

## **Steps for Creating Local Policy**

The **process** of policy development is just as important as the final product — the policy document. Individuals could work independently to write a policy, but it will be ineffective if it is not supported and implemented districtwide. This requires a team with appropriate representation from the school and community to come to consensus regarding best practices based on local needs. Bringing individuals together to work as a team may present a challenge; however, this process is essential to ensuring the success of policy development and implementation. The end result will be a final policy document that meets local district needs and can be implemented to promote the goal of better health and learning for students.

While the actual policy development process will be different for each school district, following the steps outlined below can help all districts be successful in developing effective nutrition and physical activity policies.

### **Step 1: Identify Policy Development Team**

A districtwide School Health Team (or School Health Council, School Health Advisory Group, etc.) is critical to successful policy development. The team consists of a group of individuals representing the school and community. The School Health Team works to develop, implement, monitor, review and revise school nutrition and physical activity policies. The process may involve the development of a new team or enhancement of an existing School Health Team, such as a school health council or coordinated school health team. The School Health Team serves many purposes, including:

- developing policy language;
- developing guidance to clarify, support and promote policy implementation;
- monitoring policy implementation;
- evaluating the progress of policy implementation;
- serving as a resource to school sites for policy implementation (e.g., providing lists of ideas for healthy incentives, snacks and celebrations, and ideas for classroom physical activity);
- increasing awareness and providing education on health concerns (e.g., students' nutrition needs); and
- revising policy as necessary.

#### **School Health Team Members**

At a minimum, the USDA School Wellness Policy legislation requires that parents, students, school food service, the school board, school administrators and the public, be involved in developing the local wellness policy. The Connecticut State Department of Education has identified additional team members who are critical to the successful development of nutrition and physical activity policies. These include school nurses, physical education coordinator/teachers and health education coordinator/teachers. To optimize success, it is strongly recommended that the team also include other members as appropriate to local needs, as well as those who will be affected by the policy (see *School Health Team Members* on the next page). Districts should also consider the professional diversity of the team and include ethnic, cultural and demographic representation that mirrors the school community.

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It is also important to choose individuals who can champion the team's efforts. Frequently, members of *effective* policy teams demonstrate a combination of the following qualities:

- strong interest in improving school nutrition and physical activity in schools;
- effective communication skills and the attitude of team players;
- understanding of the district's procedural requirements for policy; and
- policy-related experience in the district.

### School Health Team Members

#### Minimum Core Members for School Health Team

- Parents\*
- Students\*
- School Food Service (e.g., district food service director/manager)\*
- School Nurse
- Physical Education Coordinator/Teacher
- Health Education Coordinator/Teacher
- School Board\*
- School Administrators (e.g., superintendent, assistant superintendent, principal, assistant principal, school business official, curriculum director)\*
- The Public\*

*\*Required by the USDA School Wellness Policy legislation*

#### Recommended Team Members (as appropriate to local needs)

- **Other school staff members**, e.g., school medical advisors, curriculum supervisors, school counselors, family and consumer sciences teachers, school social workers and school business officials
- **Health care providers**, e.g., pediatricians, dietitians, nutrition/health consultants, dentists and representatives of nonprofit health organizations, e.g., American Cancer Society, American Diabetes Association and American Heart Association
- **Community groups**, e.g., YMCA, YWCA, Boy Scouts, Girl Scouts, Boys and Girls Clubs, faith-based groups, school readiness councils and local elected officials
- **Physical activity groups**, e.g., town park and recreation programs, youth sports leagues and commercial fitness centers
- **University departments and other government agencies** involved in nutrition and physical activity, e.g., local cooperative extension service
- **Hospitals and public health representatives**, e.g., local health department/district

### **Team Leader**

A team leader or coordinator should be identified. This person plays a critical leadership role in coordinating the activities of the School Health Team, so it is important to have someone who is qualified, dedicated and can commit the necessary time.

### **Collaboration**

The School Health Team should ensure collaboration with any existing efforts underway in the school or community. The school district may already be working on student wellness issues and have an existing infrastructure, such as a school health council, coordinated school health initiatives, a local Team Nutrition team, or staff members involved in the Carol M. White Physical Education Program (PEP). These teams and team members are well-positioned to assist in the development of the policy. District policies should also be part of the overall school initiatives and connect directly to the strategies in the School Improvement Plan (SIP) to promote student achievement (for those Title I funded schools not making adequate yearly progress under the No Child Left Behind Act).

### **Responsibilities of School Health Team**

Responsibilities of the School Health Team may include, but are not limited to, oversight of the following:

- implementation of district nutrition and physical activity standards;
- integration of nutrition and physical activity in the overall curriculum;
- assurance that staff professional development includes nutrition and physical activity issues;
- assurance that students receive nutrition education and engage in vigorous physical activity;
- pursuit of contracts with outside vendors that encourage healthful eating and reduction of school/district dependence on profits from foods of little nutritional value;
- consistent healthful choices among all school venues that involve the sale of food;
- increasing community awareness of student health needs;
- partnering with local community to support policies and programs;
- gathering data to measure the impact of local policies over time;
- revising policies as necessary to meet changing needs and respond to local evaluation results; and
- preparation of annual reports that include specific information regarding the implementation and evaluation of local policies. This information can include:
  1. monthly district menus and meal counts;
  2. financial data for vending and other food sales;
  3. listing of all a la carte, vending and competitive foods sold by school food service;
  4. listing of all other sales of foods throughout the district, including vending machines, school stores, culinary and special education programs, in-school and in-class fundraisers, etc.;
  5. listing of physical activity programs and opportunities for students throughout the school year;
  6. assessment of student, staff and parent satisfaction and/or support of instituted policies and practices; and
  7. other evaluation data specific to the local district policies.

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The following resources provide more detailed information on the structure, function and role of school health teams.

- *Improving School Health: A Guide to School Health Councils*, American Cancer Society, Inc., 1999: [http://actionforhealthykids.org/filelib/resources/Ntl\\_Guide\\_to\\_SHAC.pdf](http://actionforhealthykids.org/filelib/resources/Ntl_Guide_to_SHAC.pdf)
- *Promoting Healthy Youth, Schools and Communities: A Guide to Community-School Health Advisory Councils*, Iowa Department of Public Health, 2000: [http://www.idph.state.ia.us/hpcdp/promoting\\_healthy\\_youth.asp](http://www.idph.state.ia.us/hpcdp/promoting_healthy_youth.asp)

For additional resources to assist schools with establishing a new team or building on existing teams and partnerships, see *School Health Teams* under *Resources* at the end of this section.



## Step 2: Identify Local Policy Development Process

There are no standard procedures for developing nutrition and physical activity policies. The process will vary from one district to another. Before the School Health Team can start to develop policies, team members must understand their local school district process for policy development and adoption. The team should find out:

- who in the district needs to be involved or kept informed;
- what format should be used for the document;
- who needs to review and approve drafts; and
- the typical timeline for policy review and approval.

If the School Health Team is not familiar with the district's procedures, the school district superintendent's office can provide specific information on the process. Understanding these requirements upfront will save time and prevent frustration. The process by which the district's policy is developed can have a significant impact on the school and community and on the effectiveness of implementation. It is important for the School Health Team to take time and plan carefully.

School Health Team members must also understand what is needed for compliance with all local, state and federal requirements. The team should identify and review existing state laws and policies, other school districts' policies, and the school district's own local policies that address wellness topics. Districts may have existing local health policies that can be expanded to include nutrition and/or physical activity.

In many cases, state laws and state or local policies are more stringent than the federal law. At a minimum, the school district's nutrition and physical activity policies must be in compliance with the federal requirements, plus all relevant state and district requirements. Information on Connecticut's relevant laws is found in *Federal and State Laws Pertaining to Nutrition and Physical Activity* on the next page.

Note: When reviewing other districts' policies and sample policy resources for potential language, it is important to ensure that the language is appropriate for your district and meets all applicable federal and state requirements. For example, districts that participate in healthy food certification (see *Section 5 – Nutrition Standards for School Foods and Beverages*) should not use policy language from a district that does not participate, as it is unlikely to comply with the statutory requirements for healthy food certification.

### **Federal and State Laws Pertaining to Nutrition and Physical Activity**

#### **Health Education**

**Connecticut General Statutes Section 10-16b. Prescribed courses of study.** (a) In the public schools the program of instruction offered shall include at least the following subject matter, as taught by legally qualified teachers, the arts; career education; consumer education; health and safety, including, but not limited to, human growth and development, nutrition, first aid, disease prevention, community and consumer health, physical, mental and emotional health, including youth suicide prevention, substance abuse prevention, safety, which may include the dangers of gang membership, and accident prevention; language arts, including reading, writing, grammar, speaking and spelling; mathematics; physical education; science; social studies, including, but not limited to, citizenship, economics, geography, government and history; and in addition, on at least the secondary level, one or more foreign languages and vocational education. For purposes of this subsection, language arts may include American sign language or signed English, provided such subject matter is taught by a qualified instructor under the supervision of a teacher who holds a certificate issued by the State Board of Education.

(c) Each local and regional board of education shall on September 1, 1982, and annually thereafter at such time and in such manner as the Commissioner of Education shall request, attest to the State Board of Education that such local or regional board of education offers at least the program of instruction required pursuant to this section, and that such program of instruction is planned, ongoing and systematic.

<http://www.cga.ct.gov/2005/pub/Chap164.htm#Sec10-16b.htm>

#### **Physical Education**

**Connecticut General Statutes Section 10-221a. High school graduation requirements.** (b) Commencing with classes graduating in 2004, and for each graduating class thereafter, no local or regional board of education shall permit any student to graduate from high school or grant a diploma to any student who has not satisfactorily completed a minimum of twenty credits, not fewer than four of which shall be in English, not fewer than three in mathematics, not fewer than three in social studies, including at least one-half credit course on civics and American government, not fewer than two in science, not fewer than one in the arts or vocational education and not fewer than one in physical education.

<http://www.cga.ct.gov/2005/pub/Chap170.htm#Sec10-221a.htm>

#### **Physical Activity**

**Connecticut General Statutes Section 10-221o. Lunch Periods and Recess.** Each local and regional board of education shall require each school under its jurisdiction to (1) offer all full day students a daily lunch period of not less than twenty minutes, and (2) include in the regular school day for each student enrolled in grades kindergarten to five, inclusive, a period of physical exercise, except that a planning and placement team may develop a different schedule for a child requiring special education and related services in accordance with chapter 164 and the Individuals With Disabilities Education Act, 20 USC 1400 et seq., as amended from time to time. In the event of a conflict with this section and any provision of chapter 164, such other provision of chapter 164 shall be deemed controlling.

<http://www.cga.ct.gov/2005/pub/Chap170.htm#Sec10-221o.htm>

## **Foods and Beverages**

### **Connecticut General Statutes Section 10-215. Lunches, breakfasts and other feeding programs for public school children and employees.**

Any local or regional board of education may establish and operate a school lunch program for public school children, may operate lunch services for its employees, may establish and operate a school breakfast program, as provided under federal laws governing said programs, or may establish and operate such other child feeding programs as it deems necessary. Charges for such lunches, breakfasts or other such feeding may be fixed by such boards and shall not exceed the cost of food, wages and other expenses directly incurred in providing such services. When such services are offered, a board shall provide free lunches, breakfasts or other such feeding to children whose economic needs require such action under the standards promulgated by said federal laws. Such board is authorized to purchase equipment and supplies that are necessary, to employ the necessary personnel, to utilize the services of volunteers and to receive and expend any funds and receive and use any equipment and supplies which may become available to carry out the provisions of this section. Any town board of education may vote to designate any volunteer organization within the town to provide a school lunch program, school breakfast program or other child feeding program in accordance with the provisions of this section.

<http://www.cga.ct.gov/2005/pub/Chap169.htm#Sec10-215.htm>

### **Connecticut General Statutes Section 10-215a. Nonpublic school and nonprofit agency participation in feeding programs.**

Nonpublic schools and nonprofit agencies may participate in the school breakfast, lunch and other feeding programs provided in sections 10-215 to 10-215b under such regulations as may be promulgated by the State Board of Education in conformance with said sections and under the federal laws governing said programs, except that such schools, other than the endowed academies approved pursuant to section 10-34, and agencies shall not be eligible for the funding described in subdivision (2) of subsection (a) of section 10-215b.

<http://www.cga.ct.gov/2007/pub/Chap169.htm#Sec10-215a.htm>

### **Connecticut General Statutes Section 10-215b. Duties of State Board of Education re feeding programs.**

(a) The State Board of Education is authorized to expend in each fiscal year an amount equal to (1) the money required pursuant to the matching requirements of said federal laws and shall disburse the same in accordance with said laws, and (2) ten cents per lunch served in the prior school year in accordance with said laws by any local or regional board of education, the regional vocational-technical school system or governing authority of a state charter school, interdistrict magnet school or endowed academy approved pursuant to section 10-34 that participates in the National School Lunch Program and certifies pursuant to section 10-215f that the nutrition standards established by the Department of Education pursuant to section 10-215e shall be met.

(b) The State Board of Education shall prescribe the manner and time of application by such board of education, the regional vocational-technical school system, such governing authority or controlling authority of the nonpublic schools for such funds, provided such application shall include the certification that any funds received pursuant to subsection (a) of this section shall be used for the program approved. The State Board of Education shall determine the eligibility of the applicant to receive such grants pursuant to regulations provided in subsection (c) of this section and shall certify to the Comptroller the amount of the grant for which the board of education, the regional vocational-technical school system, the governing authority or the controlling authority of a nonpublic school is eligible. Upon receipt of such certification, the Comptroller shall draw an order on the Treasurer in the amount, at the time and to the payee so certified.

(c) The State Board of Education may adopt such regulations as may be necessary in implementing sections 10-215 to 10-215b, inclusive.

(d) The Commissioner of Education shall establish a procedure for monitoring compliance by boards of education, the regional vocational-technical school system, or governing authorities with certifications submitted in accordance with section 10-215f and may adjust grant amounts pursuant to subdivision (2) of subsection (a) of this section based on failure to comply with said certification.

<http://www.cga.ct.gov/2007/pub/Chap169.htm#Sec10-215b.htm>

### **Foods and Beverages, Continued**

**Connecticut General Statutes Section 10-215e. Nutrition standards for food that is not part of lunch or breakfast program.** Not later than August 1, 2006, and January first of each year thereafter, the Department of Education shall publish a set of nutrition standards for food items offered for sale to students at schools. Such standards shall not apply to food sold as part of the National School Lunch Program and School Breakfast Program unless such items are purchased separately from a school lunch or breakfast that is reimbursable under such program.

<http://www.cga.ct.gov/2007/pub/Chap169.htm#Sec10-215e.htm>

**Connecticut General Statutes Section 10-215f. Certification that food meets nutrition standards.** (a) Each local and regional board of education, the regional vocational-technical school system, and the governing authority for each state charter school, interdistrict magnet school and endowed academy approved pursuant to section 10-34 that participates in the National School Lunch Program shall certify in its annual application to the Department of Education for school lunch funding whether, during the school year for which such application is submitted, all food items made available for sale to students in schools under its jurisdiction and not exempted from the nutrition standards published by the Department of Education pursuant to section 10-215e will meet said standards. Except as otherwise provided in subsection (b) of this section, such certification shall include food not exempted from said nutrition standards and offered for sale to students at all times, and from all sources, including, but not limited to, school stores, vending machines, school cafeterias, and any fundraising activities on school premises, whether or not school sponsored.

(b) Each board of education, the regional vocational-technical school system and each governing authority that certifies pursuant to this section compliance with the department's nutrition standards for food may exclude from such certification the sale to students of food items that do not meet such standards, provided (1) such sale is in connection with an event occurring after the end of the regular school day or on the weekend, (2) such sale is at the location of such event, and (3) such food is not sold from a vending machine or school store. <http://www.cga.ct.gov/2007/pub/Chap169.htm#Sec10-215f.htm>

**Connecticut General Statutes Section 10-221p. Boards to make available for purchase nutritious and low-fat foods.** Each local and regional board of education and governing authority for each state charter school, interdistrict magnet school and endowed academy approved pursuant to section 10-34, shall make available in the schools under its jurisdiction for purchase by students enrolled in such schools nutritious and low-fat foods, which shall include, but shall not be limited to, low-fat dairy products and fresh or dried fruit at all times when food is available for purchase by students in such schools during the regular school day. <http://www.cga.ct.gov/2007/pub/Chap170.htm#Sec10-221p.htm>

**Connecticut General Statutes Section 10-221q. Sale of beverages.** (a) Except as otherwise provided in subsection (b) of this section, each local and regional board of education and the governing authority for each state charter school, interdistrict magnet school and endowed academy approved pursuant to section 10-34, shall permit at schools under its jurisdiction the sale of only the following beverages to students from any source, including, but not limited to, school stores, vending machines, school cafeterias, and any fund-raising activities on school premises, whether or not school sponsored: (1) Milk that may be flavored but contain no artificial sweeteners and no more than four grams of sugar per ounce, (2) nondairy milks such as soy or rice milk, which may be flavored but contain no artificial sweeteners, no more than four grams of sugar per ounce, no more than thirty-five per cent of calories from fat per portion and no more than ten per cent of calories from saturated fat per portion, (3) one hundred per cent fruit juice, vegetable juice or combination of such juices, containing no added sugars, sweeteners or artificial sweeteners, (4) beverages that contain only water and fruit or vegetable juice and have no added sugars, sweeteners or artificial sweeteners, and (5) water, which may be flavored but contain no added sugars, sweeteners, artificial sweeteners or caffeine. Portion sizes of beverages, other than water as described in subdivision (5) of this subsection, that are offered for sale pursuant to this subsection shall not exceed twelve ounces.

### **Foods and Beverages, Continued**

(b) Each such board of education or governing authority may permit at schools under its jurisdiction, the sale to students of beverages that are not listed in subsection (a) of this section, provided (1) such sale is in connection with an event occurring after the end of the regular school day or on the weekend, (2) such sale is at the location of such event, and (3) such beverages are not sold from a vending machine or school store. <http://www.cga.ct.gov/2007/pub/Chap170.htm#Sec10-221q.htm>

*Note: CGS Sections 10-221p and 10-221q apply to all public schools, regardless of whether they are participating in USDA federally funded Child Nutrition Programs and regardless of whether they are implementing healthy food certification under Section 10-215f. (For more information on healthy food certification see Section 5 – Nutrition Standards for School Foods and Beverages.)*

#### **Regulations of Connecticut State Agencies Section 10-215b-1. Competitive Foods.**

(a) No school food authority shall permit the sale or dispensing to students of extra food items anywhere on the school premises from thirty minutes prior to the start of any state or federally subsidized milk or food service program until thirty minutes after such program.

(b) “Extra food items” means tea, coffee, soft drinks and candy.

(c) “School food authority” means the governing body which has the legal authority to operate one or more school feeding programs and receive state or federal subsidies for the operation of any such program.

(d) The provisions of this section shall not apply to the Department of Corrections.

*Note: Section 10-221q of the Connecticut General Statutes (see page 24) completely eliminates the sale of tea, coffee and soft drinks to students in all public schools, so it supersedes the timeframe previously allowed by Section 10-215b-1 of the Regulations of Connecticut State Agencies.*

**Regulations of Connecticut State Agencies Section 10-215b-23. Income from the sale of food items.** The income from the sale to students of food items, anywhere on the school premises from thirty minutes prior to the start of any state or federally subsidized milk or food service program until thirty minutes after any such program, shall accrue to the school food authority for the benefit of state or federally subsidized milk or food service programs.

*Note: Regulations 10-215b-1 and 10-215b-23 only apply to schools participating in the USDA’s National School Lunch Program, School Breakfast Program, After-School Snack Program and Special Milk Program.*

**Connecticut General Statutes Section 10-266w. School breakfast grant program.** (a) For each fiscal year, each local and regional board of education having at least one school building designated as a severe need school, as defined by federal law governing school nutrition programs, in the fiscal year two years prior to the grant year, shall be eligible to receive a grant to assist in providing school breakfasts to all students in each eligible severe need school, provided any local or regional board having at least one school building so designated shall participate in the federal school breakfast program on behalf of all severe need schools in the district with grades eight or under in which at least eighty per cent of the lunches served are served to students who are eligible for free or reduced price lunches pursuant to federal law and regulations.

<http://www.cga.ct.gov/2005/pub/Chap172.htm#Sec10-266w.htm>

**USDA Regulations 7 CFR 220 School Breakfast Program:** Specifies the requirements for the School Breakfast Program, including menu planning requirements and nutrition standards for breakfasts.

<http://www.fns.usda.gov/cnd/Governance/regulations.htm>

**USDA Regulations 7 CFR 210 National School Lunch Program:** Specifies the requirements for the National School Lunch Program, including menu planning requirements and nutrition standards for lunches. <http://www.fns.usda.gov/cnd/Governance/regulations.htm>

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**USDA Regulations 7 CFR 215 Special Milk Program:** Specifies the requirements for the Special Milk Program. <http://www.fns.usda.gov/cnd/governance/regulations/7CFR215.pdf>

**USDA Regulations 210.11 (a) (2) and 220.12 (a) Competitive Food Services:** Federal regulations prohibit the sale of foods of minimal nutritional value (FMNV) in food service areas during mealtimes. Appendix B to Parts 210 and 220 of the federal regulations defines four specific categories of FMNV, including (1) soda water (all carbonated and aerated beverages), (2) water ices (any frozen, sweetened water such as "...sicles" and flavored ice with the exception of products that contain fruit, fruit juice, milk, milk ingredients or egg ingredients other than egg whites), (3) chewing gum and (4) certain candies (hard candy, jellies and gums, marshmallow candies, fondant, licorice, spun candy and candy-coated popcorn). <http://www.fns.usda.gov/cnd/Governance/regulations/7CFR210.pdf> and <http://www.fns.usda.gov/cnd/Governance/regulations/7CFR220.pdf>

*Note: This regulation only applies to schools participating in the USDA's National School Lunch Program, School Breakfast Program, After-School Snack Program and Special Milk Program. Schools that do not participate in the federally funded Child Nutrition Programs are not subject to any federal nutrition standards. However, all public schools must comply with the requirements for allowable beverages under Section 10-221q of the Connecticut General Statutes, and the state competitive foods regulations (Sections 10-215b-1 and 10-215b-23) which supersede the federal regulation.*

### Lunch Periods

**USDA Regulations 210.10 (f) (1) Timing of Lunch Periods:** Specifies that schools participating in the NSLP must serve lunches during the timeframe of 10:00 a.m. to 2:00 p.m. The regulation requires that schools must submit a request to the SDE for a waiver if lunches will be served before or after this timeframe. The SDE must evaluate the circumstances of each request to determine whether it meets one of the two USDA criteria for an exemption from the specified timeframe for lunch. <http://www.fns.usda.gov/cnd/governance/regulations/7CFR210.pdf>

**Connecticut General Statutes Section 10-221o. Lunch Periods and Recess.** Each local and regional board of education shall require each school under its jurisdiction to (1) offer all full day students a daily lunch period of not less than twenty minutes, and (2) include in the regular school day for each student enrolled in grades kindergarten to five, inclusive, a period of physical exercise, except that a planning and placement team may develop a different schedule for a child requiring special education and related services in accordance with chapter 164 and the Individuals With Disabilities Education Act, 20 USC 1400 et seq., as amended from time to time. In the event of a conflict with this section and any provision of chapter 164, such other provision of chapter 164 shall be deemed controlling. <http://www.cga.ct.gov/2005/pub/Chap170.htm#Sec10-221o.htm>

### Food Safety

**Section 19-13-B42 of the Regulations for Connecticut State Agencies:** Specifies the requirements of the Connecticut Public Health Code for the Sanitation of Places Dispensing Foods and Beverages. <http://www.dph.state.ct.us/BRS/food/fpregs.htm>

**Section 111 of Public Law 108-265 School Food Safety Program:** Each school food authority shall implement a school food safety program, in the preparation and service of each meal served to children, that complies with any hazard analysis and critical control point system established by the USDA. All schools participating in the National School Lunch Program and School Breakfast Program must have a minimum of two food safety and sanitation inspections per year. Schools are also required to post their most recent health inspection in a visible public location and provide a copy of the report to any member of the public on request. [http://www.fns.usda.gov/cnd/Governance/Legislation/Historical/PL\\_108-265.pdf](http://www.fns.usda.gov/cnd/Governance/Legislation/Historical/PL_108-265.pdf)

## **Step 3: Conduct Local Assessment Process**

### ***Nutrition and Physical Activity Practices***

Before making plans to develop policies, the School Health Team should assess the district's current nutrition and physical activity programs, policies and student needs, then identify areas that need improvement. It often helps to begin by conducting a baseline assessment of schools' existing nutrition and physical activity environments. The results of school-by-school assessments can be compiled at the district level to prioritize needs. Some strategies for assessing local needs are listed below.

- Interview nutrition and health professionals to learn more about local eating and physical activity habits and to identify materials and services available for students and school staff members. Schools might interview representatives from: the school food service program; the state Team Nutrition Program; the State Department of Education Child Nutrition Programs; the nutrition unit within the State Department of Health; the district or state school health coordinator; the local WIC program and Cooperative Extension nutrition education program; the state or local chapters of the American Cancer Society, American Diabetes Association, American Dietetic Association and the American Heart Association; nutrition councils or coalitions; university research programs; organizations with special insights into the particular nutrition education needs of cultural and ethnic minorities; and businesses that offer nutrition-related services or food products.
- Interview food service staff members about students' eating practices in the school cafeteria, e.g., percent participation in school meals, types of a la carte items purchased, plate waste and content of lunches sent from home.
- Observe the school cafeteria, the teachers' lunchroom and other areas in the school where food is available.
- Review health, nutrition and physical education curriculums used by teachers.
- Review school district policies regarding recess and physical activity.
- Survey teachers to determine how nutrition and physical education are taught, and where they fit into the comprehensive school health curriculum.
- Survey the level of teachers' interest in nutrition, physical activity or wellness programs for themselves.
- Survey schools regarding current practices on fundraising, celebrations and use of food by school staff members for reward or punishment.
- Survey schools regarding foods and beverages sold in vending machines, school stores and a la carte in the cafeteria.
- Survey students to determine their dietary preferences and the types of healthy changes they want in foods at school.
- Survey parents regarding family nutrition and physical activity practices and issues of concern regarding nutrition and physical activity.

Strategies adapted with permission from *Guidelines for School Health Programs to Promote Lifelong Healthy Eating*. Centers for Disease Control and Prevention, MMWR, June 14, 1996/45(RR-9);1-33.

<http://www.cdc.gov/mmwr/preview/mmwrhtml/00042446.htm>

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The Centers for Disease Control and Prevention's *School Health Index* (SHI) provides a comprehensive tool for assessing current nutrition and physical activity practices at the local school level.

- *School Health Index for Physical Activity and Healthy Eating – A Self Assessment and Planning Guide*, Centers for Disease Control and Prevention, U.S. Department of Health and Human Services, 2005: <http://apps.nccd.cdc.gov/shi/>

The SHI enables schools to:

- identify strengths and weaknesses of health and safety policies and programs;
- develop an action plan for improving student health; and
- engage teachers, parents, students, and the community in promoting health-enhancing behaviors and better health.

The items in the SHI are based on CDC's research-based guidelines for school health programs, which identify the policies and practices most likely to be effective in reducing youth health risk behaviors. The SHI is structured around CDC's eight-component model of coordinated school health. For more information on coordinated school health, see *Coordinated School Health* under *Resources* at the end of this section.

Additional resources to assist schools with the self-assessment and planning process are found in *Program Assessment* under *Resources* at the end of this section.

### **Student Health Data**

Identifying data on the education and health status of students in the local district provides a powerful rationale for local-level change and assists in prioritizing areas of work. Districts can review local health data, such as student fitness tests, BMI data and other indicators of student health. Local health departments and community organizations can also provide relevant local data. State agencies (e.g., Departments of Public Health and Education) and organizations (e.g., American Cancer Society, American Heart Association and American Diabetes Association) can also provide community and state data. Some local data sources include:

- *Child Well-Being Data Reports*, Connecticut Voices for Children: [http://www.ctkidslink.org/pub\\_issue\\_15.html](http://www.ctkidslink.org/pub_issue_15.html) and [http://www.ctkidslink.org/pub\\_detail\\_247.html](http://www.ctkidslink.org/pub_detail_247.html)
- *Connecticut Department of Public Health's Annual Registration Reports* (Statistics from the Connecticut vital records databases, including analyses of births and deaths): <http://www.ct.gov/dph/cwp/view.asp?a=3132&q=394598>
- *Connecticut School Health Survey (CSHS)*: [http://www.ct.gov/dph/cwp/view.asp?a=3132&q=388104&dphNav\\_GID=1832&dphPNavCtr=#46988](http://www.ct.gov/dph/cwp/view.asp?a=3132&q=388104&dphNav_GID=1832&dphPNavCtr=#46988)
- *Connecticut State Department of Education's Strategic School Profiles* (percent of students passing all four physical fitness tests): <http://www.csde.state.ct.us/public/cedar/profiles/index.htm>
- *Connecticut State Profile, Action for Healthy Kids*: [http://actionforhealthykids.org/state\\_profile.php?state=CT](http://actionforhealthykids.org/state_profile.php?state=CT)
- *The 2009 Connecticut Health Disparities Report*, Connecticut Department of Public Health: [http://www.ct.gov/dph/lib/dph/hisr/pdf/2009ct\\_healthdisparitiesreport.pdf](http://www.ct.gov/dph/lib/dph/hisr/pdf/2009ct_healthdisparitiesreport.pdf)

National data is available from many sources, such as the Centers for Disease Control and Prevention (CDC), the U.S. Department of Agriculture and Action for Healthy Kids. Some of these resources provide state profiles in addition to national summaries. Some sources for national data on the health status of young people are listed below. For additional resources on children's nutrition and physical activity status, see *Data and Trends* under *Resources* at the end of this section.

- Action for Healthy Kids:  
<http://actionforhealthykids.org/index.php>
- Childhood Obesity Fact Sheets (CDC):  
<http://www.cdc.gov/healthyouth/obesity/facts.htm>
- National Center for Health Statistics (NCHS) Health and Nutrition Examination Survey:  
<http://www.cdc.gov/nchs/nhanes.htm>
- Obesity Trends Among Children and Adolescents (CDC):  
<http://www.cdc.gov/nccdphp/dnpa/obesity/trend/>
- School Health Policies and Programs Study – SHPPS (CDC):  
<http://www.cdc.gov/HealthyYouth/shpps/index.htm>
- Trend Fact Sheets from YRBSS (CDC):  
<http://www.cdc.gov/HealthyYouth/yrbs/trends.htm>
- Youth Risk Behavior Surveillance System – YRBSS (CDC):  
<http://www.cdc.gov/HealthyYouth/yrbs/index.htm>
- U.S. Department of Agriculture Economic Research Service:  
<http://www.fns.usda.gov/fns/research.htm>
- U.S. Department of Agriculture Office of Analysis, Nutrition and Evaluation:  
<http://www.fns.usda.gov/oane/>

When gathering assessment data, it is also important to keep the end in mind. Districts should consider what data will be useful to determine the impact of the local policies and to measure outcomes over time. Baseline data is critical to the evaluation process in determining whether the desired changes have occurred. For additional information on evaluation, see *Section 8 – Measurement and Evaluation*.



### Step 4: Prioritize Needs and Develop an Action Plan

To facilitate policy development, the School Health Team should prioritize the areas for change and address them in order of local importance. After completing a needs assessment (see Step 3 – *Conduct Local Assessment Process*), the School Health Team can determine the critical areas for change and develop an action plan with recommended strategies to improve performance. The *School Health Index (SHI)* is useful in this process.

- *School Health Index for Physical Activity and Healthy Eating – A Self Assessment and Planning Guide*, Centers for Disease Control and Prevention, U.S. Department of Health and Human Services, 2005: <http://apps.nccd.cdc.gov/shi/>

The SHI includes a section on prioritizing areas for improvement, based on importance, cost, time, commitment and feasibility. The results of school-by-school assessments can be compiled at the district level to prioritize needs. This step allows the School Health Team to decide on the key actions that will be implemented first.

The SHI also includes a School Health Improvement Plan that allows the School Health Team to list the steps identified and plan for implementation of recommended actions. Completing the SHI is an important first step toward improving school health promotion policies and practices. Schools can then act to implement the School Health Improvement Plan and develop an ongoing process for monitoring progress and reviewing the recommendations for change.

School and community forums can be used to inform the broader school community of the findings of the assessment, gather additional input and build consensus for recommendations and proposed actions. The *Healthy Eating Active Living Resource Toolkit* (Connecticut Association of Directors of Health) is a good resource to assist schools with this process. It provides descriptions and examples of a step-by-step process for team building, assessment, development of action plans and evaluation. The kit is available at <http://www.cadh.org/CADHResources/HealthyEatingActiveLivingToolkit/tabid/61/Default.aspx>.

Additional resources to assist districts with prioritizing local needs and developing an action plan are found in *Assessment and Developing and Implementing School Policies* under *Resources* at the end of this section.

## Step 5: Draft Policy Language

The School Health Team should use the results of the needs assessment to draft initial policy statements (see *Step 3 – Conduct Local Assessment Process* and *Step 4 – Prioritize Needs and Develop an Action Plan*). Policies should address the six policy components:

1. Nutrition Education and Promotion;
2. Physical Activity and Physical Education;
3. Nutrition Standards for School Foods and Beverages (School Meals and Other Foods and Beverages);
4. Other School-Based Activities to Promote Student Wellness;
5. Communication and Promotion; and
6. Measurement and Evaluation.

*USDA School Wellness Policy regulations require that districts address:*

- *nutrition education;*
- *physical activity,*
- *other school-based activities designed to promote student wellness;*
- *nutrition guidelines for all foods at school;*
- *assurance that school meals meet USDA guidelines; and*
- *a plan for measuring implementation.*

Sections 3 through 8 of this guide contain recommended (not required) policy language and additional implementation guidance for each of the six policy components. School districts are encouraged to adapt policy language to meet local needs and reflect community priorities.

*Fit, Healthy and Ready to Learn: A School Health Policy Guide* from the National Association of State Boards of Education (<http://www.nasbe.org/healthyschools/fithealthy.html>) is a useful tool for developing policy language. This guide provides direction on establishing an overall policy framework for school health programs and specific policies on various topics, including healthy eating and physical activity.

*Fit, Healthy and Ready to Learn* provides an excellent starting place for sample language that the School Health Team may consider adapting to meet the school district's needs. The following websites also contain a wealth of resources and information on sample policy language:

- USDA Team Nutrition:  
<http://www.fns.usda.gov/tn/Healthy/wellnesspolicy.html>
- National Alliance for Nutrition and Activity:  
<http://www.schoolwellnesspolicies.org/>
- School Nutrition Association:  
<http://www.schoolnutrition.org/Content.aspx?id=8504>
- Action for Healthy Kids:  
[http://www.actionforhealthykids.org/resources\\_wp.php](http://www.actionforhealthykids.org/resources_wp.php)

Many other federal, state and local organizations have developed model language and sample policies. For more information, see *Developing and Implementing School Policies* and *Sample Policies* under *Resources* at the end of this section.

Note: When reviewing other district policies and sample policy resources for potential language it is important to ensure that the language is appropriate for your district and meets all applicable federal and state requirements.

### Tips for Drafting Policy Language

- **Follow established, science-based health guidelines.** School policies must follow science-based guidelines from credible health organizations and government agencies, such as the U.S. Department of Agriculture, U.S. Department of Health and Human Services, American Academy of Pediatrics, Centers for Disease Control and Prevention and National Association for Sport and Physical Education. Undocumented and overly restrictive dietary approaches to childhood weight control, behavior management or other health issues are not appropriate as school policy.
- **Be consistent** with existing state and federal requirements and local district policies addressing student health. (See *Federal and State Laws Pertaining to Nutrition and Physical Activity* on page 22.)
- **Be concise.** Use language that is simple, clear and specific and that avoids jargon.
- **Include the rationale** for the policy (based on national, state and local data) and the benefits of adopting the policy.
- **Be realistic.** The goals you set for nutrition education and physical activity, the nutrition guidelines and other school-based activities must be developed while recognizing both where you would like your school district to be, and where it is now; they should be realistic and attainable.
- **Provide options.** It is often a good idea to propose several policy options from which decision makers can choose.
- **Provide practical guidance** for school staff members regarding implementation.
- **Provide data regarding financial impact.** The local school board or superintendent will probably want to know the financial implications of each policy option, particularly in regard to nutrition guidelines for foods and beverages sold in vending machines or school stores. The Connecticut State Department of Education's Healthy Snack Pilot provides detailed information on the financial impact of a year-long pilot in five schools, as well as guidance on providing healthy snacks throughout the school environment (see *Section 5 – Nutrition Standards for School Foods and Beverages*). The USDA and CDC's joint publication *Making It Happen: School Nutrition Success Stories* provides examples of success stories in which schools improved the nutritional quality of foods offered and maintained revenue. (For additional information, see *Success Stories* under *Resources* at the end of this section.)
- **Plan for evaluation.** The School Health Team will find it helpful to draft a plan for implementing and measuring the new policy while drafting the policy itself. Questions to consider include: What indicators will be used to evaluate the progress of implementation? Who will be responsible for monitoring the implementation of the policy? How often will the implementation be evaluated? Answering these questions while the initial policy is drafted will help the team anticipate challenges and prepare to meet them. (For additional information, see *Section 8 – Measurement and Evaluation*.)
- **Keep decision makers informed.** Decision makers do not like surprises. The team needs to keep school district decision makers informed about the proposed policy and obtain their support throughout the development process.

Adapted with permission from *Fit, Healthy and Ready to Learn*, National Association of State Boards of Education, 2000.

## Step 6: Build Awareness and Support

Educating various audiences — such as administrators, teachers, food service staff members, parents, students and the community — about the district's policy initiative is critical to success. Healthy nutrition and physical activity practices will need significant support from students, families, school staff members and the community. It is essential to obtain their input during the policy development process in order for the policy to be smoothly adopted and widely implemented. Ideally, all of these groups will be part of the School Health Team and can provide representative input on behalf of their members.

### **Tips for Success**

- **Gather input from the school and community.** Input can be gathered informally and formally through a variety of channels such as student advisory councils and surveys; parent meetings and surveys; and community forums and town meetings. (Information on surveys can be found under *Resources* in *Section 8 – Measurement and Evaluation*.)
- **Use local media to spread awareness of the district's needs and proposed policies** (see *Working with the Media* under *Resources* in *Section 7 – Communication and Promotion*). When dealing with the education community, it is helpful to identify the potential benefits the policy can have on student learning and academic achievement. Data and resources are contained in *Health and Achievement* under *Resources* at the end of this section.
- **Enlist community leaders to speak out in favor of the proposed solutions.** Community leaders can be powerful champions in building awareness and support for the district's nutrition and physical activity policies.
- **Be prepared for challenges that may arise.** School and community responses to policy language around nutrition and physical activity practices can be unexpectedly controversial (such as what foods are or are not allowed for school parties or fundraisers). Research the facts and prepare in advance to respond to concerns with specific talking points that reflect scientific data and guidelines for best practice. Be sure that all spokespeople for the policy are providing a consistent message.
- **Learn from others' successes.** The Connecticut School Nutrition Policies Pilot districts implemented a variety of activities to promote awareness and build local support (see *Section 9 – School Nutrition Policies Pilots*). The USDA's *Making it Happen! School Nutrition Success Stories* documents successes with building local support for school health policy goals (<http://www.fns.usda.gov/tn/Resources/makingithappen.html>). Additional strategies are found in *Success Stories* under *Resources* at the end of this section.

### **Step 7: Adopt and Implement the Policy**

Developing and adopting a sound policy is only the beginning. The adoption of a policy does not automatically mean that it will be implemented. Implementation requires good planning and management skills, the necessary resources, consistent oversight and widespread buy-in by school staff members and the local community. Leadership, commitment, communication and support are key to successful policy implementation.

Implementation can occur all at once or may be phased in over time. The School Health Team is in the best position to determine which approach is likely to be most effective in the district.

The attitude of all school personnel – individuals serving the food, the personnel who stock vending machines, students, coaches, teachers and administrators – can have a significant effect on the response to the policy. A positive attitude toward new foods, new physical activity options or other changes – from everyone in the school community – can make a huge difference.

Communication and promotion can be important tools for policy implementation. A proactive communication plan can help inform, educate and build support for adopting and implementing school nutrition and physical activity policies. For more information, see *Section 7 – Communication and Promotion*.



## Step 8: Maintain, Measure and Evaluate

In order for policies to be successful, school districts must establish a plan for measuring implementation and sustaining local efforts. This includes evaluation, feedback and documentation based on sound evidence.

A sustained effort by each district is necessary to ensure that new policies are faithfully implemented. The School Health Team or other designated staff members must periodically assess how well the policies are being managed and enforced. It may be necessary to reinforce policy goals with school staff members. School Health Teams may also need to update or amend policies based on changes such as new research and trends in community health needs.

Evaluation and feedback are very important in maintaining local nutrition and physical activity policies. Districts need to document any changes that result from the policies, such as:

- financial impact on the school food service program;
- school store or vending machine revenues;
- student health trends;
- time spent on physical activity; and
- nutrition education programs conducted.

It is also important to assess student, parent, teacher, administrator and other school staff member satisfaction with the new policies.

A good evaluation plan does not need to be extensive or formal or put additional, undue burdens on team members or others who are involved in the process. Through the evaluation process, the district will be able to answer some basic questions that are very important to policymakers, students, school staff members, families and the general public.

Keep in mind that the policy process is ongoing – it does not end with the development of the policy document. Policy implementation requires regular evaluation. The results of local evaluation efforts often necessitate policy revisions. For additional resources and more information on the evaluation process, see *Section 8 – Measurement and Evaluation*.

*USDA School Wellness Policy regulations require that districts **establish a plan for measuring implementation of the local wellness policy**, including the designation of one or more persons within the local education agency or at each school, as appropriate, charged with ensuring that the school meets the local wellness policy.*

### References

- Aerated Beverages Categorized as “Soda Water” from the Competitive Food Services Regulation, Operational Memorandum 02-09, Connecticut State Department of Education, November 14, 2008:  
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- Connecticut Public Health Code 19-13-B42 Sanitation of Places Dispensing Foods or Beverages:  
[http://www.ct.gov/dph/lib/dph/public\\_health\\_code/sections/19-13-b40\\_to\\_19-13-b44\\_sanitation\\_of\\_food.pdf](http://www.ct.gov/dph/lib/dph/public_health_code/sections/19-13-b40_to_19-13-b44_sanitation_of_food.pdf)
- Connecticut General Statutes Section 10-16b. Prescribed courses of study.  
<http://www.cga.ct.gov/2005/pub/Chap164.htm#Sec10-16b.htm>
- Connecticut General Statutes Section 10-215. Lunches, breakfasts and other feeding programs for public school children and employees. <http://www.cga.ct.gov/2005/pub/Chap169.htm#Sec10-215.htm>
- Connecticut General Statutes Section 10-215a. Nonpublic school and nonprofit agency participation in feeding programs. <http://www.cga.ct.gov/2007/pub/Chap169.htm#Sec10-215a.htm>
- Connecticut General Statutes Section 10-215b. Duties of State Board of Education re feeding programs. <http://www.cga.ct.gov/2007/pub/Chap169.htm#Sec10-215b.htm>
- Connecticut General Statutes Section 10-215e. Nutrition standards for food that is not part of lunch or breakfast program. <http://www.cga.ct.gov/2007/pub/Chap169.htm#Sec10-215e.htm>
- Connecticut General Statutes Section 10-215f. Certification that food meets nutrition standards. <http://www.cga.ct.gov/2007/pub/Chap169.htm#Sec10-215f.htm>
- Connecticut General Statutes Section 10-221o. Lunch Periods and Recess. <http://www.cga.ct.gov/2005/pub/Chap170.htm#Sec10-221o.htm>
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- Connecticut General Statutes Section 10-221p. Boards to make available for purchase nutritious and low-fat foods. <http://www.cga.ct.gov/2007/pub/Chap170.htm#Sec10-221p.htm>
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<http://apps.nccd.cdc.gov/shi/>

*The Child Nutrition and WIC Reauthorization Act of 2004 (Public Law 108-265, Section 204):*

[http://www.fns.usda.gov/cnd/Governance/Legislation/Historical/PL\\_108-265.pdf](http://www.fns.usda.gov/cnd/Governance/Legislation/Historical/PL_108-265.pdf)

*The Local Process: How to Create and Implement a Local Wellness Policy*, U.S. Department of Agriculture, Team Nutrition Website: [http://www.fns.usda.gov/tn/Healthy/wellnesspolicy\\_steps.html](http://www.fns.usda.gov/tn/Healthy/wellnesspolicy_steps.html)

*USDA Regulations for the National School Lunch Program, 7CFR Part 210:*

<http://www.fns.usda.gov/cnd/Governance/regulations/7CFR210.pdf>

*USDA Regulations for the School Breakfast Program, 7CFR Part 220:*

<http://www.fns.usda.gov/cnd/Governance/regulations/7CFR220.pdf>

*USDA Regulations for the Special Milk Program, 7CFR Part 215:*

<http://www.fns.usda.gov/cnd/governance/regulations/7CFR215.pdf>

## Resources

Resources are listed by main category. Many resources contain information on multiple content areas. For additional resources, consult each policy component section of the *Action Guide*.

### Assessment

Click on the SDE's [Healthy School Environment Resource List](#), then click on *Assessment* under *School Policies to Promote Healthy Lifestyles* to access resources on this topic.

### Coordinated School Health

Click on the SDE's [Healthy School Environment Resource List](#), then click on *Coordinated School Health* under *School Policies to Promote Healthy Lifestyles* to access resources on this topic.

### Data and Trends

Click on the SDE's [Healthy School Environment Resource List](#), then click on *Data and Trends* under *School Policies to Promote Healthy Lifestyles* to access resources on data and trends for nutrition and health.

Click on the SDE's [Healthy School Environment Resource List](#), then click on *Data and Trends* under *Physical Activity and Physical Education* to access resources on data and trends for physical activity and physical education.

### Developing and Implementing School Policies

Click on the SDE's [Healthy School Environment Resource List](#), then click on *Developing and Implementing School Policies* under *School Policies to Promote Healthy Lifestyles* to access resources on this topic.

### Health and Achievement

Click on the SDE's [Healthy School Environment Resource List](#), then click on *Health and Achievement* to access resources on this topic.

### Sample Policies

Click on the SDE's [Healthy School Environment Resource List](#), then click on *Sample Policies* under *School Policies to Promote Healthy Lifestyles* to access resources on this topic.

## 2 Steps for Creating Local Policy

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### **School Health Teams**

Click on the SDE's [Healthy School Environment Resource List](#), then click on *School Health Teams* under *School Policies to Promote Healthy Lifestyles* to access resources on this topic.

### **School Improvement Plan**

Connecticut State Department of Education School Improvement Plan:

[http://www.csde.state.ct.us/public/cedar/nclb/sip/resources/sip\\_guide/templates/sample\\_school\\_improvement\\_template.doc](http://www.csde.state.ct.us/public/cedar/nclb/sip/resources/sip_guide/templates/sample_school_improvement_template.doc)

*No Child Left Behind – District and School Improvement*, Connecticut State Department of Education: <http://www.csde.state.ct.us/public/cedar/nclb/sip/index.htm>

*School Improvement Guide to Comprehensive Accountability for Learning and NCLB Requirements in Connecticut Schools*, Connecticut State Department of Education, June 2005:

[http://www.csde.state.ct.us/public/cedar/nclb/sip/resources/sip\\_guide/school\\_improvement\\_guide\\_7-05.pdf](http://www.csde.state.ct.us/public/cedar/nclb/sip/resources/sip_guide/school_improvement_guide_7-05.pdf)

### **Success Stories**

Click on SDE's [Healthy School Environment Resource List](#), then click on *Success Stories* under *School Policies to Promote Healthy Lifestyles* to access resources on this topic.

Additional resources can be found in the SDE's *Healthy School Environment Resource List* ([http://www.sde.ct.gov/sde/lib/sde/PDF/DEPS/Nutrition/hse\\_resource\\_list.pdf](http://www.sde.ct.gov/sde/lib/sde/PDF/DEPS/Nutrition/hse_resource_list.pdf)) and *Nutrition-Related Resources* ([http://www.sde.ct.gov/sde/lib/sde/PDF/DEPS/Nutrition/nutrition\\_resources.pdf](http://www.sde.ct.gov/sde/lib/sde/PDF/DEPS/Nutrition/nutrition_resources.pdf)). These lists are updated regularly.