

HEALTHY SCHOOLS CAMPAIGN

EVERY CHILD DESERVES TO LEARN + THRIVE

Chicago Public Schools Proposed Local School Wellness Policy for Students

Healthy Schools Campaign Review and Public Comments

April, 2023

Thank you for the opportunity to provide comments and feedback on Chicago Public Schools' (CPS) proposed Local School Wellness Policy for Students. Below, please find Healthy Schools Campaign's feedback and recommendations.

These recommendations are the result of a careful review by Healthy Schools Campaign team members across the organization, conversations with key partners, consultation of best practices, and our full participation in the district's stakeholder engagement process. In key areas, this feedback has benefited from input from parent and community leaders involved in our Parents United for Healthy Schools/Padres Unidos program. Their priorities are noted throughout.

Parent and caregiver feedback on the draft CPS wellness policy was in three main areas: the need for oversight of the policy to carefully track and measure implementation in a way that does not rely on school self-reporting (parents raised concerns about historical and current inconsistencies in policy implementation); the need for clear implementation strategies, training and assistance for school staff and educators so they are well prepared to understand and fully implement policies; and the need for CPS to continue to be a leader in school food policy and not roll back its high nutrition standards. Healthy Schools Campaign also surveyed over 300 CPS parents and caregivers participating in our work, who identified mental health services and school food as their top concerns.

About Healthy Schools Campaign

Healthy Schools Campaign (HSC), a national nonprofit organization based in Chicago, works to ensure that schools can provide students with equitable access to healthy school environments, which include nutritious food and nutrition education, clean air, health services and opportunities for physical activity. Our approach is strategic and comprehensive. We develop policy and program recommendations supporting healthy schools and advocate for these recommendations at the local, state and national levels. We also help to strengthen the leadership skills of parents and caregivers,

students and school staff and administrators to advocate on their own behalf, and we work to build support for student health and wellness in the education sector and beyond.

We are primarily concerned with the needs of schools whose students are affected by health inequities, particularly in BIPOC and historically under-resourced communities, and have a special focus on the Chicago Public Schools.

We are pleased to offer the following recommendations and feedback, and look forward to discussing our recommendations with you to make the Local School Wellness Policy for Students even stronger.

Policy Framework

Safe and supportive environments

The draft CPS wellness policy includes a strong equity statement, and explicitly acknowledges and respects the differences and diversity of people in the school setting, including their bodies, genders and relationships. The draft wellness policy provides guidance for ensuring safe and supportive environments, specifically acknowledging the challenges LGBTQ+ students are more likely to experience.

We want to acknowledge and thank the CPS team for including this strong language in the draft CPS wellness policy.

Alignment with the Whole School Whole Community, Whole Child (WSCC) model

The draft CPS wellness policy language makes a strong effort to align with the Whole School Whole Community, Whole Child (WSCC) model, and this strengthens the overall policy from what is currently in place. The new framework asserts the importance of student health and well-being to academic achievement, and calls for greater alignment and collaboration between education leaders and health sectors to improve each child's cognitive, physical, social and emotional development. The draft wellness policy addresses eight out of 10 WSCC components and helps underscore the connections between health and academic achievement and the importance of evidence-based school policies and practices recommended by the Centers for Disease Control and Prevention (CDC).

CPS should consider adding specific references to school health services, a key WSCC model component, to the Local School Wellness Policy for Students.

School Food and Safe Drinking Water

Comprehensive school meal standards

With each meal comes the opportunity to support schools' core mission of education, and studies consistently document a powerful connection between health and academic achievement. A vast body of research shows that improved nutrition in schools can lead to increased focus and attention, improved test scores and better classroom behavior. Very simply, healthy, well-nourished students are more likely to attend school and to be engaged and ready to learn.

Nutritious and appealing school meals can also guide students toward a lifelong relationship with healthy food. Research shows that school meals are some of the healthiest meals children receive, and CPS has been a national leader in their steadfast commitment to supporting student health through healthier school meals. The draft CPS wellness policy increases transparency by referencing the CPS Food Service guidelines, and links directly to them. However, the draft CPS wellness policy removes the district's previous commitment to conduct school meal planning without "dessert-like" or reformulated items.

Parents and caregivers are highly concerned that CPS is considering a policy that will weaken its nutrition standards. Parents are also concerned about reformulated foods as they create confusion at home and in the grocery store, and make it harder for parents and the school district to speak with one consistent voice about the importance of healthy food.

In 2018, [CPS released Pathways to Excellence in School Nutrition](#), which officially documented the district's high nutrition standards and commitments — including reducing or eliminating many ingredients of concern. The [Ingredient Guide for Better School Food Purchasing](#) identifies ingredients to eliminate, and those to watch out for, as new food products are developed and others are modified.

CPS should include their commitment to removing ingredients of concern from the school meal program in the Local School Wellness Policy for Students.

CPS' Pathways to Excellence in School Nutrition document references the nutrition standards set by the Healthy, Hunger-Free Kids Act. Since then, the federal nutrition standards have been weakened, moving further away from eventual alignment with the [Dietary Guidelines for Americans](#).

CPS should commit, in the Local School Wellness Policy for Students, to meet the standards for sodium and whole grains established by the Healthy, Hunger-Free Kids Act, and not revert to less healthy ones. Further, the U.S. Department of Agriculture (USDA) has proposed a new rule that would limit the amount of added sugars in school foods. Implementing a sugar cap that aligns with the most recent Dietary Guidelines for Americans would be a huge step forward, and CPS should do so, as well as state that the district is

committed to meeting the current federal nutrition standards and continuing to implement science-based decisions in regards to school meals.

CPS has worked in close partnership with HSC and others to build a strong school meal program. As a result, the district's high nutrition standards and practices have become a national model for healthy school food. We are fully aware of the challenges currently facing the district, including rising food costs, supply shortages and decreased participation in school meal programs (which affects reimbursement). We understand why the district might consider loosening the nutrition standards as a response, but we know that this solution will not benefit the long-term health of students. Families depend on schools to offer nutritionally balanced meals, and for students experiencing food insecurity, healthy school meals are essential.

We urge the district to maintain high nutrition standards in the Local School Wellness Policy for Students, and are committed to supporting CPS in addressing its participation rate and other issues raised by the district.

Nutrition standards for competitive foods and other foods and beverages

The draft CPS wellness policy's purpose statement says that nutrition standards for competitive foods and beverages will align with the USDA's [Smart Snacks Standards](#). This is a good starting point, but additional detail would strengthen the policy.

Smart Snacks Standards include a limit of total sugar by weight, which means that many products that meet the Smart Snack standard contain more than the amount of added sugar recommended by the American Heart Association for a child for an entire day. In contrast, the Dietary Guidelines for Americans recommendations are to limit added sugars to less than 10% of calories per day. CPS should establish an updated added sugars standard for competitive foods that aligns with Dietary Guidelines for Americans, provide more specificity about regulating school stores, and include the definition of a school store within the Local School Wellness Policy for Students.

Food as a reward

In section D.1, the draft CPS wellness policy states that, "individual student rewards using food are not permitted. This includes, but is not limited to, teachers, staff, or partners giving out candy or snacks during class, school assemblies, or other gatherings." Contradicting that statement is Section E which states, "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](#)."

Overall, the language in these areas is confusing, and should be clarified and aligned with best practices of not using food as a reward in the Local School Wellness Policy for Students.

School-wide and classroom celebrations

The draft CPS wellness policy discusses the issue of food at celebrations and other events in several places, and there appears to be a lack of consistency with the message and requirements overall.

While the draft CPS wellness policy provides helpful clarification by defining school-wide celebrations, the Local School Wellness Policy for Students should be updated to send a consistent message. And, to align with best practices recommended by Rudd Center for Food Policy and Health, the Local School Wellness Policy for Students should clearly direct schools to host classroom celebrations that do not involve food, and require school-wide celebrations to meet competitive food requirements. Parents were confused by this language and emphasized the need for clarity around school-wide events and classroom celebrations, as well as sharing requirements with individual schools so there can be consistency and accountability across the district.

Promoting safe water consumption

Children spend substantial time in schools, and many arrive at school inadequately hydrated. Easy access to safe drinking water in schools encourages the consumption of water over sugar-sweetened beverages, which offers a host of benefits, including physical health and cognitive function. The draft CPS wellness policy addresses access to drinking water, but is limited in scope. CDC best practices recommend that wellness policies include language to address water in following categories: access, delivery options, promotion and marketing, education, safety and quality, reusable water bottles and monitoring and evaluation.

The Local School Wellness Policy for Students should specifically address all of the CDC recommended categories, which are crucial to increasing water consumption and ensuring the safety of drinking water in schools.

Unpaid school meal fees

CPS provides breakfast and lunch to all students at no cost under the Community Eligibility Provision (CEP), currently making policies relating to student shaming and other consequences for unpaid school meal fees unnecessary. This policy is extremely beneficial to ensuring students are well-nourished, healthy and ready to learn, but it is vulnerable if federal guidelines change.

The Local School Wellness Policy for Students should include language to document the district's commitment to providing school meals at no cost regardless of the CEP, so that all students maintain access to healthy school meals in the event federal rules change in the future.

Physical Activity

Recess

The draft CPS wellness policy is in greater alignment with state law than the previous version by stating that elementary schools must provide at least 20 minutes of recess per day, and that schools that serve grades K-5 must schedule 30 minutes of recess or supervised, unstructured physical activity every day. The draft wellness policy also references best practices to schedule recess prior to

students' lunch periods when possible, and references, but does not link to, the recess guidelines set by the Office of Student Health and Wellness.

The Local School Wellness Policy for Students should include links to the referenced recess guidelines, to ensure consistency and clarity around the recess guidelines. Parents raised concerns about the recess policy not currently being followed, or being implemented inconsistently.

Safe Routes to Schools

The draft CPS wellness policy does not include a statement that addresses active transport (Safe Routes to School) for all K-12 students who live within walkable/bikeable distance.

The Local School Wellness Policy for Students should clearly state that the school district encourages schools (with hands-on assistance and support from the district) to develop an active transport program.

School Facilities and Outdoor Spaces

Spaces that support physical education and activity

CPS has strong physical education (PE) and recess policies that make the district a leader in prioritizing the importance of movement and physical activity throughout the school day. The lack of adequate and appropriate indoor and outdoor facilities has been identified by schools as a common barrier for implementing PE and recess. While CPS has installed new playgrounds and is leveraging other resources to transform schoolyards, there is still a large unmet need for these amenities and their upkeep.

The Local School Wellness Policy for Students would be strengthened by the inclusion of language that directs the district to fully assess indoor and outdoor facility needs - both capital improvement needs and maintenance, repair or replacement needs - as part of its triennial wellness policy update. This assessment should then inform the district's capital and facilities plans to make it possible for all schools to fully implement PE and recess.

School gardens

School gardens are dynamic places for students to strengthen their understanding of good nutrition and healthy eating habits, as well as support the overall educational curriculum in various subjects including language arts, reading, social studies, art, math and science. The draft CPS wellness policy includes new, stronger language to ensure school gardens are well utilized and taken care of by requiring the school to form a garden team that includes parent and community representation, and encourages the use of school gardens to support nutrition education.

We commend the inclusion of language in the draft CPS wellness policy that encourages the use of school gardens for classroom instruction - for any subject - throughout the school year, as well as language about garden teams and Eat What You Grow. We recommend that the Local School Wellness Policy for Students include a link to CPS' School Gardens Guidance.

Implementation, Evaluation and Communication

Stakeholder review of wellness policy

Although CPS includes a statement in the draft wellness policy that says they will, “establish a process to gather regular reporting and feedback from individual schools, community partners, students and parents on the implementation of the policy,” stronger language is necessary.

The Local School Wellness Policy for Students should be strengthened to document how specific stakeholder groups will be included in a district-wide review of the wellness policy.

Assessing implementation

The draft CPS wellness policy requires assessment of district implementation of the local wellness policy at least once every three years, but does not clearly state the methodology or details for how the assessment will be done and by whom.

The Local School Wellness Policy for Students should be strengthened to include more details for what the assessment of district implementation of the policy will include, and follow Well-SAT recommendations for doing so (e.g., quantitative assessment of policy implementation every three years using the Wellness School Assessment Tool-Implementation (WellSAT-I) or the School Health Index).

Communicating to the public

The U.S. Department of Agriculture (USDA) rules regarding the Local School Wellness Policy stipulate that the district must specify the methods of communicating with the public.

The Local School Wellness Policy for Students should clearly state that the district will publicly share, via a specific web address, the results of an annual district-wide assessment that includes a compilation of every school's annual progress report measure, as well as the required triennial assessment. It should also specify that these materials will be made available in all the languages spoken in the district. Additionally, policy language should make it clear that the district is required to post its wellness policy on the website and distribute the wellness policy to the school and community on an annual basis.

Upholding strong standards, despite rollbacks at the state or federal level

The recent rollbacks of health-promoting policies at the national and state levels (not in Illinois) has raised concerns among many school stakeholders. CPS has been a national leader in strong wellness standards and should maintain that reputation by including stronger wellness policy language to uphold those standards, even when state or national regulations are rolled back.

The draft CPS wellness policy should remove the provision that allows the Chief Health Officer, Executive Director of NSS, or their designee to update guidelines if less stringent standards are issued. Including this language in the policy puts it at risk of being weakened without going through a transparent, public process, and creates loopholes that potentially undermine the policy as a whole. If weakening nutrition standards becomes a consideration, CPS should follow the full process and procedures for considering formal changes to its district wellness policy, including informing the public and having a public comment period and board vote.

Improving data collection, validity and access

Data, metrics and accountability play an important role in encouraging and ensuring implementation of the Local School Wellness Policy for Students.

In the Local School Wellness Policy for Students, CPS should require and detail a stronger and more transparent data collection and evaluation plan that allows school stakeholders, including principals, teachers, parents and caregivers, district officials and the public, to understand how schools are implementing the wellness policy and making progress over time. Instead of a self-reported and voluntary survey to monitor and report on a school's ability to meet wellness policy requirements, CPS should require schools to complete the annual survey, and broaden efforts to document wellness policy implementation beyond self-reporting. The policy should also require data sharing between CPS departments.

Supporting Local School Council oversight of wellness policy implementation

A key accountability provision of the draft CPS wellness policy is the requirement that principals provide quarterly reports to their Local School Council (LSC), and that the LSC monitors progress in policy implementation.

To equip LSC members with the tools and knowledge to monitor school-level implementation of the CPS wellness policy, the Local School Wellness Policy for Students should require that training for LSC members be updated to include wellness policy responsibilities and resources, as well as information on how to include wellness goals in the school's Continuous Improvement Work Plan (CIWP). The policy should direct the Office of Student Health and Wellness to provide guidance and resources to equip LSC members to monitor school-level implementation of the wellness policy and resources, and include wellness goals in the CIWP.

Integrating health and wellness goals into the Continuous Improvement Work Plan

Including health and wellness in a school's CIWP presents a tremendous opportunity to support the learning and health of students. The CIWP sets the priorities and goals for individual schools, and identifies the resources needed to support implementation.

The Local School Wellness Policy for Students should include language that directs schools (and provides them with support and resources) to include student health and wellness policies and practices into their CIWP.