Introduction

In accordance with the 2016 Final Rule, schools must complete an assessment of their district wellness policy every three years, at minimum. The assessment must include several components:

Step 1: Comparison to a model School Wellness Policy using the WellSAT

The WellSAT Policy was used to compare the written policy to model standards and assess compliance of LSWP in the areas of Federal Requirements (FR), Nutrition Environment and Services (NES), Nutrition Education (NE), Physical Education and Physical Activity (PEPA), Employee Wellness (EW), and Integration and Coordination (IC).

Step 2: Local measurement of compliance with School Wellness Policy

The WellSAT Practice was used to assess the implementation of the Local School Wellness Policy and compliance of district practices in the same areas listed in the WellSAT Policy via interviews with district and school-level personnel.

Step 3: Description of the district's progress toward achieving goals described in the policy The results of the WellSAT Policy and WellSAT Practice were analyzed and summarized in the Triennial Assessment report, documenting our progress towards meeting wellness goals. Scores range from 0-2.

N/A - Not Applicable

- 0 Not mentioned or the policy clearly detracts from requirement
- 1 Information is implied, repeats language in the federal requirement or lacks specifics
- 2 Specific goals and standards are met

Petaluma City Schools used the WellSAT Triennial Assessment tools to fulfill the requirements of the Triennial Assessment.

We are pleased to present the results of our federally mandated Triennial Assessment of our Local School Wellness Policy (LSWP). This comprehensive review is critical for ensuring our schools promote a healthy environment through strong standards for nutrition, physical activity, and overall student well-being, aligning with the requirements set forth by the USDA and California Department of Education (CDE).

Overall Results and Comparison:

This year's assessment, which began in the Spring of 2024 and was completed in October 2025, demonstrates that our district is in compliance with federal and state standards pertaining to meal patterns, nutrient levels, and calorie requirements for each grade level served. Compared to our last assessment, we've seen some improvements, particularly in the areas of conducting a rigorous, multidisciplinary assessment of our policies and practices as well as increasing awareness of district wellness policies by posting the LSWP outlining nutrition and physical activity regulations in public view in each school cafeteria and/or dining area.

The Assessment Process:

This Triennial Assessment was led by the Food Service Department and involved our dedicated School Nutrition Advisory Committee (SNAC). The SNAC includes a diverse group of stakeholders including but not limited to parents, student representatives, teachers, classified staff, school administrators, community partners and District Board representatives. In addition to SNAC, district wellness policy and practices were assessed by the Superintendent's leadership cabinet including the Business Office, Student Services and Education Services. We used a multi-step process involving the WellSAT 3.0 policy evaluation tool to measure the strength and comprehensiveness of both our policy and our practices. The results of this entire process

are now being used to prioritize updates and new initiatives for the next three years.

Strong Policies and Aligned Practices

This section of the Triennial Assessment demonstrates the district's sustained commitment to achieving a culture of health and wellbeing. Our success is particularly evident in meeting and exceeding federal mandates related to strict adherence to nutritional requirements and establishing policies that support student and staff health behaviors.

Federal Requirements Addressed:

The items in this section directly address several core federal requirements under the Healthy, Hunger-Free Kids Act (HHFKA) and USDA FNS regulations:

Meal Integrity:

Meeting all federal standards for meal patterns, nutrient levels, and calorie requirements across all grade levels served (7 CFR parts 210 and 220).

Water During Meals:

Ensuring free drinking water is available to students during all meal service times (7 CFR § 210.10(a)(1)(i) and 7 CFR § 220.8(a)(1)).

LSWP Content:

Requiring the LSWP to address nutrition education, physical activity, and other school-based activities that promote wellness, which is achieved through the modeling and water access components (7 CFR § 210.31).

Areas of Demonstrated Success and Policy Improvement:

Per our assessment, our district has maintained compliance and demonstrated operational distinction in the following key areas:

Nutritional Integrity and Meal Compliance:

We consistently meet all state and federal standards for meal patterns, nutrient levels, and calorie requirements for all grade levels (K-12). This foundational success is the result of thoughtful menu planning, disciplined use of nutrient analysis and menu planning software, and ongoing training for all kitchen staff to ensure adherence to all state and federal nutritional requirements.

Universal Breakfast and Meal Access:

We successfully offer breakfast every school day to all enrolled students. This ensures that essential morning nutrition is not a barrier to learning. Furthermore, free (no cost) drinking water is provided at all mealtimes, utilizing easily accessible, high-flow water dispensers located adjacent to the serving lines.

Policy Score	Practice Score	

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	\Leftrightarrow
FR4	Is free (i.e., no cost to students) drinking water available to students during meals?	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	Σ
NES14	Do students have consistent and easy access to free drinking water throughout the school day?	2	2	Σ
EW2	Are school staff encouraged to model healthy eating and physical activity behaviors in front of students?	2	2	₹

Create Practice Implementation Plan

As a district, we understand the critical importance of achieving and maintaining full compliance with the Local School Wellness Policy (LSWP) mandates. The findings from this assessment will guide our ongoing efforts to enhance student health and wellness. As we continue to refine our policies and programs, we remain dedicated to fostering a school environment that supports lifelong healthy habits.

To ensure full compliance with all elements of our District LSWP, we are committed to developing and executing practical implementation plans that align with federal regulations and best practices. Our approach will focus on clear action steps, accountability measures, and ongoing stakeholder collaboration to support student health and well-being effectively. We will continue to use feedback from the Triennial Assessment to identify areas for improvement and refine implementation strategies. Furthermore, the District will ensure regular communication with families, students and staff about wellness policy goals, activities, and opportunities to get involved.

As such, our implementation plan, outlined below, is designed to address key areas of needed improvement and ensure full fidelity to the new policy's requirements.

The primary federal requirements we are targeting relate to competitive foods and beverages as well as food and beverage marketing, both of which must meet or exceed the USDA Smart Snacks and California standards and must apply to food and beverages available during and after the school day. Additionally, we must formalize a plan to address the availability of nutrition education in our school environment.

Implementation Plan for Improvement - Our strategy is divided into three actionable pillars:

- 1. Sales and Marketing Audit: We will execute a systematic district-wide audit of all competitive food sales, including a la carte, vending, school stores, and fundraisers consumed during the school day, as well as all foods sold to students after school. This audit will allow us to create a curated inventory of compliant foods available during the school day.
- 2. School Culture and Policy Compliance: The Food Services Department will work with each school site to implement the newly formalized district policy around non-Smart Snack compliant foods available throughout the school day, specifically, student stores, fundraisers and competitive foods available during the school day. This process will include understanding site specific needs, conducting training for school staff, developing materials and resources to support policy implementation, codified procedures to ensure adherence to district policy and ultimately monitoring compliance across all school sites.
- 3. Nutrition Education Enhancement: We will work closely with our Programs SNAC Pac (a subcommittee of the School Nutrition Advisory Committee) to rigorously review and enhance nutrition education approaches and interventions across all grade levels as well as increase student agency in the school food program. We will leverage USDA, CDE and industry resources as well as local community partnerships (e.g., Farm-to-School initiatives) to provide hands-on, experiential learning opportunities that connect classroom concepts directly to the school garden and cafeteria offerings.

Responsibility and Timeline

The Director, Food and Nutrition in collaboration with key stakeholders (e.g. the Chief Business Official, the Assistant Superintendent of Education Services, and the constituents in the School Nutrition Advisory Committee) will be responsible for creating and overseeing the master implementation plan.

Plan Creation Date: The full practice implementation plan will be created and formally approved by August 1, 2026.

Plan Implementation Date: The plan will be fully integrated and put into effect across all sites beginning SY 2026-2027.

Assessment of Success:

Success will be assessed through quantifiable, ongoing monitoring mechanisms such as site audits conducted by the Director, Food and Nutrition or site Principals to verify adherence to Smart Snacks standards in all points of service. Success in cultural compliance (e.g. fundraisers) will be measured via a biannual survey of teachers and principals, and by reviewing principal documentation of policy dissemination. Success in nutrition education will be assessed by the number of newly implemented programs (e.g. Farm to School initiatives) and professional development opportunities implemented within the PCS community over the course of the next three years. We will consider the implementation successful when all elements show documented evidence of improvement in both policy as well as practice.

Policy Score	Practice Score	

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	1	0	
FR7	Do all a la carte foods and beverages sold in the cafeteria meet Smart Snacks standards?	1	0	
FR9	Do all foods and beverages sold in school stores during the school day meet Smart Snack standards?	1	0	
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?	1	0	
FR11	Does your district regulate foods and beverages served at class parties and other school celebrations in elementary schools?	1	0	
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	0	
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	0	
FR16	Is wellness policy implementation evaluated every three years?	2	1	
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)?	1	0	
NES13	Do teachers or school staff give students food as a reward?	1	0	
NE1	Are skills-based, behavior-focused, and interactive/ participatory methods used in nutrition education to develop student skills?	1	0	

NE2	Do all elementary school students receive sequential and comprehensive nutrition education?	1	0	
NE3	Do all middle school students receive sequential and comprehensive nutrition education?	1	0	
NE5	Is nutrition education integrated into other subjects beyond health education?	1	0	
PEPA1	Does the district have a written physical education curriculum that is implemented consistently for every grade?	1	0	

Update Policies

Over the course of the past 12 months, our district has endeavored a comprehensive update to our school wellness policy in collaboration with our school community to serve as the roadmap for all members in our district for the next three years. The revised LSWP now explicitly addresses all areas identified as below standard or deficient per our WellSat policy and practice assessment process. The updated LSWP aligns our values and aspirations as a district; introduces a host of bold, innovative policies pertaining to all areas covered by the LSWP; and new policy language consistently meets or exceeds state and national best-practice models, such as the Alliance for a Healthier Generation framework.

At the time of this writing, the Food Services Department, in collaboration with the School Nutrition Advisory Committee (SNAC), has assumed primary responsibility for updating policy language pertaining to Nutrition Education and Nutrition Promotion, while the Assistant Superintendent of Student Services in collaboration with PCS Safety and School Climate Committee has assumed primary responsibility for updating policy language related to Physical Activity and Other Wellness Initiatives. All draft language shall be integrated into a single draft ready for community review. The updated draft will be circulated to the Principals at all school sites, thereby providing an opportunity for further stakeholder feedback. The finalized draft is slated for review and approval by the PCS Board of Trustees by March 2026.

		Policy Score	Practice Score	
FR13	Which groups are represented on the district-level wellness committee?	1	2	
FR15	How is the wellness policy made available to the public?	1	2	

Has the wellness policy been revised based on the previous triennial assessment?	1	2	
Does your school use strategies to maximize participation in the school breakfast program and/ or school lunch program?	0	2	
In your district, is it a priority to procure locally produced foods for school meals?	0	2	
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?	0	2	
Are foods or beverages containing caffeine sold at the high school level?	0	2	
How does your physical education program promote a physically active lifestyle?	1	2	
Are all physical education classes taught by state certified/licensed teachers who are endorsed to teach physical education?	0	2	
Is ongoing professional development offered every year for PE teachers that is relevant and specific to physical education?	1	2	
What percentage of students do you estimate do not take PE each year due to exemptions?	0	2	
Are there opportunities for all students to engage in physical activity before and after school?	1	2	
Is there daily recess for all grades in elementary school?	1	2	
Do teachers provide regular physical activity breaks for students in the classroom?	0	2	
	Does your school use strategies to maximize participation in the school breakfast program and/or school lunch program? In your district, is it a priority to procure locally produced foods for school meals? 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? Are foods or beverages containing caffeine sold at the high school level? How does your physical education program promote a physically active lifestyle? Are all physical education classes taught by state certified/licensed teachers who are endorsed to teach physical education? Is ongoing professional development offered every year for PE teachers that is relevant and specific to physical education? What percentage of students do you estimate do not take PE each year due to exemptions? Are there opportunities for all students to engage in physical activity before and after school? Is there daily recess for all grades in elementary school? Do teachers provide regular physical activity	Does your school use strategies to maximize participation in the school breakfast program and/ or school lunch program? In your district, is it a priority to procure locally produced foods for school meals? 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? Are foods or beverages containing caffeine sold at the high school level? How does your physical education program promote a physically active lifestyle? Are all physical education classes taught by state certified/licensed teachers who are endorsed to teach physical education? Is ongoing professional development offered every year for PE teachers that is relevant and specific to physical education? What percentage of students do you estimate do not take PE each year due to exemptions? Are there opportunities for all students to engage in physical activity before and after school? Is there daily recess for all grades in elementary school? Do teachers provide regular physical activity	Does your school use strategies to maximize participation in the school breakfast program and/ or school lunch program? In your district, is it a priority to procure locally produced foods for school meals? 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? Are foods or beverages containing caffeine sold at the high school level? How does your physical education program promote a physically active lifestyle? Are all physical education classes taught by state certified/licensed teachers who are endorsed to teach physical education? Is ongoing professional development offered every year for PE teachers that is relevant and specific to physical education? What percentage of students do you estimate do not take PE each year due to exemptions? Are there opportunities for all students to engage in physical activity before and after school? Is there daily recess for all grades in elementary school? Do teachers provide regular physical activity O 2 2 2 2 3 4 2 4 2 4 2 2 4 3 4 4 5 5 6 6 7 7 8 7 8 8 8 8 8 9 9 9 9 9 9 9 9

PEPA15	Does the district have "joint-use" or "shared-use" agreements?	1	2	
PEPA17	Are teachers encouraged to use physical activity as a reward for students?	0	2	
PEPA18	Do teachers ever use physical activity as a punishment?	0	2	
PEPA19	Do teachers ever withhold physical activity as a classroom management tool?	0	2	
EW1	Are there strategies used by the school to support employee wellness?	1	2	
IC1	Is there an active district-level wellness committee?	1	2	

Opportunities for Growth

The following three key areas represent the priorities identified through the Triennial Assessment that require policy refinement and/or practice improvement to ensure full compliance and maximize impact on student wellness.

- 1. Nutrition Environment and Services SmartSnack Compliance
- a. Plan for Improvement: We will work to close a documented gap in both our policy and our practices in terms of adherence to SmartSnack compliance in all situations and contexts by cultivating a thorough, disciplined school culture that ensures all food and beverages SERVED and SOLD to students on school grounds both during and after the school day (including third-party clubs, etc.) will meet or exceed state and federal Smart Snack nutrition standards.
- b. Responsible Parties: The Director, Food and Nutrition, working in partnership with affected stakeholders at each school site (e.g. Principals, teachers, student leadership groups) will develop a program for implementation over the course of the next 3 years including the materials, processes and operating procedures necessary to minimize disruption to stakeholders while ensuring strict compliance with all regulations.
- c. Assessment: The Director, Food and Nutrition and school site leadership will perform unannounced site visits and monitor all channels for competitive foods to ensure full compliance with the new LSWP language.
- 2. Nutrition Education
- a. Plan for Improvement: We appreciate that the transition from general encouragement of nutrition education to embedding specific, measurable goals tied to curriculum standards may be challenging for

teachers to implement in a timely manner, especially considering comparable competing requests for other important topics (e.g. environmental literacy). As such, our plan for improvement in this area will take a two-pronged approach. First, the Food Services Department will leverage USDA, CDE and other evidence-based resources to curate a robust library of materials that teachers across all grade levels can deploy in their classrooms at their discretion. This effort will coincide with a disciplined communication and promotion campaign spearheaded by the Food Services Department encouraging teachers to utilize the library of classroom resources.

Second, the Director, Food and Nutrition will work with the "Programs" SNAC Pac (a subcommittee of the School Nutrition Advisory Committee) to identify and implement nutrition education approaches and interventions outside of the classroom by working with local partners and subject matter experts. These programs will include opportunities to develop food literacy, basic cooking skills, school garden and cafeteria integration as well as increasing student engagement in the school food program (e.g. Advisory committees, taste tests, student volunteers, etc.)

- b. Responsible Parties: The Director, Food and Nutrition, working in partnership with key stakeholders at each school site (e.g. Principals, teachers, parent groups, garden coordinators, ASB, etc.) and the SNAC committee will develop a 3 year roadmap for implementing nutrition education opportunities at every grade level over the course of the next 3 years.
- c. Assessment: The Director, Food and Nutrition will track the number of newly offered programs delivered at each grade level. The Director, Food and Nutrition will also work with site Principals to conduct an annual survey of teachers to measure the frequency, use and reach of the curated classroom materials.
- 3. Increase Level of School-Level Wellness Committees/Ambassadors
- a. Plan for Improvement: The District will start by encouraging each school site to designate a representative, either the Site Administrator or designee (e.g. a teacher, a parent/guardian, a student) to participate in the School Nutrition Advisory Committee. These representatives will also support the Food Services Department in rolling out student-led wellness committees at each school site to promote student agency (i.e. students as decision makers) in the food program.
- b. Responsible Parties: The Director, Food and Nutrition will work closely with district leadership to promote ongoing site representation in SNAC and recruit SNAC representatives from every site.
- c. Assessment: Success will be measured by tracking attendance of site representatives at all SNAC meetings.

		Policy Score	Practice Score	
FR1	Does the district have specific goals for nutrition education designed to promote student wellness?	1	1	
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?	1	1	

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NES5	Are marketing strategies used to promote healthy food and beverage choices in school?	0	1	
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?	0	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)?	1	1	
NE4	Do all high school students receive sequential and comprehensive nutrition 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	
PEPA2	Does the district have a written physical education curriculum that is aligned with national and/or state standards?	0	0	
PEPA4	How many minutes per week of PE does each grade in elementary school receive?	0	1	
PEPA5	How many minutes per week of PE does each grade in middle school receive?	0	1	
PEPA6	How many minutes per week of PE does each grade in high school receive?	0	1	
PEPA10	What percentage of students do you estimate do not take PE each year due to substitutions?	0	1	

PEPA11	Are there opportunities for families and community members to engage in physical activity at school?	1	1	%
PEPA16	What proportion of students walk or bike to school?	0	1	
IC2	Is there an active school-level wellness committee?	0	0	

Conclusion

Our Triennial Wellness Assessment reaffirms our district's commitment to cultivating a healthy school environment that supports student well-being, academic success, and lifelong healthy habits. Through this comprehensive review, we have identified some key areas of success; however, we also recognize opportunities for enhancement and growth to ensure full compliance with federal wellness policy requirements and alignment. Specifically, over the next 3 years, our district will prioritize efforts to improve our school food environment, increase food and nutrition education opportunities and bolster community (including student) engagement and collaboration.

With the input of students, parents, staff, and community stakeholders, we look forward to the ratification of a more comprehensive, prescriptive Local School Wellness Policy and will continue to refine implementation strategies to create meaningful, sustainable improvements. Our commitment to accountability, transparency, and collaboration will drive ongoing progress, ensuring that every student has access to the resources and opportunities needed to thrive.

Moving forward, our district will use the insights from this assessment to guide policy updates, program enhancements, and monitoring efforts to maintain compliance and exceed wellness standards. By working together, we can continue to build a healthier school environment that nurtures the success and well-being of all students and staff.

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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