

# **Stanislaus County Juvenile Institutions Wellness Policy**

*“Healthy minds are fed by healthy bodies,  
provided they are supplied by healthy foods”*

*We meet our youth health and wellness issues by providing a balance of healthy foods to match physical education program. Stanislaus County Juvenile Institutions have developed this wellness policy as a template to be reviewed, modified and implemented to meet our facility’s wellness needs. In following California State and Federal guidelines, a facility- specific “Wellness Committee” panel has been established. The panel is to be comprised of key members of the facility representing youth, educators, health services and dining services.*

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# **Section 1 -Nutrition Education**

## **Establish Goals for Nutrition Education and Promotion**

Nutrition lessons are integrated into the curriculum of the on-site school for all youths. Additional physical activities are promoted through nutrition awareness postings and healthy menu planning for all meals. Proper portion sizes and eating habits are introduced by the dining staff and reinforced by the Probation Corrections Officers, medical staff, as well as the mental health staff.

Youth have access to credentialed teachers, mental health clinicians, medical staff, and probation corrections officers, who provide them with support and assistance in making healthy decisions, managing emotions, and coping with crisis. (Disordered eating behaviors, including obesity, anorexia, and bulimia are often related to mental, emotional and social problems, and overweight residents may suffer from low self-esteem and/or be the target of bullying.)

Healthy foods are promoted, and non-healthy foods are not. Health educational posters are to be in plain view of all residents. Youth also have additional health education programs such as a gardening program, culinary class, and a kitchen program. Staff are encouraged to be healthy role models for the youth.

## **Section 2 -School Curriculum**

### **1. Building Healthy Minds and Healthy Lifestyles**

The ultimate goal of health education is to foster and promote health literacy. Youth must comprehend a set of core health concepts and develop skills to apply that knowledge in their own personal behavior and environment. Achievement will be assessed by strategies that measure knowledge, behavior and skill development and support critical thinking such as tests, surveys, and visual/oral demonstration of learned skills.

### **2. Activities for Lifelong Change**

It is recommended that the following objectives, which are based on the expectations of what youth should know and are able to apply to their nutrition-related behavior, serve as the foundation for all nutrition education offered. Youth should:

- i. Demonstrate ways in which they can enhance and maintain their nutrition-related health and well-being, using knowledge based on current recommendations, goal setting skills and decision-making skills.
- ii. Understand and demonstrate behaviors that prevent disease and speed recovery from illness, based on concepts and self-management skills related to diet, physical activity and safe food handling.
- iii. Understand and accept individual differences in growth and development and the relationship between the human body and nutrition.
- iv. Explore the various food, agriculture and nutrition-related careers, as vocational options through the Let's Work program.

### **3. Instructors and Staff Development**

The safety of all youth remains the focus of the facility. As such, all personnel working for the facility, directly with youth, must obtain and maintain the appropriate credential, certification or training required to fulfill their job function.

Additionally, the Probation Department, Stanislaus County Office of Education, Health Services and Mental Health will make all effort possible to provide employees with access to continuing education within their field.

Maintaining the most up-to-date standards, curriculum, techniques and tools to promote resident wellness is the goal of the agencies.

Staff development includes training and/or certification for food service personnel at their various levels of responsibility, including safe food handling and nutrition education. The Food Service Director (Supervising Custodial Cook) will obtain at least 12 hours of continuing education credits annually, the Managers (Custodial Cooks) will have at least 10 hours of continuing education credits annually. The Staff (Assistant Cooks) will have at least 6 hours of continuing education annually. Part time staff (Part Time Cooks) will have at least 4 hours of continuing education annually. All Probation Corrections Officers who work within the Institutions will have at least 4 hours of continuing education annually as well. Annual requirements apply to the 12 months of a school calendar, which are between July 1<sup>st</sup> and June 30<sup>th</sup>. Trainings may be obtained in person, online, at meetings, webinars, conferences, etc. Training records will be maintained and kept on file for at least four years.

## Section 3 -Food Service Regulations

### Requirements of the National School Breakfast/Lunch Program

The Supervising Custodial Cook shall ensure the meals served to youth meet all legal requirements set forth by the USDA for participating in the National School Breakfast, Lunch and After School Snack Program. Annually the five-week cycle menus will be submitted to an accredited dietician for examination to ensure the requirements are met.

When procuring food, preference is given to food that is sourced locally. When purchasing food, preference is given to food items that are produced or grown within the United States. Over 51% of the agricultural food component, by weight or volume, must come from within the United States. If there is an exemption, proper documentation will be sourced before bringing an agricultural food item that is sourced outside of the United States.

There are no food sales or vending machines at the facilities for youth use. A school day is the period from midnight before to 30 minutes after the end of the official school session.

### BREAKFAST

Each week the breakfast served to the youth shall include the following:

- 1) **Fruit** = 7 cups (includes but is not limited to, fresh, frozen, dried, juice and canned. One-quarter cup of dried fruit counts as ½ cup of fruit. All juice must be 100% full strength. Frozen 100% juice without added sugar can be used.
- 2) **Grains** = 12.5-14-ounce equivalent (at least one ounce equivalent each day. All grains must be whole grain rich, containing 50% or more of whole grains. Grains include but are not limited to: bread, rolls, muffins, pancakes, sweet rolls, ready-to-eat, or cooked cereals, corn bread, pasta, rice, tortillas, etc.)
- 3) **Dairy Group** = 1 fluid cup (All milk shall be pasteurized and fortified with vitamins A and D. Raw milk as defined in Division 15 of the California Food and Agricultural Code, shall not be used. Powdered milk shall not be used as a beverage but shall be allowed in cooking and baking. A serving is equivalent to 8 oz. of fluid milk and provides at least 250 mg of calcium. The milk served shall be offered a choice between 1% low fat milk and fat free chocolate milk.
- 4) **Calories** = Min. 450 – Max 600
- 5) **Saturated fat** = less than 10% of the calories
- 6) **Sodium** = 640 mg or less (with a future target of 570 mg or less)

- 7) **Trans Fat** = The nutrition label or manufacturer specifications must indicate zero grams of trans fat (<0.5 grams) per serving. This one area is not averaged for the week.

## LUNCH

Each week the lunch served to the youth shall include the following:

- a) **Fruit** = 7 cups (includes but is not limited to, fresh, frozen, dried, juice and canned. One-quarter cup of dried fruit counts as ½ cup of fruit. All juice must be 100% full strength. Frozen 100% juice without added sugar can be used. At least one serving a week will be a fresh fruit.
- b) **Vegetable** = 5 cups  
Each week one fresh vegetable will be served.

The vegetables servings for the week will include each of the following:

- ½ cup of dark green vegetables,
- 1 ¼ cup of red or orange vegetable,
- ½ cup of beans and peas,
- ½ cup of starchy,
- 7 servings of a vitamin C source containing at least 30 mg.  
*One serving of vitamin C equals but not limited to the following:*

Broccoli	Orange Juice
Brussel	Potato (baked only)
Sprouts	Strawberries
Cabbage	Tangerine, large
Cauliflower	Tomato Paste
Green and red	Tomato Puree
peppers (not	Tomato Juice
dehydrated)	Vegetable juice
Orange	cocktail
- 7 servings of a vitamin A source containing at least 200 micrograms Retinol Equivalents (RE) or more.  
*One serving of vitamin A equals but not limited to the following:*

Apricots	Pumpkin
Cantaloupe	Red Peppers
Carrots	Sweet Potatoes or
Mixed	yams
Vegetables	Vegetable Juice
with carrots	Cocktail
Peas and	Winter Squash
carrots	

- $\frac{3}{4}$  cup “Other vegetables”. The “other vegetable” requirement may be met with any additional amounts from the dark green, red/orange, and beans/peas (legumes) vegetable subgroups.
- c) **Grains** = 14-17 (2 ounce serving equivalent) All grains must be whole grain rich, containing 50% or more of whole grains. Grains include bread, rolls, muffins, sweet rolls, hot dog bun, hamburger bun, breadcrumbs (3 Tbsp=1 serv), crackers, corn bread, pasta, rice, tortillas, etc.)
  - d) **Meat/Meat Alternate** = 14-17 (2 ounce serving equivalent) In addition, there shall be a requirement to serve a third serving from legumes three days a week. Meat/meat alternate group includes but is not limited to: cooked boneless meat or fish, 2 medium eggs, beans, 4 Tbsp. peanut butter, tofu,  $\frac{1}{2}$  cup seeds,  $\frac{2}{3}$  cup nuts.
  - e) **Dairy Group** = 1 fluid cup (All milk shall be pasteurized and fortified with vitamins A and D. Raw milk as defined in Division 15 of the California Food and Agricultural Code, shall not be used. Powdered milk shall not be used as a beverage but shall be allowed in cooking and baking. A serving is equivalent to 8 oz. of fluid milk and provides at least 250 mg of calcium. The milk served shall be offered a choice between 1% low fat milk and fat free chocolate milk.
  - f) **Calories** = Min. 750 – Max 850
  - g) **Saturated Fat** = less than 10% of the calories
  - h) **Sodium** = 1420 mg or less (with a future target of 1080 mg or less)
  - i) **Trans Fat** = The nutrition label or manufacturer specifications must indicate zero grams of trans fat (<0.5 grams) per serving. This one area is not averaged for the week.

## Evening Snacks

The evening snack program is an extension of the National School Lunch Program and is designed to provide a meal supplement to residents. The snack will be served within the guidelines set forth by the program agencies.

Each reimbursable snack will consist of two different components from the following four categories:

- 1) A serving of fluid milk = 1 fluid cup (All milk shall be pasteurized and fortified with vitamins A and D. Raw milk as defined in Division 15 of the California Food and Agricultural Code, shall not be used. Powdered milk shall not be used as a beverage but shall be allowed in cooking and baking. A serving is equivalent to 8 oz. of fluid milk and provides at least 250 mg of calcium. The milk served shall alternate between 1% low fat milk and fat free chocolate milk.
- 2) A serving of meat or meat alternate. Meat/meat alternate group includes but is not limited to 4 Tbsp. peanut butter, tofu,  $\frac{1}{2}$  cup seeds,  $\frac{2}{3}$  cup nuts



- 3) A serving of Vegetable(s) or Fruit(s) (includes but is not limited to, fresh, frozen, dried, juice and canned. One-quarter cup of dried fruit counts as ½ cup of fruit. All juice must be 100% full strength. Frozen 100% juice without added sugar can be used. Juice may not be served when milk is served as the only other component.)
- 4) A serving of Whole Grain All grains must be whole grain rich, containing 50% or more of whole grains. Grains include: bread, rolls, muffins, sweet rolls, crackers, tortillas, etc.)

The evening snack menu is documented on a weekly menu list. Each month, the kitchen staff will provide the menu to all the living units. Each youth must receive both components of the snack for it to be reimbursable.

To verify that only reimbursable breakfast, lunch, and snacks are claimed, a physical head count will be taken by each staff member supervising the meal or snack in their unit at the time of serving the food. The total number of youths served will be recorded on the units Point of Service Sheet and submitted to the kitchen for accounting and processing.

### **Water**

A water fountain is in every unit, in the multipurpose room and in the recreation yards. At meals and snacks, pitchers of ice water are served and youth are encouraged to drink water. Youth also have a sink in each room, so they have access to water in their rooms as well.

### **Mealtime Schedule and Location**

A minimum of twenty minutes will be provided for the youth to eat each meal and snack. The twenty minutes starts from the time the last youth sits down to eat their meal. Meals will be served as follows:

Meal Periods:

Breakfast 7:00 am

Lunch 12:00 pm (11:30 am on non-school days)

Dinner 5:00 pm

Snack 8:30 pm

Since all food is provided by the facility to the youth, arrangements shall be made so that each youth has available at least three meals per day.

Not more than 15 hours shall elapse between the third meal of one day and first meal of the following day. If a youth misses a regularly scheduled facility meal, they shall be provided with a substitute meal and beverage.

Menus shall be written at least one week in advance and copies of the menus as served shall be dated and kept on file for at least 30 days. Menus shall be made available for review by the youth or their authorized representatives and the licensing agency, upon request.

Modified diets prescribed by a youth's physician as a medical necessity shall be provided. The kitchen shall obtain and follow instructions from the physician or dietitian on the preparation of the modified diet. Where indicated, food shall be cut, chopped, ground, or pureed to meet individual needs.

All foods shall be selected, transported, stored, prepared and served so as to be free from contamination and spoilage and shall be fit for human consumption. Food in damaged containers shall not be accepted, used or retained.

Except upon written approval by the licensing agency, meat, poultry, and meat food products shall be inspected by state or federal authorities. Written evidence of such inspection shall be available for all products not obtained from commercial markets.

All persons engaged in food preparation and service shall observe personal hygiene and food services sanitation practices which protect the food from contamination.

All foods or beverages capable of supporting rapid and progressive growth of microorganisms, which can cause food infections or food intoxications, shall be stored in covered containers at 45 degrees F (7.2 degrees C) or less.

Pesticides and other similar toxic substances shall not be stored in food storerooms, kitchen areas, food preparation areas, or areas where kitchen equipment or utensils are stored.

Soaps, detergents, cleaning compounds, or similar substances, shall be stored in the janitor closet separate from food supplies.

All kitchen, food preparation, and storage areas shall be kept clean, free of litter and rubbish, and measures shall be taken to keep all such areas free of rodents and other vermin.

All food shall be protected against contamination. Contaminated food shall be discarded immediately.

All equipment, fixed or mobile, dishes and utensils shall be kept clean and maintained in safe condition.

All dishes and utensils used for eating and drinking and in the preparation of food and drink shall be cleaned and sanitized after each usage.

Dishwashing machines shall reach a temperature of 160 degrees F during the washing cycle and 180 degrees F during the drying cycle to ensure that dishes and utensils are cleaned and sanitized.

Equipment necessary for the storage, preparation and service of food shall be provided, and shall be well maintained.

Tableware and tables, dishes and utensils shall be provided in the quantity necessary to serve the youth. Adaptive devices shall be provided for self-help in eating as needed by youth.

## **Section 4 -Atmosphere**

### **Serving Residents in a Friendly Environment**

Youth are provided with a comfortable setting to enjoy their meals. Youth are encouraged to try new items they may not have experienced before. Healthy menu planning provides ways to complete the dining experience. Youth are allotted enough time to enjoy their meals and sit among their peers during the meal service.

### **Appealing and Comfortable Dining Facility**

Seasonal decorations, as well as menu choices, provide a comfortable dining experience. Youth are encouraged to participate in the creation of a seasonal decorations, many of which are displayed in their common area of their unit where they dine, lending to a more comfortable setting. Decorations are to remain appropriate and in theme with the seasons. Healthy educational posters are to be in plain view of all youth. Each unit common area is maintained by daily cleaning routines to ensure meals are presented in a clean and healthy environment.

## **Section 5 - Physical Activity and Education**

### **Minimum Requirements for Physical Activity and Education**

To provide youth with adequate physical activity, Stanislaus County Juvenile Institutions encourages all residents to participate in regularly scheduled physical activity daily. Proper stretching and warm-ups should be emphasized throughout the process. If a youth has limitations that have been identified through medical, physical fitness shall be modified to meet the needs of the youth.

As a requirement, all Probation Corrections Officer staff are trained on proper physical education through the CORE training program. At Juvenile Hall, the ratio of staff to youth during recreation is a minimum of one staff to ten youth. At the Juvenile Commitment Facility, the ratio of staff to youth during recreation is a minimum of one staff to fifteen youth.

The California Department of Education 2004 *Physical Education Model Content Standards for California Public Schools: Kindergarten Through Grade Twelve*, outlines the essential skills and knowledge that all students need for maintaining a physically active lifestyle. The five overarching standards state that students should:

- 1.) Demonstrate motor skills and movement patterns needed to perform a variety of physical activities.
- 2.) Demonstrate knowledge of movement concepts, principles and strategies as they apply to learning and performing physical activities.
- 3.) Assess and maintain a level of physical fitness to improve health and performance.
- 4.) Demonstrate knowledge of physical fitness concepts, principles and strategies to improve health and performance.
- 5.) Demonstrate and utilize knowledge of psychological and sociological concepts, principles and strategies as applied to learning and performing physical activities.

### **Scheduling of Physical Activities**

The facility discourages extended periods (i.e., periods of three or more hours) of inactivity. The youth are given a mid-morning break during school days. All youths shall be provided with the opportunity for at least one hour of outdoor physical activity each school day and at least 2 hours on non-school days (a minimum of 540 minutes a week), weather permitting. In the event weather does not permit outdoor physical activity, rain or severe heat, at least 1 hour each day of activity involving large muscle activity shall be provided indoors.

Participation in scheduled physical education program is required for all youth that are eligible. Staff are prohibited from using exercise for the purpose of disciplining youth.

The staff at Stanislaus County Juvenile Institutions are responsible for scheduling and supervising all after school, weekend and holiday activities. The activities are available to all eligible youth. The facility offers a range of activities that meet the needs, interests and abilities of all students wishing to participate. Trained and knowledgeable staff will be present during all recreational activities. Prior to commencement of any physical recreational activity, staff shall conduct warm-up exercises for all participating youth.

Annually, new equipment for physical fitness shall be ordered. Then, as necessary throughout the year, replacement equipment may be ordered.

## **Section 6 -Promoting Student Wellness**

### **Meeting the Youth's General Student Wellness Needs**

The facility provides a safe and healthy environment that supports health literacy and successful learning and ensures that youth are physically and emotionally safe. In addition to physical safety, the facility should reflect a sense of community and mutual support among staff and youth.

Youth have access to credentialed teachers, mental health nurse, psychiatrist, nursing staff, a Chaplin, supervising probation officers and group counselors, who provide them with support and assistance in making healthy decisions, managing emotions, and coping with crises. (Disordered eating behaviors, including obesity, are often related to mental, emotional and social problems, and overweight residents may suffer from low self-esteem and/or be the target of bullying.)

On school days, from 3:10-4:10 pm, the youth are provided with Cognitive Behavioral Interventions program. The tools and interventions used in this curriculum rely on a cognitive behavioral approach to teach participants strategies to manage risk factors. The program places heavy emphasis on skill building activities to assist with cognitive, social, emotional, and coping skill development. Designed with an open enrollment format, the curriculum allows for flexibility for youth housed in the short and long term. Additionally, individuals may attend sessions more than once and use different risky situations to develop a greater awareness of how beneficial social skills can be. Components of the curriculum include but, are not limited to: Changing risky thinking, active listening, anger control, learning self-control, use of self-control, deciding to say "no," and keeping out of fights.

The facility provides positive reinforcement rewards to encourage healthy habits. This is seen in rewards such as a Basketball Program and the use of a Game Room which has exercise equipment available for the youth to use.

### **Staff Wellness Participation**

Staff wellness should be supported by the facility so that they can serve as role models to the residents. Staff is given one free meal per shift. The staff are provided a choice of ordering a salad or eating the same meal that is on the menu for the youth. Stanislaus County also promotes wellness through an annual Wellness Fair in which all staff is encouraged to participate in a variety of wellness related classes at no cost such as exercise, nutrition, stress reduction, walks, bike rides, etc. There is also a Self-Care Leadership group

that organize a variety of wellness activities for staff such as yoga classes, basketball groups, running groups, as well as guest speakers on wellness related topics.

Staff members should be positive role models to the youth while dining. Role modeling should include encouraging residents to try new food, as well as promoting the consumption of fresh fruits and vegetables. Stanislaus County Probation Department views this as very important to promote a healthy lifestyle and disease prevention.

### **Educational Environment**

Education is a part of everyday life at the facility. Physical education takes place within the confines of the facility with staff. Nutritional education is incorporated into the school curriculum with a weekly culinary class, as part of the dining service experience, manifested in the dining program, as part of the kitchen program in which youth work in the kitchen, helping staff serve the healthy meals planned and laid out in the wellness committee.



## **Section 7 -Medical Staff**

### **Youth Relations**

Youth are given a physical and a health assessment within 96 hours of admittance. The weight is recorded on each youth's chart. The facility physician monitors underweight youth. A higher caloric diet may be ordered for them. Youth who are overweight are counseled on the proper diet to maintain a healthy weight.

### **Physician and Diets**

The facility physician is available on-site on a regularly scheduled basis. Written orders for specific diet changes come directly from the facility physician. Any diet orders are then communicated to the kitchen.

## **Section 8 -Measuring Implementation of the Policy**

### **Monitoring**

#### **Wellness Committee Establishing Guidance for All Residents**

Wellness Committee is made up of key members of the facility. The group meets weekly to discuss health issues of the youth (also known as the MDT meeting). Food issues will be covered during these meetings. With key members of the facility's staff, the many issues addressed will include: health education in the school, recreational plans for after school and weekends, implementation of new policies and review findings from previous policy changes. New policies presented in front of the facility board are reviewed before implementation. The key members of the facility board are to include: a Supervising Probations Corrections Officer, teachers, mental health clinicians, a nurse and the kitchen supervisor.

The Wellness Committee should be involved in establishing the goals for the school wellness policy, success indicators, reporting methodology and frequency of reporting to the Director of the facility.

Every three years, the Wellness Committee will undertake an evaluation of policy implementation and will report outcomes that may be influenced by the policy. The quality indicators used to measure the implementation of the policy will include nutrient analysis of meals, feedback from food service personnel, administrators, medical staff, surveys from staff and youth. When a unit is not in compliance with the wellness policy, a specified period of time will be given to institute the appropriate changes, providing assistance as needed. Progress will be documented as a follow up until goals are reached.

The Wellness Committee shall prepare a report, triennially, evaluating the implementation of the policy and regulations and include any recommended changes or revisions. The Wellness Policy as well as the most recent Wellness Policy Summary of Findings from the latest review, will be posted in each Unit for the youth to access at any time, in Unit 1 for any visitor to view, as well as posted online on the website for the Juvenile Institutions. The public is welcome to submit feedback and comments via email to [wellness@stanpro.org](mailto:wellness@stanpro.org).

#### **Civil Rights Wellness Complaints**

Youth may appeal and have resolved grievances relating to any condition of confinement, including but not limited to health care services, wellness policy, program participation, mistreatment, harassment, or violations of the non-discrimination policy. All youth are informed of the grievance process. Upon

request, each youth shall be entitled to assistance from a staff member in pursuing a grievance issue. The right to seek staff assistance and the filing of a grievance should not be delayed or impeded by staff. The grievance process shall be as follows: 1. Talk to the youth to determine grievance. 2. Resolve the grievance, if possible, at the lowest appropriate staff level. If the grievance involves civil rights with the food program being involved, the grievance will be reported to the California Department of Education as well as the United States Department of Agriculture.

Complaints from public against a Stanislaus County program, service, or activity involving discrimination on the basis of race, color, age, disability or national origin should be directed to the Stanislaus County ADA Title II/Civil Rights Title VI Coordinator located in the Clerk of the Board Office at (209) 525-4494, fax (209) 525-4420 or <http://www.stancounty.com/accessibility>.

In accordance with Federal civil rights law and U.S. Department of Agriculture (USDA) civil rights regulations and policies, the USDA, its Agencies, offices, and employees, and institutions participating in or administering USDA programs are prohibited from discriminating based on race, color, national origin, sex, religious creed, disability, age, political beliefs, or reprisal or retaliation for prior civil rights activity in any program or activity conducted or funded by USDA.

Persons with disabilities who require alternative means of communication for program information (e.g. Braille, large print, audiotape, American Sign Language, etc.), should contact the Agency (State or local) where they applied for benefits. Individuals who are deaf, hard of hearing or have speech disabilities may contact USDA through the Federal Relay Service at (800) 877-8339. Additionally, program information may be made available in languages other than English.

To file a program complaint of discrimination, complete the USDA Program Discrimination Complaint Form, (AD-3027) found online at:

[http://www.ascr.usda.gov/complaint\\_filing\\_cust.html](http://www.ascr.usda.gov/complaint_filing_cust.html), and at any USDA office, or write a letter addressed to USDA and provide in the letter all of the information requested in the form. To request a copy of the complaint form, call (866) 632-9992. Submit your completed form or letter to USDA by:

- (1) Mail: U.S. Department of Agriculture  
Office of the Assistant Secretary for Civil Rights  
1400 Independence Avenue, SW  
Washington, D.C. 20250-9410;
- (2) Fax: (202) 690-7442; or
- (3) E-mail: [program.intake@usda.gov](mailto:program.intake@usda.gov).

This institution is an equal opportunity provider.

## **Review**

The facility shall conduct a baseline assessment of nutrition and physical activity programs and policies, which is compiled by the chairmen of the Wellness committee used to set priorities.

The facility shall repeat its nutrition and physical activity assessment as least every three years to determine compliance and progress toward implementation of the adopted school wellness policy and to set new priorities.

As necessary, the wellness policy shall be revised to address changes in state and federal law, as well as areas in need of improvement.

### **Training**

The facility will provide appropriate and continuing professional development that is supportive of the adopted wellness policy to members of the Wellness committee. The facility will also provide annual civil rights training to all of the staff.