

# Stanislaus County School Districts Local Wellness Policy Review

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ChangeLab Solutions

For the Stanislaus County Department of Public Health

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# I. INTRODUCTION

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## A. WHY LOOK AT LOCAL WELLNESS POLICIES?

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The dramatic rise in childhood obesity and other health concerns related to diet and lack of physical activity has led to a national conversation and push to take actions that positively impact the health of our young people. According to the Centers for Disease Control and Prevention (CDC), the rate of childhood obesity has risen over three times in the past thirty years resulting in a third of children and adolescents considered overweight or obese as of 2008.<sup>1</sup> These young people are at greater risk for developing a host of diseases and health issues including heart disease, diabetes, bone and joint problems, sleep apnea, and psychological issues related to social stigma, bullying, and low self-esteem.<sup>2</sup> Guiding children to develop healthy habits, particularly related to eating and exercise, can have a significant impact on their health, maximize their capacity for learning, and establish a foundation for lifelong healthy practices.

Schools play an essential role in reducing the rates of childhood obesity and a strong Local Wellness Policy (“LWP”) is an important tool for school districts to improve both student health and learning capacity. Through LWPs, schools can develop coordinated and efficient strategies by integrating nutrition education, physical activity, and healthy foods throughout the school day and school environment. The Healthy, Hunger-Free Kids Act of 2010 (“HHFKA 2010”) (Public Law 111-296, Section 204) includes updated requirements for LWPs, adding provisions that insure greater accountability through broader community engagement, implementation plans, evaluation, and reporting.<sup>3</sup> All school districts receiving federal funds through the National School Lunch Program (NLSLP) are expected to meet these new standards starting in the 2013 – 2014 school year.<sup>4</sup> The United States Department of Agriculture (USDA) planned to release proposed rules related to LWPs and open a comment period in the fall of 2012, but has not yet done so. The final rules are scheduled to be released in the fall of 2013, but it seems unlikely that this timeline is still operative.

## B. KEY CHANGES IN HHFKA 2010<sup>5</sup>

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HHFKA 2010 continues the existing requirements for LWPs as defined by the Child Nutrition and WIC Reauthorization Act of 2004<sup>6</sup> and adds a number of important new requirements.

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<sup>1</sup> *Childhood Obesity Facts*. Centers for Disease Control and Prevention, 2012. Available at: <http://www.cdc.gov/healthyouth/obesity/facts.htm>

<sup>2</sup> *Id.*

<sup>3</sup> *Child Nutrition Reauthorization 2010: Local School Wellness Policies (MEMO SP 42 – 201)*. United States Department of Agriculture, July 8, 2011. Available at: [www.fns.usda.gov/cnd/Governance/Policy-Memos/2011/SP42-2011\\_os.pdf](http://www.fns.usda.gov/cnd/Governance/Policy-Memos/2011/SP42-2011_os.pdf)

<sup>4</sup> *Id.*

<sup>5</sup> *Healthy, Hunger-Free Kids Act of 2010, Section 204: Local School Wellness Policies 5-Year Technical Assistance and Guidance Plan*. USDA Food and Nutrition Service, US Department of Education, and DHHS Centers for Disease Control and Prevention, September 20, 2011. Available at: [www.fns.usda.gov/tn/healthy/lwp5yrplan.pdf](http://www.fns.usda.gov/tn/healthy/lwp5yrplan.pdf)

### Existing Requirements:

- Goals for:
  - Nutrition education
  - Physical activity
  - Other school-based activities to promote student wellness
- Nutrition guidelines for all food served or available at school
- Plan for measuring implementation
- Identify a school wellness coordinator
- Stakeholder involvement of parents, students, school food staff, school board, and administrators required in development of policy

### New Requirements under HHFKA 2010:

- Goals for Nutrition promotion
- Physical education teachers and school health professionals required within stakeholders
- Stakeholder involvement in implementation, review, and update of policies
- Requirement for public notification (students, parents, and others in the community) of LWP contents and updates
- Requirement to designate one or more school district or school officials to ensure LWP compliance at each school

## C. IMPORTANT CALIFORNIA STATE POLICIES RELATED TO LWPs

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In August of 2011, the California Department of Education (“CDE”) issued a bulletin to superintendents, school board members, and nutrition services directors recommending that all school districts evaluate their wellness policies in school year 2011 – 2012 and prepare to make revisions according to HHFKA 2010.<sup>7</sup> In addition to the new federal requirements, school districts must also consider a host of state standards and requirements when crafting a wellness policy. Two California laws passed in 2005, SB 12 and SB 965, set strong standards and placed restrictions on unhealthy foods and beverages that may be sold during the school day. Specifically, SB 12 strengthened the nutrition standards for competitive foods placing limits on total fat, saturated fat, sugar, and total calories per food item. Notably, the main sponsors of SB 12 included some of the lead organizations of the National Alliance for Nutrition and Activity, which created one of the two model wellness policies used by school districts in Stanislaus County.<sup>8</sup>

SB 965, or the Healthy Beverage Bill, placed restrictions on sugar content in beverages and eliminated sodas from being sold on school grounds. The major exception in SB 965 to restricting sugar-sweetened beverages was an allowance for electrolyte replacement beverages that can contain up to 42 grams of

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<sup>6</sup> Child Nutrition and WIC Reauthorization Act of 2004, Pub. L. No. 108-265, § 204 (2004). Available at: [www.fns.usda.gov/tn/healthy/108-265.pdf](http://www.fns.usda.gov/tn/healthy/108-265.pdf).

<sup>7</sup> *Child Nutrition Reauthorization 2010: Local School Wellness Policies*. Nutrition Services Division Management Bulletin, California Department of Education, August 2011. Available at: [www.cde.ca.gov/ls/nu/sn/mbusdasnp162011.asp](http://www.cde.ca.gov/ls/nu/sn/mbusdasnp162011.asp)

<sup>8</sup> *SB 12 (Escutia): School Nutrition Standards – Summary*. California Center for Public Health Advocacy, July 2007. Available at: [www.publichealthadvocacy.org/PDFs/SB12Summary.pdf](http://www.publichealthadvocacy.org/PDFs/SB12Summary.pdf)

added sweetener per 20 ounces.<sup>9</sup> In an effort to reduce the negative impact of sugar sweetened beverages on student health and performance, several California school districts including San Francisco, Oakland, and Lemon Grove have also eliminated electrolyte replacement beverages from their school offerings.<sup>10</sup>

The CDE has issued a statewide nutrition curriculum that provides a sequential course of study through health education classes and a set of grade-appropriate educational benchmarks and standards.<sup>11</sup> Similarly, the CDE has issued a physical education framework, curriculum, and standards based on scientific research.<sup>12</sup> State policy requires that students in grades 1-6 have 200 minutes of physical education for every 10 school days<sup>13</sup> and students in grades 7-12 have 400 minutes of physical education for every 10 school days.<sup>14</sup> It should be noted that the state physical education time requirements fall below the standards offered by public health and childhood obesity experts that were used in this policy review. For example, the Centers for Disease Control and Prevention recommend 60 minutes of physical activity per day for school age children and adolescents.<sup>15</sup>

The requirement in the HHFKA of 2010 to provide free, fresh drinking water during meal times in school food service<sup>16</sup> areas is reinforced by California SB 1413. The California statute went into effect July 1, 2011.<sup>17</sup> The state law, similar to the federal policy, only requires access to “free, fresh drinking water during meal times in the food service areas of the schools.” Recognizing that many communities may face challenges with outdated water infrastructure and local water quality concerns, the CDE offers a few resources to aid schools in meeting this requirement, including opportunities for accessing funding or technical assistance.<sup>18</sup>

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<sup>9</sup> *Restrictions on Food and Beverage Sales Outside of the School Meal Program*. Nutrition Services Division, California Department of Education, August 2006. Available at: [www.cde.ca.gov/ls/nu/sn/mb06110.asp](http://www.cde.ca.gov/ls/nu/sn/mb06110.asp)

<sup>10</sup> California Project LEAN has published case studies of three California districts that eliminated high-sugar electrolyte replacement beverages: *CASE STUDIES: Eliminating Electrolyte Replacement Beverages in California Public Schools*. California Project LEAN, 2010. Available at: [www.californiaprojectlean.org/docuserfiles//Case%20Studies\\_ERBs\\_web.pdf](http://www.californiaprojectlean.org/docuserfiles//Case%20Studies_ERBs_web.pdf)

<sup>11</sup> *Nutrition Education Resource Guide*. California Department of Education. Available at: [www.cde.ca.gov/ls/nu/he/nerg.asp](http://www.cde.ca.gov/ls/nu/he/nerg.asp)

<sup>12</sup> *Physical Education Framework for California Public Schools Kindergarten through Grade Twelve*. California Department of Education, 2009. Available at: <http://www.cde.ca.gov/ci/cr/cf/documents/peframework2009.pdf>

<sup>13</sup> Cal. Educ. Code § 51210 (2012).

<sup>14</sup> Cal. Educ. Code § 51222 (2012).

<sup>15</sup> *Youth Physical Activity Guidelines Toolkit*. Centers for Disease Control and Prevention, n.d. Available at: [www.cdc.gov/healthyouth/physicalactivity/guidelines.htm](http://www.cdc.gov/healthyouth/physicalactivity/guidelines.htm)

<sup>16</sup> *Child Nutrition Reauthorization 2010: Water Availability During National School Lunch Program Meal Service (Memo SP 28- 2011 – Revised)*. United States Department of Agriculture Food and Nutrition Service, July 12, 2011. Available at: [www.fns.usda.gov/cnd/Governance/Policy-Memos/2011/SP28-2011\\_osr.pdf](http://www.fns.usda.gov/cnd/Governance/Policy-Memos/2011/SP28-2011_osr.pdf)

<sup>17</sup> *Drinking Water for Students in Schools*. California Department of Education. Available at: [www.cde.ca.gov/ls/nu/he/water.asp](http://www.cde.ca.gov/ls/nu/he/water.asp)

<sup>18</sup> “Drinking Water for Students in Schools.” California Department of Education. Available at: [www.cde.ca.gov/ls/nu/he/water.asp](http://www.cde.ca.gov/ls/nu/he/water.asp)

## **D. CREATING THE RIGHT LWP FOR YOUR SCHOOL DISTRICT**

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Each school district and each school is unique, facing a different landscape of challenges and circumstances. While it may be easier for some districts and schools to adopt strong wellness policies immediately, others may find they need to phase new policies and practices in over time. The federal policy allows school districts a fair amount of discretion to craft LWPs according to their needs, priorities and resources. For example, districts in densely populated areas may find it easier to support students in walking or biking to school than districts in more rural areas. One district may decide that school gardens are a great use of resources to support student health, whereas another district may choose to focus on staff trainings on strategies for incorporating healthy eating and physical activity into the classroom. The key is making sure that the LWP is as strong as possible given what makes sense for each district.

Beyond meeting new federal guidelines and state policies, LWPs provide an important platform to improve coordination across administrators, school food staff, teachers, parents, and health educators and specialists. By locating all wellness-related policies in one document, the school community can genuinely evaluate and offer constructive feedback to improve wellness practices or identify and address gaps in the policy. LWPs can even be expanded beyond the scope of nutrition and physical activity to address staff wellness, mental health, tobacco use, and bullying and school violence. Additionally, a LWP can be a way to highlight, share, celebrate and refine all of the work a district is doing to improve student health. These policies have the potential to be much more than a requirement; they can be an opportunity to build creative and comprehensive solutions involving the whole school community to support children in leading whole, healthy, and rewarding lives.



## II. REVIEW METHODOLOGY

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The Stanislaus County Department of Public Health commissioned a team of law and policy analysts from ChangeLab Solutions to review 25 LWPs from school districts across Stanislaus County. Staff at the Stanislaus County Department of Public Health collected the policies in October and November 2012 and provided them to ChangeLab Solutions.

The main goals of the review were:

1. To assess the overall strength and compliance levels of LWPs across the county
2. To highlight areas of improvement to meet pending and existing federal and state standards
3. To offer best practices and innovative policy solutions that will maximize positive student health outcomes and position Stanislaus County school districts as a national leader in school wellness policy.

To evaluate the LWPs, ChangeLab Solutions integrated the best-available research and criteria from leading institutions in the field, including Action for Healthy Kids , the Alliance for a Healthier Generation, the Centers for Disease Control and Prevention, the Center for Science in the Public Interest, the Robert Wood Johnson Foundation, and Yale University’s Rudd Center for Food Policy & Obesity, to create an evaluation tool organized around the federal requirements in HHFKA 2010. The criteria were then reviewed and modified by staff at the Stanislaus County Department of Public Health. ChangeLab Solutions also thoroughly reviewed reports evaluating wellness policies, relevant California state policies and laws, model policy language, and guidance provided by the USDA to deepen the analysis and recommendations included in this report.

The majority of the criteria are designed to evaluate how policy language promotes childhood obesity prevention strategies. Additional criteria are considered that assess overall integration of wellness policies and strategies into the school environment, tobacco prevention, staff wellness, stakeholder participation, evaluation, reporting, and implementation. The main categories and select criteria are summarized below (see p.13 for a complete list):

- **Wellness Programming**
  - **Nutrition Education** - continuous curriculum, standards, trained and qualified staff, integrated into school food environment
  - **Wellness Promotion** – including new requirement for nutrition promotion goals
  - **Physical Education** – continuous curriculum, standards, adequate time, trained and qualified staff
  - **Physical Activity** – integrated throughout the school day, adequate breaks and recess times, shared use of facilities, before and after school activities,

- **Tobacco Prevention** – 24/7 ban on tobacco use and marketing, tobacco prevention curriculum
- **Staff Recruitment and Training** – adequate training, qualifications, and professional development opportunities for all relevant staff
- **Food Service and Nutrition Guidelines**
  - **School Food Service, Promotion, and Nutrition Guidelines** – promotion of and access to breakfast and summer food programs, standards beyond USDA requirements, strategies to increase participation, meal environment supportive of health, adequate time to eat.
  - **Nutrition Standards for Competitive Foods and Beverages** – reduce or ban unhealthy foods and beverages including sugar sweetened beverages, portion control, require fruits and vegetables at all food locations, free drinking water
- **Stakeholder Participation and Public Notification**
  - Family engagement and communication, wellness councils at school and district level, community engagement and partnerships, public policy involvement
- **Evaluation, Implementation, & Accountability**
  - Designated wellness coordinator, plan for policy communication and training, evaluation strategy and timeline, reporting procedures and methods, plan for revision

Each policy was assessed and rated across 58 individual criteria. The strength of each policy’s language was also evaluated to determine whether the policy met, exceeded, or did not address standards. Detailed, comprehensive and mandatory strategies using language such as “shall,” “must,” “will,” or “required” were rated as “+,” meaning strong or exceeding standards. Suggested or vague language using language such as “should,” “may,” “encourage,” or “as appropriate” were rated as “✓,” meaning fair or meeting standards, depending on the criteria. Where no language was found or the language was so vague as to not be meaningful a policy was rated “-,” meaning there is a need for improvement.

It is important to note that many school districts may address several of the evaluated criteria more thoroughly in other areas of school policy. However, the focus of this analysis is specifically on Local Wellness Policies and their function as an important tool to coordinate, communicate, and evaluate a range of various wellness policies and practices. Therefore, each Local Wellness Policy was evaluated only on the language contained within the LWP itself, regardless of other policies a school district may have that address the evaluation criteria.

The individual assessments of the LWPs were then analyzed to determine the overall performance of school districts in Stanislaus. Given that nearly all schools used one of two model policies as the basis for the majority of their LWP, policies were grouped based on which model they used. The wellness policies were then analyzed collectively by model policy for each category of criteria with strengths, weaknesses, and variations from the model noted and thoroughly detailed in Section IV: Wellness Policy Evaluation Findings on page 15.

### III. SUMMARY OF FINDINGS

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#### A. MODEL WELLNESS POLICIES

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##### 1. STANISLAUS SCHOOL DISTRICTS AND MODEL POLICIES

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Almost all school districts in Stanislaus County used one of two model policies as the basis for most of their LWP language. The two models were created by the California School Board Association and the National Alliance for Nutrition and Activity.

The California School Boards Association (“CSBA”) is a member-driven organization including nearly all of the school districts and respective county offices of education in the state.<sup>19</sup> CSBA conducts policy analysis and advocacy on state and federal levels and provides technical assistance, education, and support to its constituents. Specific to school wellness policies, CSBA has crafted model language based on national and state requirements and offers a guidebook with worksheets to support school districts through the process of adapting the model wellness policy to reflect the realities on the ground for each jurisdiction.<sup>20</sup>

The National Alliance for Nutrition and Activity (“NANA”) is an advocacy and education organization with a goal to promote federal policies that facilitate healthier eating and physical activity. Many leading national public health organizations are part of NANA’s LWP steering committee, including the American Heart Association, American Diabetes Association, and the Center for Science in the Public Interest. NANA was instrumental in the effort to pass HHFKA 2010 and has led the push for the CDC to increase resources directed to nutrition and physical activity promotion.<sup>21</sup>

Of the twenty five (25) Local Wellness Policies reviewed, fifteen (15) were based on the CSBA Model Policy. A few districts used the CSBA Model Policy without any modification, but most adapted the language to reflect local practices and priorities. Of the eight (8) districts that used the NANA Model Policy as the basis of their LWP, many also drew a few elements from the CSBA Model Policy. Turlock Unified School District, which has one of the strongest wellness policies, developed its LWP with a blend of NANA and CSBA language, plus additional policy language that goes beyond either model. The Graton School District, which had one of the weaker policies, did not seem to draw from either the CSBA or NANA Model Policies.

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<sup>19</sup> More information about the California School Board Association available at: [www.csba.org](http://www.csba.org).

<sup>20</sup> *Student Wellness: A Healthy Food and Physical Activity Policy Resource Guide*. California School Board Association and California Project LEAN, 2006. Available at: [www.csba.org/~/\\_/media/B5947DF3DE58432C9B038C9C38360684.ashx](http://www.csba.org/~/_/media/B5947DF3DE58432C9B038C9C38360684.ashx).

<sup>21</sup> More information about NANA along with a full list of the NANA steering committee and member organizations is available at: [www.cspinet.org/nutritionpolicy/nana.html](http://www.cspinet.org/nutritionpolicy/nana.html)

**Table 1: School District Wellness Policies by Model Policy Primarily Used**

<b>CSBA Based Policies</b>	<b>NANA Based Policies</b>	<b>Other Policies</b>
Ceres Union School District	Chatom Union School District	Gratton School District
Denair Unified School District	Hickman School District	Turlock Unified School District – <i>blend of CSBA and NANA</i> <sup>22</sup>
Empire Union School District	Modesto City Schools District	
Hart-Ransom Union School District	Newman-Crows Landing Unified School District	
Hughson Unified School District	Patterson Joint Unified School District	
Keyes Union School District	Roberts Ferry School District	
Knights Ferry School District	Salida Union School District	
Oakdale Joint Union School District	Waterford Unified School District	
Paradise Elementary School District		
Riverbank Unified School District		
Shiloh School District		
Stanislaus County Office of Education		
Stanislaus Union School District		
Sylvan Union School District		
Valley Home Joint School District		

## 2. THE CSBA MODEL POLICY

Both the CSBA and NANA Model Policies meet federal requirements based on the 2004 standards. The CSBA Model Policy, unlike the NANA policy, was updated in July of 2011 to take into account the provisions in HHFKA 2010 as well as recent changes to state policy. While the CSBA Model Policy meets federal and state standards and is sensitive to the needs and concerns of local school districts, it does not take major strides to promote wellness beyond the minimum requirements. However, CSBA offers many other policies and resources— such as tools to address bullying and violence and promote safe routes to schools— that encourage and support California school districts to take additional, forward-thinking steps toward holistically improving student wellness.<sup>23</sup>

### **CSBA Model Policy Summary**

*The following summary of the CSBA model policy’s strengths and key areas for improvement is based on*

<sup>22</sup> The analysis in this report is based on the LWP provided by the Stanislaus County Department of Health in November 2012 and posted on the website for the Turlock Unified School District Child Nutrition program at <http://cnd.turlock.k12.ca.us/wellnesspolicy>. The main website for the Turlock Unified School District includes an apparently outdated link to what appears to be a NANA based LWP.

<sup>23</sup> For more on additional CSBA policies and tools to support student wellness see the CSBA’s Student Wellness Resource List, available at: [http://www.csba.org/~/link.aspx?\\_id=6FFD3563424B4CBB949DF04572E60373&\\_z=z](http://www.csba.org/~/link.aspx?_id=6FFD3563424B4CBB949DF04572E60373&_z=z)

*the results of evaluating the model policy using same criteria applied to the LWPs. Strengths are areas where the policy earned a “+” rating and exceeded baseline standards or expectations set by the criteria. Key areas for improvement are topics where the policy received a “-” rating, indicating that there was either no mention or very vague reference to the policy criteria. It should be noted that there are many areas where the policy met evaluation standards, receiving a “✓” rating that are not highlighted in this summary. For a full analysis, see “Section IV. Wellness Policy Evaluation Findings.”*

### **CSBA Model Policy – Key Strengths**

#### **PROGRAMMING**

##### ***Wellness Promotion***

- Calls for a coordinated wellness strategy
- Restricts marketing of unhealthy foods and beverages

##### ***Staff Recruitment and Training***

- Staff as role models

#### **EVALUATION, IMPLEMENTATION, AND ACCOUNTABILITY**

- Designated school health coordinator
- Plan for monitoring and evaluation – criteria

### **CSBA Model Policy – Key Areas for Improvement**

#### **PROGRAMMING**

##### ***Wellness Promotion***

- No policy to encourage marketing and promotion of healthy foods
- No mention of school gardens or safe routes to schools

##### ***Nutrition Education & Physical Education***

- Language for nutrition and physical education is weak and suggestive or just meets standards

##### ***Physical Activity***

- Physical activity language is suggestive, but does not require daily recess for elementary school or address physical activity as punishment

##### ***Tobacco Prevention Policies***

- No tobacco policies mentioned

##### ***Staff Recruitment and Training***

- Minimally addresses staff professional development. Does not mention continuing training or qualifications of nutrition and physical education professionals.

#### **FOOD SERVICE AND NUTRITION GUIDELINES**

##### ***Nutrition Standards and Promotion for School Meal Programs***

- Nutrition guidelines just meet standards, does not address school meal program participation, time to eat or school meal environment
- No policy to make nutrition information available to students and parents

##### ***Nutrition Standards for Competitive and Other Foods and Beverages***

- Does not address access to fruits and vegetables or free drinking water
- No prohibition of sugar sweetened beverages or serving size limits.

#### **EVALUATION, IMPLEMENTATION, AND ACCOUNTABILITY**

- No plan for policy implementation, staff trainings on the wellness policy, or revision of policy described.

### **3. THE NANA MODEL POLICY**

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The NANA Model Policy is stronger overall than the CSBA Model Policy. It includes stronger nutrition standards that extend across the school environment and into after-school hours. Additionally the NANA

Model Policy supports a healthy eating environment, has strong support for physical activity, and addresses staff training. Cross-cutting strategies with benefits beyond the school day include suggesting school gardens and walking and biking through safe routes to schools. Despite these strengths, the NANA policy has not been updated to address more recent changes to federal and state policy. This results in a lack of required HHFKA 2010 elements such as calling for a coordinated wellness strategy, having a wellness coordinator for the district, or detailing how wellness policies and information will be distributed to parents or other stakeholders. On the other hand, the nutrition standards in NANA closely match recent standards issued by the state of California (SB 12 and SB 965). The members of NANA have agreed to update their Model Policy after the USDA releases its final rules on School Wellness Policies.

### **NANA Model Policy Summary**

*The following summary of the NANA model policy's strengths and key areas for improvement is based on the results of evaluating the model policy using same criteria applied to the LWPs. Strengths are areas where the policy earned a "+" rating and exceeded baseline standards or expectations set by the criteria. Key areas for improvement are topics where the policy received a "-" rating, indicating that there was either no mention or very vague reference to the policy criteria. It should be noted that there are many areas where the policy met evaluation standards, receiving a "✓" rating that are not highlighted in this summary. For a full analysis, see "Section IV. Wellness Policy Evaluation Findings."*

### **NANA Model Policy – Key Strengths**

#### **PROGRAMMING**

##### ***Wellness Promotion***

- Provides a strong and detailed statement of wellness mission and vision within its preamble, back by compelling facts and statistics.
- Has language to prohibit marketing of "low-nutrition foods" and limits in-school marketing to foods and beverages that "meet the nutrition standards."
- The policy also encourages active promotion of only healthy foods and beverages.
- Limits fundraisers to foods that meet nutrition and portion size standards and encourages physical activity based fundraisers.
- Specifies that food and beverages will not be used as a reward or withheld as punishment.
- Requires food and beverage sold at school sponsored events outside of the school day to meet nutrition standards for competitive foods.
- Includes support for innovative, cross cutting strategies including school gardens and joint use agreements.

##### ***Physical Education***

- Strong requirements for age appropriate Physical Education curriculum and time requirements

##### ***Physical Activity***

- Strong physical activity policies addressing before and after school programs, not withholding activity as punishment, safe routes to school, and adequate daily recess for elementary students

##### ***Staff Recruitment and Training***

- Addresses qualifications of PE teachers
- Training for food service staff to serve healthy food

#### **FOOD SERVICE AND NUTRITION GUIDELINES**

##### ***Nutrition Standards and Promotion for School Meal Programs***

- Promotes access to USDA food programs
- Nutrition standards above federal requirements
- Addresses meal environment and gives enough time to each

### ***Nutrition Standards for Competitive and Other Foods and Beverages***

- Strong competitive food policy prohibits unhealthy foods and beverages, portion control, and requires fruits and vegetables

### **EVALUATION, IMPLEMENTATION, AND ACCOUNTABILITY**

- Strong plan to report on wellness policy compliance and revise

## **NANA Model Policy – Key Areas for Improvement**

### **PROGRAMMING**

#### ***Wellness Promotion***

- Does not specify a coordinated wellness strategy

#### ***Physical Education***

- Physical education policy lacks reference to a sequential curriculum, equipment, or student-teacher ratio

#### ***Tobacco Prevention Policies***

- No tobacco policies
- Could extend training opportunities to physical education and health teachers and offer professional development opportunities

#### ***Staff Recruitment and Training***

- Does not encourage staff to be healthy role models

### **FOOD SERVICE AND NUTRITION GUIDELINES**

#### ***Nutrition Standards for Competitive and Other Foods and Beverages***

- Does not address access to fresh, free drinking water

### **STAKEHOLDER PARTICIPATION & PUBLIC REPORTING**

- Stakeholder participation in wellness policies and communication with families is not specified

### **EVALUATION, IMPLEMENTATION, AND ACCOUNTABILITY**

- No coordinator for wellness policy across the district and no plan to educate staff about the LWP

## **B. OVERALL PERFORMANCE OF SCHOOL DISTRICTS**

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Most of the LWPs reviewed meet the basic 2004 requirements, and many go beyond. Some districts, particularly those with CSBA based policies, appear to have tried to update their LWPs to comply with HHFKA 2010. And most districts are on track to meet the HHFKA 2010 requirements.

The LWPs reviewed vary greatly in strength, detail, and even length. While most districts adopted either the CSBA or NANA Model Policy, some made changes (for example, adjusting language from “shall” to “should.”), often resulting in weakened policies. While the Model Policies are an excellent starting point, there is no one size fits all policy. Each district is unique and faces different challenges; a district with one elementary school (like Roberts Ferry) has different needs, qualifications, and challenges than a district with over 30 schools serving students from pre-K to high school (like Modesto City). As districts review and revise their policies, it is important to be mindful of the changes and requirements to the LWP requirements in HHFKA 2010 (detailed on p.2), particularly in the areas of stakeholder engagement and communication.

## C. HOW TO USE THE FINDINGS SECTION

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The following section “IV. Wellness Policy Evaluation Findings” contains the results of our evaluation of all the district policies across our 58 criteria. Table 2 (see below) provides a visual summary of how the results groups and presented. Most generally, the results are organized by broad “Policy Categories” designed to mirror the HHFKA 2010 policy language. Under each “Policy Category” is a “Policy Area” that covers many topics that correspond to the evaluation criteria. An in-depth analysis of the policies is provided at the “Policy Area” level. Since there were some overlaps across criteria, they were collapsed into 58 topic areas, as shown below in Table 2.

For each “Policy Area,” the analysis is organized in the following manner:

- 1. Assessment Criteria**

This section outlines the evaluation criteria for this Policy Area as defined by the strongest wellness policy language.

- 2. Summary Table**

The Summary Table displays the ratings each school district’s LWP received for the various “Topic Areas” or criteria covered in this Policy Area.

- 3. CSBA Based Policies – Analysis**

A full analysis of all the LWPs based on the CSBA model policy. This section provides a discussion of how the policies addressed each of the “Topic Areas” or criteria covered in this Policy Area.

- 4. NANA Based Policies – Analysis**

A full analysis of all the LWPs based on the CSBA model policy. This section provides a discussion of how the policies addressed each of the “Topic Areas” or criteria covered in this Policy Area.

- 5. Other Policies – Analysis**

A full analysis of the two LWPs—specifically Gratton and Turlock—not based on either model. This section provides a discussion of how the policies addressed each of the “Topic Areas” or criteria covered in this Policy Area.

- 6. Opportunities for Strengthening**

This section contains key recommendations to strengthen LWPs in this Policy Area. Sample language from school district LWPs that were notably strong can be found here.



**Table 2: Wellness Policy Evaluation Criteria & Guide to Findings**

Policy Categories & HHFKA 2010 Language	Policy Area	Topics Assessed
<b>Wellness Programming</b>		
<p><i>Sec 9A (b) GUIDELINES.—The Secretary shall promulgate regulations that provide the framework and guidelines for local educational agencies to establish local school wellness policies, including, at a minimum,—</i></p> <p><i>(1) goals for nutrition promotion and education, physical activity, and other school-based activities that promote student wellness;</i></p>	<p><b>Wellness Promotion</b> (Starts at p. 15)</p>	<ul style="list-style-type: none"> <li>• Overall Mission and Vision</li> <li>• Comprehensive and Coordinated Approach</li> <li>• Healthy Fundraising and Events</li> <li>• Marketing</li> <li>• Community Access</li> <li>• Obesity Stigma/Bullying</li> <li>• No Food as Reward</li> <li>• School Gardens</li> </ul>
	<p><b>Nutrition Education and Promotion</b> (Starts at p. 20)</p>	<ul style="list-style-type: none"> <li>• Comprehensive and Sequential Nutrition Curriculum</li> <li>• Connected to School Food Environment</li> <li>• Behavior and Skills Focused</li> </ul>
	<p><b>Physical Education</b> (Starts at p. 22)</p>	<ul style="list-style-type: none"> <li>• Sequential PE Curriculum</li> <li>• Minimum Time per Week</li> <li>• Adequate and Safe Facilities</li> <li>• Limited Waivers</li> </ul>
	<p><b>Physical Activity</b> (Starts at p. 25)</p>	<ul style="list-style-type: none"> <li>• Regular Physical Activity Breaks</li> <li>• Recess for Elementary Students</li> <li>• Structured Physical Activity Before and After School</li> <li>• Walking and Biking to School and/or SRTS</li> <li>• No Physical Activity Restrictions as Punishment</li> </ul>
	<p><b>Tobacco Prevention</b> (Starts at p. 30)</p>	<ul style="list-style-type: none"> <li>• Tobacco free school</li> <li>• Ban Tobacco Advertising and Promotion</li> <li>• Tobacco Prevention Included in Health Curriculum</li> </ul>
	<p><b>Staff Education, Training, and Wellness</b> (Starts at p. 31)</p>	<ul style="list-style-type: none"> <li>• Training , Education, and Background of PE Teachers</li> <li>• Professional Development for PE Teachers</li> <li>• Training, Education, and Background of Health Teachers</li> <li>• Professional Development for Health Teachers</li> <li>• Professional Development for Other Wellness Staff</li> <li>• Nutrition Training and Support for Food Service Staff</li> <li>• Encourage Staff to be Healthy Role Models</li> <li>• Promote Worksite Wellness and Physical Activity for Staff</li> </ul>
<b>Food Service and Nutrition Guidelines</b>		
<p><i>(2) for all foods available on each school campus under the jurisdiction of the local educational agency during the school day, nutrition guidelines that—</i></p> <p><i>(A) are consistent with sections 9 and 17 of this Act, and sections 4 and 10 of the Child Nutrition Act of 1966 (42 U.S.C. 1773, 1779); and</i></p> <p><i>(B) promote student health and reduce childhood obesity;</i></p>	<p><b>For USDA School Meals</b> (Starts at p. 35)</p>	<ul style="list-style-type: none"> <li>• School Breakfast Program Access and Promotion</li> <li>• Summer Food Service Program Access and Promotion</li> <li>• Nutrition Standards Beyond USDA Minimums</li> <li>• Increase School Meal Participation</li> <li>• Adequate Time to Eat</li> <li>• Pleasant Meal Environment</li> <li>• Healthy Food Preparation</li> <li>• Nutrition Information made Available</li> </ul>
	<p><b>For Competitive and Other Foods</b> (Starts at p. 40)</p>	<ul style="list-style-type: none"> <li>• Remove the Sale of Unhealthy Foods</li> <li>• Healthy Food At All Times (stores, vending, celebrations)</li> <li>• Fruits and Vegetables Available with all Food Offerings</li> </ul>
	<p><b>For Beverages</b> (Starts at p. 42)</p>	<ul style="list-style-type: none"> <li>• Prohibit all SSBS</li> <li>• Control serving sizes of beverages</li> <li>• Ensure access to free, safe, unflavored, cool drinking water</li> </ul>

<b>Stakeholder Participation and Community Engagement</b>		
<i>(3) a requirement that the local educational agency permit parents, students, representatives of the school food authority, teachers of physical education, school health professionals, the school board, school administrators, and the general public to participate in the development, implementation, and periodic review and update of the local school wellness policy;</i>	<b>Stakeholder Participation and Community Engagement</b> (Starts at p. 45)	<ul style="list-style-type: none"> <li>• District Wellness Group</li> <li>• School Site Wellness Groups</li> <li>• Engage Families in LWP Process</li> <li>• Involvement in Community Coalitions and the Policy Process</li> </ul>
<b>Public Notification</b>		
<i>(4) a requirement that the local educational agency inform and update the public (including parents, students, and others in the community) about the content and implementation of the local school wellness policy;</i>	<b>Public Notification</b> (Starts at p. 49)	<ul style="list-style-type: none"> <li>• Informing and Updating</li> <li>• Dissemination of LWPs to Parents</li> </ul>
<b>Implementation, Evaluation, and Accountability</b>		
<i>(5) a requirement that the local educational agency— (A) periodically measure and make available to the public an assessment on the implementation of the local school wellness policy, including— (i) the extent to which schools under the jurisdiction of the local educational agency are in compliance with the local school wellness policy; (ii) the extent to which the local school wellness policy of the local educational agency compares to model local school wellness policies; and (iii) a description of the progress made in attaining the goals of the local school wellness policy; and (B) designate 1 or more local educational agency officials or school officials, as appropriate, to ensure that each school complies with the local school wellness policy.</i>	<b>Implementation Plan &amp; Support</b> (Starts p. 51)	<ul style="list-style-type: none"> <li>• Clear Policy Implementation Plan</li> <li>• Training for Teachers and Staff on LWP</li> <li>• Budget Support for LWP Process</li> <li>• Designated Staff Person to Coordinate Wellness Policy</li> </ul>
	<b>Evaluation plan &amp; Revision Procedure</b> (Starts at p. 53)	<ul style="list-style-type: none"> <li>• Clear Evaluation Plan with Specific Indicators</li> <li>• Plan for Reporting School Compliance</li> <li>• Procedures for Updating and Revising</li> </ul>

## IV. WELLNESS POLICY EVALUATION FINDINGS

### A. WELLNESS PROGRAMMING

#### 1. HHFKA 2010 REQUIREMENTS

HHFKA 2010 requires that LWPs include “goals for nutrition promotion and education, physical activity, and other school-based activities that promote student wellness.” (42 U.S.C. 1758b(b)(1) (2012).) “Nutrition promotion” is a new requirement under HHFKA 2010.

#### 2. LOCAL WELLNESS POLICY AREAS EVALUATED

##### a) WELLNESS PROMOTION

##### (1) ASSESSMENT CRITERIA:

The strongest LWPs:

- (1) include a statement of the district’s overall *mission* and *vision* that expresses a strong commitment to student health and well being;
- (2) take a *comprehensive* and *coordinated* approach to student wellness; and
- (3) address a variety of wellness topics *beyond* what is required by the *HHFKA*, including: marketing, healthy fundraising and events, community access to school facilities (typically through joint use agreements), prohibited using food as a reward, obesity stigma and bullying, and school gardening.

##### (2) SUMMARY TABLE

<u>Wellness Promotion</u>	Overall Mission and Vision	Comprehensive and Coordinated Approach	Healthy fundraising and events	Marketing	Community Access	Obesity Stigma / Bullying	No food as reward	School gardens
<b>CSBA Based Policies</b>								
CERES	✓	+	✓	✓	✓	-	✓	-
DENAIR	✓	+	✓	✓	✓	-	✓	-
EMPIRE UNION	✓	+	✓	✓	-	-	✓	-
HART-RANSOM	✓	+	✓	-	-	-	✓	-
HUGHSON	✓	+	✓	✓	✓	-	✓	✓
KEYES	✓	+	-	✓	-	-	✓	-
KNIGHTS FERRY	✓	+	✓	✓	✓	-	✓	-
OAKDALE	✓	+	-	✓	-	-	-	-
PARADISE	-	-	-	✓	✓	-	-	-

RIVERBANK	✓	+	✓	✓	-	-	✓	-
SHILOH	✓	+	✓	✓	-	-	✓	-
STANISLAUS COE	✓	+	✓	✓	-	-	✓	-
STANISLAUS USD	✓	+	✓	✓	✓	-	✓	-
SYLVAN	✓	+	✓	-	✓	-	✓	-
VALLEY HOME	✓	+	✓	✓	-	-	✓	-
<b><u>NANA Based Policies</u></b>								
CHATOM	✓	-	✓	-	-	-	✓	✓
HICKMAN	-	-	+	-	✓	-	✓	-
MODESTO CITY	+	-	✓	-	-	-	✓	-
NEWMAN-CROWS LANDING	+	-	✓	✓	-	-	✓	-
PATTERSON	-	-	✓	✓	-	-	✓	✓
ROBERTS FERRY	+	-	+	✓	✓	-	✓	✓
SALIDA	+	-	✓	✓	-	-	✓	-
WATERFORD	+	-	✓	✓	✓	-	✓	-
<b><u>Other Policies</u></b>								
GRATTON	-	-	-	-	-	-	-	-
TURLOCK	✓	+	✓	+	✓	-	✓	-

### (3) CSBA BASED POLICIES

The CSBA Model Policy includes a brief statement of overall mission and vision that includes “providing a comprehensive program promoting healthy eating and physical activity” and building a “coordinated school health system.” All of the districts that adopted a CSBA based LWP retained this language except for Paradise.

The CSBA Model Policy provision on fundraising is to “encourage school organizations to use healthy food items or non-food items for fundraising purposes.” Three districts with CSBA based LWPs (Keyes, Oakdale, and Paradise) did not include this provision in their LWP; the remaining CSBA based LWPs included this permissive provision on fundraising.

The CSBA Model Policy includes a strong prohibition on marketing of non-nutritious foods and beverages and most districts included this language in their LWPs (the exceptions are Hart Ransom USD and Stanislaus USD). The CSBA Model Policy (and the CSBA based LWPs) does not include provisions regarding marketing to *promote* healthy food and beverage options.

While the CSBA Model Policy includes permissive language on utilizing joint use agreements to provide public recreational access to school grounds, only seven of the districts that adopted CSBA based LPWs included this provision (Ceres, Denair, Knights Ferry, Hughson, Paradise, Stanislaus USD, and Sylvan).

Similarly, the CSBA Model Policy on using food as a reward or punishment is to “*encourage* staff to avoid the use of non-nutritious food as a reward.” Two districts with CSBA based LWPs (Oakdale and Paradise) did not include this provision in their LWP; the remaining CSBA based LWPs included this permissive provision on food as a reward.

The CSBA Model Policy does not include any language relating to obesity stigma/bullying or school gardens. The Hughson LWP includes a statement encouraging school gardens; no other districts with CSBA based LWPs made additions in these areas.

#### (4) NANA BASED POLICIES

The NANA Model Policy includes a strong and detailed statement of wellness mission and vision within its preamble. While most of the districts with NANA based LWPs included the preamble language, two omitted the preamble entirely (Hickman and Patterson) and one greatly reduced it in scope and length (Chatom).

The NANA Model Policy does not explicitly address taking a comprehensive and/or coordinated approach to school wellness. The Modesto City's LWP includes the following strong statement on a comprehensive wellness program: "The Board intends for health education to be part of a comprehensive district program to promote the health and well-being of students and staff. Instruction in health-related topics shall be supported by physical education, health services, nutrition services, psychological and counseling services, and a safe and healthy school environment."

The NANA Model Policy includes fairly strong provisions regarding fundraising, including: limiting fundraisers to foods that meet nutrition and portion size standards and encouraging physical activity based fundraisers. However, fundraising is a policy area where districts diverged significantly from the model policy and many adopted slightly weaker policies (Chatom, Modesto City USD, Newman-Crows Landing, Patterson, and Salida). A number of districts (Chatom, Patterson, and Salida) included special allowances for food and/or beverage fundraisers that took place either "at least one-half hour after the end of the school-day" or "off the school premises."

The NANA Model Policy limits food and beverage marketing to promoting foods and beverages that "meet the nutrition standards" laid out in the policy and specifically prohibits the marketing of "predominately low-nutrition foods and beverages." The NANA Model Policy also encourages promotion of healthy foods. All but three districts (Chatom, Hickman, and Modesto City) included these provisions in their NANA based LWPs.

Similar to the CSBA Model Policy, the NANA Model Policy includes permissive language on utilizing joint use agreements to provide public recreational access to school grounds. However, only three of the districts that adopted NANA based LPWs included this provision (Hickman, Roberts Ferry , and Waterford).

While the NANA Model Policy includes a weak prohibition on using food or beverages as a reward, it appears to have an exception for foods that meet nutrition standards. The NANA Model Policy does specify that food and beverages will not be withheld as punishment. All of the districts with NANA based policies include these provisions. The Roberts Ferry LWP includes the following additional provision related to food as a reward: "Roberts Ferry Elementary School District desires to involve the community and local businesses in our educational program and will continue to encourage their support even though the focus may be on rewarding academic performance or good behavior with food."

Like the CSBA Model Policy, the NANA Model Policy does not include any language relating to obesity stigma/bullying. The NANA Model Policy does include a very brief reference to school gardens as a component of nutrition education and promotion.

## (5) OTHER POLICIES

### (a) GRATTON

The Gratton LWP does not address any of the Wellness Promotion topics reviewed.

### (b) TURLOCK

The Turlock LWP includes portions from both the CSBA and NANA Model Policies related to Wellness Programming. The overall mission and vision statement from the CSBA Model Policy has been adopted in the Turlock LWP, along with the following statement reiterating a commitment to adopting a comprehensive wellness program: “This wellness policy recognizes the link between student health and learning and desires to provide a comprehensive program promoting healthy eating and physical activity for district students.”

Turlock’s LWP includes the NANA Model Policy provisions on fundraising, as well as a stronger statement that the district will “require school organizations to use healthy food items or non-food items for fundraising purposes.” However, the Turlock LWP includes an express exception that food and beverages offered at school-sponsored events that take place outside of the school day (such as athletic events, dances, or performances) “do not have to meet the nutritional requirements.”

Turlock’s LWP also includes the NANA Model Policy provisions on marketing. In addition, it explicitly “prohibits the marketing and advertising of non-nutritious foods and beverages through signage, vending machine fronts, logos, scoreboards, school supplies, advertisements in school publications, coupon or incentive programs, free give-aways, or other means.”

The provisions related to community access to school grounds through joint use agreements in the Turlock LWP are taken from the NANA Model Policy.

The Turlock LWP provisions on food as a reward are adopted from the CSBA Model Policy. The Turlock LWP also specifically promotes using non-food items as rewards and “discourage[s schools] from rewarding students with foods or beverages that are not on the approved SB 12 food list.”

Like the CSBA Model Policy, the Turlock LWP does not include any language relating to obesity stigma/bullying or school gardens.

## (6) OPPORTUNITIES FOR STRENGTHENING:

Many of the LWPs contain some strong provisions related to Wellness Promotion; but they also have room for strengthening. With respect to providing a strong signal of the districts’ wellness mission and vision, the NANA based policies would benefit from adding a commitment to developing a *comprehensive* and *coordinated* wellness policy. The CSBA based policies would benefit from adding some of the detail found in the NANA Model Policy preamble.

*Requiring* marketing to *promote* health food and beverage options, would strengthen both the CSBA based and NANA based LWPs. The NANA Model Policy includes some good examples of marketing to promote healthy foods in its permissive provision, including: “vending machines covers promoting water; pricing structures that promote healthy options in a la carte lines or vending machines; sales of fruit for fundraisers, and coupons for discount gym memberships.” Examples of other LWP provisions regarding healthy food promotion include:

- “Schools shall label/mark healthy food items available so students know which are healthy items;” and
- “The healthiest choices, like fruits, vegetables, will be prominently displayed in the cafeteria to encourage students to make healthy choices.”

Most of the districts’ LWPs address healthy fundraising to some extent. Stronger fundraising policies would include:

- *Requiring* only healthy food and beverages options that are described with specificity (fruits and vegetables, nonfat or low fat dairy, whole grains, fewer than 200 calories per serving, no SSBs);
- Strongly encouraging physical activity (fun run, walk-a-thon, bike derby) or community service (car wash, parking at events) options; and
- No exceptions for off campus or after school fundraising.

The CSBA and NANA based LWPs would benefit from *prohibiting* the use of food as a reward (as opposed to merely discouraging). The ban on food as a reward is not just about keeping unhealthy foods out of kids’ diets, but also about encouraging healthy attitudes towards food that are not tied to either reward or punishment. An example of LWP language is “Food rewards or incentives shall not be used in classrooms to encourage student achievement or desirable behavior.” Some districts, including Chatom, provide helpful suggestions to teachers for non-food rewards, typically things like stickers, erasers, pencils, etc.

All of the LWPs would benefit from addressing obesity stigma and teasing and bullying based on weight and body size. (It is possible that these topics are covered in the districts' anti-bullying policies, which were not part of the scope of this review.) Examples of policy language include:

- ensure students of all sizes are encouraged to participate in physical activities;
- avoid practices that single out students on the basis of body size or shape;
- avoid elimination games (dodge ball, tag, etc.) that limit opportunities for all students to participate and succeed;
- display visual materials that feature a diverse combination of students being active and eating healthy; and
- adopt a universal bullying prevention program that addresses weight discrimination and teasing.

Whether or not school gardens are a good fit for particular district will depend on a number of factors, including available facilities and resources; for this reason, permissive and/or aspirational provisions are probably appropriate for LWPs. For example, the Hughson LWP includes the following: “District schools are encouraged to establish school gardens and/or farm-to-school projects to increase the availability of safe, fresh, seasonal fruits and vegetables for school meals and to support the district’s nutritional education program.”

Waterford’s LWP includes a provision on the “Asthma Friendly Flag Program,” which “serves as a visual communication device to alert administrators, school staff, students, parents and the surrounding community of the daily air quality by utilizing colored flags.” The Stanislaus County Asthma Coalition lists a number of school districts as partners on its website (including Modesto City USD, Newman-Crows Landing, Oakdale, Patterson, Riverbank, and Sylvan). Given the often poor outdoor air quality and high rates of asthma in Stanislaus County,<sup>24</sup> other districts would likely benefit from participating in the Asthma Friendly Flag Program (if they are not already), and including a discussion of it in their LWPs.

**b) NUTRITION EDUCATION AND PROMOTION**

(Note that following districts do not address nutrition education and promotion in their LWPs: Paradise, Hickman, and Newman-Crows Landing.)

**(1) ASSESSMENT CRITERIA:**

The strongest LWPs require:

- (1) A comprehensive nutrition curriculum for each grade level;
- (2) That is focused on teaching behaviors and skills; and
- (3) Is connected to the larger school food environment.

**(2) SUMMARY TABLE**

<b><u>Nutrition Education and Promotion</u></b>	<b>Comprehensive and Sequential Nutrition Curriculum</b>	<b>Connected to School Food Environment</b>	<b>Behavior and Skills Focused</b>
<b><u>CSBA Based LWPs</u></b>			
CERES	✓	✓	✓
DENAIR	✓	✓	✓

<sup>24</sup> Stanislaus County Asthma Report Card 2010: Executive Summary. Stanislaus County Health Services Agency, Public Health Services, Stanislaus County Asthma Coalition, 2010. Available at: <http://www.schsa.org/PublicHealth/pdf/coalitionPartnerships/asthma/asthmareportcard2010-executivesummary.pdf>.



EMPIRE UNION	✓	✓	✓
HART-RANSOM	✓	✓	-
HUGHSON	✓	✓	✓
KEYES	✓	✓	✓
KNIGHTS FERRY	✓	✓	✓
OAKDALE	✓	✓	✓
PARADISE	-	-	-
RIVERBANK	✓	✓	✓
SHILOH	✓	✓	✓
STANISLAUS COE	✓	✓	✓
STANISLAUS USD	✓	✓	✓
SYLVAN	✓	✓	✓
VALLEY HOME	✓	✓	✓
<b><u>NANA Based Policies</u></b>			
CHATOM	✓	✓	✓
HICKMAN	-	-	-
MODESTO CITY	✓	✓	✓
NEWMAN-CROWS LANDING	-	-	-
PATTERSON	✓	✓	✓
ROBERTS FERRY	✓	✓	✓
SALIDA	✓	✓	✓
WATERFORD	✓	✓	✓
<b><u>Other Policies</u></b>			
GRATTON	✓	-	-
TURLOCK	-	✓	-

### (3) CSBA BASED POLICIES

The CSBA Model Policy requires that the district’s nutrition education program be based on the “state’s curriculum framework and content standards” and designed to “build ... skills and knowledge.” The related California standards set forth a sequential curriculum for each grade level. The CSBA Model Policy also suggests that nutrition education, “as appropriate, ... be integrated into other academic subjects.” Almost all of the CSBA based LWPs include these provisions (Hart Ransom USD’s LWP does not include the focus on skills and, as noted above, Paradise’s LWP omits all sections on nutrition education).

### (4) NANA BASED POLICIES

The NANA Model Policy encourages a “sequential, comprehensive, standards-based” nutrition education program that emphasizes “knowledge and skills.” It also suggests incorporating nutrition education into other subjects and linking to the “school meal program, other school foods, and nutrition-related community services.” Hickman and Newman-Crows Landing do not include the detailed Nutrition Education provisions from the NANA Model Policy in their LWPs; all other districts do.

## (5) OTHER POLICIES

### (a) GRATTON

The Gratton LWP contains the following on nutrition education and promotion: “To foster and promote health literacy, Gratton School complies with California Education Code Section 51210 which requires health education, including nutrition education, to be taught in grades one through six.”

### (b) TURLOCK

The Turlock LWP contains the CSBA Model Policy provision on nutrition education and promotion. However, the Turlock LWP omits the CSBA language linking nutrition education to the state standards (which satisfies the “comprehensive and sequential” element of the criteria) and the reference to “skills and knowledge”.

## (6) OPPORTUNITIES FOR STRENGTHENING:

While almost all of the LWPs address Nutrition Education and Promotion, most would benefit from stronger language and enhanced detail in this area. The CSBA based LPWs (including Turlock) and the Gratton LWP would be strengthened by explicitly requiring the inclusion of sequential and comprehensive nutrition education taught at every grade level rather than referencing the state “curriculum framework and content standards.” The NANA based LWPs would similarly benefit from a mandate rather than a suggestion that schools should provide sequential, comprehensive nutrition education. An example of a simple but strong LWP provision on nutrition education and promotion is: “Nutrition education topics shall be integrated within the comprehensive health education curriculum and taught at every grade level.”

The CSBA and NANA Based Policies (as well as the Turlock and Gratton LWPs) would be strengthened by more detailed provisions on skills based nutrition education and promotion, including suggested lesson areas. An example provision is: “All students will be taught the skills needed to make healthy food choices. Nutrition education will incorporate lessons helping children acquire skills for reading food labels and menu planning.”

Finally, while most of the LWPs reference integrating nutrition education into other academic subjects, *requiring* such integration rather than just suggesting it would strengthen them. The NANA Model Policy includes some good examples of ways to link nutrition education and promotion with the school environment, including: “developmentally appropriate, culturally-relevant, participatory activities, such as contests, promotions, taste testing, farm visits, and school gardens;” and “links with the school meal programs, other school foods, and nutrition related community services.” Schools interested in establishing school gardens can also consider provisions such as “The nutrition education program shall work with the school meal program to develop school gardens and use the cafeteria as a learning lab.”

## c) PHYSICAL EDUCATION

(Note that the Paradise does not address nutrition education in its LWP.)

**(1) ASSESSMENT CRITERIA:**

The strongest LWPs require:

- (1) A written physical education curriculum for each grade level;
- (2) That provides a minimum amount of time per week of physical education;
- (3) With safe and adequate equipment and facilities; and
- (4) Prohibits waivers.

**(2) SUMMARY TABLE**

<u>Physical Education</u>	Sequential PE Curriculum	Minimum Time Per Week	Adequate and Safe Facilities	Limited Waivers
<b><u>CSBA Based LWPs</u></b>				
CERES	✓	✓	-	-
DENAIR	✓	✓	-	-
EMPIRE UNION	✓	✓	-	-
HART-RANSOM	✓	✓	-	-
HUGHSON	✓	✓	-	✓
KEYES	✓	✓	-	-
KNIGHTS FERRY	✓	✓	-	-
OAKDALE	✓	✓	-	-
PARADISE	-	-	-	-
RIVERBANK	✓	✓	-	-
SHILOH	✓	✓	-	-
STANISLAUS COE	✓	✓	-	-
STANISLAUS USD	✓	✓	-	-
SYLVAN	✓	✓	-	-
VALLEY HOME	✓	✓	-	-
<b><u>NANA Based Policies</u></b>				
CHATOM	✓	✓	-	-
HICKMAN	-	✓	-	+
MODESTO CITY	-	✓	-	-
NEWMAN-CROWS LANDING	-	✓	-	+
PATTERSON	✓	✓	-	-
ROBERTS FERRY	-	+	-	-
SALIDA	-	+	-	-

WATERFORD	✓	+	-	-
<b><u>Other Policies</u></b>				
GRATTON	✓	✓	-	-
TURLOCK	-	+	-	+

### (3) CSBA BASED POLICIES

Similar to the provisions for nutrition education, the CSBA Model Policy requires that the district’s physical education (“PE”) program be based on the “state’s curriculum framework and content standards” and designed to “build ... skills and knowledge.” The related California standards set forth a sequential curriculum for each grade level and requirements for the number of minutes of PE per week. The CSBA Model Policy does not address PE equipment and facilities or PE waivers. The vast majority of districts with CSBA based LWPs adopted the Physical Education provisions wholesale. As noted above, Paradise’s LWP omits all sections on physical education. Hughson added a provision to its LWP allowing limited PE waivers, which is based on related California Education Code sections.

### (4) NANA BASED POLICIES

The NANA Model Policy provides strong, detailed requirements on PE curriculum, minimum PE time per week, and waivers. However, many of the districts with NANA based LWPs either specify a lower minutes per week or refer generically to the state requirement on minutes of PE per week (Chatom, Modesto City, Newman-Crows Landing, and Patterson). Most districts also either removed or weakened the PE waiver prohibition (Chatom, Modesto City, Patterson, Roberts Ferry, Salida, and Waterford). Like the CSBA Model Policy, the NANA Model Policy does not address PE equipment and facilities.

### (5) OTHER POLICIES

#### (a) GRATTON

The Gratton LWP contains the following on physical education: “All kindergarten through eighth grade students, including students with disabilities and/or special health-care needs, will receive physical education instruction as designated in California Education Code Sections 51210, 51222, 51223.”

#### (b) TURLOCK

The Turlock LWP includes the NANA Model Policy provision on physical education.

### (6) OPPORTUNITIES FOR STRENGTHENING:

The majority of the districts could strengthen their LWPs by adopting stronger and more detailed provisions relating to PE, that include the following (much of which—but not all—is found in the NANA Model Policy):

- All students in grades K-12, including students with disabilities, special health-care needs, and in alternative education settings, will receive daily physical education of 150 minutes/week for elementary school students and 225 minutes/week for middle and high school students for the entire school year.
- Physical education will be based on a comprehensive curriculum/program.
- A certified physical education teacher shall teach all physical education.

- Student involvement in other activities involving physical activity, including interscholastic or intramural sports, will not be substituted for meeting the physical education requirement.
- Students will spend at least 50 percent of physical education class time participating in moderate to vigorous physical activity.
- The physical education program shall be provided with adequate space and equipment and conform to all applicable safety standards.

**d) PHYSICAL ACTIVITY**

(Note that Modesto City Schools’ LWP does not address physical activity.)

**(1) ASSESSMENT CRITERIA:**

The strongest LWPs:

- (1) Require adequate recess time for elementary school students;
- (2) Require regular physical activity breaks for all students;
- (3) Provide for structured physical activity through before and after school programs;
- (4) Promote walking and biking to school (where appropriate) and/or a safe routes to school program; and
- (5) Prohibit restricting physical activity as punishment.

**(2) SUMMARY TABLE**

<u>Physical Activity</u>	Regular Physical Activity Breaks	Recess for Elementary Students	Structured Physical Activity Before and After School	Walking and Biking to School and/or SRTS	No Physical Activity Restrictions as Punishment
<b><u>CSBA Based LWPs</u></b>					
CERES	✓	-	✓	✓	-
DENAIR	✓	-	✓	✓	-
EMPIRE UNION	✓	-	✓	-	-
HART-RANSOM	-	+	-	-	-
HUGHSON	✓	-	✓	✓	-
KEYES	-	-	+	-	-
KNIGHTS FERRY	✓	-	✓	✓	-
OAKDALE	-	-	+	-	-
PARADISE	✓	-	✓	✓	-
RIVERBANK	-	-	+	-	-
SHILOH	-	-	+	-	-
STANISLAUS COE	-	-	+	-	-
STANISLAUS USD	✓	-	✓	✓	-

SYLVAN	✓	-	✓	✓	-
VALLEY HOME	-	-	+	-	-
<b><u>NANA Based Policies</u></b>					
CHATOM	-	-	+	-	✓
HICKMAN	✓	+	✓	-	-
MODESTO CITY	-	-	-	-	-
NEWMAN-CROWS LANDING	✓	+	+	-	+
PATTERSON	-	+	+	-	✓
ROBERTS FERRY	✓	+	✓	✓	+
SALIDA	✓	+	✓	-	-
WATERFORD	✓	✓	+	+	+
<b><u>Other Policies</u></b>					
GRATTON	-	-	-	-	+
TURLOCK	✓	+	✓	+	+

### (3) CSBA BASED POLICIES

The CSBA Model Policy broadly requires students “be provided opportunities to be physically active on a regular basis.” However, only eight of the districts with CSBA based LWPs included this provision (Ceres, Denair, Empire Union USD, Hughson, Paradise, Stanislaus USD, and Sylvan).

The CSBA Model Policy makes a brief, vague reference to recess as an “opportunity for moderate to vigorous physical activity.” Because the research and criteria consulted all require mandatory daily recess for a “✓” equivalent rating, the CSBA Model Policy was rated “-” in this area. (A “+” rating is given for mandatory daily recess of at least 20 minutes.) Hart Ransom USD is the only district with a CSBA based LWP to include a provision mandating “20 minute supervised recess each day” for elementary students.

Opportunities for structured physical activity before and after school are suggested in the CSBA Model Policy, including “school athletic programs [and] extracurricular programs.” All of the districts with CSBA based LWPs except Hart Ransom USD include at least this suggestive provision and six districts make it mandatory (Keyes, Oakdale, Riverbank, Shiloh, Stanislaus COE, and Valley Home).

The CSBA Model Policy suggests providing “programs to encourage students to walk or bicycle to and from and school.” This provision is included in only four of the CSBA based LWPs (Hughson, Paradise, Stanislaus USD, and Sylvan). The CSBA Model Policy does not specifically mention Safe Routes to Schools programs and it was not added to any of the CSBA based LWPs.

The CSBA Model Policy does not include a provision prohibiting restrictions on physical activity as punishment. While Hart Ransom USD’s LWP includes a provision banning withholding physical *education* as punishment, none of the districts with CSBA based LWPs include provisions regarding not withholding physical *activity* as punishment.

#### (4) NANA BASED POLICIES

The NANA Model Policy addresses all of the physical activity criteria reviewed. It includes particularly strong provisions regarding regular physical activity breaks, recess for elementary school students (required daily for 20 minutes), physical activity beyond PE, Safe Routes to Schools Programs, and not using physical activity restrictions as punishment. Walking and biking to school is addressed only briefly within the Safe Routes to School portion.

However, the districts with NANA based LWPs have not uniformly adopted the physical activity provisions; and Modesto City did not include any of the physical activity provisions in its LWP. Most of the districts with NANA based LWPs include the provision on regular physical activity breaks (Chatom, Modesto City, and Patterson do not). Similarly, most of the districts with NANA based LWPs include the strong recess provision requiring 20 minutes daily for elementary students. The exceptions are Chatom, which instead has a CSBA Model Policy type provision referring tangentially to recess as a form of physical activity and Waterford, which shortened the daily recess requirement to 15 minutes.

All of the districts with NANA based LWPs (with the exception of Modesto City as noted above) include provisions related to offering opportunities for structured physical activity before and after school. The LWPs for Hickman USD, Roberts Ferry, and Salida however revised the provision from mandatory to merely encouraged.

While the NANA Model Policy includes a strong provision regarding walking and biking to school and encouraging districts to explore adopting Safe Routes to School programs, most of the districts with NANA based policies did not include this language (Chatom, Hickman, Modesto City, Newman-Crows Landing, Patterson, and Salida). Roberts Ferry includes the walking and biking portion but not the Safe Routes to School portion; Waterford adopted the NANA Model Policy language in its entirety.

The NANA Model Policy includes a strong provision prohibiting using “physical activity (e.g., running laps, pushups) or withholding opportunities for physical activity (e.g., recess, physical education) as punishment.” The Hickman USD, Modesto City, and Salida LWPs do not include this language; the Chatom and Patterson LWPs revised the NANA Model Policy language to be encouraging rather than mandatory. Newman-Crows Landing, Roberts Ferry, and Waterford included the full NANA Model Policy provision in their LWPs.

#### (5) OTHER POLICIES

##### (a) GRATTON

The Gratton LWP contains the following provision related to physical activity: “Teachers and other school and community personal will not use physical activity or withhold opportunities for physical activity as punishment as stated in California Education Code Section 49001.”

##### (b) TURLOCK

The Turlock LWP provisions on physical activity are based on both the CSBA and NANA Model Policies, as well as some entirely unique language.

The Turlock LWP includes the CSBA Model Policy provision that references “in-class physical activity breaks” and “integration of physical activity into the academic curriculum.” The NANA Model Policy on recess is included in the Turlock LWP. The Turlock LWP includes the provision on Safe Routes to School from the NANA Model Policy, and adds rollerblading and skateboarding as additional modes of active transportation recommended for students. The Turlock LWP contains the following provision related to physical activity as punishment: “The school district will not deny student participation in recess or other physical activities as a form of discipline or for classroom make-up time.” While this provision addresses withholding physical activity as punishment, it does not address prohibiting using physical activity as punishment.

The provision related to other opportunities for physical activity in the Turlock LWP is based on the NANA Model Policy, but modified from a mandatory statement to a permissive statement (“will” to “should”). The Turlock LWP also includes the following additional, non-model based language regarding other physical activity opportunities:

- “Students are given opportunities for physical activity through a range of before- and/or after-school programs including, but not limited to, intramurals, interscholastic athletics, and physical activity clubs.”
- “Students are given opportunities for physical activity during the school day through physical education (PE) classes, daily recess periods for elementary school students, and the integration of physical activity into the curriculum.”

While it does not specifically address any of the criteria assessed, the Turlock LWP also contains a statement regarding the role of families in increasing physical activity: “Schools encourage parents and guardians to support their children’s participation in physical activity, to be physically active role models, and to include physical activity in family events.”

## **(6) OPPORTUNITIES FOR STRENGTHENING**

Most of the districts LWPs would benefit from stronger language in at least one of the physical activity areas reviewed.

The NANA Model Policy contains strong example language on providing regular physical activity breaks (subtitled “Integrating Physical Activity into the Classroom Setting”):

For students to receive the nationally-recommended amount of daily physical activity and for students to fully embrace regular physical activity as a personal behavior, students need opportunities for physical activity beyond physical education class.

Toward that end:

- classroom health education will complement physical education by reinforcing the knowledge and self-management skills needed to maintain a physically-active lifestyle and to reduce time spent on sedentary activities, such as watching television;
  - opportunities for physical activity will be incorporated into other subject lessons;
- and



- classroom teachers will provide short physical activity breaks between lessons or classes as appropriate.

Examples of other LWP language on regular physical activity breaks include: “Physical activity opportunities shall be provided throughout the school day;” “All teachers shall be provided with Take 10! Training”; and “Classroom teachers shall incorporate appropriate, short breaks that include physical movement.”

Hart Ransom USD’s LWP is a good example of a CSBA based policy that includes stronger language on recess: “Students K-8 shall have a 20 minute supervised recess each day.” The NANA Model Policy is similar, but provides additional detail: “All elementary school students will have at least 20 minutes a day of supervised recess, preferably outdoors, during which schools will encourage moderate to vigorous physical activity verbally and through the provision of space and equipment.”

Many of the districts’ LWPs already include strong mandatory provision regarding physical activity opportunities before and after school. A number of districts could strengthen their LWPs by making their provisions in this area mandatory rather than suggestive. Hickman’s LWP is an example of a strongly worded provision (based on the NANA Model Policy) that includes specific examples of programs, including “California Governor’s Challenge Program, Mileage Club, Fitness Center.” Newman-Crows Landing includes an additional strong provision related to communication regarding physical activity opportunities: “The district will provide information about physical education and other school-based physical activity opportunities before, during, and after the school day; and support parents’ efforts to provide their children with opportunities to be physically active outside of schools.” As noted above, the Turlock LWP includes a strong provision regarding encouraging family involvement in physical activity.

Walking and/or biking to school may not be realistic for students in some districts, particularly rural districts that are more spread out and lack appropriate infrastructure like sidewalks. However, where appropriate, districts should consider adding strong language on walking and biking to school and Safe Routes to School programs. Walking and biking to school (or using other active transportation modes like scooters, skateboards, or roller skates) can help to increase physical activity levels of students (and often their families), as well as reduce traffic congestion and air pollution. Example LWP language in this area includes: “Students will be encouraged to walk or bike to school;” “Schools shall provide bike racks for students;” and “Schools will work with parent groups to establish ‘walking school bus’ and ‘bicycle train’ programs.” The NANA Model Policy includes a strong provision addressing infrastructure needed to support active transportation to schools: “The school district will assess and, if necessary and to the extent possible, make needed improvements to make it safer and easier for students to walk and bike to school. When appropriate, the district will work together with local public works, public safety, and/or police departments in those efforts.” The NANA Model Policy also contains a strong provision regarding Safe Routes to Schools Programs.

Most of the districts’ LWPs would benefit from including a strong *prohibition* on using or restricting physical activity as punishment. Similar to prohibiting using food as a reward, prohibiting physical activity as punishment helps to encourage healthy attitudes about physical activity and ensures that all

children are getting the exercise they need. The NANA Model Policy includes strong language in this area: “Teachers and other school and community personnel will not use physical activity (e.g., running laps, pushups) or withhold opportunities for physical activity (e.g., recess, physical education) as punishment.” Another example of LWP language is: “Students shall not be denied participation in recess or other physical activity opportunities as a form of discipline or punishment unless the safety of students is in question.”

**e) TOBACCO PREVENTION POLICIES**  
**(1) ASSESSMENT CRITERIA:**

The strongest LWPs:

- (1) Tobacco free school;
- (2) Ban tobacco advertising and promotions; and
- (3) Tobacco use prevention included in sequential health education curriculum.

**(2) SUMMARY TABLE**

<u>Tobacco Prevention</u>	Tobacco Free School	Ban Tobacco Advertising and Promotion	Tobacco Prevention Included in Health Curriculum
<b><u>CSBA Based LWPs</u></b>			
CERES	-	-	-
DENAIR	-	-	-
EMPIRE UNION	-	-	-
HART-RANSOM	-	-	-
HUGHSON	-	-	-
KEYES	-	-	-
KNIGHTS FERRY	-	-	-
OAKDALE	-	-	-
PARADISE	-	-	-
RIVERBANK	-	-	-
SHILOH	-	-	-
STANISLAUS COE	-	-	-
STANISLAUS USD	-	-	-
SYLVAN	-	-	-
VALLEY HOME	-	-	-

<b><u>NANA Based Policies</u></b>			
CHATOM	-	-	-
HICKMAN	-	-	-
MODESTO CITY	-	-	-
NEWMAN-CROWS LANDING	-	-	-
PATTERSON	-	-	-
ROBERTS FERRY	-	-	-
SALIDA	-	-	-
WATERFORD	-	-	-
<b><u>Other Policies</u></b>			
GRATTON	-	-	-
TURLOCK	-	-	-

None of the LWPs include tobacco prevention provisions. It is expected that the districts have tobacco prevention policies in place, but they are not included in the LWPs.

**(3) OPPORTUNITIES FOR STRENGTHENING:**

To strengthen comprehensive nature of LWP, districts should consider including tobacco prevention provisions in their LWPs, even if this creates duplication with other policies. These provisions should include: a tobacco free school policy; ban on tobacco advertising on school property, at school events, and in written educational materials and publications; ban on tobacco promotions, promotional offers, and prizes on school property, at school events, and in written educational materials and publications; and, inclusion of tobacco-use prevention in the sequential health education curriculum for pre-K to grade 12 students.

**f) STAFF EDUCATION, TRAINING, AND WELLNESS**

(Note that Modesto City Schools’ LWP does not address staff education, training, and wellness.)

**(1) ASSESSMENT CRITERIA:**

The strongest LWPs:

- (1) Require appropriate training, education, and background of physical education and health teachers;
- (2) Provide for professional development and continuing education for PE and health teachers and other wellness related staff;
- (3) Provide for nutrition training and support for all food service staff;
- (4) Encourages staff to be healthy role models; and
- (5) Promote worksite wellness and physical activity opportunities for staff.

(2) SUMMARY TABLE

<u>Staff Education, Training, and Wellness</u>	Training, Education, and Background of PE Teachers	Professional Development for PE Teachers	Training, Education, and Background of Health Teachers	Professional Development for Health Teachers	Professional Development for Other Wellness Staff	Nutrition Training and Support for Food Service Staff	Encourage Staff to be Healthy Role Models	Promote Worksite Wellness and Physical Activity for Staff
<b><u>CSBA Based LWPs</u></b>								
CERES	-	-	-	-	✓	-	+	✓
DENAIR	-	-	-	-	✓	-	+	✓
EMPIRE UNION	-	-	-	-	✓	-	✓	✓
HART-RANSOM	-	-	-	-	✓	-	-	✓
HUGHSON	+	+	-	-	-	-	-	-
KEYES	-	-	-	-	✓	-	✓	✓
KNIGHTS FERRY	-	-	-	-	✓	-	+	✓
OAKDALE	-	-	-	-	+	-	✓	✓
PARADISE	-	-	-	-	✓	-	+	✓
RIVERBANK	-	-	-	-	✓	-	✓	✓
SHILOH	-	-	-	-	✓	-	✓	✓
STANISLAUS COE	-	-	-	-	✓	-	✓	✓
STANISLAUS USD	-	-	-	-	✓	-	+	✓
SYLVAN	-	-	-	-	✓	-	+	✓
VALLEY HOME	-	-	-	-	+	-	✓	✓
<b><u>NANA Based Policies</u></b>								
CHATOM	-	-	-	-	✓	+	-	-
HICKMAN	-	-	-	-	-	+	-	-
MODESTO CITY	-	-	-	-	-	-	-	-
NEWMAN-CROWS LANDING	✓	-	-	-	-	-	-	-
PATTERSON	-	-	-	-	✓	+	-	-
ROBERTS FERRY	-	-	-	-	-	✓	-	✓
SALIDA	✓	-	-	✓	✓	+	-	+
WATERFORD	✓	-	-	-	-	+	-	+
<b><u>Other Policies</u></b>								
GRATTON	-	-	-	-	-	-	-	-
TURLOCK	+	-	-	-	-	+	+	✓

### (3) CSBA BASED POLICIES

The CSBA Model Policy does not include any provisions regarding: training, education, and background of PE and health education teachers; professional development for PE and health education teachers; or nutrition training or support for food service staff. All of the CSBA based LWPs are similarly lacking language in these areas, with the exception of Hughson, which includes the following strong provision on physical education teachers: “Physical education instruction shall be delivered by appropriately credentialed teachers who may be assisted by instructional aides, paraprofessionals, and/or volunteers. The district shall provide physical education teachers with continuing professional development, including classroom management and instructional strategies designed to keep students engaged and active and to enhance the quality of physical education instruction and assessment.”

The CSBA Model Policy includes a vague, suggestive provision regarding professional development for other wellness related staff: “Professional development may include instructional strategies that assess health knowledge and skills and promote healthy behavior.” Hughson does not include this provision in its LWP. Oakdale and Valley Home include this provision, but replace the permissive language with mandatory language (“shall” instead of “may”). The remaining districts with CSBA based policies include the provision quoted above.

The CSBA Model Policy includes relatively strong language on encouraging staff to be healthy role models and worksite wellness: “The Superintendent ... shall encourage staff to serve as positive role models for healthy eating and physical fitness ... [and] shall promote work-site wellness and may provide opportunities for regular physical activity among employees.” The Hughson LWP does not include these provisions; Hart-Ransom’s LWP does not include the portion on work-site wellness and physical activity for staff. The LWPs for Empire Union, Hart-Ransom, Keyes, Oakdale, Riverbank, Shiloh, Stanislaus COE, and Valley Home all include these provisions, but with less detail (many removed the reference to “work-site wellness”).

### (4) NANA BASED POLICIES

While the NANA Model Policy specifically requires that PE be taught by a certified PE teacher, it does not address qualifications for health education teachers, or continuing professional development for either PE or health education teachers. The certified PE teacher requirement is not included in the LWPs for Chatom, Hickman, Modesto City, or Roberts Ferry, and is revised to encouraged in Newman’s LWP. (It is required in Salida for grades 7 and 8 and in Waterford for secondary students.)

Although the NANA Model Policy refers to “training for teachers and other staff” as part of the nutrition education program, it is otherwise silent on professional development for other wellness staff. The LWPs for Chatom, Patterson, Roberts Ferry, Salida, and Waterford include the nutrition education training provision in some form (Hickman, Modesto City, and Newman-Crows Landing do not). Patterson also includes a broader strong provision that: “Professional development shall include instructional strategies that assess health knowledge and skills and promote healthy behaviors in nutrition, health, and physical fitness.”

The NANA Model Policy includes the following strong provision on qualifications and continuing professional development for food service staff:

Qualified nutrition professionals will administer the school meal programs. As part of the school district’s responsibility to operate a food service program, we will provide continuing professional development for all nutrition professionals in schools. Staff development programs should include appropriate certification and/or training programs for child nutrition directors, school nutrition managers, and cafeteria workers, according to their levels of responsibility.

This provision is included in the LWPs for Chatom, Hickman, Patterson, Salida, and Waterford; a significantly modified version in the Roberts Ferry LWP. Modesto City and Newman-Crows Landing do not include the food service staff provision.

Although the NANA Model Policy includes a particularly strong provision on promoting Staff Wellness (that includes establishing a Staff Wellness Committee), it does not address staff as healthy role models. While Salida and Waterford include the Staff Wellness provision, Chatom, Hickman, Modesto City, Newman-Crows Landing, and Patterson do not. Roberts Ferry includes the following provision on staff wellness: “Roberts Ferry Elementary School District highly values the health and well-being of every staff member and promotes activities and policies that support efforts by staff to maintain a healthy lifestyle. These policies should be based on input solicited from school staff and should outline ways to encourage healthy eating, physical activity, and other elements of a healthy lifestyle among school staff.”

**(5) OTHER POLICIES**

**(a) GRATTON**

The Gratton LWP does not contain any language on staff education, training, and wellness.

**(b) TURLOCK**

The Turlock LWP’s provisions related to staff education, training, and wellness are adopted primarily from the NANA model policy. The Turlock LWP specifically requires that PE be taught by a certified PE teacher, it does not address qualifications for health education teachers, or continuing professional development for either PE or health education teachers. It also includes the strong provision on qualifications and professional development for food service staff from the NANA Model Policy. The Turlock LWP contains the NANA Model Policy on staff wellness, but the provision has been revised from mandatory (“will plan and implement”) to suggestive (“should encourage activities and policies”) and the requirements for staff wellness committee are loosened.

**(6) OPPORTUNITIES FOR STRENGTHENING:**

The majority of the districts could strengthen their LWPs by adopting stronger and more detailed provisions regarding staff education, training, and wellness that include the following:

- “All physical education will be taught by a certified physical education teacher.”

- “The district shall provide physical education teachers with continuing professional development on at least a yearly basis, including classroom management and instructional strategies designed to keep students engaged and active and to enhance the quality of physical education instruction and assessment.” (from the Hughson LWP)
- “All health education will be taught by a certified health education teacher.”
- “Health Education staff will receive professional development on at least a yearly basis, including nutrition education and promotion.”
- “Professional development shall include instructional strategies that assess health knowledge and skills and promote healthy behaviors in nutrition, health, and physical fitness.” (from the Patterson LWP)

The NANA Model Policy provision on qualifications and professional development for food service staff, quoted above, is particularly strong. (This provision is included in most of the NANA based LWPs, as well as the Turlock LWP.)

While encouraging staff to be healthy role models and promoting staff wellness are not required by HHFKA 2010, teachers and other school staff will most effectively understand and teach wellness to students if they themselves have opportunities to eat well and be physical active. The CSBA and NANA Model Policies both provide strong provisions in these areas, which many districts include in their LWPs. Other example LWP language includes: “Staff will be encouraged to model healthy eating and physical activity as a valuable part of daily life.”

## **B. FOOD SERVICE AND NUTRITION GUIDELINES**

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### **1. HHFKA 2010 REQUIREMENTS**

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The HHFKA 2010 requires that LWPs include “for all foods available on each school campus..., nutrition guidelines that ... are consistent with [the HHFKA and the Child Nutrition Act] and ... promote student health and reduce childhood obesity.” (42 U.S.C. 1758b(b)(2) (2010).)

### **2. LOCAL WELLNESS POLICY AREAS EVALUATED**

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#### **a) NUTRITION STANDARDS FOR USDA SCHOOL MEALS**

##### **(1) ASSESSMENT CRITERIA:**

The strongest LWPs:

- (1) Address access to and promotion of the School Breakfast and Summer Food Service Programs;
- (2) Require that nutrition standards for school meals go beyond the USDA minimum standards;
- (3) Specify strategies to increase school meal participation;
- (4) Ensure students have adequate time to eat in a pleasant school meal environment;
- (5) Require healthy food preparation methods; and
- (6) Ensure that nutrition information for school meals is made available.

(2) SUMMARY TABLE

<u>Nutrition Standards for USDA School Meals</u>	School Breakfast Program Access and Promotion	Summer Food Service Program Access and Promotion	Nutrition Standards Beyond USDA Minimums	Increase School Meal Participation	Adequate Time to Eat	Pleasant Meal Environment	Healthy Food Preparation	Nutrition Information made Available
<b><u>CSBA Based LWPs</u></b>								
CERES	✓	✓	-	-	-	-	-	-
DENAIR	✓	✓	-	-	-	-	-	-
EMPIRE UNION	✓	-	-	-	-	-	-	-
HART-RANSOM	✓	-	✓	-	-	-	-	-
HUGHSON	✓	-	-	-	✓	✓	✓	-
KEYES	✓	-	-	-	-	-	-	-
KNIGHTS FERRY	✓	✓	-	-	-	-	-	-
OAKDALE	✓	-	-	-	-	-	-	-
PARADISE	✓	✓	-	-	-	-	-	-
RIVERBANK	✓	-	-	-	-	-	-	-
SHILOH	✓	-	-	-	-	-	-	-
STANISLAUS COE	✓	-	-	-	-	-	-	-
STANISLAUS USD	✓	✓	-	-	-	-	-	-
SYLVAN	✓	✓	-	-	-	-	-	-
VALLEY HOME	✓	-	-	-	-	-	-	-
<b><u>NANA Based Policies</u></b>								
CHATOM	✓	✓	-	✓	✓	✓	-	✓
HICKMAN	+	-	✓	✓	+	✓	-	-
MODESTO CITY	✓	-	-	-	-	-	-	-
NEWMAN-CROWS LANDING	✓	-	-	✓	+	-	-	✓
PATTERSON	✓	✓	-	✓	✓	✓	-	✓
ROBERTS FERRY	-	-	-	-	-	✓	-	-
SALIDA	✓	✓	-	✓	-	✓	-	✓
WATERFORD	✓	✓	-	✓	✓	✓	-	✓
<b><u>Other Policies</u></b>								
GRATTON	-	-	✓	-	-	-	-	-
TURLOCK	+	✓	-	-	✓	+	-	-



### (3) CSBA BASED POLICIES

The CSBA Model Policy includes permissive language on providing the School Breakfast Program and the Summer Meal Program. It does not address nutrition standards beyond USDA minimums; increasing school meal participation; providing adequate time to eat in a pleasant meal environment; healthy food preparation; or making nutrition information available. The districts with CSBA based LWPs adopted the provisions on USDA School Meals wholesale form the CSBA Model Policy, with the following exceptions:

- The Empire Union, Hart Ransom, Hughson, Keyes, Oakdale, Riverbank, Shiloh, Stanislaus COE, and Valley Home LWP's do not include the permissive provision on the Summer Meal Program;
- The Hart-Ransom LWP requires that meals meet the nutrition recommendations of the current United States Dietary Guidelines for Americans; and
- The Hughson LWP refers to "adequate time and space to eat meals" and prohibits foods that have been "deep fried, par fried, or pan fried by the district or as part of the manufacturing process."

### (4) NANA BASED POLICIES

The NANA Model Policy includes more detailed guidance on Nutrition Standards for USDA School Meals, although many of the provisions are permissive and there is uneven adoption by the districts with NANA based LWPs.

While, the NANA Model Policy provision on the School Breakfast Program is suggestive ("to the extent possible"), it provides strong specific recommendations for increasing participation. All of the districts with NANA based policies include the School Breakfast Program provision except Roberts Ferry. Hickman's LWP states that the district "operates the School Breakfast Program."

The NANA Model Policy requires participation "for at least six weeks" in the Summer Meal Program for "schools in which more than 50% of students are eligible for free or reduced-price school meal." The NANA Model Policy does not address increasing participation in the Summer Meal Program. Of the districts with NANA based policies, only Chatom, Patterson Joint, Salida, and Waterford include the Summer Meal Program provision (Hickman, Modesto City, Newman-Crows Landing, and Roberts Ferry do not).

The NANA Model Policy includes a few nutrition standards for school meals that go beyond USDA minimums, including: "offer a variety of fruits and vegetables; serve only low-fat (1%) and fat-free milk and nutritionally equivalent non-dairy alternatives; and ensure that half of the served grains are whole grain." The LWPs for Chatom, Hickman Patterson Joint, Roberts Ferry, and Salida include these additional standards, except for whole grains; Modesto City's LWP does not include this provision.

The NANA Model Policy includes a number of strategies aimed at increasing school meal participation, including: "grab-and-go" or classroom breakfast; arranging bus schedules to encourage breakfast participation; providing free meals to all children regardless of income; and taste tests and surveys for students and parents to help "identify new, healthful, and appealing food choices." Chatom, Hickman, Patterson, Salida, and Waterford's LWPs include the breakfast specific provisions; Hickman, Newman-

Crows Landing, Patterson, Salida, and Waterford include the other provisions. Modesto City and Roberts Ferry's LWPs do not address increasing participation in school meal programs.

The NANA Model Policy provides a detailed provision on meal times and scheduling that requires at least 10 minutes to eat breakfast and 20 minutes to eat lunch, and scheduling to ensure that other activities do not interfere with meals. The LWPs for Modesto City, Roberts Ferry, and Salida do not include these provisions; the LWPs for Chatom, Patterson, and Waterford include modified versions of these provisions where the meal times are reduced. (Hickman and Newman-Crows Landing include the provisions in their entirety in their LWPs).

The NANA Model Policy requires that meals "be served in a clean and pleasant environment." This provision is in all of the NANA based LWPs except Modesto City and Newman-Crows Landing. The NANA Model Policy does not include any provisions regarding healthy food preparation and none of the districts with NANA based LWPs added such provisions.

The NANA Model Policy suggests that students and parents receive "information about the nutritional content of meals" through "menus, a website, on cafeteria menu boards, placards, or other point-of-purchase materials." Hickman, Modesto City, and Roberts Ferry do not include this provision in their LWPs; the other districts with NANA based LWPs include this provision.

## (5) OTHER POLICIES

### (a) GRATTON

The Gratton LWP includes the following provisions related to nutrition standards for USDA school meals:

- "All school meals must meet or exceed nutrition requirements established by local, state, and federal requirements."
- "Food and beverages sold or served as part of federally reimbursed meal programs must meet the nutrition recommendations of the current United States Dietary Guidelines for Americans."
- "Lunch will be served at appropriate intervals from other meals, in accordance with current USDA guidelines."
- "Gratton School will do everything possible to prevent overt identification of their low income students to ensure that those students are not stigmatized or otherwise treated differently because they avail themselves of free and reduced-price meals and snacks."

The Gratton LWP does not expressly address: access to and promotion of the School Breakfast or Summer Meals Programs; strategies for increasing school meal participation; providing adequate time to eat in a pleasant environment; healthy food preparation; or making nutrition information available to students and parents.

### (b) TURLOCK

The Turlock LWP includes the CSBA Model Policy provisions on the Summer Meal Program and nutrition standards for school meals ("shall meet or exceed state and federal nutrition standards"). It also includes a mandatory version of the CSBA Model Policy provision on the School Breakfast Program (removed "to the extent possible").

The Turlock LWP does not include any provisions related to strategies for increasing school meal participation, health food preparation, or making nutrition information available to students and parents.

In a section not based on either the NANA or CSBA Model Policies title “Goals,” the Turlock LWP includes the following regarding time for eating and the school meal environment:

“The school district will ensure an adequate time for students to enjoy healthy food with friends in school. The school district will schedule lunch time as near the middle of the school day as possible. The school district will schedule recess for elementary schools before lunch so that children will come to lunch less distracted and ready to eat.”

“The school shall provide a clean, safe, enjoyable meal environment for students. The school district provides enough space and serving areas to ensure all students have access to school meals with minimum wait time.”

These guidelines on scheduling meals are strong, but the Turlock LWP does not explicitly address how long students have to eat. In addition, while these provisions on time for eating and school meal environment are strong affirmative statements, because they are under the subheading of “goals” it is unclear if they are in fact mandatory.

#### **(6) OPPORTUNITIES FOR STRENGTHENING:**

The majority of the districts could strengthen their LWPs by adopting stronger and more detailed provisions regarding nutrition standards for USDA school meals, including:

- “All schools will provide breakfast through the USDA School Breakfast Program.”
- “To promote participation in the USDA School Breakfast Program, schools will arrange bus schedules and utilize methods to serve school breakfasts that encourage participation, including serving breakfast in the classroom, “grab-and-go” breakfast, or breakfast during morning break and/or recess.”
- Additional measure for increasing school meal participation that districts may consider include: closed campuses; promotional mailings or events; “grab and go” and “fun on the run” programs (beyond the Breakfast Program); student and parent input on menus; and taste tests.
- “Schools in which more than 50% of students are eligible for free or reduced-price school meals will sponsor the Summer Food Service Program for at least six weeks between the last day of the academic school year and the first day of the following school year, and preferably through the entire summer vacation.” (from the NANA Model Policy). Note that districts can adjust the percentage as appropriate.
- “After obtaining food, students will have least 10 minutes to eat breakfast and at least 20 minutes to eat lunch.”
- Example provisions related to school meal environment include:
  - “Students shall be provided with a pleasant environment in which to eat meals;”
  - “Appropriate supervision shall be provided in the cafeteria and rules for safe behavior shall be consistently enforced.”

- “The school shall provide a clean, safe, enjoyable meal environment for students.” (from Turlock)
- “The school district provides enough space and serving areas to ensure all students have access to school meals with minimum wait time.” (from Turlock)
- “Health food preparation methods, including steaming, low fat, low salt, and no frying, shall always be used in the school cafeteria and food services.”
- “Students and parents will be provided information about the nutritional content of meals through [posted menus, school website, etc.]”

**b) NUTRITION STANDARDS FOR COMPETITIVE AND OTHER FOODS**

(Note that the Newman-Crows Landing LWP does not address nutrition standards for competitive and other foods.)

**(1) ASSESSMENT CRITERIA:**

The strongest LWPs:

- (1) Ensure that students are provided with healthy foods at all times (stores, vending, celebrations);
- (2) Remove unhealthy foods; and
- (3) Require that fruits and vegetables are available with all food offerings.

**(2) SUMMARY TABLE**

<u>Nutrition Standards for Competitive and Other Foods</u>	Remove the Sale of Unhealthy Foods	Healthy Foods At All Times (stores, vending, celebrations)	Fruits and Vegetables Available With All Food Offerings
<b><u>CSBA Based LWPs</u></b>			
CERES	✓	-	-
DENAIR	✓	-	-
EMPIRE UNION	✓	-	-
HART-RANSOM	✓	+	-
HUGHSON	✓	-	-
KEYES	✓	-	-
KNIGHTS FERRY	✓	-	-
OAKDALE	✓	-	-
PARADISE	✓	-	-
RIVERBANK	✓	-	-
SHILOH	✓	-	-

STANISLAUS COE	✓	-	-
STANISLAUS USD	✓	-	-
SYLVAN	✓	-	-
VALLEY HOME	✓	-	-
<b><u>NANA Based Policies</u></b>			
CHATOM	+	✓	+
HICKMAN	+	✓	+
MODESTO CITY	✓	-	-
NEWMAN-CROWS LANDING	-	-	-
PATTERSON	+	✓	+
ROBERTS FERRY	+	✓	-
SALIDA	+	✓	+
WATERFORD	+	✓	+
<b><u>Other Policies</u></b>			
GRATTON	✓	-	-
TURLOCK	✓	✓	-

### (3) CSBA BASED POLICIES

The CSBA Model Policy only briefly refers to nutrition standards for competitive and other foods: “Nutritional standards adopted by the district for all foods and beverages sold to students, including foods and beverages provided through the district’s food service program, *student stores*, *vending machines*, or *other venues*, shall meet or exceed state and federal nutritional standards.” The CSBA Model Policy refers to class parties and celebrations, but with a very weak and suggestive provision. The CSBA Model Policy does not require that fruits and vegetables be made available with all food offerings. All of the districts with CSBA based policies except Hart Ransom adopted these provisions wholesale. Hart Ransom’s LWP includes more detailed language regarding nutrition standards for competitive and other foods that includes detailed standards for fat, sugar, and calorie content.

### (4) NANA BASED POLICIES

The NANA Model Policy requires that all foods and beverages sold outside the meal program (“a la carte lines, vending machines, student stores”) meet certain nutrition (fat, sugar, sodium) and portion size standards. (It is worth noting that the standards refer to a number of potentially nutritionally poor foods, including chips, cookies, pastries, muffins, doughnuts, and ice cream.) As noted above, Newman-Crows Landing’s LWP does not include nutrition standards for competitive and other foods; Modesto City’s LWP includes only a short reference to such foods meeting or exceeding state and federal regulations. The remaining districts with NANA based LWPs adopted the detailed provisions regarding nutrition standards for competitive and other foods.

The NANA Model Policy includes a particularly strong provision requiring “A choice of at least two fruits and/or non-fried vegetables will be offered for sale at any location on the school site where foods are sold.” Chatom, Hickman, Patterson, Salida, and Waterford’s LWPs include this provision; the other NANA based LWPs do not (Modesto City, Newman-Crows Landing, Roberts Ferry).

## **(5) OTHER POLICIES**

### **(a) GRATTON**

The Gratton LWP includes the following provisions related to nutrition standards for competitive foods and beverages:

- “Individual food items sold outside the federal reimbursable meal programs shall meet local, state, and federal requirements.”
- “Gratton School will follow the nutrition standards for kindergarten through grade eight, for all food sold, including before and after school programs according to California Education Code Sections 49431 and 49431.5.”

### **(b) TURLOCK**

The Turlock LWP includes the CSBA Model Policy provision on competitive and other foods quoted above. The Turlock LWP expressly exempts from nutritional standards “foods and beverages offered or sold at school-sponsored events outside the school day” “such as, but not limited to, athletic events, dances, or performances.” Like the CSBA Model Policy, the Turlock LWP does not require that fruits and vegetables be made available with all food offerings.

## **(6) OPPORTUNITIES FOR STRENGTHENING**

To ensure that students are provided with healthy foods at all times and unhealthy foods are removed from school offerings, districts are encouraged to adopt LWP provisions that specify nutritional content (calories, saturated fat, sugar, sodium) and portion size requirements. The NANA Model Policy provides a good example of this type of provision, although, as noted above, it includes references to a number of nutritionally poor foods. In addition, SB12 provides for many of the nutritional content standards. Alternatively or additionally, districts can consider providing a specific and restricted list of food items allowed (e.g., limiting to water, fruits, vegetables, whole grains, lean proteins, low-fat or non-fat dairy, and nuts) and/or provide a comprehensive list of prohibited foods (e.g., baked goods, candy, ice cream). The NANA Model Policy provision requiring fruits and vegetables always being offered is particularly strong and can help to ensure that students can include fresh produce in their healthy food choices.

## **c) NUTRITION STANDARDS AND RESTRICTIONS FOR BEVERAGES**

### **(1) ASSESSMENT CRITERIA**

The strongest LWPs:

- (1) Prohibit all Sugar Sweetened Beverages;
- (2) Control serving sizes of beverages; and
- (3) Ensure access to free, safe, unflavored, cool drinking water throughout the day, including during PE and recess.

**(2) SUMMARY TABLE**

<u>Nutrition Standards and Restrictions for Beverages</u>	Prohibit Sugar Sweetened Beverages	Limit Serving Size of Beverages	Provide Free Water
<b><u>CSBA Based LWPs</u></b>			
CERES	-	-	-
DENAIR	-	-	-
EMPIRE UNION	-	-	-
HART-RANSOM	+	-	-
HUGHSON	-	-	✓
KEYES	-	-	-
KNIGHTS FERRY	-	-	-
OAKDALE	-	-	-
PARADISE	-	-	-
RIVERBANK	-	-	-
SHILOH	-	-	-
STANISLAUS COE	-	-	-
STANISLAUS USD	-	-	-
SYLVAN	-	-	-
VALLEY HOME	-	-	-
<b><u>NANA Based Policies</u></b>			
CHATOM	+	+	-
HICKMAN	+	+	-
MODESTO CITY	-	-	-
NEWMAN-CROWS LANDING	-	-	-
PATTERSON	+	+	-
ROBERTS FERRY	+	+	-
SALIDA	+	+	-
WATERFORD	+	+	-
<b><u>Other Policies</u></b>			
GRATTON	-	-	-
TURLOCK	-	-	✓

**(3) CSBA BASED POLICIES**

The CSBA Model Policy does not address nutrition standards and restrictions for beverages other than to require that they “meet or exceed state and federal nutritional standards.” For the most part, the districts with CSBA based LWPs also do not address nutrition standards and restrictions for beverages.

An exception is Hart Ransom’s LWP, which provides strong language on sugar sweetened beverages (SSBs): “Allowable beverages include water, milk (2 percent, 1 percent, non-fat, soymilk, rice milk)[,] juices that are 100 percent fruit or vegetable juice or at least 50 percent juice with no added sweetener.” Hughson’s LWP requires the district to “provide access to free, fresh drinking water during meal times in food service areas at all district schools” (this is rated as “✓” because it is limited to meal times and not at all times).

#### (4) NANA BASED POLICIES

The NANA Model Policy contains strong provisions on both SSBs and beverage portion sizes, but it does not include a provision on access to free water. The policy includes lists of both allowed and not allowed beverages:

Allowed: water or seltzer water without added caloric sweeteners; fruit and vegetable juices or fruit based drinks that contain at least 50% fruit juice and do not contain additional caloric sweeteners; unflavored or flavored low-fat or fat-free fluid milk or nutritionally equivalent nondairy beverages (to be defined by USDA);

Not Allowed: soft drinks containing caloric sweeteners, sports drinks; iced teas; fruit based drinks that contain less than 50% real fruit juice or that contain additional caloric sweeteners; beverages containing caffeine, excluding low-fat or fat-free chocolate milk (which contain trivial amounts of caffeine).

The policy also limits portion sizes of beverages to 12 fluid ounces (excluding water). All of the districts with NANA based policies include these provisions except Modesto City and Newman-Crows Landing.

#### (5) OTHER POLICIES

##### (a) GRATTON

The Gratton LWP does not contain any provisions relating to SSBs, beverage portion size, or access to free water.

##### (b) TURLOCK

The Turlock LWP does not address SSBs, other than the vague CSBA statement regarding beverages meeting “nutrition standards.” The Turlock LWP also does not address beverage portion sizes. The following provision on drinking water is included in the Turlock LWP in a section titled “Goals”: “The school district makes drinking fountains available in all schools, so that students can get water at meals throughout the day.” It is unclear whether this provision is meant to guarantee access to water at all times or just during meal periods.

#### (6) OPPORTUNITIES FOR STRENGTHENING

All of the districts would benefit from strengthened LWP provisions on nutritional standards and restrictions for beverages. The NANA Model Policy (quoted above) is particularly strong in the areas of prohibiting SSBs and limiting portions sizes of beverages. There is some debate in the public health community about whether flavored milk, less than 100% juice drinks, and artificially sweetened beverages should be served in schools, and districts may decide to modify the NANA Model Policy to remove these types of beverages from the allowed list. All of the districts would also benefit from



ensuring that “Students and staff will have access to free, safe, and fresh drinking water throughout the school day, including during physical education and recess.” We recognize that some Stanislaus County communities and their schools do not have access to safe drinking water and therefore this requirement may be difficult to meet.

## C. STAKEHOLDER PARTICIPATION AND COMMUNITY ENGAGEMENT

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### 1. HHFKA 2010 REQUIREMENTS

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The HHFKA 2010 requires that LWPs include:

- a “requirement that the local education agency permit parents, students, representatives of the school food authority, teachers of physical education, school health professionals, the school board, school administrators, and the general public to participate in the development, implementation, and periodic review and update of the local school wellness policy” (42 U.S.C. 1758b(b)(3) (2010))

New to HHFKA 2010: participation in development of LWP by PE teachers and school health professionals; participation by all named stakeholders in *implementation* of LWP.

### 2. LOCAL WELLNESS POLICY AREAS EVALUATED

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#### a) STAKEHOLDER PARTICIPATION AND COMMUNITY ENGAGEMENT

##### (1) ASSESSMENT CRITERIA:

The strongest LWPs:

- (1) Specify methods for engaging families in developing, implementing, and reviewing wellness policies.
- (2) Provide for the establishment of:
  - a. A district wellness group comprised of school personnel, parents, students, and community partners to help develop, implement, and review the LWP; and
  - b. School site wellness groups comprised of school personnel, parents, students, and community partners to help plan and implement the health and wellness activities of the school site.
- (3) Require active involvement in community coalitions and partnerships addressing chronic disease and participation in the public policy process.

(2) SUMMARY TABLE

<u>Stakeholder Participation and Community Engagement</u>	District Wellness Group	School Site Wellness Groups	Engage Families in LWP Process	Involvement in Community Coalitions and the Policy Process
<b><u>CSBA Based LWPs</u></b>				
CERES	✓	-	✓	-
DENAIR	✓	-	✓	-
EMPIRE UNION	✓	-	✓	-
HART-RANSOM	✓	-	✓	-
HUGHSON	-	-	✓	-
KEYES	✓	-	✓	-
KNIGHTS FERRY	✓	-	✓	-
OAKDALE	✓	-	✓	-
PARADISE	-	-	-	-
RIVERBANK	✓	-	✓	-
SHILOH	✓	-	✓	-
STANISLAUS COE	✓	-	✓	-
STANISLAUS USD	✓	-	✓	-
SYLVAN	-	-	✓	-
VALLEY HOME	✓	-	✓	-
<b><u>NANA Based Policies</u></b>				
CHATOM	✓	-	+	-
HICKMAN	✓	-	✓	-
MODESTO CITY	-	-	-	-
NEWMAN-CROWS LANDING	✓	✓	✓	-
PATTERSON	✓	-	✓	-
ROBERTS FERRY	✓	-	-	-
SALIDA	✓	-	✓	-
WATERFORD	✓	✓	✓	-
<b><u>Other Policies</u></b>				
GRATTON	✓	-	-	-
TURLOCK	+	-	✓	-

### (3) CSBA BASED POLICIES

The CSBA Model Policy requires that “parents/guardians, students, food service employees, physical education teachers, school health professionals, Board members, school administrators, and members of the public” be permitted “to participate in the development, implementation, and periodic review and update” of the LWP. All of the districts with CSBA based policies, with the exception of Paradise, include this provision. Not captured in the ratings is the fact that many school districts weakened this required CSBA language, substituting “may permit” for “shall permit” in reference to stakeholder participation. School districts also modified which stakeholders were included, occasionally not including the newly federally required “physical education teachers” and “school health professionals” among others.

Districts are permitted under the CSBA Model Policy to “appoint a school health council or other district committee” with representatives from the above named groups, as well as “health educators, curriculum directors, counselors, before- and after-school program staff, health practitioners, and/or others interested in school health issues.” The Hughson, Paradise, and Sylvan LWP do not include this provision; all of the other CSBA based policies do. The CSBA Model Policy does not address school site health groups.

The CSBA Model Policy does not address active involvement of the district or the school wellness groups in community coalitions and partnerships addressing chronic diseases or participating in the broader public policy process.

### (4) NANA BASED POLICIES

The NANA Model Policy requires the district and/or individual schools to “create, strengthen, or work within existing school health councils to develop, implement, monitor, review, and, as necessary, revise school nutrition and physical activity policies [and] serve as resources to school sites for implementing those policies.” Most of the districts with NANA based LWPs adopted this provision. Modesto City’s LWP does not include this provision. The Hickman LWP specifies that the existing District Advisory Council will “serve as the School Health Council.”

Like the CSBA Model Policy, the NANA Model Policy does not address active involvement of the district or the health groups in community coalitions and partnerships addressing chronic diseases or participating in the broader public policy process.

### (5) OTHER POLICIES

#### (a) GRATTON

The Gratton LWP provides that “The Gratton School Site Council will serve as a health council to develop, implement, review, and revise the School Wellness Plan and Policies on Nutrition and Physical Activity.”

#### (b) TURLOCK

The Turlock LWP includes the CSBA Model Policy provision on allowing participation of various interested groups in the LWP process. It also includes a version of the CSBA Model Policy provision on district health councils that makes such councils mandatory (changed to “will” from “may”). The Turlock

LWP does not include any additional provisions regarding family engagement in the LWP process, nor anything about school site health councils or participation in community coalitions and/or broader public policy process.

## **(6) OPPORTUNITIES FOR STRENGTHENING**

All of the districts will need to adopt stronger provisions in their LWPs relating to stakeholder participation. We expect the upcoming rules from the USDA to include more detailed guidance on fulfilling the stakeholder participation and community engagement requirements. In the meantime, districts have the opportunity to review existing policies and structures to identify gaps with compliance with the expected rules.

An example provision that draws from the CSBA and NANA Model Policy and would likely meet the bare minimum requirements of HHFKA 2010 is: “The district will create (or work within existing) a district wellness council to involve parents, students, food service staff, teachers (especially physical education and health teachers), school health professionals, Board members, school administrators, and other interested members of the public in the development, implementation, and periodic review and update of the district’s student wellness policy. The council will meet no less than twice per semester.” To the extent possible, districts should also consider establishing separate wellness groups for each school site with representatives from the same constituency groups to help plan and implement the health and wellness activities of the school site.

While participation in community coalitions and partnerships and the broader public policy process can be seen as extraneous and resource taxing, these processes can in fact be way to bring additional resources and support for wellness policies to district. Aspirational LWP provisions that encourage such participation can be a way to start this process, including:

- “District staff and/or volunteers are encouraged to participate in community coalitions and partnerships (e.g., food policy council, tobacco-free partnership, neighborhood safety coalition, county asthma prevention council) to address chronic disease and related risk factors (e.g., poor nutrition, physical inactivity, tobacco use and exposure).”
- “District staff and/or volunteers are encouraged to stay informed on and participate in the public policy process to highlight the need for community changes to address chronic disease and related risk factors.”

## **D. PUBLIC NOTIFICATION**

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### **1. HHFKA 2010 REQUIREMENTS**

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The HHFKA 2010 requires that LWPs include:

- a “requirement that the local education agency inform and update the public (including parents, students, and others in the community) about the content and implementation of the local school wellness policy” (42 U.S.C. 1758b(b)(4) (2010)).

The public notification requirements are entirely new to HHFKA 2010.

## 2. LOCAL WELLNESS POLICY AREAS EVALUATED

### a) PUBLIC NOTIFICATION

#### (1) ASSESSMENT CRITERIA:

The strongest LWPs:

- (1) Specify methods for informing and updating parents, students, and others in the community about the content and implementation of the LWP; and
- (2) Require the dissemination of school wellness policy to parents.

#### (2) SUMMARY TABLE

<u>Public Notification</u>	Informing and Updating	Dissemination of LWPs to Parents
<b><u>CSBA Based LWPs</u></b>		
CERES	✓	✓
DENAIR	✓	✓
EMPIRE UNION	✓	-
HART-RANSOM	✓	✓
HUGHSON	✓	-
KEYES	✓	-
KNIGHTS FERRY	✓	✓
OAKDALE	✓	-
PARADISE	✓	-
RIVERBANK	✓	-
SHILOH	✓	-
STANISLAUS COE	✓	-
STANISLAUS USD	✓	✓
SYLVAN	✓	✓
VALLEY HOME	✓	-
<b><u>NANA Based Policies</u></b>		
CHATOM	-	-

HICKMAN	-	-
MODESTO CITY	-	-
NEWMAN-CROWS LANDING	✓	-
PATTERSON	✓	-
ROBERTS FERRY	-	-
SALIDA	✓	-
WATERFORD	✓	-
<b><u>Other Policies</u></b>		
GRATTON	-	-
TURLOCK	✓	✓

**(3) CSBA BASED POLICIES**

The CSBA Model Policy permits districts to “disseminate health information and/or the district’s student wellness policy to parents/guardians through district or school newsletters, handouts, parent/guardian meetings, district and school web sites, and other communications.” All of the districts with CSBA based policies include this provision. The CSBA Model Policy also requires that the district “inform and update the public, including parents/guardians, students, and others in the community, about the contents and implementation” of the LWP. Only Ceres, Denair, Hart-Ransom, Knights Ferry, Stanislaus USD, and Sylvan include this provision in their LWP.

**(4) NANA BASED POLICIES**

While the NANA Model Policy includes some strong requirements that the district engage in a variety of nutrition and physical activity promotion communications with parents, it does not include any provisions specifically regarding communication about the LWP.

**(5) OTHER POLICIES**

**(a) GRATTON**

The Gratton LWP does not include any provisions regarding public notification.

**(b) TURLOCK**

The Turlock LWP includes the public notification provisions from the CSBA Model Policy.

**(6) OPPORTUNITIES FOR STRENGTHENING**

The public notification requirements are new to HHFKA 2010. We expect the upcoming rules from the USDA to include more detailed guidance on fulfilling the stakeholder participation and community engagement requirements. In the meantime, districts have the opportunity to review existing policies and structures to identify gaps with compliance with the expected rules.

CSBA model policy has the strongest currently available public notification provision, and districts may consider adding this language in advance of the USDA ruling. Districts are encouraged to augment this provision with specific details about the venues and methods that will be used to notify the public and parents in particular, about LWP development, implementation, and evaluation.

## E. IMPLEMENTATION, EVALUATION, AND ACCOUNTABILITY

### 1. HHFKA 2010 REQUIREMENTS

The HHFKA 2010 requires that LWPs include: a “requirement that the local education agency – (A) periodically measure and make available to the public an assessment on the implementation of the local school wellness policy, including – (i) the extent to which schools under the jurisdiction of the local educational agency are in compliance with the local school wellness policy; (ii) the extent to which the local school wellness policy of the local educational agency compares to model local school wellness policies; and (iii) a description of the progress made in attaining the goals for the local school wellness policy; and (B) designate one or more local educational agency officials or school officials, as appropriate, to ensure that each school complies with the local school wellness policy.”

The HHFKA 2010 requirements relating to measuring implementation include a new reporting requirement, specific topics for assessment, and designation of an official to ensure compliance by each school.

### 2. LOCAL WELLNESS POLICY AREAS EVALUATED

#### a) IMPLEMENTATION PLAN AND SUPPORT

##### (1) ASSESSMENT CRITERIA:

The strongest LWPs:

- (1) Include a clear policy implementation plan;
- (2) Require training for all teachers and staff on LWP;
- (3) Provide budgetary support for LWP implementation and health promotion; and
- (4) Require a designated staff person to oversee and coordinate wellness policy implementation and school health activities across the district

##### (2) SUMMARY TABLE

<u>Implementation Plan and Support</u>	Clear Policy Implementation Plan	Training for Teachers and Staff on LWP	Budget Support for LWP Process	Designated Staff Person to Coordinate Wellness Policy
<u>CSBA Based LWPs</u>				
CERES	-	-	-	+
DENAIR	-	-	-	+
EMPIRE UNION	-	-	-	+
HART-RANSOM	✓	-	-	-

HUGHSON	-	-	-	+
KEYES	✓	-	-	+
KNIGHTS FERRY	-	-	-	+
OAKDALE	✓	-	-	+
PARADISE	-	-	-	+
RIVERBANK	✓	-	-	+
SHILOH	✓	-	-	-
STANISLAUS COE	✓	-	-	+
STANISLAUS USD	-	-	-	+
SYLVAN	-	-	-	+
VALLEY HOME	✓	-	-	+
<b><u>NANA Based Policies</u></b>				
CHATOM	-	-	-	✓
HICKMAN	-	-	-	+
MODESTO CITY	-	-	-	✓
NEWMAN-CROWS LANDING	-	-	-	✓
PATTERSON	-	-	-	✓
ROBERTS FERRY	-	-	-	✓
SALIDA	-	-	-	✓
WATERFORD	-	-	-	✓
<b><u>Other Policies</u></b>				
GRATTON	-	-	-	-
TURLOCK	-	-	-	+

### (3) CSBA BASED POLICIES

The CSBA Model Policy does not include a plan for policy implementation, however, a number of districts (Hart Ransom, Keyes, Oakdale, Riverbank, Shiloh, Stanislaus COE, and Valley Home) include a provision requiring the “Wellness Committee” to “develop a plan to implement the Wellness Policy to be approved by the Board.” The CSBA Model Policy requires the Superintendent to “designate one or more district or school employees, as appropriate, to ensure that each school site complies with” the LWP. All of the districts with CSBA based policies, except Shiloh, include some variation on this requirement.

The CSBA Model Policy does not include provisions requiring training for all teachers and staff on the LWP or provide for budgetary support for LWP implementation and health promotion. The districts with CSBA based policies also do not include provisions on these topics.

### (4) NANA BASED POLICIES

The NANA Model Policy includes a requirement that “the superintendent or designee will ensure compliance with established district-wide nutrition and physical activity wellness policies” as well as requiring school principals report to the superintendent on their individual schools’ compliance. All of the districts with NANA based policies include this provision.



The NANA Model Policy does not include a plan for policy implementation (other than what is discussed above with respect to the district health group), provisions requiring training for all teachers and staff on the LWP, or provide for budgetary support for LWP implementation and health promotion. The districts with NANA based policies also do not include provisions on these topics.

## **(5) OTHER POLICIES**

### **(a) GRATTON**

The Gratton LWP states that “The superintendent will ensure compliance and annual review of the established district plan and policies.”

### **(b) TURLOCK**

The Turlock LWP includes the NANA Model Policy provision making the Superintendent responsible for LWP compliance. The Turlock LWP does not include an implementation plan, and does not provide for staff training on the LWP or budget support.

## **(6) OPPORTUNITIES FOR STRENGTHENING**

All of the districts could adopt stronger provisions in their LWPs relating to plans and support for policy implementation. While HHFKA 2010 does not explicitly require that LWPs include an implementation plan and support, it does include an increased emphasis on periodic compliance assessment and evaluation. Successful compliance with the LWP requires successful implementation. The districts that plan for LWP implementation, and include stakeholders in that process, will be the most successful.

LWPs must at the very least designate responsibility for ensuring implementation of and compliance with the policy both at the district and individual school level. In addition to a detailed implementation plan, successful implementation of the LWP will also require training for teachers and other district and school staff to make sure they are aware of and support specific policy provisions, as well as the district’s overall commitment to student wellness. To the extent possible, districts should ensure budget support for LWP development, implementation, and evaluation.

## **b) EVALUATION AND REVISION PROCEDURES**

### **(1) ASSESSMENT CRITERIA:**

The strongest LWPs include an evaluation strategy that:

- (1) Specifies evaluation indicators to be used;
- (2) Lays out an evaluation calendar; and
- (3) Includes a detailed plan for public reporting of the results.

The strongest LWPs also include specific plans and procedures for periodic revising and updating.

**(2) SUMMARY TABLE**

<b><u>Evaluation and Revision Procedures</u></b>	<b>Clear Evaluation Plan with Specific Indicators</b>	<b>Plan for Reporting School Compliance</b>	<b>Procedures for Updating and Revising</b>
<b><u>CSBA Based LWPs</u></b>			
CERES	+	✓	-
DENAIR	+	✓	-
EMPIRE UNION	+	✓	-
HART-RANSOM	✓	✓	✓
HUGHSON	✓	✓	-
KEYES	+	✓	-
KNIGHTS FERRY	+	✓	-
OAKDALE	✓	✓	-
PARADISE	+	✓	-
RIVERBANK	+	✓	-
SHILOH	+	✓	-
STANISLAUS COE	+	✓	-
STANISLAUS USD	+	✓	-
SYLVAN	+	✓	-
VALLEY HOME	✓	✓	-
<b><u>NANA Based Policies</u></b>			
CHATOM	✓	-	-
HICKMAN	✓	✓	-
MODESTO CITY	-	✓	-
NEWMAN-CROWS LANDING	-	✓	-
PATTERSON	✓	✓	-
ROBERTS FERRY	✓	✓	-
SALIDA	✓	✓	✓
WATERFORD	✓	✓	✓
<b><u>Other Policies</u></b>			
GRATTON	-	-	-
TURLOCK	+	+	+

**(3) CSBA BASED POLICIES**

The CSBA Model Policy evaluation provisions includes the following list of detailed and specifies evaluation indicators to be assessed:

- Descriptions of the district's nutrition education, physical education, and health education curricula by grade level
- Number of minutes of physical education instruction offered at each grade span
- Number and type of exemptions granted from physical education
- Results of the state's physical fitness test
- An analysis of the nutritional content of meals served based on a sample of menus
- Student participation rates in school meal programs, compared to percentage of students eligible for free and reduced-price meals
- Number of sales of non-nutritious foods and beverages in fundraisers or other venues outside of the district's meal programs
- Feedback from food service personnel, school administrators, the school health council, parents/guardians, students, teachers, before- and after-school program staff, and/or other appropriate persons
- Any other indicators recommended by the Superintendent and approved by the Board

The CSBA Model Policy does not specify how often the contents and/or implementation of the LWP should be evaluated. The CSBA Model Policy contains vague requirements to report to the public on the results of the evaluation. All of the districts with CSBA based policies include the evaluation provision, but Hart Ransom and Hughson do not include the specific evaluation indicators.

The CSBA Model Policy does not provide procedures for updating and revising the LWP. The Hart Ransom LWP includes a requirement that “the Board will adopt necessary revisions made to address changes in state or federal law as well as in areas of needed improvement.”

#### (4) NANA BASED POLICIES

The NANA Model Policy requires that each school conduct a “baseline assessment of the existing nutrition and physical activity environment and policies” and then repeat the assessment every three years. The report on these assessments is to be provided to the school board and “school health councils, PTOs, principals, and school health services.” These provisions are not included in the LWPs for Modesto City and Newman-Crows Landing; Roberts Ferry requires a “periodic” assessment rather than the three-year period.

The NANA Model Policy also includes a requirement that districts “as necessary, revise the wellness policies.” Of the districts with NANA based policies, only Salida and Waterford include this provision in their LWPs.

#### (5) OTHER POLICIES

##### (a) GRATTON

The Gratton LWP includes the following provisions related to evaluation and revision:

- “The superintendent will ensure compliance and annual review of the established district plan and policies.”

- “To assess physical fitness: Graton School will administer a physical fitness test annually to all students in grades five, and seven during the months of February, March, April, or May as stated in California Education Code Section 60800.”

**(b) TURLOCK**

The Turlock LWP includes strong provisions on LWP evaluation and revision drawn from the NANA and CSBA Model Policies. The Turlock LWP contains the NANA Model Policy provision mandating baseline and follow-up assessments, but requires annual assessments instead of every three years. It also includes the detailed list of assessment criteria found in the CSBA Model Policy and the revision provision from the NANA Model Policy. The Turlock LWP also contains a reference to new assessment requirements found in HHFKA 2010, including the requirement that assessments include a comparison to model LWPs.

**(6) OPPORTUNITIES FOR STRENGTHENING**

We expect the upcoming rules from the USDA to include more detailed guidance on fulfilling the evaluation and revision requirements of HHFKA 2010. In the meantime, districts have the opportunity to review existing policies and structures to identify gaps with compliance with the expected rules. As a starting point, the districts with CSBA based policies will need to add comparison to model LWPs to the list of indicators (new to HHFKA 2010). These districts can also strengthen their LWPs by indicating a required frequency of assessment (yearly, every three years, etc.), including a more detailed plan for how assessment results will be disseminated to the district community, and addressing updating and revising of the LWP. The districts with NANA based policies can strengthen their LWPs by specifying assessment criteria (as the CSBA Model Policy does).

## V. CONCLUSION

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### A. HOW TO USE THE INFORMATION IN THIS REPORT

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This report is meant to serve as a tool to support local school districts in evaluating and preparing to adapt their Local Wellness Policy (aka School Wellness Policy) to meet the pending updates to federal rules, expected from the USDA in fall of 2013. Beyond meeting federal standards, the evaluation was developed to also help districts identify areas where improvements in wellness policies and practices at the school level can make a significant impact on the health of students. Additionally, the evaluation may highlight areas where school district can add existing policies and practices to the wellness policy, such as anti-tobacco regulations and programming.

### B. RECOMMENDATIONS FOR SCHOOL DISTRICTS MOVING FORWARD

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#### 1. GET AHEAD OF THE NEW RULES

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Since we know the new rules are coming, this is a great time to start preparing for the upcoming changes. While several school districts have updated their policies recently using the newest CSBA model policy, many others have outdated policies still in place. While there are a several changes that will be made, the focus of the USDA rulings is expected to be on community engagement, stakeholder participation, evaluation, and revision. Beginning a process now that involves stakeholders in updating policies is an opportunity to figure out a system that works best for your district and schools in advance of the rules come out.

##### a) START EVALUATION AND ASSESSMENT

Both the California Department of Education and the USDA recommend that school districts engage in a review and evaluation of their Local Wellness Policies in advance of the USDA rules. This will benefit the districts in making an easy transition as well as place districts in a position to provide meaningful feedback to the draft USDA rulings before the final rules are published.

##### b) EDUCATE YOUR STAKEHOLDERS

Make sure local wellness policy councils and stakeholders are aware of the upcoming changes to the wellness policy requirements. Include stakeholders in the evaluation and assessment process as much as possible. The more support your district has from the community, the more opportunities for creating an updated wellness policy that will have real impact.

##### c) PLAY TO YOUR STRENGTHS

Look for changes in your wellness policy that play to existing areas of strength. First, incorporate existing policies that promote health and wellness that are not currently included in the LWP. Next, evaluate where your district's strongest assets or resources are and look for opportunities to make improvements to support the best use of those assets. For example, does your district have a strong physical education or sports program staff? The wellness policy update could potentially use this strength to allow room for

this staff to support more opportunities for activity throughout the school day by training teachers on stretches they can do in the classroom. Even if your district is feeling strapped or stretched thin, don't underestimate your strengths. Your assets could be a strong parent group, the dedication of school administrators and teachers, supportive community partners or local businesses, or the creativity of your students.

#### **d) LOOK FOR RESOURCES & SUPPORT**

The California Department of Education, CSBA, NANA, as well as other California-based anti-obesity organizations provide a host of resources in addition to model policy language to help districts make their wellness policies a strong tool for promoting better health and educational outcomes among our young people. For example, there are guides for how to best engage families in local wellness policies, or resources and model policy language on how to create a joint use agreement. See the "Resources" section at the end of this report for a selection of some materials and organizations that can help your district move forward on a range of wellness solutions.

## **2. USE YOUR LWP AS A COMMUNICATIONS TOOL**

HHFKA 2010 requires that the district (1) involve stakeholders from across the school community in the implementation and evaluation of LWPs and (2) notify the public about the wellness policy and process. Rather than seeing these requirements as a burden, we encourage school districts to seize on the opportunity to view and use their LWPs as a tool for communication across the school community to build a coordinated and unified approach to student health and wellness.

#### **a) SHOW OFF HOW STRONG YOUR POLICIES ALREADY ARE**

In the evaluation process, look for areas that your district can highlight or improve to show off what you are already doing well. Are you competitive food or school food standards above the federal requirements? The wellness policy can explain what standards your district already uses to ensure students have access to healthy foods, adequate physical activity, nutrition education, and a wellness promoting environment.

#### **b) INCLUDE ALL WELLNESS RELATED POLICIES**

Many wellness related policies are not directly required by the USDA. However, as a communications tool, your district can use this as an opportunity to share and highlight all the policies that make schools a healthy and safe place for students. Does your district have a great anti-smoking education program? Do your schools have a school garden? Do your schools operate innovative anti-bullying or anti-violence strategies? Make sure to highlight and specify policies in areas your district shines. Remember, with the new stakeholder rules, this policy will be an important way to communicate to the whole school community the district's commitment to student wellness and maximizing learning capacity.

#### **c) USE STAKEHOLDER FEEDBACK TO HELP DEVELOP YOUR POLICY**

The administrators, physical education and health teachers, parents, students, school food service staff, and health professionals that make up each school community all bring valuable insight and information in developing an effective wellness policy. Finding effective ways to incorporate stakeholder feedback and ideas is important to building a wellness policy that will be more easily implemented and adopted.

For example, a key for successfully introducing healthier offerings on the school menu is to involve students in taste testing proposed items or even having students suggest new ideas themselves as part of their nutrition education programs. Making sure staff and parents are included in the process of developing policy can not only be the source of great ideas, but also promote goodwill and support for the policy over the long run.

### **3. PLAN FOR A HEALTHY FUTURE**

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Wellness policies do not have to be limited to only what is feasible in the moment. Including aspirational goals along with a sense of the resources needed to achieve those goals can be a great way to start momentum. With a sense of what could be possible, the school community may feel more empowered to take action to make some of these goals a reality.

#### **a) REACH FOR SOME HIGH IMPACT GOALS**

While school districts may have their own distinct conditions and priorities, there are a few high-impact policy goals that seem important to highlight. These goals may take some time to implement, but they can result in significant health benefits and in some cases have minimal costs associated with operations in the long run. In planning for a healthy future for students and the whole community, school districts may want to consider:

1. Provide access to fresh, free drinking water at all times
2. Remove Sugary Electrolyte Replacement Drinks from School Offerings
3. Curb Bullying and Obesity Stigma
4. Open Access to School Grounds for Recreation through Joint Use Agreements
5. Make Marketing a Tool for Teaching Healthy Choices

#### **b) ADDRESS FUNDING NEEDS**

Policies cannot function without adequate resources for implementation. In the current economic climate, it can be daunting to initiate new policies that may come with new expenses. However, these barriers should not entirely limit the goals a district sets for their wellness policy. Generally, the wellness policy should provide some provision for a budget for implementation and evaluation. Additionally, making sure the wellness policy addresses funding gaps or needs can be a tool for opening opportunities to accessing funding. For example, say a school wellness policy has set a goal of creating a garden to teach students about healthy foods in a hands-on and physically active environment. Often, it can take just one committed teacher, principal, or parent to write a grant or ask local businesses for supplies and get the resources that can take a school garden from goal to reality.

## VI. RESOURCES

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To meet the new standards, the USDA and its federal and state partners plan to provide guidance and technical assistance to schools through online resources, updated tools, webinars, and partnerships with states. However there are a whole range of organizations and resources available to schools interested in improving wellness related policies and activities. A selection of existing resources related to school wellness policies are listed below:

### A. WELLNESS PROGRAMMING

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#### General Resources

USDA's "Local School Wellness Policy" website, available at:  
<http://teammnutrition.usda.gov/healthy/wellnesspolicy.html>.

NANA's "Local School Wellness Policies: Additional Resources" website, available at:  
[www.schoolwellnesspolicies.org/WellnessResources.html](http://www.schoolwellnesspolicies.org/WellnessResources.html)

The Alliance for a Healthier Generation's School Wellness Council Toolkit, available at:  
[http://www.healthiergeneration.org/uploadedFiles/For\\_Schools/Helpful\\_Tools/08Toolkit\\_SWC.pdf](http://www.healthiergeneration.org/uploadedFiles/For_Schools/Helpful_Tools/08Toolkit_SWC.pdf)

Action for Healthy Kids' Wellness Policy Tool, available at: <http://www.actionforhealthykids.org/schools/wellness-policy-tool/>

Yale University's Rudd Center for Food Policy & Obesity's Wellsat: Wellness School Assessment Tool, available at: <http://wellsat.org/>

#### Wellness Policy Research & Background Information

Bridging the Gap. *School District Wellness Policies: Evaluating Progress and Potential for Improving Children's Health Three Years After the Federal Mandate*. 2010. Available at:  
[http://www.bridgingthegapresearch.org/research/district\\_wellness\\_policies/](http://www.bridgingthegapresearch.org/research/district_wellness_policies/)

Centers for Disease Control and Prevention. *School Health Guidelines to Promote Healthy Eating and Physical Activity*. Morbidity and Mortality Weekly Report, Recommendations and Reports, 60(5): September 16, 2011. Available at: <http://www.cdc.gov/mmwr/preview/mmwrhtml/rr6005a1.htm>.

*F as in Fat: How Obesity Threatens America's Future*. Trust for America's Health and the Robert Wood Johnson Foundation. 2010. [www.healthyamericans.org/reports/obesity2010/](http://www.healthyamericans.org/reports/obesity2010/)

#### Marketing

*Restricting Food and Beverage Advertising in Schools*. ChangeLab Solutions. 2009. Available at:  
[www.changelabsolutions.org/sites/default/files/RestrtrngAds\\_FactSheet\\_web\\_FINAL\\_090219.pdf](http://www.changelabsolutions.org/sites/default/files/RestrtrngAds_FactSheet_web_FINAL_090219.pdf)



*Captive Kids: Selling Obesity at Schools: An Action Guide to Stop the Marketing of Unhealthy Foods and Beverages in Schools.* California Project Lean. 2007. Available at: <http://www.californiaprojectlean.org/doc.asp?id=178>.

### **Healthy Fundraising**

Center for Science in the Public Interest. *Sweet Deals: School Fundraising Can Be Healthy and Profitable.* 2007. Available at: <http://www.cspinet.org/schoolfundraising.pdf>.

*Ideas for Healthy Fundraising Alternatives for Schools, Sports and Clubs.* In Policy in Action: A Guide to Implementing Your Local School Wellness Policy. California Project LEAN. Available at: <http://www.californiaprojectlean.org/docuserfiles//Ideas%20for%20healthy%20fundraising%20fact%20sheet.pdf>.

### **Physical Activity and Physical Education**

National Association for Sport and Physical Education. <http://www.aahperd.org/naspe/>

*Doe v. Albany Unified School District (2010): Analysis and Implications Regarding Enforcement of Physical Education For Obesity Prevention Advocates.* ChangeLab Solutions, 2012. [www.changelabsolutions.org/publications/doe-v-albany](http://www.changelabsolutions.org/publications/doe-v-albany)

### **Joint Use Agreements for Physical Activity**

*Opening School Grounds to the Community after Hours: Increasing Physical Activity through Joint Use Agreements.* ChangeLab Solutions, 2010. Available at: [www.changelabsolutions.org/publications/CA-JUA-toolkit](http://www.changelabsolutions.org/publications/CA-JUA-toolkit)

*Model Agreements: Joint Use in California.* ChangeLab Solutions, 2009. Available at: [www.changelabsolutions.org/publications/model-JUAs-CA](http://www.changelabsolutions.org/publications/model-JUAs-CA)

### **Safe Routes to Schools**

National Center for Safe Routes to School. <http://www.saferoutesinfo.org/>

*Safe Routes to School: An Overview for California Advocates.* ChangeLab Solutions, 2011. Available at: [www.changelabsolutions.org/publications/safe-routes-school-programs-california](http://www.changelabsolutions.org/publications/safe-routes-school-programs-california)

*Safe Routes to School: Minimizing Your Liability Risk in California.* ChangeLab Solutions, 2011. Available at: [www.changelabsolutions.org/publications/safe-routes-school-programs-california](http://www.changelabsolutions.org/publications/safe-routes-school-programs-california)

### **School Gardens**

California School Garden Network. <http://www.csgn.org/>

Kids Gardening. National Gardening Association. <http://www.kidsgardening.org/>

*Serving School Garden-Grown Produce to Students*. ChangeLab Solutions. April 2012. Available at: <http://changelabsolutions.org/publications/school-garden-produce>

## **B. FOOD SERVICE AND NUTRITION GUIDELINES**

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### **Competitive Foods**

Healthier Vending for Municipalities: Guide and Model Vending Agreement. ChangeLab Solutions. 2012. Available at: <http://changelabsolutions.org/publications/healthier-vending-municipalities>

District Policy Establishing a Healthy Vending Program. ChangeLab Solutions. Available at: <http://changelabsolutions.org/publications/district-policy-healthy-vending>

California Project Lean's "California School Food and Beverage Standards" resources webpage, available at: [www.californiaprojectlean.org/doc.asp?id=179&parentid=95](http://www.californiaprojectlean.org/doc.asp?id=179&parentid=95).

### **Healthy Food Procurement**

Establishing a Farm-to-School Program: A Model School Board Resolution. ChangeLab Solutions. 2011. Available at: <http://changelabsolutions.org/publications/establishing-farm-school-program>

Understanding Healthy Procurement: Using Government's Purchasing Power to Increase Access to Healthy Food. 2011. ChangeLab Solutions. Available at: <http://changelabsolutions.org/publications/healthy-procurement>

### **Drinking Water**

Bringing Free Drinking Water Back to California Schools. ChangeLab Solutions. 2011. Available at: [http://changelabsolutions.org/sites/default/files/documents/Drinking\\_Water\\_in\\_Schools\\_FINAL\\_2011\\_206.pdf](http://changelabsolutions.org/sites/default/files/documents/Drinking_Water_in_Schools_FINAL_2011_206.pdf)

Water Access in Schools: Model Wellness Policy Language. ChangeLab Solutions. 2012. Available at: <http://changelabsolutions.org/publications/wellness-policy-water>

Drinking Water Access in Schools. ChangeLab Solutions. 2011. Available at: <http://changelabsolutions.org/publications/drinking-water-access-schools>

California Department of Education's "Drinking Water for Students in Schools" resource webpage, available at: <http://www.cde.ca.gov/ls/nu/he/water.asp>.

Water in Schools Project. <http://www.waterinschools.org/>.

## **C. STAKEHOLDER PARTICIPATION, COMMUNITY ENGAGEMENT, AND PUBLIC NOTIFICATION**

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### **Stakeholder Participation and Community Engagement**

Parent Lesson Plans: Advocating for Healthier School Environments (available in English and Spanish). California Project LEAN. Available at:

[http://californiaprojectlean.org/doc.asp?id=168&parentid=20#Advocacy\\_Guides](http://californiaprojectlean.org/doc.asp?id=168&parentid=20#Advocacy_Guides)

Parents in Action!: A Guide to Engaging Parents in Local School Wellness Policy (available in English and Spanish). California Project LEAN. Available at:

[http://californiaprojectlean.org/doc.asp?id=168&parentid=20#Advocacy\\_Guides](http://californiaprojectlean.org/doc.asp?id=168&parentid=20#Advocacy_Guides)

The Jamie Oliver Foundation’s School Food Revolution Toolkits for Change, available at:

<http://www.jamieoliver.com/us/foundation/jamies-food-revolution/school-food>

## **D. IMPLEMENTATION, EVALUATION, AND ACCOUNTABILITY**

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### **Policy Implementation**

How to Enforce a Wellness Policy: A Guide for Parents and Community Advocates. ChangeLab Solutions. 2009. Available at: <http://changelabsolutions.org/publications/enforce-wellness-policy>

Policy in Action: A Guide to Implementing Your Local School Wellness Policy. California Project LEAN.

Available at: [http://californiaprojectlean.org/doc.asp?id=168&parentid=20#Advocacy\\_Guides](http://californiaprojectlean.org/doc.asp?id=168&parentid=20#Advocacy_Guides)

## VII. APPENDICES

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### A. MODEL POLICIES

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#### 1. CALIFORNIA SCHOOL BOARD ASSOCIATION (CSBA) MODEL POLICY

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California School Board Association. CSBA Sample Student Wellness Policy 5030. July, 2011. Available at: [www.csba.org/~link.aspx?id=54F898FF264A4F9A284B978249DAE0&z=z](http://www.csba.org/~link.aspx?id=54F898FF264A4F9A284B978249DAE0&z=z).

For more information visit the CSBA website at [www.csba.org](http://www.csba.org).

#### 2. NATIONAL ALLIANCE FOR NUTRITION AND ACTIVITY (NANA) MODEL POLICY

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National Alliance for Nutrition and Activity. Model Local School Wellness Policies on Physical Activity and Nutrition. March, 2005. Available at: <http://www.schoolwellnesspolicies.org/WellnessPolicies.html>.

For more information visit the NANA website at [www.nanacoalition.org](http://www.nanacoalition.org).

### B. COMPREHENSIVE EVALUATION CHART

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A chart detailing the results of all schools for all criteria is available as an attached Excel spreadsheet.