

Wellness Policy Comparison Activity

In this handout are excerpts from the Rudd Center's WellSAT: 3.0 tool and the guidance for scoring the policy using the tool for the section on nutrition standards for competitive and other foods and beverage.

For this activity, you will be completing one part of the requirement to compare your policy to a model policy, for the section on competitive foods and beverages. The entire tool, which scores six sections, is available online at the WellSAT web page.

WellSAT: 3.0

Wellness School Assessment Tool

DISTRICT SCORECARD



Federal Requirement



Farm to School



CSPAP



Section 3: Nutrition Standards for Competitive and Other Foods and Beverages

		Rating
NS1	Addresses compliance with USDA nutrition standards (commonly referred to as Smart Snacks) for all food and beverages sold to students during the school day.	
NS2	USDA Smart Snack standards are easily accessed in the policy.	
NS3	Regulates food and beverages sold in a la carte.	
NS4	Regulates food and beverages sold in vending machines.	
NS5	Regulates food and beverages sold in school stores.	
NS6	Addresses fundraising with food to be consumed during the school day.	
NS7	Exemptions for infrequent school-sponsored fundraisers.	
NS8	Addresses foods and beverages containing caffeine at the high school level. Use N/A if no high schools in district.	
NS9	Regulates food and beverages served at class parties and other school celebrations in elementary schools. Use N/A if no elementary schools in district.	
NS10	Addresses nutrition standards for all foods and beverages served to students after the school day, including, before/after care on school grounds, clubs, and after school programming.	
NS11	Addresses nutrition standards for all foods and beverages sold to students after the school day, including before/after care on school grounds, clubs, and after school programming.	
NS12	Addresses food not being used as a reward.	
NS13	Addresses availability of free drinking water throughout the school day.	
Subtotal for Section 3	Comprehensiveness Score: Count the number of items rated as "1" or "2." Divide this number by the total number of items, excluding those that are not applicable (N/A). Multiply by 100.	
	Strength Score: Count the number of items rated as "2." Divide this number by the total number of items, excluding those that are not applicable (N/A). Multiply by 100.	

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Guidance



SM9: Ensures annual training for food and nutrition services staff in accordance with USDA Professional Standards.

Training requirements include: new and current directors: 12 hours; new and current managers: 10 hours; new and current staff: 6 hours. Requirement information available at: <https://www.gpo.gov/fdsys/pkg/FR-2015-03-02/pdf/2015-04234.pdf>.

0	Not mentioned
1	<p>Training suggested, but unclear if USDA requirement is met</p> <p>Examples:</p> <ul style="list-style-type: none"> "All food service personnel will have adequate training in food service operations." "All food service personnel shall receive pre-service training in food service operations."
2	<p>It is clear that USDA requirement for training and/or continuing education is being met.</p> <p>Examples:</p> <ul style="list-style-type: none"> "The USDA Professional Standards for State and Local Nutrition Programs are followed to ensure that professional development in the area of food and nutrition is provided for food service directors, managers and staff. New and current food service directors must have at least 12 hours; new and current managers must have at least 10 hours; new and current staff must have at least 6 hours" "All school nutrition program directors, managers and staff will meet hiring and annual continuing education/training requirements in the USDA Professional Standards for Child Nutrition Professionals. These school nutrition personnel will refer to USDA's Professional Standards for School Nutrition Standards website to search for training that meets their learning needs."



SM10: Addresses purchasing local foods for the school meals program. Procurement is one of the three components of the farm to school program. Procurement is defined as local foods that are purchased, promoted, and served in the cafeteria or as a snack or taste-test. USDA farm to school program available at: <https://www.fns.usda.gov/farmtoschool/farm-school>

0	Not mentioned
1	<p>Mentions vague and/or suggested strategies</p> <p>Examples:</p> <ul style="list-style-type: none"> "Schools are encouraged to make available locally grown produce available." "Schools are encouraged to source fresh fruits and vegetables from local farmers where practicable."
2	<p>Local foods will be purchased and promoted</p> <p>Examples:</p> <ul style="list-style-type: none"> "School meals will include fresh, locally-grown foods in school meals from farms engaged in sustainable practices whenever possible and these foods will be promoted in the cafeteria." "Cafeteria will regularly provide taste tests for locally grown products."



NS1: Addresses compliance with USDA nutrition standards (commonly referred to as Smart Snacks) for all food and beverages sold to students during the school day. The school day begins at midnight the night before and goes until 30 minutes after the final bell. Federal Rule language states that policies must contain "standards and nutrition guidelines for all foods and beverages sold to students during the school day on each participating school campus under the jurisdiction of the local educational agency."

0	Not mentioned
1	<p>Vague and/or suggested. Any of the following:</p> <ul style="list-style-type: none"> Specifies meeting nutrition standards for competitive foods, but does not show: specific standards that document compliance OR specify USDA Smart Snacks OR specify federal requirements. Lists some, but not all standards/ implies partial compliance Requires Smart Snacks for foods or beverages, but not both. <p>Examples:</p> <ul style="list-style-type: none"> "All foods sold to students outside of school meals shall meet district nutrition standards" (district nutrition standards do not meet Smart Snacks) "All beverages sold must meet Smart Snack nutrition standards."

2	<p>All foods and beverages sold to students during the school day are required to meet or are in compliance with USDA Smart Snacks federal nutrition standards or specific standards are named that imply compliance.</p> <p>Examples:</p> <ul style="list-style-type: none"> • "The district is in compliance with all federal and state nutrition standards for all foods served in schools." • "Guidelines from USDA's Final Rule: Nutrition Standards for All Food Sold in School standards apply to a la carte in the cafeteria, in-school stores, snack bars, vending machines, and any other venues where food or candy may be sold on school campuses during the school day, including fundraisers, beginning July 1, 2014"
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NS2: USDA Smart Snack standards are easily accessed in the policy.

0	Not mentioned
1	<p>USDA Smart Snacks are mentioned without a link to the full regulation</p> <p>Example: "The District will follow the Smart Snacks in School standards for all food and beverages sold to students on school campus during the school day." (no link or full description of standards are provided)</p>
2	The complete Smart Snack standards are included in the policy or an active web link is provided



NS3: Regulates food and beverages sold in a la carte. If a policy requires that "all food sold" or "all food and beverages made available" meet Smart Snacks standards, or competitive foods are not allowed to be sold, NS3 should be coded as a 2.

0	Not mentioned or language such as "The district shall monitor all food and beverages sold or served to students, including those available outside of the federally regulated child nutrition programs". (i.e., a la carte, vending, student stores, rewards, fundraising, etc.)
1	<p>Recommended/limited to either of the following:</p> <ul style="list-style-type: none"> • A la carte regulations or umbrella statement regulating "all (competitive) foods" is vague, suggested, time- or location-specific, subject to principal's discretion, or weakened by other exceptions • A la carte nutrition standards are required, but do not meet the level of Smart Snacks <p>Examples:</p> <ul style="list-style-type: none"> • "Food service shall strive to include some healthy choices (choices listed) for all a la carte food sales." • "All foods and beverages sold must meet nutrition standards for fat, sugar, and calories. Only water, milk, and 100% juice may be sold." (requirements don't meet Smart Snacks)
2	<p>Requires either Smart Snacks or competitive food and beverage sales are banned during the school day (or just within the a la carte lines)</p> <p>Examples:</p> <ul style="list-style-type: none"> • "It is the policy of the School District that all foods and beverages sold to students during the school day on any property under the jurisdiction of the district will meet the U.S. Department of Agriculture (USDA) school meal and Smart Snacks in School (Smart Snacks) nutrition standards." • "All food items served or offered (for sale) to students during the school day (from the midnight prior, to 30 minutes after the end of the official school day) will meet all federal, state, and local standards for all nutrient and competitive food guidelines." • "The sale of F&B is limited to F&B sold through the school meal program." • "No competitive foods or beverages may be sold during the school day."



NS4: Regulates food and beverages sold in vending machines. If a policy requires that "all food sold" or "all food and beverages made available" meet Smart Snacks standards, or competitive foods are not allowed to be sold, NS4 should be coded as a 2.

0	Not mentioned or language such as "The district shall monitor all food and beverages sold or served to students, including those available outside of the federally regulated child nutrition programs." (i.e., a la carte, vending, student stores, rewards, fundraising, etc.)
1	<p>Recommended or limited to either of the following:</p> <ul style="list-style-type: none"> • Vending machine regulations or umbrella statement regulating "all (competitive) foods" is vague, suggested, time- or location- specific, subject to principal's discretion, or weakened by other exceptions • Vending machine nutrition standards are required, but do not meet the level of Smart Snacks

	Examples: <ul style="list-style-type: none"> • "Food service shall strive to include some healthy choices (choices listed) for all a la carte food sales." • "All foods and beverages sold must meet nutrition standards for fat, sugar, and calories. Only water, milk, and 100% juice may be sold." (requirements don't meet Smart Snacks)
2	Requires either of the following: <ul style="list-style-type: none"> • Smart Snacks • Competitive food and beverage sales are banned during the school day (or just vending machines) Examples: <ul style="list-style-type: none"> • "It is the policy of the School District that all foods and beverages sold to students during the school day on any property under the jurisdiction of the district will meet the U.S. Department of Agriculture (USDA) school meal and Smart Snacks in School (Smart Snacks) nutrition standards." • "All food items served or offered (for sale) to students during the school day (from the midnight prior, to 30 minutes after the end of the official school day) will meet all federal, state, and local standards for all nutrient and competitive food guidelines." • "All vending machines will be turned off during the school day." • "No competitive foods or beverages may be sold during the school day."



NS5: Regulates food and beverages sold in school stores. If a policy requires that "all food sold" or "all food and beverages made available" meet Smart Snacks standards, or competitive foods are not allowed to be sold, NS5 should be coded as a 2.

0	Not mentioned or language such as "The district shall monitor all food and beverages sold or served to students, including those available outside of the federally regulated child nutrition programs." (i.e., a la carte, vending, student stores, rewards, fundraising, etc.)
1	Recommended or limited to either of the following: <ul style="list-style-type: none"> • School store regulations or umbrella statement regulating "all (competitive) foods" is vague, suggested, time- or location-specific, subject to principal's discretion, or weakened by other exceptions • School store nutrition standards are required, but do not meet the level of Smart Snacks. Examples: <ul style="list-style-type: none"> • "Food service shall strive to include some healthy choices (choices listed) for all a la carte food sales." • "All foods and beverages sold must meet nutrition standards for fat, sugar, and calories. Only water, milk, and 100% juice may be sold." (requirements don't meet Smart Snacks)
2	Requires either of the following Smart Snacks or competitive food and beverage sales are banned during the school day (or just within school stores) Examples: <ul style="list-style-type: none"> • "It is the policy of the School District that all foods and beverages sold to students during the school day on any property under the jurisdiction of the district will meet the U.S. Department of Agriculture (USDA) school meal and Smart Snacks in School (Smart Snacks) nutrition standards." • "All food items served or offered (for sale) to students during the school day (from the midnight prior, to 30 minutes after the end of the official school day) will meet all federal, state, and local standards for all nutrient and competitive food guidelines." • "This district does not allow for the operation of school stores until 30 minutes after the end of the school day." • "No competitive foods or beverages may be sold during the school day."



NS6: Addresses fundraising with food to be consumed during the school day.

If a policy requires that "all food sold" or "all food and beverages made available" meet Smart Snacks standards, or competitive foods are not allowed to be sold, NS6 should be coded as a 2. Smart Snacks applies to food and beverages sold as fundraiser during the school day. State agencies may adopt a policy that allows for exemptions to this requirement for infrequent school-sponsored fundraisers. The next variable (NS7) will capture whether or not those exemptions apply. Please indicate whether your district's nutrition standards apply to fundraising with food to be consumed during the school day here.

0	Not mentioned or language such as "The district shall monitor all food and beverages sold or served to students, including those available outside of the federally regulated child nutrition programs. (i.e., a la carte, vending, student stores, rewards, fundraising, etc.)
1	Recommended or limited to either of the following:

	<ul style="list-style-type: none"> Fundraiser regulations or umbrella statement regulating "all (competitive) foods" is vague, suggested, time- or location-specific, subject to principal's discretion, or weakened by other exceptions Fundraiser nutrition standards are required, but do not meet the level of Smart Snacks. <p>Examples:</p> <ul style="list-style-type: none"> "Food service shall strive to include some healthy choices (choices listed) for all fundraisers." "All foods and beverages sold must meet nutrition standards for fat, sugar, and calories. Only water, milk, and 100% juice may be sold." (requirements don't meet Smart Snacks)
2	<p>Requires either Smart Snacks or competitive food and beverage sales are banned during the school day (or just fundraisers)</p> <p>Examples:</p> <ul style="list-style-type: none"> "It is the policy of the School District that all foods and beverages sold to students during the school day on any property under the jurisdiction of the district will meet the U.S. Department of Agriculture (USDA) school meal and Smart Snacks in School (Smart Snacks) nutrition standards." "All food items served or offered (for sale) to students during the school day (from the midnight prior, to 30 minutes after the end of the official school day) will meet all federal, state, and local standards for all nutrient and competitive food guidelines." "There will be no food-related fundraisers held during the school day." "No competitive foods or beverages may be sold during the school day."

NS7: Exemptions for infrequent school-sponsored fundraisers.

Under Smart Snacks, your state may have adopted an exemption policy that allows for a certain number of infrequent school-sponsored fundraisers during which foods and beverages sold do not have to meet Smart Snacks. If your state allows exemptions, it provides the maximum number of exempt fundraisers allowed. However, your school district may have adopted language that limits this number even further, or prohibits exempt fundraisers all together.

0	Not mentioned
1	<p>Some number of exemptions for infrequent fundraisers are allowed during which foods and beverages sold do not have to meet the Smart Snacks nutrition standards.</p> <p>Example: Smart Snacks nutrition standards apply to all foods and beverages sold to students through district-sponsored fundraisers, unless an exemption applies. Each school will be allowed to hold 3 exempt fundraisers per school year during which any food or beverages may be sold.</p>
2	<p>Zero fundraiser exemptions are allowed</p> <p>Example: All fundraisers held during the school day must meet Smart Snacks. There are no exemptions</p>

NS8: Addresses foods and beverages containing caffeine at the high school level. Use N/A if no high school in district. As of 2014, USDA Smart Snacks standards prohibit the sale of foods and beverages containing caffeine in elementary and middle schools. However, high schools are allowed to sell caffeinated beverages.

0	Not mentioned
1	<p>Recommends or suggests high schools not sell foods and/or beverages with caffeine.</p> <p>Example: "High school principals are encouraged to limit the sale of beverages with caffeine to high school students (e.g. coffee from the school store)."</p>
2	<p>Either of the following: Prohibits the sale of foods and/or beverages containing caffeine (with the exception of trace amounts of naturally occurring caffeine) at all grade levels, during the school day; or requires high schools to follow the stricter Smart Snack beverage standards for middle schools.</p> <p>Examples:</p> <ul style="list-style-type: none"> "USDA Smart Snack standards for beverages sold in elementary and middle schools shall also be applied in high schools." "Beverages containing caffeine will not be sold on the high school campus." "Only water, milk, and 100% juice shall be sold to students during the school day."



NS9: Regulates food and beverages served at class parties and other school celebrations in elementary schools. Use N/A if no elementary schools in district.

0	Not mentioned OR the foods and beverages served are specifically exempted from any district nutrition standards.
1	<p>Any of the following:</p> <ul style="list-style-type: none"> Regulations for class parties are required but weakened (e.g., by allowing one traditional party food.)

	<ul style="list-style-type: none"> Provide a specific and restricted list of food items allowed to be served/distributed/available at class parties or at all times (e.g., limiting to fruits and whole grains). Examples: <ul style="list-style-type: none"> "The district shall provide parents with a list of allowable party foods that meet the Smart Snack standards. "The district will regulate all food and beverages served during classroom activities." "Classroom parties, celebrations, etc. shall be limited to one snack and one beverage from a list of Smart Snack allowable items."
2	<p>No food is served during class celebrations.</p> Examples: <ul style="list-style-type: none"> "Classroom celebrations will focus on activities, rather than food. No food will be served." "Due to concerns about food safety and food allergies, children will be recognized on their birthdays by being given special privileges, such as being line leader or teacher's helper for the day. No food will be brought into the classroom."

NS10: Addresses nutrition standards for all foods and beverages served to students after the school day, including, before/after care on school grounds, clubs, and after school programming.

0	Not mentioned or only mentions participate in a program (e.g., CACFP) without stating that program nutrition standards will be followed.
1	<p>Nutrition standards apply to before/aftercare, but they are weaker than CACFP or Smart Snack standards.</p> Example: "Only healthy snacks will be served to students in after school programs."
2	<p>Requires that foods and beverages served to students in before/aftercare, whether run by the school or an outside party (e.g., YMCA) will meet CACFP nutrition standards OR Smart Snacks standards. Policy may state that one of these specific nutrition standards are followed, or may list the specific standards, providing evidence that they are followed.</p> Example: "Snacks in aftercare are served via the Child and Adult Care Food Program and meet the requirements of that program."

NS11: Addresses nutrition standards for all foods and beverages sold to students after the school day, including before/after care on school grounds, clubs, and after school programming.

0	Not mentioned
1	<p>Nutrition standards apply to extended day, but they are weaker than Smart Snack standards.</p> Examples: <ul style="list-style-type: none"> "Only healthy snacks will be sold to children participating in on-site programs after school ends." "Snacks sold to students during after school programs must be less than 200 calories and be low in sugar and sodium."
2	<p>Requires that foods sold during the extended school day meet or exceed Smart Snacks nutrition standards. Policy must either state that Smart Snacks or federal nutrition standards are used OR document compliance by providing a list of the nutrition standards.</p> Examples: <ul style="list-style-type: none"> "Snacks sold to children participating in on-site programs after school ends will meet USDA Smart Snack nutrition standards." "All snacks sold to students during after school programs will meet the same nutrition standards as foods sold during the school day."

NS12: Addresses food not being used as a reward.

0	Not mentioned OR students will be given an alternative meal until account is paid OR students will not be fed a school meal until account is paid
1	<p>Discourages food as a reward.</p> Examples: <ul style="list-style-type: none"> "...strongly discourage the use of food/beverages as a reward or punishment." "...will encourage non-food alternatives as rewards." "Food should not be used as a reward."
2	<p>Prohibits food as a reward. Prohibition of food as a reward with the exception of Individual(ized) Academic Plans (IAP) or Individual(ized) Education Plans (IEP) still qualifies for a rating of "2."</p> Examples: <ul style="list-style-type: none"> "Food rewards or incentives shall not be used in classrooms to encourage student achievement or desirable behavior." "The use of food or candy as a classroom reward in any school is prohibited." "Schools will not use food or beverages as rewards for academic, classroom, or sports performances."

NS13: Addresses availability of free drinking water throughout the school day.

0	Not mentioned or only mentions water availability where meals are served.
1	Availability of free water is suggested or encouraged. Examples: <ul style="list-style-type: none"> "Water should be accessible during hours of school operation through choices such as drinking fountains or vending machines." "Schools are encouraged to provide drinking fountains throughout the school campus."
2	Free water is always available. Examples: <ul style="list-style-type: none"> "Students and staff will have access to free, safe, and fresh drinking water throughout the school day." "Drinking water fountains will be made available to students and staff throughout the school building." "Students will be provided free access to drinking water throughout the school day." "Students are allowed to bring in bottled water from home."



PEPA1: There is a written physical education curriculum for grades K-12.

0	Not mentioned
1	Vague and/or suggested Example: "Physical education will enable students to acquire the knowledge and skills necessary to maintain physical fitness, participate in physical activities and make healthy lifestyle choices."
2	Clear that school district has a written physical education curriculum for each grade K-12 (e.g., policy describes a comprehensive physical education curriculum- for "K-12," "all levels," or "all students"). Example: "The school district's comprehensive, standards-based physical education curriculum identifies the progression of skill development in grades K-12. Physical education curriculum revision will follow a formally established periodic review cycle congruent to other academic subjects."

PEPA2: The written physical education curriculum for each grade is aligned with national and/or state physical education standards.

0	Not mentioned
1	Vague and/or suggested Example: <ul style="list-style-type: none"> "The physical education curriculum should follow existing standards."
2	Required. School district requires the written physical education curriculum to be aligned with state and/or national physical education standards Example: "The physical education curriculum for grades K-12 will be aligned with established state physical education standards."

PEPA3: Physical education promotes a physically active lifestyle.

0	Not mentioned
1	Any of the following: <ul style="list-style-type: none"> Suggests that physical education promotes a physically active lifestyle Suggests NASPE standards Suggests that physical education programs focus on self-assessment Example: "Physical education programs should promote an active lifestyle"
2	Required. Any of the following: <ul style="list-style-type: none"> Requires physical education to teach lifetime activities Requires schools to follow NASPE standards Focuses on self-assessment through a "Fitnessgram" or "Activity gram" Examples: <ul style="list-style-type: none"> "Schools will provide physical education that fosters lifelong habits of physical activity." "Physical education shall focus on personal fitness." "Shall provide all students physical education that teaches them the skills needed for lifelong physical fitness."