



June 30, 2017

The Honorable Tom Torlakson  
State Superintendent of Public Instruction  
California Department of Education  
1430 N Street  
Sacramento, CA 95814

**Re: Comments on the Draft California Every Student Succeeds Act (ESSA) State Plan**

Dear Superintendent Torlakson,

Thank you for the opportunity to respond to the draft of California's ESSA State Plan. ESSA recognizes the need for schools to support the whole child and specifically acknowledges the importance of promoting health and wellness. The implementation of ESSA provides an important opportunity to more fully integrate student and school health into education policy and practice and support the integral connection between health and learning. The link between health and learning is clear: healthy, active, and well-nourished children are more likely to attend school, be ready to learn, and stay engaged in class.

With the Local Control Funding Formula (LCFF), California has taken great strides towards improving educational equity and supporting the whole child. Through ESSA, California has the opportunity to continue to build upon the LCFF and create a national model for incorporating health and wellness into its accountability system, the California School Dashboard and needs assessment. We urge you to seize the new opportunity presented by ESSA implementation to further support student health and school wellness.

The California Food Policy Advocates (CFPA) is a statewide policy and advocacy organization dedicated to improving the health and wellbeing of low-income Californians by improving their access to nutritious, affordable foods. We have 25 years of experience advancing policies that support access to and participation in the federal nutrition programs, including the National School Lunch and School Breakfast Program.

CFPA is working to ensure that our school funding and accountability systems recognize school nutrition as an academic support strategy for our students. In our comments, we provide recommendations on improving the proposed state plan and background information to justify our recommendations. Additional information is available upon request. We appreciate the opportunity to comment on the draft and welcome the opportunity to discuss these recommendations with you. We look forward to seeing ESSA fully implemented so that every child in California is in school and ready to learn.

Sincerely,

A handwritten signature in black ink that reads "Anna Colby". The signature is written in a cursive, flowing style.

Anna Colby, MS, MPP  
Nutrition Policy Advocate, California Food Policy Advocates



## **Introduction**

School meal program help shield students from experiencing hunger and provide students with the nutritious foods they need in order to attend school and succeed academically. Consumption of school breakfast and school lunch are positively associated with improved attendance and academic achievement.<sup>1,2,3</sup>

There is a tremendous need for the federal school nutrition programs in California. Over two million California kids risk hunger. These children live in households that struggle to put enough food on the table. That is nearly one in four children that may go to bed hungry. Hungry students have a hard time concentrating in class, which affects their ability to learn and succeed academically.

Yet, too many low-income students miss out on school breakfast and lunch:

- 30% of low-income students miss out on school lunch. This means that an additional 970,000 students in need could be reached every day.
- Over 60% of low-income students miss out on school breakfast. This means over 2 million students in need could be reached every day.<sup>4</sup>

Our accountability system, the California School Dashboard, and needs assessments should compel schools to consider the health, well-being and nutritional needs of their students. Ensuring students have access to enough nutritious food is crucial to furthering the state's educational equity goals and making sure our high need students are in school and ready to learn.

## **Recommendations**

1. Include Health-Related Indicators on the California School Dashboard
2. Ensure That Comprehensive Needs Assessments of Schools and Student Groups Designated as Needing Improvement Address Student Health and Nutritional Needs and the Overall Wellness Environment within the School

## **Background Information and Justification for Recommendations**

### **Recommendation #1: Include Health-Related Indicators on the California School Dashboard**

ESSA requires states that receive Title I funding include measures that relate to or inform student attendance on their report cards. These include rates of in-school suspensions, out-of-school suspensions, and expulsions; school-related arrests and referrals to law enforcement; and incidences of violence including bullying and harassment. We recommend that measures of health and wellness, which relate to or inform chronic absenteeism, be reported on the California School Dashboard. These include, but are not limited to:

---

<sup>1</sup> Food Research and Action Center. "Research Brief: Breakfast and Learning." October, 2016. Available at <http://frac.org/wp-content/uploads/2009/09/breakfastforlearning.pdf>

<sup>2</sup> Centers for Disease Control and Prevention. "Health and Academic Achievement." May, 2014. Available at [http://www.cdc.gov/healthyyouth/health\\_and\\_academics/pdf/health-academic-achievement.pdf](http://www.cdc.gov/healthyyouth/health_and_academics/pdf/health-academic-achievement.pdf)

<sup>3</sup> California Food Policy Advocates. "Breakfast & Academics." Available at: <http://cfpa.net/ChildNutrition/SBP/Legislation/BreakfastAndAcademics-2016.pdf>

<sup>4</sup> California Food Policy Advocates. "School Meal Access & Participation: California Statewide Summary 2014-15" Available at: [http://cfpa.net/ChildNutrition/ChildNutrition\\_CFPAPublications/SchoolMealAnalysis-StateSummary-2014-15.pdf](http://cfpa.net/ChildNutrition/ChildNutrition_CFPAPublications/SchoolMealAnalysis-StateSummary-2014-15.pdf)



1. Measures of access to and participation in the federal school nutrition programs, such as:
  - Rate of participation in the National School Lunch Program and School Breakfast Programs of students eligible for free or reduced-price meals
  - Participation in Community Eligibility Provision (CEP)
  - Availability of Breakfast After the Bell, such as breakfast in the classroom or alternative school breakfast models

These indicators will inform parents and the public how their schools are working to ensure students have access to the health and academic benefits of school meals. CEP and serving breakfast after the start of the school day are proven strategies to increase access to the school meal programs.

- When free meals are offered to all children, school meal participation increases, in part because it reduces the stigma of participating in the meal programs. High need schools and districts can be reimbursed for providing free breakfast and lunch to all students through federal options such as CEP.<sup>5</sup>
- Serving breakfast after the start of the school day increases participation in school breakfast.<sup>6</sup> After the bell breakfast reduces barriers to participation, such as transportation issues and tight bus schedules that limit students' ability to show up to school before class.

2. Adherence to and progress towards Local School Wellness Policy (LSWP) goals and requirements

A LSWP is a written document that outlines an LEA's policies that support student health, wellness and ability to learn. Schools may also have their own wellness policies. These policies should include nutrition guidelines for all foods sold in all areas of the school building (including vending machines and school stores). Additionally, the LSWP should include specific goals for nutrition promotion, education, physical activity and other school-based activities that promote student wellness.

Each LEA that participates in the National School Lunch Program or other federal Child Nutrition programs is required by federal law to establish a LSWP for all schools under its jurisdiction. Collection of data related to the LSWP is included in the Administrative Reviews conducted for compliance to the Healthy, Hunger Free Kids Act of 2010.

As California moves towards one state and federal accountability plan, we recommend taking steps to integrate LSWPs into that plan. Posting this information on the California School Dashboard could serve as an interim step to including this data in the accountability system.

---

<sup>5</sup> California Food Policy Advocates. "The Benefits of Universal Free School Meals." Available at: [http://cfpa.net/ChildNutrition/ChildNutrition\\_Legislation/SB138-Universal-Free-Meals-Benefits.pdf](http://cfpa.net/ChildNutrition/ChildNutrition_Legislation/SB138-Universal-Free-Meals-Benefits.pdf)

<sup>6</sup> Food Research and Action Center. "School Breakfast Program: Trends and Factors Affecting Participation." March, 2015. Available at [http://frac.org/pdf/school\\_breakfast\\_trends\\_and\\_factors2015.pdf](http://frac.org/pdf/school_breakfast_trends_and_factors2015.pdf)



## **Recommendation #2: Ensure That Comprehensive Needs Assessments of Schools and Student Groups Designated as Needing Improvement Address Student Health and Nutritional Needs and the Overall Wellness Environment within the School**

Schools and student groups identified for targeted or school-wide improvement interventions must undertake a comprehensive needs assessment to hone in on specific areas of need, as well as available resources and assets. In order to ensure that the accountability system is supportive of continual improvement, needs assessments should take into account a range of student needs, including student health and nutrition.

Collection of the following types of data will support schools in identifying health and nutrition insufficiencies, and selecting appropriate evidence-based interventions to address those insufficiencies. We recommend that the CDE require health and wellness data be collected/utilized as part of a comprehensive needs assessment. These include but are not limited to:

- Free- and reduced-priced percentages, participation in CEP, and participation in school meals (as compared to eligibility), and availability of breakfast after the bell
- School climate indicators that include measures of health and wellness and the school nutrition environment
- Quality and availability of school-based after-school and summer programs (particularly those that support health and wellness and provide nutritious meals through the federal meal programs)
- School health policies and practices, including adherence to and progress towards goals in their Local School Wellness Policy

## **Conclusion**

CFPA is grateful for the opportunity to comment on California's proposed plan to update the state's system for educational accountability, school improvement, and educator preparation, support, and retention. We urge you to continue to advance your work towards educational equity by recognizing the importance of nutrition as an academic support strategy. We look forward to your leadership on these critical issues and stand ready to assist in any way possible.