

**INTERNATIONAL AMERICAN EDUCATION FEDERATION, INC.
D/BA/
INTERNATIONAL LEADERSHIP OF TEXAS (“ILTEXAS” or
“CHARTER”)
BOARD POLICY MANUAL
POLICY GROUP 3 – STUDENTS
WELLNESS POLICY**

PG-3.13

International Leadership of Texas (ILTexas) Local Wellness Policy (LWP).

This Local Wellness Policy (LWP) outlines **ILTexas**’s approach to ensuring environments and opportunities for all students to practice healthy eating and physical activity throughout the school day while minimizing commercial distractions. This policy applies to all students, staff, and schools in ILTexas. Two goals are identified at the end of the Local Wellness Policy.

Section 3.13.1 IMPLEMENTATION, EVALUATION AND COMMUNICATION

The Superintendent or designee shall oversee this policy’s implementation and develop administrative procedures to periodically measure the wellness policy’s implementation, as necessary. ILTEXAS Child Nutrition Department will seek to involve parents, students, child nutrition staff, the board, administrators/school staff, school health professionals, and the community in the continued development and implementation of the school’s Local Wellness Policy.

ILTEXAS will develop and maintain a plan for implementation to manage and coordinate the execution of the Local Wellness Policy. The plan delineates roles, responsibilities, actions, and timelines; and includes information about who will be responsible for making what change, by how much, where, and when; as well as specific goals and objectives for nutrition standards for all foods and beverages available on the school campus, nutrition promotion and education, physical activity, physical education and other school-based activities that promote student wellness.

The International Leadership of Texas has identified the following LEA or school official(s) responsible for the implementation and oversight of the LWP to ensure the Charter follows the policy ([7 CFR 210.31\(c\)\(4\)](#)).

NAME	POSITION/ TITLE	EMAIL ADDRESS	LWP ROLE
Mr. Eddie Conger	Superintendent	econger@iltexas.org	Superintendent
Frank Crabill	Chief Operations Officer	fcrabill@iltexas.org	Executive Wellness Champion
Larry Albritton	Executive Director of Child Nutrition	lalbritton@iltexas.org	Executive Wellness Champion
Lori Livingston	Director of Compliance Child Nutrition	llivingston@iltexas.org	Director Wellness Champion

TRIENNIAL ASSESSMENT

At least once every three years, the **International Leadership of Texas Child Nutrition Department** will conduct a Triennial Assessment and develop a report that reviews compliance with the LWP. This assessment and report will include a full description of the progress made in attaining the goals of **ILTexas** LWP.

The position/person responsible for the development, implementation, assessment, update, and report of the Local Wellness Policy/Triennial is the **Director of Compliance - Child Nutrition**. The above-referenced individual(s) will monitor ILTEXAS schools’ compliance with the LWP. **The Director of Compliance - Child Nutrition** will actively notify households/ families of the availability of the triennial progress report via the ILTEXAS website.

Sec. 3.13.2 WELLNESS

ILTEXAS shall follow nutrition guidelines that advance student health, reduce childhood obesity, and shall promote the general wellness of all students through nutrition education, physical activity, and other school-based activities. In addition, ILTEXAS established the following goals and regulations for wellness:

1. School staff members shall be encouraged to model healthy eating and physical activity behaviors.
2. ILTEXAS will provide a comprehensive program promoting healthy eating and physical activity for Charter students and staff.
3. Teachers should use non-food alternatives as rewards. For example, extra recess may be provided when time allows.
4. Teachers are discouraged from assigning physical activity as student punishment.
5. The administration believes that recess and other opportunities for physical activity are an essential part of the school day. Teachers are encouraged to find alternatives to withholding recess or other physical activities as a punishment.
6. Marketing strategies, such as taste tests and signage in the cafeteria, should be used to promote healthy food and beverages throughout the school.
7. Federal Rule language states that schools may only permit marketing on the school campus during the school day of those foods and beverages that meet the nutrition standards under 210.11 promotes student health and reduces childhood obesity.
8. The United States Department of Agriculture (USDA) prohibits the advertising of food and beverages that do not meet the Smart Snack Nutrition Standards to be sold during the school day. USDA specifically prohibits this advertising of non-compliant food on school property (signs, banners, scoreboards, etc.) and/or will prohibit at any time of renewal of sponsorship agreements.
9. It is recommended that schools avoid participation in fundraising or corporate incentive programs that promote a message inconsistent with our goals for a healthy school community.

Sec. 3.13.3 WELLNESS GOALS REGULATIONS AND POLICIES

Sec. 3.13.2.1 Nutrition and Health Education

ILTEXAS shall implement, in accordance with law, a coordinated health program with a nutrition education component and shall use a health course curriculum that emphasizes the importance of proper nutrition.

In addition, **ILTEXAS** established the following goals and regulations for nutrition and health education:

1. Students will receive nutrition education that fosters the adoption and maintenance of healthy eating behaviors.
2. **The ILTEXAS Local Wellness Committee** will meet minimum twice during each school year.
3. **The ILTEXAS Child Nutrition Department** will send the school community via email and will post on the **ILTEXAS** website inviting members of the community to join the wellness committee.
4. Parents, students, representatives of the school food authority, PE teachers, school health professionals, the school board, school administrators, Health Services, Child Nutrition, and the community members will be included in the development, implementation, review, and update of the wellness policy.
5. **ILTEXAS** has promoted its Local Wellness Policy to faculty, staff, parents, and students. A copy of the Local Wellness Policy is posted on the school’s website under the Child Nutrition tab.
6. The Local Wellness Policy will be assessed every three years by using the Wellness School Assessment Tool-Implementation (WellSAT-I) or the School Health Index.
7. The Triennial Report will be posted on the Charter’s website under the Child Nutrition tab. The report will include an assessment of compliance, to the extent to which our wellness policy compares to model wellness policies.
8. **ILTEXAS** Local Wellness Policy Committee will revise the LWP as needed.
9. Nutrition education will be an **ILTEXAS**-wide priority and will be integrated into other areas of the curriculum, as appropriate.
10. Staff responsible for nutrition education will be adequately prepared and will participate in professional development activities to effectively deliver the program as planned.
11. The food service staff, teachers, and other school personnel will coordinate the promotion of nutrition messages in the cafeteria, the classroom, and other appropriate settings.
12. Educational nutrition information will be shared with families and the public to positively influence the health of students and community members.

Sec. 3.13.2.2. Physical Education and Physical Activity

ILTEXAS shall implement, in accordance with law, a coordinated health program with physical education and physical activity components and shall offer at least the amount of physical activity for all grades required by the Texas Education Code or Commissioner Rule.

In addition, **ILTEXAS** established the following goals and regulations for physical activity and physical education:

1. **ILTEXAS** will provide an environment that fosters safe and enjoyable fitness activities for all students, including those who are not participating in competitive sports.
2. Physical education classes will regularly emphasize moderate to vigorous activity.
3. **ILTEXAS** will encourage teachers to integrate physical activity into the academic curriculum where appropriate.
4. **ILTEXAS** will encourage parents to support their children’s participation, to be active role models, and to include physical activity in family events.
5. **ILTEXAS** shall provide all students with physical education that teaches them the skills needed for lifelong physical fitness.
6. All elementary school students shall receive the required amount per week of physical education throughout the school year.
7. All middle school students shall receive the required amount per week of physical education instruction throughout the school year.
8. All high school students shall receive the required amount per week of physical education instruction throughout the school year.
9. To qualify as an ILTexas K-12 physical education teacher, candidates must possess a bachelor's degree and pass a background check.
10. **ILTEXAS** shall provide all physical education teachers with annual professional development opportunities that are focused on physical education/physical activity topics and competencies.
11. Unless otherwise exempted, all students will be required to engage in the Charter’s physical education program.
12. The Charter discourages students from substituting other schools or community activities for physical education class time or credit in place of required physical education.
13. The Charter discourages students from substituting other schools or community activities for physical education class time or credit in place of required physical education.
14. Schools shall provide at least 20 minutes of active daily recess to all elementary school students.
15. The Charter requires that all K-12 school students be provided with daily physical activity breaks during the school day.

Sec. 3.13.2.3 Standard for USDA School Meals

ILTEXAS is committed to serving healthy meals to children, with plenty of fruits, vegetables, whole grains, and fat-free and low-fat unflavored milk; and are moderate in sodium, low in saturated fat, and have zero grams trans-fat per serving (nutrition label or manufacturer’s specification); and to meeting the nutrition needs of school children within their calorie requirements. The school meal programs aim to improve the diet and health of school children, help mitigate childhood obesity, model healthy eating to support the development of lifelong healthy eating patterns and support healthy choices while accommodating cultural food preferences and special dietary needs.

All schools within the Charter participate in USDA child nutrition programs, including the National School Lunch Program (NSLP), and the School Breakfast Program (SBP). All food served meets or exceeds current nutrition requirements established by local, state, and federal statutes and regulations. (The Charter offers reimbursable school meals that meet USDA requirements.)

In addition, **ILTEXAS** applies the following goals and USDA regulations for school meals:

1. Menus will be posted on the Charter website or individual school websites; nutrient content and ingredients can be obtained on request.
2. Menus will be created/reviewed by a Registered Dietitian or other certified nutrition professional through the vendor who provides meals to **ILTEXAS** students.
3. A team of Child Nutrition professionals administers school meals.
4. The Charter’s Child Nutrition Department will accommodate students with special dietary needs. Go to the Child Nutrition Department website to gain more information about the special dietary accommodations. <https://www.iltexas.org/families/child-nutrition>
5. Participation in Federal child nutrition programs will be promoted among students and families to help ensure that families know what programs are available in their children’s schools.
6. Meals served through the Charter’s Child Nutrition Program shall comply with the National School Lunch and/or Breakfast standards for meal patterns, nutrient levels, and calorie requirements for the ages/grade levels served, as specified in 7 CFR 210.10 or 220.8, as applicable.
7. All schools will provide breakfast through the USDA School Breakfast Program.
8. All students, regardless of the type of payment they make for school meals, or the food being purchased (meal or a la carte) will use their ILTEXAS student ID number at the cash register.
9. Parents can access the Free and Reduced-Price Meal Application via online and at the local school campus. The meal application can be completed during enrollment and/or throughout the school year.

10. Annually the students will have the opportunity to provide input on local, cultural, and ethnicity favorites via Student and Parent Surveys.
11. Water fountains or water filling stations are available in all cafeterias.
12. All school nutrition program directors, managers, and staff will meet hiring and continuing annual education/training requirements in the USDA Professional Standards for Child Nutrition Professionals.
13. Schools are encouraged to make available locally grown produce.

Sec. 3.13.2.4 Competitive and Non-Competitive Foods and Beverages

The Charter is committed to ensuring that all foods and beverages are available to students on the school campus* during the school day* and supports healthy eating. No foods may be sold or served at any time throughout the school day*, other than through the Child Nutrition Program. Food cannot be sold or served during meal service. For Example: Sunshine K-8 meal service starts at 10:00 am and ends at 1:30 pm, no competitive and/or non-competitive food can be served (given) or sold from 10:00 am to 1:30 pm.

All foods and beverages sold or served must meet the USDA Smart Snacks in School nutrition standards, at a minimum. The Competitive Waiver Form must be completed when Competitive and Non-Competitive food are served/sold to the students.

Celebrations and Classroom Snacks – Non-Competitive Food

All food/beverages served and/or sold on the school campus* during the school day* should meet or exceed the USDA Smart Snacks School Nutrition Standards, including through:

1. **Celebrations and parties.** The Child Nutrition Department will provide a list of healthy party ideas to parents and teachers, including non-food celebration ideas. Healthy party ideas are available from the [Alliance for a Healthier Generation](#) (See below, entitled Appendix A). Food/beverages cannot be served or sold during any ILTexas meal service.
2. **Birthday Celebrations.** Parents can bring pre-packed items, such as cupcakes or cookies, to be eaten after all meals have been served to all students on campus (see below, entitled Appendix B). Food and beverage items may be distributed only to a parent’s child and/or the child’s classmates and require prior authorization from campus administration.
3. **Classroom snacks brought by parents.** The Child Nutrition Department will provide parents a [list of food and beverages that meet Smart Snacks](#) nutrition standards, (See below, entitled Appendix A).
4. **Food Safety.** (see below, entitled Appendix B).

Fundraising – Competitive Food

Foods and beverages that meet or exceed the USDA Smart Snacks in Schools nutrition standards may be sold through fundraisers on the school campus* after the school day* ends. Fundraising outside school hours: may include the sale of foods that do not meet the USDA Smart Snack nutrition standards. These fundraisers may include but are not limited to donation nights at restaurants, cookie dough, candy, and pizza sales, market days, etc. The State allows up to six Exempt Fundraising days.

Exempt Days:

ILTEXAS is enrolled in the National School Lunch Program (NSLP) and School Breakfast Program (SBP) and is permitted to conduct fundraisers selling or serving food and/or beverages that do not comply with the Competitive Food Nutrition Standards. Exempt Days are allowed to occur during the school day for a maximum of six days per academic year at each campus. However, any food and/or beverages sold or served during the day should not directly compete with the school meal service. No competitive food/beverages can be sold or served when the Child Nutrition Department is conducting meal service. An Exempt Fundraiser Waiver Form must be completed and emailed to childnutrition@iltexas.org to sell or serve competitive foods.

Documentation or Records for Concession Stands or Other Events Where Food and/or Beverages Are Sold During the School Day on the School Campus: When food and/or beverages are sold during the school day on the school campus through concession stands or other events (ie field day, award ceremonies...) the school’s administrators shall ensure documentation is maintained demonstrating compliance with Competitive Food Nutrition Standards. The school administrators are solely responsible for gathering and retain all required documentation related to the food and beverage sales that are distributed during the event. The following documentation is a TDA requirement to ensure the Competitive Food Nutrition Standards are met: The documentation must be retained for five years from the day of the event.

1. Nutrition facts labels
2. Invoice(s)/ receipts
3. Portion size/serving amounts

Food and Beverage Marketing in Schools

The Charter is committed to providing a school environment that ensures opportunities for all students to practice healthy eating and physical activity throughout the school day while minimizing commercial distractions. The Charter strives to teach students how to make informed choices about nutrition, health, and physical activity. These efforts will be weakened if students are subjected to advertising on Charter property that contains messages inconsistent with the health information the Charter is imparting through nutrition education and health promotion efforts. It is the intent of the Charter to protect and promote student’s health by permitting advertising and marketing for only those foods and beverages that are permitted to be sold on the school campus, consistent with the Charter’s wellness policy.

Any foods and beverages marketed or promoted to students on the school campus* during the school day* will meet or exceed the USDA Smart Snacks in School nutrition standards.

Sec. 3.13.2.5 Policy and Plan Elevation Measuring

Compliance with Nutrition Guidelines

The Charter will measure compliance with the child nutrition guidelines by referencing the Local Wellness Policy on the Child Nutrition website. The Child Nutrition Department will review foods and beverages that are served and sold to ensure the Charter is following the federal and state regulations. No food shall be served or sold in competition with school meals, to students during the school day.

Marketing Plan

The Marketing Plan will ensure that all marketed items acquired post-July 1, 2017, meet the Competitive Food Nutrition Standards, promoting healthier choices and adherence to regulations. The Child Nutrition Department will conduct an evaluation on each campus to review all marketing information is following the competitive food nutrition standards. During the evaluation process, if non-compliant materials are identified the marketing display(s) will be removed.

Policy and Plan Evaluation

At least every three years, as required by law, the ILTexas Child Nutrition Department will measure and make available to the public the results of an assessment of the implementation of the Chart’s wellness policy. This “triennial assessment” will evaluate the extent to which each campus is compliant with the wellness policy, the progress made in attaining the goals of the wellness policy, and the extent to which the wellness policy and plan compare with any state or federally designated model policies.

Public Notification

Annually, the District will notify the public about the content and implementation of the wellness policy and plan and any updates to these materials.

To comply with the legal requirement to annually inform and update the public about the content and implementation of the local wellness policy, the district will create a wellness page on its website to document information and activity related to the school wellness policy, including:

1. A copy of the wellness policy
2. A copy of this wellness plan, with dated revisions
3. Notice of any Board-adopted revisions
4. The name, position, and contact information of the Charter official responsible for oversight and implementation of the wellness policy and wellness plan.
5. Notice of any meeting at which the wellness policy or implementation documents are scheduled for discussion.
6. The triennial assessment; and
7. Any other relevant information.
8. The Charter will also publish the above information on the Child Nutrition website.

Sec. 3.13.6 RECORD RETENTION

ILTexas shall maintain all required wellness and nutrition program documentation in either paper or electronic format using an organized system that allows records to be readily retrieved upon request. Charter schools shall retain records for a minimum of five years. All documentation will be complete, accurate, easily accessible, and available for review by the Texas Department of Agriculture during administrative reviews.

[See CPC and FFA (LEGAL)]

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Appendix A

Healthy Options for Classroom Activities, Snacks, and Celebrations:

Beverages

- ☐ Fruit juices (100%) Fruit
- ☐ smoothies Lemonade
- ☐ Milk (nonfat or low fat, plain or flavored)

Low Fat Grain Foods

- ☐ Pretzels
- ☐ Animal crackers
- ☐ Graham crackers
- ☐ Wheat crackers
- ☐ English muffins (whole wheat)
- ☐ Rice cakes or mini rice cakes (flavored) Baked
- ☐ tortilla chips with salsa
- ☐ Fruit or grain muffin (low fat) Dry
- ☐ cereal (individual serving) Fig bars
- ☐ Vanilla wafers

Fresh Fruits and Vegetables

- Fresh seasonal fruit
- Carrots, broccoli, and cauliflower with low-fat dip or salad dressing

Additional Items

- ☐ Fruit snacks
- ☐ Fruit grain bars Frozen
- ☐ fruit bars
- ☐ Fat-free popcorn (94% fat free) Sun
- ☐ butter crackers
- ☐ Low-fat string cheese
- ☐ Fruit, nut, and/or grain trail mixes

Appendix B

Food Safety and Security Guidelines

On **Exemption days and birthday celebrations**, parents and school staff may bring food items for students to the classroom. School staff should be able to identify and verify that the person leaving the item has been approved to do so, prior to providing it to students (i.e., do not accept food from an unidentified person). Parents/sponsors must only provide food items prepared by an authorized vendor and/or individually wrapped items for celebrations, approved instructional activities (i.e., folklore festivals), or after-school fundraisers to reduce the risk of food contamination. The School’s Staff must complete a Competitive Food Waiver Form before the event occurs.

***School Campus** - Areas that are owned or leased by the school and used at any time for school-related activities, including on the outside of the school building, school buses or other vehicles used to transport students, athletic fields, and stadiums (e.g., on scoreboards, coolers, cups, and water bottles), or parking lots.

***School Day** – The time between midnight the night before to 30 minutes after the end of the instructional day.

Competitive Food - Is defined as Foods and/or beverages sold to students that compete with the school’s operation of the NSLP and/or SBP. This definition includes, but is not limited to, food and/or beverages sold a la carte in a meal service line, in vending machines, in school stores, or as part of fundraisers.

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In accordance with federal civil rights law and U.S. Department of Agriculture (USDA) civil rights regulations and policies, this institution is prohibited from discriminating on the basis of race, color, national origin, sex, disability, age, or reprisal or retaliation for prior civil rights activity. Program information may be made available in languages other than English. Persons with disabilities who require alternative means of communication to obtain program information (e.g., Braille, large print, audiotape, American Sign Language), should contact the responsible state or local agency that administers the program or USDA’s TARGET Center at (202) 720-2600 (voice and TTY) or contact USDA through the Federal Relay Service at (800) 877-8339. To file a program discrimination complaint, a Complainant should complete a Form AD-3027, USDA Program Discrimination Complaint Form which can be obtained online at: <https://www.usda.gov/sites/default/files/documents/ad-3027.pdf>, from any USDA office, by calling (866) 632-9992, or by writing a letter addressed to USDA. The letter must contain the complainant’s name, address, telephone number, and a written description of the alleged discriminatory action in sufficient detail to inform the Assistant Secretary for Civil Rights (ASCR) about the nature and date of an alleged civil rights violation. The completed AD-3027 form or letter must be submitted 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; or
2. fax: (833) 256-1665 or (202) 690-7442; or
3. email: Program.Intake@usda.gov

This institution is an equal opportunity provider.



International Leadership of Texas Child Nutrition Department Local Wellness Policy Plan

Charter-Wide Implementation Plan

Purpose

This plan supports the implementation, evaluation, and communication of the ILTexas Local Wellness Policy to ensure all students, campus staff, community and ILTexas households have access to healthy nutrition, physical activity, and wellness-promoting environments throughout the school year.

Goal 1: Promote Healthy Nutrition and Eating Environments Across All ILTexas Campuses

Objective 1.1: Ensure all foods and beverages served or sold during the school day meet USDA Smart Snacks and meal pattern standards.

Action Items:

- Enforce completion and approval of Competitive Food Waiver Forms with required nutrition documentation.
- Monitor compliance with Smart Snacks standards for classroom celebrations, fundraisers, concession stands, and exempt days.
- Review menus and nutrition documentation through the Child Nutrition Department.

Responsible Parties:

- Director of Compliance – Child Nutrition
- Child Nutrition Department
- Campus Administrators

Timeline:

- Ongoing throughout the school year
- Formal review during administrative and triennial assessments

Measurement of Success:

- 90% of submitted waiver forms include required documentation
- Zero findings of non-compliant foods during TDA or internal reviews



International Leadership of Texas Child Nutrition Department Local Wellness Policy Plan

- Annual reduction in non-compliance notices to campuses
-

Objective 1.2: Increase nutrition education and wellness engagement for students, staff, families, and the community.

Action Items:

- Integrate nutrition education with the Ask the Dietitian
- Promote healthy food choices through signage, taste tests, and cafeteria messaging.
- Share nutrition education materials with families via email and the ILTexas website.
- Conduct student and parent surveys to gather feedback on menu preferences and cultural foods.

Responsible Parties:

- Child Nutrition Department
- Campus Administrators
- Teachers and Food Service Staff

Timeline:

- Nutrition promotion activities conducted each semester
- Surveys administered annually

Measurement of Success:

- Increased student participation in school meal programs
 - Survey data reflects improved awareness of healthy eating choices
 - Nutrition education materials consistently posted and distributed
-

Goal 2: Foster a school culture that models and promotes healthy behaviors.

Action Items:

- Encourage staff to model healthy eating and physical activity.



International Leadership of Texas Child Nutrition Department Local Wellness Policy Plan

- Promote non-food rewards and positive behavior incentives.
- Avoid fundraisers or corporate programs that conflict with wellness goals.
- Conduct a 21-day Challenge for high school students.

Responsible Parties:

- Executive Wellness Champions
- Campus Administrators
- Human Resources and Professional Development Teams

Timeline:

- Staff expectations communicated annually
- Professional development provided yearly

Measurement of Success:

- Increased use of non-food rewards
- Staff participation in wellness initiatives
- Positive feedback from staff and students

Evaluation, Communication, and Accountability

Action Items:

- Conduct a Triennial Assessment using WellSAT-I or the School Health Index.
- Post the Local Wellness Policy, Wellness Plan, and Triennial Report on the ILTexas website.
- Notify families and the public annually of wellness policy updates and implementation.
- Maintain all documentation for a minimum of five years in accordance with record retention requirements.

Responsible Party:

- Director of Compliance – Child Nutrition



International Leadership of Texas Child Nutrition Department Local Wellness Policy Plan

Timeline:

- Triennial Assessment: Every three years
- Public notification: Annually (Child Nutrition Website)

Measurement of Success:

- Timely completion and publication of triennial reports
 - Public access to wellness documents via the website
-