Triennial Assessment Report: 2026 Well SAT (8/2026)
District: OLDHAM COUNTY

Introduction

Every three years, federal law requires Oldham County Schools to assess how well our written wellness policies and our day-to-day school practices support student health. This year's assessment was conducted in August 2026 using the WellSAT (Wellness School Assessment Tool), a nationally recognized instrument that evaluates policies against USDA and Kentucky requirements as well as best practices for nutrition, physical education, and overall student wellness.

Our district's wellness policy scored 82% on comprehensiveness (how thoroughly the policy addresses each required topic) and 56% on strength (how clearly and firmly the policy commits the district to action). These results show that OCS addresses nearly all of the federal requirements and recommended best-practice areas in writing, and that a majority of our commitments are stated as clear, required actions rather than suggestions. Areas where our practices are already strong — such as meal program compliance, Smart Snacks standards, staff training, and public access to the policy — earned full marks for both comprehensiveness and strength. We also identified specific opportunities to strengthen language around topics like protecting students with unpaid meal balances, physical education time requirements, and nutrition education, and we are actively working to close those gaps in upcoming policy revisions.

This assessment was led by Niki Brown, Deputy Superintendent, in coordination with the district-level wellness team. The review examined our current governing documents, including Board Policy 09.2 and related policies, the District Wellness Plan, and our District Wellness Policy, comparing the written policy language against both the WellSAT scoring criteria and observed practices in our schools. The findings in this report reflect that review and will guide our policy updates over the coming school year.

Strong Policies and Aligned Practices

The Federal Requirements section of our wellness policy (items FR1–FR18) covers the core provisions that federal law mandates for every local wellness policy, including nutrition education goals, compliance with USDA meal pattern and Smart Snacks standards, protecting the privacy of students receiving free or reduced-price meals, staff training requirements, wellness committee participation, and the triennial assessment process itself, including how results are shared with the public and how the policy is updated afterward.

This is a strong section of our policy, both on paper and in practice. Of the 30 items, all are written as clear, required commitments rather than vague suggestions. More importantly, comparing our written policy to what is actually happening in schools shows that these commitments are fully realized and reflect both strong required language and matching practice in our schools.

Overall, the Federal Requirements section shows a district where strong policy language is matched by strong practice.

		Policy Score	Practice Score	
FR1	Does the district have specific goals for nutrition education designed to promote student wellness?	**2**	**2**	☆
FR2	Do your National School Lunch Program meals (and, if applicable, School Breakfast Program meals) meet all federal standards for meal patterns, nutrient levels, and calorie requirements for the grade levels served?	**2**	**2**	☆
FR3	Does your school take steps to protect the privacy of students who qualify for free or reduced-price meals?	**2**	**2**	☆
FR4	Is free (i.e., no cost to students) drinking water available to students during meals?	**2**	**2**	☆
FR5	Do all school nutrition program directors, managers, and staff meet or exceed the annual continuing education/training hours required by the USDA's Professional Standards requirements?	**2**	**2**	☆
FR6	Do all competitive foods and beverages sold to students during the school day meet or exceed the USDA's nutrition standards, commonly called Smart Snacks?	**2**	**2**	☆
FR7	Do all a la carte foods and beverages sold in the cafeteria meet Smart Snacks standards?	**2**	**2**	☆

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FR8	Do all foods and beverages sold in vending machines meet Smart Snack standards?	**2**	**2**	☆
FR9	Do all foods and beverages sold in school stores during the school day meet Smart Snack standards?	**2**	**2**	☆
FR12	Is there food or beverage marketing on the school campus during the school day? If yes, do the marketed items meet Smart Snacks criteria?	**2**	**2**	☆
FR14	Is there an official who is responsible for the implementation and compliance with the wellness policy at the building level for each school?	**2**	**2**	☆
FR15	How is the wellness policy made available to the public?	**2**	**2**	☆
FR16	Is wellness policy implementation evaluated every three years?	**2**	**2**	☆
FR17	What is included in the triennial assessment report to the public?	**2**	**2**	☆
NES1	Does the district offer breakfast every day to all students?	**2**	**2**	☆
NES3	Does your school or district provide information to families about eligibility for free or reduced-price meals?	**2**	**2**	☆
NES4	Does your school use strategies to maximize participation in the school breakfast program and/or school lunch program?	**2**	**2**	☆
NES5	Are marketing strategies used to promote healthy food and beverage choices in school?	**2**	**2**	☆
NES6	Do students have at least 10 minutes to eat breakfast and at least 20 minutes to eat lunch, counting from the time they are seated?	**2**	**2**	☆
NES7	 In your district, is it a priority to procure locally produced foods for school meals?	**2**	**2**	☆
NES8	Do you know where to access the USDA Smart Snacks nutrition standards to check and see if an item can be sold in school during the school day?	**2**	**2**	☆
NES14	Do students have consistent and easy access to free drinking water throughout the school day?	**2**	**2**	☆
PEPA2	Does the district have a written physical education curriculum that is aligned with national and/or state standards?	**2**	**2**	☆
PEPA3	How does your physical education program promote a physically active lifestyle?	**2**	**2**	☆

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PEPA7	Are all physical education classes taught by state certified/licensed teachers who are endorsed to teach physical education?	**2**	**2**	☆
PEPA13	Is there daily recess for all grades in elementary school?	**2**	**2**	☆
PEPA18	Do teachers ever use physical activity as a punishment?	**2**	**2**	☆
PEPA19	Do teachers ever withhold physical activity as a classroom management tool?	**2**	**2**	☆
EW1	Are there strategies used by the school to support employee wellness?	**2**	**2**	☆
IC1	Is there an active district-level wellness committee?	**2**	**2**	☆

Create Practice Implementation Plan

Several items across our wellness policy show a pattern where the written policy is already strong and specific, but daily practice has not yet fully caught up. This gap applies to FR10, FR13, and FR18 within the Federal Requirements section, PEPA1 and PEPA4 within Physical Education and Physical Activity, and EW2 within Employee Wellness.

Rather than revising policy language that is already sufficient, our focus will be on closing the gap between what the policy requires and what is happening day-to-day in schools. To do this, we will: Educate principals through administrative staff meetings, ensuring building-level leaders understand what the policy requires and can bring school practices into alignment. We will also review the composition of the district wellness committee and align membership with the recommended representation of stakeholder groups. Finally, we will brainstorm with school leaders around staff wellness challenges, school wellness events, and opportunities for staff to visibly model healthy eating and physical activity.

The Director of School Nutrition will work directly with building principals, the district Food and Nutrition Services team, and the district-level wellness team to ensure each action step is assigned to the appropriate staff and tracked at the building level.

		Policy Score	**Practice Score**	
FR10	Are there fundraisers that sell foods or beverages to be consumed during the school day? If yes, do the foods and beverages sold meet Smart Snacks standards?	**2**	**1**	✊
FR13	Which groups are represented on the district-level wellness committee?	**2**	**1**	✊
FR18	Has the wellness policy been revised based on the previous triennial assessment?	**2**	**1**	✊
PEPA1	Does the district have a written physical education curriculum that is implemented consistently for every grade?	**2**	**1**	✊
PEPA4	How many minutes per week of PE does each grade in elementary school receive?	**1**	**0**	✊

EW2	Are school staff encouraged to model healthy eating and physical activity behaviors in front of students?	**2**	**1**	

Update Policies

Six items on our scorecard show a specific pattern: the district is already fully implementing these practices in schools, but our written policy either doesn't address the topic at all or only addresses it in vague, non-required terms. In these cases, the work ahead isn't about changing what we do, it's about writing down the good practices that are already happening.

None of these six items fall within Section 1, Federal Requirements. Item NES2, protecting students with unpaid meal balances from stigma. Our schools are already handling this respectfully in practice by providing students with a fully reimbursable meal. However, the policy language is vague and does not spell out that specific protection. PEPA15, joint-use or shared-use agreements for physical activity is another area the Local Wellness Team will review. The district has these agreements in practice, but the policy does not clearly describe them. Finally, IC2 refers to an active school building-level wellness committee. Schools are already running these committees, but the policy does not currently establish or require them at all. The Local Wellness Team will review these areas and draft policies that will match our current practices for review by our local Board of Education.

The Director of School Nutrition will lead the drafting of updated policy language for these items, working with the Deputy Superintendent, building principals, and the district-level wellness team to ensure the new language accurately reflects current school-level practice.

		Policy Score	**Practice Score**	
NES2	Does your school take steps to address feeding students with unpaid meal balances without stigmatizing them?	**1**	**2**	
NE2	Do all elementary school students receive sequential and comprehensive nutrition education?	**1**	**2**	
PEPA9	What percentage of students do you estimate do not take PE each year due to exemptions?	**0**	**2**	
PEPA10	What percentage of students do you estimate do not take PE each year due to substitutions?	**1**	**2**	
PEPA15	Does the district have “joint-use” or “shared-use” agreements?	**1**	**2**	
IC2	Is there an active school-level wellness committee?	**0**	**2**	

Opportunities for Growth

This portion of our scorecard represents our largest opportunity for growth. The items reflect topics that our district has either not addressed at all or has only addressed in a limited way, in both written policy and actual school practice. These items require the district to build both policy language and implementation together, rather than aligning one to match the other.

Only one item in this group, FR11, is a Federal Requirement — it addresses whether foods and beverages served at elementary class parties and other school celebrations meet nutrition standards. Both our policy and current practice loosely address this area, so this is an area the Local Wellness Team will need to review in the upcoming year.

Outside of the federal requirement, the committee will focus on educating staff on using physical activity as rewards for students and incorporating physical activity breaks within the classroom for students. These areas will be reviewed over the upcoming year, and any changes will be documented in the district policy for the upcoming year.

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The Director of School Nutrition will oversee this effort district-wide. She will be supported by the Local Wellness Team.

		Policy Score	Practice Score	
FR11	Does your district regulate foods and beverages served at class parties and other school celebrations in elementary schools?	**1**	**1**	
NES9	Are you familiar with any state laws allowing exemptions for school-sponsored fundraisers during which foods and beverages do not have to meet Smart Snacks?	**1**	**1**	
NES10	Are foods or beverages containing caffeine sold at the high school level?	**1**	**1**	
NES11	Do all foods or beverages SERVED (not sold) to students after the school day on school grounds (including aftercare, clubs, and afterschool programming) meet federal nutrition standards (e.g., CACFP or Smart Snacks)?	**0**	**0**	
NES12	Do all foods or beverages SOLD (not served) to students after the school day on school grounds (including aftercare, clubs, and afterschool programming) meet federal nutrition standards (e.g., CACFP or Smart Snacks)?	**0**	**0**	
NES13	Do teachers or school staff give students food as a reward?	**1**	**1**	
NE1	Are skills-based, behavior-focused, and interactive/participatory methods used in nutrition education to develop student skills?	**1**	**1**	
NE3	Do all middle school students receive sequential and comprehensive nutrition education?	**1**	**1**	
NE4	Do all high school students receive sequential and comprehensive nutrition education?	**1**	**1**	
NE5	Is nutrition education integrated into other subjects beyond health education?	**1**	**1**	
NE6	Do school nutrition services staff members use the following methods to collaborate with teachers to reinforce nutrition education lessons taught in the classroom?	**0**	**1**	
NE7	 Does nutrition education address agriculture and the food system?	**0**	**1**	
PEPA5	How many minutes per week of PE does each grade in middle school receive?	**0**	**0**	
PEPA6	How many minutes per week of PE does each grade in high school receive?	**1**	**1**	
PEPA8	Is ongoing professional development offered every year for PE teachers that is relevant and specific to physical education?	**1**	**1**	

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PEPA11	Are there opportunities for families and community members to engage in physical activity at school?	**1**	**1**	
PEPA12	Are there opportunities for all students to engage in physical activity before and after school?	**1**	**1**	
PEPA14	Do teachers provide regular physical activity breaks for students in the classroom?	**1**	**1**	
PEPA16	What proportion of students walk or bike to school?	**0**	**1**	
PEPA17	Are teachers encouraged to use physical activity as a reward for students?	**1**	**1**	

Conclusion

Together, these findings paint a clear picture: Oldham County Schools has built a wellness policy that meets every federal requirement and, in most areas, backs that language up with real practice in our schools. The comprehensiveness and strength scores reflect a district that has done the work of turning good intentions into required, specific commitments, particularly around meal standards, nutrition access, food and beverage marketing, staff training, and the wellness assessment process itself.

At the same time, this assessment identified two categories of work ahead. First, a small number of practices, like protecting students with unpaid meal balances, joint-use agreements for physical activity, and building-level wellness committees, are already happening successfully in our schools but need to be formally written into policy, so our commitments match our practice. Second, a broader set of areas, including elementary celebration food standards, nutrition education, and physical education and activity, need attention in both policy language and day-to-day implementation.

The district-level wellness team will use the findings of this assessment to guide policy updates and practice improvements over the coming year. We are proud of the strong foundation already in place and remain committed to continuous improvement in support of every student's health and wellness.

Key

Strong Policies and Aligned Practices - District has a strong policy and is fully implementing practices that align with the policy

Create Practice Implementation Plan - District has a strong or weak policy, but practice implementation is either absent or limited

Update Policies Update Policies - District is fully implementing a practice but there is no or only weak language in the written policy, or the district is partially implementing practices and there is no language in the policy

Opportunities for Growth - District has either not addressed the topic in policy or practice; or has only addressed the topic in a very limited way

For more resources, visit: wellsat.org/resources

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