweetened tea mix
- g. **Sweetened shakes and smoothies:** Examples are ready-to-drink milkshakes, eggnog
- h. **Vitamin-enhanced waters:** Example is Propel Fitness Water<sup>®</sup>

<sup>5</sup> Miller, P. E., McKinnon, R. A., Krebs-Smith, S. M., Subar, A. F., Chiriqui, J., Kahle, L., & Reedy, J.. Sugar-Sweetened Beverage Consumption in the US: Novel Assessment Methodology. American journal of preventive medicine, 2013;45(4): 416-421.

## 7. Foods Not Covered by this Policy

*It is not essential to include this section but doing so may help answer questions from staff and others about how foods commonly received by the food bank fit into the policy.*

Though some of the foods received by the food bank, such as some types of shelf-stable mixed dishes, are in the “Choose Rarely” category of the HER Nutrition Guidelines due to high levels of sodium and fat, they provide clients with the ability to prepare and serve quick and easy meals. Thus, they are not the focus of this nutrition policy. Condiments and cooking staples have not been ranked by the HER Nutrition Guidelines and are also not the focus of this policy, as they enable clients to prepare meals from the staple foods received from the food bank.

## 8. Brief Overview of Policy Implementation and Review

- This policy has been approved by [Name of Food Bank], board of directors, Jan 15, 2020 for implementation by the executive director.
- The policy will be effective Feb 1, 2020 and will be integrated into [Name of Food Bank’s] official Policies and Procedures Manual as an addendum by March 2020.
- The policy will be communicated and disseminated to relevant stakeholders by March 1, 2020. The director of Human Resources is responsible for the oversight of initial communications and dissemination of the policy to staff, donors and member agencies.
- Training of all staff involved in the implementation of the policy will be initiated in March 2020 and completed by June 2020. The director of Operations is responsible for oversight of training, beginning with food procurement staff, re-identifying items that do and do not meet the HER Nutrition Guidelines and the policy priorities, and finding new sources of priority foods.
- Questions and comments about the policy should be directed to the director of Operations.
- The director of Agency Relations is responsible for working with inventory staff to establish monthly reviews of the purchased items to encourage adherence to the policy and to make changes to practices as necessary.
- The director of Finance & Information Technology is responsible for reporting progress toward policy goals to the executive director.
- The policy will be reviewed six months after initial implementation (August 2020) and annually thereafter by the working group, the executive director and the board of directors.

## EXAMPLE 2: Foodshare Nutrition Policy

# FOODSHARE

## Nutrition Policy for Food Procurement

Approved by Board of Directors May 1<sup>st</sup>, 2019

### Statement of Purpose

Foodshare's 2019-2021 Strategic Roadmap set a priority to "increase access to nutritious food through collection, distribution, and network capacity." This nutrition policy communicates to clients, local partner programs and agencies, donors, and the community-at-large that we are committed to providing healthful foods to the people we serve. Foodshare staff will work with food donors and partner programs to ensure that the adoption of this nutrition policy is feasible through reasonable policy guidelines.

### Foods to Increase

The primary goal of this nutrition policy is to increase the amount of nutritious food obtained by Foodshare and made available to our partner programs. In order to achieve this goal, Foodshare will utilize the Supporting Wellness at Pantries (SWAP) ranking system to monitor and assess the nutritional value of our inventory. The SWAP system is based on the most recent Dietary Guidelines for Americans. SWAP ranks the quality of foods based on 3 nutrients: saturated fat, sodium and sugar because these nutrients are most associated with chronic disease risk. SWAP utilizes a "stop light" design that categorizes foods into one of three tiers: green (choose often), yellow (choose sometimes), and red (choose rarely).

Foodshare will actively seek and procure foods that fall into the "green" and "yellow" SWAP categories. The following list of foods that will be encouraged by Foodshare is not exhaustive, but provides guidelines for the types of foods that Foodshare will actively source and procure:

- Fresh produce
- Canned vegetables and beans low in sodium, and canned fruit low in added sugar
- Whole grain foods such as bread, pasta, brown rice, and low sugar cereal
- Low fat dairy
- Lean meats
- Soups and meals with low sodium

### Foods to Reduce

This policy does not ban any specific food items. However, in order to prioritize our limited resources, Foodshare will seek to reduce the procurement of foods that are categorized as "red" foods under SWAP. Foodshare will not purchase or actively source or seek out for donations:

- *Sugar sweetened beverages*, including, but not limited to soda, energy drinks, fruit drinks, sports drinks, sweetened coffees, sweetened teas, and shakes,
- *Sweet snacks and desserts*, including, but not limited to bakery items (such as cakes, cookies, donuts, muffins, and other pastries), ice cream, fruit snacks, and candy,
- *Savory snacks*, including, but not limited to chips and crackers.

# FOODSHARE

Our goal is to improve the nutritional quality of our inventory over time by using data and communicating with our food donors. The Nutrition Policy will help codify much of the work that Foodshare staff are already doing. In addition, we will monitor and track the percent of our inventory that is ranked green, yellow and red and communicate with donors regarding the content of their donations based on the data. Foodshare staff and the Health & Nutrition Advisory Council have developed appropriate procedures for implementing the Nutrition Policy.

The development of this Nutrition Policy provides Foodshare with a strong and intentional commitment to client health and wellbeing, a streamlined guide to aid staff in consistent decision-making regarding food procurement, and an official communication document to share with food donors, partner programs, and the broader community.

## Nutrition Policy – Examples and Scenarios for making decisions

Scenario	Before Policy	After Policy
A local donor calls and offers Foodshare 4 pallets of ice cream.	Previously, we would always accept unless we had limited storage space or already had an abundance.	Aside from rare exceptions, Foodshare will not accept large donations consisting solely of "red" foods. An exception would be during summer months if we have room in the freezer, we may accept ice cream.
Mixed trailer loads of salvage (damaged/distressed/re turned items) from retail chains such as Stop and Shop and Big Y	We receive all items as mixed product, volunteers sort through, and we distribute	We will receive all items as mixed product, volunteers sort through, and we will distribute. We will monitor and track the percent of donations that are ranked green, yellow and red by donor. If more than 50% of overall donations from a specific donor, by weight, are RED, we will communicate with the donor to encourage more green and yellow items.
Donations of holiday candy	We accept all types in mixed shipments from retailers and if offered prior to the holiday will reach out to partner programs for direct pick-up if they are interested.	We will communicate to donors about our emphasis on healthy food and we will refuse donated holiday candy after the holiday has passed. This applies to large quantities of candy only, not smaller amounts that will show up in salvage loads. Aside from the nutritional content, there isn't demand for candy canes after Christmas and they take up room in the warehouse. (And there is no dignity in receiving these items past the holiday). We will continue to offer holiday candy to our partner programs for direct pick-up if the donation offering is made prior to the holiday.
Bakery items, such as cakes, cookies and sweets	We currently accept all bakery items from retail locations	Start tracking amount of bakery received from large national retailers as a percentage of overall donations. Encourage more green and yellow donations. When bakery donations exceed 35%, work with donors and Feeding America to make improvements (this is the new standard from Feeding America).





# Nutrition Policy Checklist

A checklist was developed for use by food banks to review and strengthen their draft policies. See the [Guide to Drafting a Food Bank Nutrition Policy](#) for details on how to meet the criteria for each item on the checklist.

Use this policy checklist to review all the sections of your food bank's nutrition policy including: the statement of purpose, policy rationale and benefits, food inventory sources covered by the policy, foods to increase and those to deprioritize, foods to prioritize and an overview of policy implementation and review. After going through the checklist, add up the number of checks in each column to better understand the overall comprehensiveness of your policy and which sections of your policy could use more detail.

	Not present	Present	Present & strong
<b>1. Statement of Purpose</b>			
Explains that the policy is an official statement of the food bank's organizational intent, a guide to action, and/or a set of specific details to guide food-procurement decisions and promote consistent decision-making to acquire more healthful foods for distribution.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>2. Policy Rationale and Benefits</b>			
Includes a brief, clear and convincing policy rationale and benefits section.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Explains the key internal benefits for the food bank.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Explains the key external benefits for clients, food suppliers and the broader community.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>3. Food Inventory Sources Covered by The Policy</b>			
Donated foods	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Government foods (e.g., TEFAP, bonus commodities)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Purchased foods	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>4. Foods to Increase Covered by the Policy</b>			
Fruits and vegetables	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Grains: whole grains and whole grain-rich foods	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Dairy: low-fat dairy foods	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Proteins: lean protein foods	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Other:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

5. Foods to Prioritize			
Identifies priority food groups that the food bank will focus its initial policy efforts.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6. Optional: Foods to Deprioritize Covered by the Policy <sup>1</sup>			
Processed/package snacks	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Desserts	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Beverages: sugar-sweetened beverages	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Other:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7. Optional: Foods not Covered by the Policy <sup>2</sup>			
Includes a clause in the policy that identifies foods and beverages that do not fit within the policy's scope and explains why they have been intentionally excluded.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
8. Brief Overview of Policy Implementation and Review			
Specifies when the policy will take effect.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Specifies when the policy will be added to the food bank's official policy and procedures manual.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Specifies when the policy will be disseminated and communicated.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Lists which staff person and/or department will oversee a dissemination and communication plan.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Establishes who has the signatory authority to approve the policy.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Lists who should be contacted with questions about the policy.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Establishes which staff person and/or department is responsible for policy implementation.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
States when and how training on the policy will be provided.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Explains how the policy's progress will be reported.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Specifies when the policy will be reviewed and/or updated.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>Total check marks from sections 1-8</b>			

<sup>1</sup> See supplement to example policy: example section on foods to deprioritize;

<sup>2</sup> See supplement to example policy: example section on foods not covered by the policy.

## Toolkit Glossary

<b>Black, Indigenous, People of Color (BIPOC)</b>	In recent years, this term has been used more frequently as an alternative to the phrase “people of color”. In this toolkit, we use BIPOC to highlight the distinct experiences and histories of Black and Indigenous peoples and their relationships to whiteness in the context of the United States. These histories and relationships have shaped the experiences of white supremacy by all people of color and are a root cause of the disproportionate food insecurity and health disparities seen in Black, Indigenous, and other communities of color.
<b><u>Citizen Science Approach</u></b>	Citizen science can be described as a process in which communities and individuals are involved in designing a research question and performing scientific experiments with minimum involvement of professional scientists.
<b>Client</b>	Throughout this toolkit, client is used to reference people accessing food and other services from the charitable food system. Terms such as “neighbors” or “recipients” may also be used to reference the same population in other contexts.
<b>Cultural Appropriateness</b>	The delivery of programs and services so that they are consistent with the communication styles, meaning systems, and social networks of clients and other stakeholders.
<b>Cultural Awareness</b>	A major element of cultural competence as defined by the National Center for Cultural Competence (NCCC). It is the first and foundational element because without it, it is virtually impossible to acquire the attitudes, skills, and knowledge that are essential to cultural competence. According to Winkelman (2005), cultural awareness includes recognition of one’s own cultural influences upon values, beliefs, and judgments, as well as the influences derived from one’s work culture.
<b>Cultural Bias</b>	Interpreting and judging phenomena by standards inherent to one’s own culture. The phenomenon is sometimes considered a problem central to social and human sciences, such as economics, psychology, anthropology, and sociology.
<b>Cultural Competence</b>	The ability to meet the needs of clients from different cultures in a way that everyone feels valued. It is an understanding and appreciation of the values, norms, and traditions within different cultures.

<b>Cultural Humility</b>	A process of reflection and lifelong inquiry, involves self-awareness of personal and cultural biases as well as awareness and sensitivity to significant cultural issues of others. Core to the process of cultural humility is one's deliberate reflection of her/his values and biases.
<b>Cultural Relevance</b>	The extent to which ethnic/cultural characteristics, experiences, norms, values, behavioral patterns, and beliefs of a particular population as well as relevant historical, environmental, and social forces are incorporated in the design, delivery, and evaluation of targeted materials and programs.
<b>Cultural Sensitivity</b>	A set of skills that enables us to learn about and understand people who are different from ourselves, thereby becoming better able to serve them within their own communities.
<b>Cultural Tailoring</b>	The process of creating culturally relevant interventions, often involving the adaptation of existing materials and programs for racial/ethnic subpopulations (Pasick et al., 1996).
<b>Diversity</b>	The range of human differences, including but not limited to race, ethnicity, gender, gender identity, sexual orientation, age, social class, physical ability or attributes, religious or ethical values system, national origin, and political beliefs.
<b>The Emergency Food Assistance Program (TEFAP)</b>	TEFAP is a key public-private-charitable partnership. It helps the U.S. Department of Agriculture (USDA), farmers, and food banks connect nutritious food with families facing hunger. TEFAP is the backbone of the charitable food system.
<b>Equity</b>	The fair treatment, access, opportunity, and advancement for all people, while at the same time striving to identify and eliminate barriers that have prevented the full participation of some groups.
<b>Healthy Eating Research Nutrition Guidelines for the Charitable Food System</b>	In 2019, Healthy Eating Research, a program of the Robert Wood Johnson Foundation, convened a panel of experts in the charitable food system, nutrition, and food policy fields to create clear, specific recommendations for evidence-based nutrition guidelines tailored to the unique needs and capacity of the charitable food system. The intent of these recommendations, formed and refined in partnership with the Feeding America network, is to improve the quality of foods in food banks and pantries in order to increase access to and promote healthier food choices across the charitable food system, allowing all people in the United States—regardless of income—access to the foods necessary for an active, healthy life. <a href="#">Learn more.</a>

<b>Inclusion</b>	Inclusion is involvement and empowerment, where the inherent worth and dignity of all people are recognized. An inclusive organization promotes and sustains a sense of belonging; it values and practices respect for the talents, beliefs, backgrounds, and ways of living of its members.
<b>Intercultural Competence</b>	Intercultural competence, also known as cultural competence, is a range of cognitive, affective, and behavioral skills that lead to effective and appropriate communication with people of other cultures. Intercultural or cross-cultural education are terms used for the training to achieve cultural competence.
<b><u>Participatory Action Research (PAR)</u></b>	Paternalism involves interfering in an individual's or community's ability or opportunity to choose and make decisions. It has the objective of improving welfare of individuals or communities and involves making decisions without the consent of the individuals or communities concerned. (Duke World Food Policy, 2020)
<b>Paternalism</b>	PAR seeks to understand and improve the world by changing it. At its heart is collective, self-reflective inquiry that researchers and participants undertake, so they can understand and improve upon the practices in which they participate and the situations in which they find themselves. The reflective process is directly linked to action, influenced by understanding of history, culture, and local context and embedded in social relationships. The process of PAR should be empowering and lead to people having increased control over their lives.
<b>Universalism</b>	Universalism assumes that values held by whites are normal and widely shared, meaning ideals are grounded in whitened cultural practices. Universalism results in a lack of resonance of these universal ideals and marginalization of those who do not conform to the ideals. Furthermore, it creates a narrative that the non-conforming must be educated on the ideals. (Duke World Food Policy, 2020)



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