

CHAPTER 11-LOCAL SCHOOL WELLNESS POLICY

Schools and RCCIs play a critical role in creating a healthy environment for the prevention of childhood obesity and for combating problems, such as Type 2 diabetes, that are associated with poor nutrition and physical inactivity. To help combat childhood obesity and to improve children's health, the Child Nutrition and WIC Reauthorization Act of 2004 (PL # 108-265) requires each school food authority that receives funding for the USDA Child Nutrition Programs to establish a local school wellness policy.

The Reauthorization Act of 2004 places the responsibility of developing a school wellness policy at the local school level. Each school/RCCI is responsible for developing, implementing, and measuring the success of a local wellness policy. This includes all schools and RCCIs sponsored by the OKDHS, School Nutrition Programs.

Section 204 of the Healthy, Hunger-Free Kids Act of 2010 (the Act), Public Law 111-296, added Section 9A to the Richard B. Russell National School Lunch Act (NSLA) (42 U.S.C. 1758b), *Local School Wellness Policy Implementation*, Section 204 of the Act strengthens wellness policies by emphasizing ongoing implementation and assessment. This provision also supports a robust process at the community level, including the expansion of the team of collaborators participating in the wellness policy development to include more members from the community. Additionally, The Act added the requirement that local wellness policies include goals for nutrition promotion.

LEAs are now required to permit teachers of physical education and school health professionals as well as parents, students, and representatives of the school food authority, the school board, school administrators, and the public to participate in the development of wellness policies. The Act also expanded the purpose of the team of collaborators beyond the development of a local wellness policy to also include the implementation of the local wellness policy with periodic review and updates.

REQUIREMENTS

As required by law, a local wellness policy, at a minimum, shall include:

- Specific goals for nutrition promotion and education, physical activity, and other school-based activities that are designed to promote student wellness in a manner that the SFA determines is appropriate;
- Include Nutrition guidelines for all foods and beverages sold to students on the school campus during the school day that are consistent with Federal regulations for: 1) School nutrition standards and 2) Smart snacks in school nutrition standards.
- Policies for food and beverage marketing that allow marketing and advertising of only those food and beverages that meet the Smart snacks in School nutrition standards.
- 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 review and update of the local wellness policy.

- Description of the public involvement, public updates, policy leadership, and evaluation plan.
- Inform and update the public (including parents, students, and others in the community) about the content and implementation of local wellness policies.
- Be measured periodically on the extent to which schools are in compliance with the local wellness policy, the extent to which the local education agency's local wellness policy compares to model local school wellness policies, and the progress made in attaining the goals of the local wellness policy, and make this assessment available to the public.

Wellness Leadership

- LEAs must establish wellness policy leadership of one or more LEA and/or school official(s) who have the authority and responsibility to ensure each school complies with the policy.

COMMUNITY INVOLVEMENT

Community involvement also requires schools to inform and update the public (including parents, students, and others in the community) about the content and implementation of the local wellness policies. LEAs are also required to measure periodically and make available to the public an assessment of the local wellness policy, including:

- The extent to which schools are in compliance with the local wellness policy;
- The extent to which the LEA's local wellness policy compares to model local school wellness policies; and
- The progress made in attaining the goals of the local wellness policy.

Triennial Assessment

The final rule requires state agencies to assess compliance with the wellness policy requirements as a part of the general area of the administrative review every 3 years.

ANNUAL REVIEW

After developing, and implementing a local wellness plan, schools and SFAs are required to review the plan, at least annually, to determine the effectiveness of the plan. When a policy is not carried out by staff members, or deemed unsuccessful, designated personnel should take steps to revise the policy and to ensure that effectiveness of the program.

Documentation

The state agency will examine records during the Administrative review including:

- Copy of the current wellness policy
- Documentation on how the policy and assessments are made available to the public
- The most recent assessment of implementation of the policy
- Documentation of efforts to review and update the policy, including who was involved in the process and how stakeholders were made aware of their ability to participate.

To assist schools in complying with these requirements, the School Nutrition Programs provides a guideline to developing an effective local school wellness policy, along with sample language for a policy. This guidance adopts language taken from the Mississippi Department of Education *Guide for Development* and from USDA, Team Nutrition Local Wellness Policy website. This local wellness guide includes all the minimum requirements necessary to comply with the federal law. In addition, it offers additional policy options that schools are encouraged to utilize in developing their specific goals. During the initial drafting, refer to the *Checklist for Implementing a Local Wellness Policy* on page 4 and answer the questions.

PARENT AND CHILD INVOLVEMENT

In addition to the Local Wellness Plan, all SFAs must comply with the federal regulations 7 CFR 210.12, which require SFAs to promote activities to involve student and parents. Such activities may include menu planning, enhancing the eating environment, nutritional education and other school related activities that promote nutrition. Food Service Management Companies and RCCIs are required to comply with this regulation to the extent possible. SFAs should document activities to demonstrate compliance.

Checklist for Implementing a Local Wellness Policy

Use the checklist to determine if your School Food Authority (SFA) has a local wellness policy on file. For each no answer, SFAs must take steps to correct the finding.

	Yes	No
1. Does the SFA have a local wellness policy on file?	<input type="checkbox"/>	<input type="checkbox"/>
2. Is the policy approved by governing official(s) or administrator, signed and dated?	<input type="checkbox"/>	<input type="checkbox"/>
3. Does the policy include each of the goals designed to promote student wellness:		
a. nutrition education;	<input type="checkbox"/>	<input type="checkbox"/>
b. physical activity;	<input type="checkbox"/>	<input type="checkbox"/>
c. other school-based activities?	<input type="checkbox"/>	<input type="checkbox"/>
d. nutrition promotion	<input type="checkbox"/>	<input type="checkbox"/>
4. Does the policy contain nutrition guidelines selected by the SFA for all foods available on each school campus during the school day with the objectives of promoting student health and reducing childhood obesity?	<input type="checkbox"/>	<input type="checkbox"/>
5. Does the policy contain guidelines for reimbursable school meals, which are no less restrictive than regulations and guidance issued by USDA, Child Nutrition Programs? This requirement implies that districts must ensure that reimbursable school meals meet the program requirements and nutrition standards set forth under the 7 CFR Part 210 and Part 220.	<input type="checkbox"/>	<input type="checkbox"/>
6. Does the policy contain an additional plan for measuring implementation of the local wellness policy?	<input type="checkbox"/>	<input type="checkbox"/>
7. In the development, implementation, and assessment, did the SFA have community involvement, including parents, students, and representatives of the school food authority, the school board, school administrators, and the public?	<input type="checkbox"/>	<input type="checkbox"/>
8. Is there documentation on file to support community involvement (list of meeting dates, names and titles)? Is the community, parents, students and team collaborators provided periodic reviews and updates?	<input type="checkbox"/>	<input type="checkbox"/>
9. Does the SFA have designated personnel charged with the operational responsibility for ensuring that each school fulfills the SFA's local wellness policies?	<input type="checkbox"/>	<input type="checkbox"/>
10. Does policy include goals for all buildings and all grade/age groups?		

11. Does designated personnel review procedures conducted by other staff, at least annually, to ensure policies are enforced?	<input type="checkbox"/>	<input type="checkbox"/>
12. Does a designated personnel review policy annually to evaluate implementation and to update or improve policy when necessary?	<input type="checkbox"/>	<input type="checkbox"/>
13. Are committee members notified given opportunity to provide input?	<input type="checkbox"/>	<input type="checkbox"/>
14. Are the goals developed attainable goals?	<input type="checkbox"/>	<input type="checkbox"/>
15. Is the policy posted for public view?	<input type="checkbox"/>	<input type="checkbox"/>
16. Is Smart snacks mentioned?	<input type="checkbox"/>	<input type="checkbox"/>
17. Standards for all foods and beverages provided but not sold mentioned?	<input type="checkbox"/>	<input type="checkbox"/>
18. Policies for food and beverages marketing?	<input type="checkbox"/>	<input type="checkbox"/>
19. Is the wellness policy signed and dated?	<input type="checkbox"/>	<input type="checkbox"/>
20. Is there a wellness leadership established?	<input type="checkbox"/>	<input type="checkbox"/>

Wellness Policy Assessment Tool- Maintain, Measure and Evaluate

As required by law, each school district must establish a plan for measuring implementation of the local wellness policy, including designation of one or more persons with operational responsibility for ensuring that the school is meeting the policy. Assessment should be ongoing. Requirements also include community participation or a team of collaborators responsible for reviewing the wellness policy and evaluating results.

A sustained effort by each district is necessary to assure that new policies are faithfully implemented. Periodically assess how well the policy is being managed and enforced. Reinforce the policy goals with school staff if necessary. Be prepared to update or amend the policy as the process moves on. The school district or individual schools should celebrate policy success milestones (and the district team can do the same!).

Evaluation and feedback are very important in maintaining a local wellness policy. You need to document any financial impact to the school foodservice program, school stores, or vending machine revenues.

It is also important to assess student, parent, teacher, and administration satisfaction with the new policies. A good evaluation plan does not need to be extensive, formal or put additional undue burdens on staff that is involved in the process.

Through the evaluation process, you will be able to answer some basic questions that are very important to policymakers, students, school staff, parents, and the general public:

Designated Person(s) responsible for review and compliance:

Date of Review: _____

Name and title of committee members participating in assessment:

1. What changes to nutrition education, physical activity, the nutritional quality of foods available to students, and other aspects covered by the policy occurred in each school as a result of the district wellness policy and the last assessment?

For example:

- Did the number of students participating in nutrition education change?
- Did the students have a different number of minutes of physical activity?
- Did any of the campuses change available food options?
- Did participation in the National School Breakfast or Lunch Program change?

2. Are the goals listed in the current Local Wellness Policy implemented (review policy)?

Yes No

If no, what steps are being taken to ensure implementation? _____

3. What is the assessment of the current Local Wellness Policy?

For example:

- Is it making a difference?
- What's working?
- What's not working?

4. Were recommended revisions in the last assessment adopted into policy? Yes No

If yes, list date of revision: _____

5. Has the review team compared policy to other Local Model Wellness Policies (policies may be reviewed at http://teamnnutrition.usda.gov/Healthy/wellnesspolicy_steps.html)?

Yes No

6. How can the impact of the policy be increased to enhance its effect on student health and academic learning?

7. Did the school provide this review and updates to the community and team collaborators?

Yes No

If you need further information on the evaluation process, the following resources are among those available to assist you:

Evaluation Primer: An overview of education evaluation. This material is excerpted from ***Understanding Evaluation: The Way to Better Prevention Programs*** [PDF].

Evaluating Community Programs and Initiatives (chapter 36-39 of the Community Toolbox) developed by the University of Kansas Work Group on Health Promotion and Community Development. This document contains information on developing a plan for evaluation, methods for evaluation and using evaluation to understand and improve the initiative.

Reference:

Team Nutrition, United States Department of Agriculture. *Healthy Schools*. [online] April 2009. http://teamnnutrition.usda.gov/Healthy/wellnesspolicy_steps.html

Team Nutrition Local wellness Policy . <http://www.fns.usda.gov/tn/local-school-wellness-policy>

USDA Updated policy July 2016
http://www.fns.usda.gov/sites/default/files/tn/LWPsummary_finalrule.pdf