Local Wellness Policy Triennial Assessment

Sponsors participating in the National School Lunch Program and/or School Breakfast Program are required to have a local wellness policy for all participating sites under its jurisdiction. At a minimum, the local wellness policy must be assessed once every three years; this is referred to as the triennial assessment. Triennial assessments must determine, for each participating site under its jurisdiction, 1) compliance with the wellness policy, 2) progress made in attaining the goals of the wellness policy, and 3) how the wellness policy compares to model wellness policies. This documentation should be kept on file with your organization’s written local wellness policy for review by an ISBE monitor during your next school nutrition administrative review.

Sponsor Name: Chicago Public Schools

Date Completed: 04/10/2024

Completed by: Sarah Dilday

Part I: Content Checklist

Below is a list of items that must be addressed in Local Wellness Policies, based on U.S. Department of Agriculture (USDA) and state guidance. Check the box for each item included in your Local Wellness Policy. For any box that is not checked, consider taking steps to add the item(s) to the policy in the future. For more information, see ISBE’s Local Wellness Policy Content Checklist.

- ☒ Goals for Nutrition Education
- ☒ Goals for Nutrition Promotion
- ☒ Goals for Physical Activity
- ☒ Goals for Other School-Based Wellness Activities
- ☒ Unused Food Sharing Plan
- ☒ Nutrition Standards for School Meals
- ☒ Nutrition Standards for Competitive Foods
- ☒ Standards for All Foods/Beverages Provided, but Not Sold
- ☒ Food & Beverage Marketing
- ☒ Wellness Leadership
- ☒ Public Involvement
- ☒ Triennial Assessments
- ☒ Reporting
Part II: Goal Assessment

Per USDA regulations, the triennial assessment must determine compliance with and progress made in attaining the goals of the wellness policy. Input the goals of your local wellness policy into the table below for the corresponding areas: Nutrition Education, Nutrition Promotion, Physical Activity, and Other School-Based Wellness Activities. Indicate if the site is meeting, partially meeting, or not meeting each goal listed. Include any next steps in attaining the goal(s), if applicable. Table rows may be added for additional goals.

<table>
<thead>
<tr>
<th>Goals</th>
<th>Meeting</th>
<th>Partially Meeting</th>
<th>Not Meeting</th>
<th>Next Steps (If Applicable)</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Nutrition Education</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
| All schools and campuses serving grades PK-8 are required to integrate evidence-based nutrition education into the curriculum in all grade levels included therein. | X (78%) |                   |             | We've seen a significant increase in compliance with this requirement. Moving forward, we will continue to:  
  ● Create and/or curate available nutrition education curricula/resources to support schools in implementing evidence-based nutrition education.  
  ● Engage with stakeholders to determine gaps in support. |
| High Schools serving grades 9-12 are required to integrate evidence-based nutrition education into the curriculum of at least two high school courses required for graduation. | X (86%) |                   |             | We've seen a significant increase in compliance with this requirement. Moving forward, we will continue to:  
  ● Create and/or curate available nutrition education curricula/resources to support schools in implementing evidence-based nutrition education.  
  ● Engage with stakeholders to determine gaps in support. |
| Schools should utilize the school garden, if one exists, for nutrition education and ensure that all students have opportunities to interact with the garden throughout the growing season. | X (86%) |                   |             | We've seen a significant increase in compliance with this requirement from clarifying requirements for school-based staff and supporting |

---

1 Data used for this assessment was pulled from the most recent Healthy CPS survey (SY22-23)
The District-level Garden team has a new full staff and can plan for training and resources to support school staff.

<table>
<thead>
<tr>
<th>Goals</th>
<th>Meeting</th>
<th>Partially Meeting</th>
<th>Not Meeting</th>
<th>Next Steps (If Applicable)</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Nutrition Promotion</strong></td>
<td>X</td>
<td></td>
<td></td>
<td>a. Dining staff continue to receive training around school food service requirements. There is still opportunity to expand to specific programming around “wellness.”</td>
</tr>
</tbody>
</table>

*Nutrition Education and Wellness in School Dining Centers.* NSS, district food service providers and school dining center staff shall be engaged in wellness activities that support taking nutrition lessons beyond the classrooms and into school dining centers to encourage and promote healthy eating habits. The District must:

a) Ensure that, through NSS, food service staff receive ongoing professional development opportunities that include training regarding nutrition, meal planning, and wellness in accordance with current contracts.

b) Encourage creativity in menu promotion and implementation of strategies that provide tasty, appealing and healthy school meals.

c) Collaborate with Principals to ensure meals are served in clean, safe and pleasant settings with adequate time provided for students to eat, at a minimum, in accordance with state and federal standards and guidelines. Reinforce healthy food messages in the dining center through printed materials like posters and nutrition pamphlets and/or presentations like taste-tests or cooking demonstrations.

d) Student engagement has increased in the last two SYs and we will continue these efforts (at least 2 sampling events every month +more in the summer, district-side survey, focus groups, etc.)

e) Communicated with the Office of Network Support regarding policy regulations (meal times, competitive foods) and
All schools with edible gardens must complete the Eat What You Grow Certification or Recertification training and PFSP (personalized food safety plan), annually as well as adhere to the guidelines, policies and procedures outlined within Eat What You Grow: A Food Safety Manual for Consuming Produce Grown at Schools.

The Eat What You Grow Certification training is a recent requirement for schools. Further clarification and communication of the requirement should occur (through Healthy CPS Checklist, network specialists, etc). District-level garden staff turnover has led to gaps in communication and support; the new fully staffed team can plan for training and resources to support school staff.

### Goals

<table>
<thead>
<tr>
<th>Goals</th>
<th>Meeting</th>
<th>Partially Meeting</th>
<th>Not Meeting</th>
<th>Next Steps (If Applicable)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Physical Activity</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Schools must provide all students, PK-12 with daily opportunities for physical activity before, during and after school.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Pre-K programs must provide a mix of structured physical activity and unstructured free play, including at least 30 minutes per day for half day programs and 60 minutes per day for full day programs.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
| K-8 Schools must provide daily opportunities for moderate to vigorous physical activity for all students in addition to recess and physical education.  
  - Grades K-5. District schools must provide all students in grades K-5 30 minutes of supervised, unstructured physical activity daily. Physical Education must not be counted towards this requirement for unstructured physical activity. This 30 minutes is inclusive of the required 20 minute daily recess.  
  - Grades 6-8. Schools must provide daily opportunities for moderate to vigorous physical activity in addition to recess and physical education. | X (86%) | | | Streamlined communication and support has significantly increased compliance with this requirement. Moving forward, we will continue to:  
  - Provide resources and PD to school administrators and classroom teachers to expand opportunities for integrating physical activity throughout the school day. |
- Grades 9-12. High Schools are encouraged to maximize existing daily opportunities for physical activity (in addition to physical education) before, during, and after school.

All elementary schools, middle schools, and high schools with elementary grades, must provide elementary students (K-8) with a daily opportunity for recess. Recess is a non-instructional activity and must occur during non-instructional time. Recess must be at least 20 minutes in length per day, schools that serve K-5 may schedule a 30 minute recess. Recess, which provides students with a break from instruction and time to engage in play with peers, shall include physical activity and/or activities that promote social skill development. It is recommended that schools schedule recess prior to students’ lunch periods. Schools must implement recess in accordance with guidelines set by the CPS Office of Student Health and Wellness.

The District recognizes that Physical Education is an important part of overall physical activity in schools. Schools must offer physical education programming in accordance with the Illinois School Code and the CPS Physical Education Policy, as overseen and administered by the Office of Teaching and Learning.

<table>
<thead>
<tr>
<th>Goals</th>
<th>Meeting</th>
<th>Partially Meeting</th>
<th>Not Meeting</th>
<th>Next Steps (If Applicable)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Other School-Based Wellness Activities</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Principals, school staff, parents/guardians and students are strongly encouraged to promote non-food fundraisers. Food fundraisers are not permitted during the school day. Food fundraisers are permitted during the school day if the items sold are intended to be consumed outside of school hours and away from school grounds (e.g. cookie dough).</td>
<td>X (93%)</td>
<td></td>
<td></td>
<td>Update resources for non-food fundraisers.</td>
</tr>
</tbody>
</table>
A school may permit a maximum of two school-wide celebrations per school year with outside food (food that is not sourced or provided by the school's dining center, e.g. through the NSS Catering Menu). Any other events where food is served, including those that celebrate student attendance or other achievements must follow the nutrition criteria outlined in the CPS Guidelines for Competitive Foods. Schools must not serve any outside food during regularly scheduled school meals (e.g. ordering food from a restaurant or bringing a food truck to school during the lunch period).

Teachers and other school personnel are prohibited from using physical activity (e.g., running laps, pushups) as discipline or withholding opportunities for physical activity (e.g., withholding recess or physical education) as punishment.

Rewards are incentives offered to students in recognition of good behavior or performance. Teachers and other school personnel are encouraged to promote non-food rewards. Individual student rewards using food are not permitted.

<table>
<thead>
<tr>
<th>Action</th>
<th>X (71%)</th>
<th>Policy language has been updated to stress ‘outside food’ rather than the more subjective ‘foods of minimal nutritional value;’ CPS will continue to market the NSS catering menu and will create or curate resources to help schools celebrate with fun rather than food.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Teachers and other school personnel are prohibited from using</td>
<td>X (98%)</td>
<td></td>
</tr>
<tr>
<td>physical activity (e.g., running laps, pushups) as discipline or</td>
<td></td>
<td></td>
</tr>
<tr>
<td>withholding opportunities for physical activity (e.g., withholding</td>
<td></td>
<td></td>
</tr>
<tr>
<td>recess or physical education) as punishment.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Rewards are incentives offered to students in recognition of good</td>
<td>X (81%)</td>
<td>Update resources for non-food rewards.</td>
</tr>
<tr>
<td>behavior or performance. Teachers and other school personnel are</td>
<td></td>
<td></td>
</tr>
<tr>
<td>encouraged to promote non-food rewards. Individual student rewards</td>
<td></td>
<td></td>
</tr>
<tr>
<td>using food are not permitted.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Part III: Model Policy Comparison

As part of the triennial assessment, USDA requires sponsors to assess how their wellness policy compares to model wellness policies. Choose one of the model wellness policies below to compare against your local wellness policy. Indicate which model policy was chosen and provide a narrative for each prompt below based on the findings.

☐ Alliance for a Healthier Generation's Model Wellness Policy – Local wellness policy created in collaboration with USDA, which exceeds minimum requirements

☒ Rudd Center's WellSAT 3.0 – Wellness assessment tool that asks a series of questions about your local wellness policy and generates a personalized scorecard based on the results. Users will need to create an account to access this tool.

☐ Other: _______________________________________________________________________

---

2 This section used information from the full analysis of WellSAT WSCC SY23-24
1. **What strengths does your current local wellness policy possess?**

According to the WellSAT WSCC assessment, the “Standards for USDA Child Nutrition Programs and School Meals” and “Nutrition Standards for Competitive and Other Foods and Beverages” were areas with the most comprehensive and strong policy language. Specifically around addressing the nutrition standards, regulations for foods sold in schools, amount of “seat time” students have to eat meals, and prohibiting the use of food for fundraisers and rewards. Other strengths include physical education and nutrition education curriculum requirements with clear goals, and school-based wellness team requirements for implementation and evaluation.

2. **What improvements could be made to your local wellness policy?**

Last year our policy was updated to clarify language for school requirements and make goals easier for schools to understand and implement. Our team is growing to support technical assistance needs for schools, which is critical to implementation of the policy. We should continue to bolster communications about requirements for schools and work to create or curate new resources to support schools. We continue to engage stakeholders (school admin and staff, partners, network chiefs, District staff, and parents) to ensure the policy requirements are based on research and best practices while still being both attainable and equitable.

3. **List any next steps that can be taken to make the changes discussed above.**

   a. Stakeholder engagement to determine how to improve compliance concerns
   b. Review of the Healthy CPS survey to determine how to better capture accurate school compliance, and inform policy updates
   c. Improve communications so schools better understand the policy requirements
   d. Review our policy with other evidence-based wellness policies to determine areas for improvement