



PIMA COUNTY BOARD OF HEALTH
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September 28, 2016

Arizona Department of Education
1535 West Jefferson Street
Phoenix, Arizona 85007

Subject: Pima County Health Department (PCHD) Board of Health public comment on proposed draft of the Every Student Succeeds Act (ESSA); An Opportunity to Put Health Back in Schools

To the members of the Arizona Department of Education:

The PCHD Board of Health would like to submit formal comments and recommendations on the draft of ESSA. From a holistic perspective, health is critical to success not just in education, but in life. Superintendent Diane Douglas quotes,

As we prepare our students for future success, we must remember that time spent in the classroom is only one aspect of their achievement. If children are hungry throughout the school day, how can we expect them to perform at their best? If they haven't been able to exercise, will they really be able to concentrate and absorb the material expected of them? We have to give students the time and resources they need to be healthy, focused learners. If we don't, they will go to school every day with one more challenge to overcome.

Health starts with conception and we know that with certain health issues, prevention starts early and must be reinforced throughout life. After reviewing the draft of the ESSA and the implementation proposals included in *AZ Kids Can't Wait!* PCHD Board of Health would like to make the following recommendations:

- 1) The Centers for Disease Control and Prevention (CDC) and the PCHD Board of Health support and recommend the use of both *School Health Profiles* and the *School Health Index* (SHI) as tools for Local Educational Authorities (LEA) and schools to meet some of the requirements for a Comprehensive Needs Assessment relating to the *Arizona Indicators of Effective Schools*. Both of these tools address key areas that assess four (4) of these seven (7) indicators and help identify low-cost, low time-commitment actions that can improve the school site. The four (4) indicators that the SHI addresses include number 2, Effective Teachers, number 4, Strengthen Instructional Program Based on Student Needs, number 6, School Environment Focused on Achievement / Non-Academic Factors Affecting Student Achievement, and number 7, Engaging Families and Communities. Though the Arizona Department of Education may not be able to make specific recommendations for to schools, it is imperative from the standpoint of health that the SHI is included in the formulation of individual school needs assessments. It should also be mentioned that the SHI supports specific assessment criteria needed to allocate Title 4 Part A funding based on Title 1 formulas to support Physical Education, Health and Nutrition Services as well as other elements of a Well-Rounded Education.

- 2) The PCHD Board of Health supports the inclusion of a fifth proposal onto *Build a Strong Student Support System*. This proposal would include, Proposal 5) Leveraging of community resources to address the *Whole School Whole Community Whole Child* model; supported by the CDC as a best practice. Implementation of this model would make use of existing community resources from public and private sectors to support education and health at any school site. One critical result of including this proposal would support linking local health departments to LEA's and schools in order to support student success and achievement. This would make it easier to connect students to care, insurance enrollment and other health-related systems that may not previously have been implemented or accessible by schools.

- 3) As *AZ Kids Can't Wait!* is the mechanism by which the Arizona Department of Education plans to implement ESSA, the PCHD Board of Health supports and suggests that ADE move forward with key health-related proposals, *Leveraging Health to Advance Student Achievement*, proposals 1-4. The inclusion of Physical Education is paramount to student success, especially when taught by a certified physical education teachers. The Youth Risk Behavior Survey (YRBS) shows 19% of youth ages 10-18 years in Pima County report attending daily PE classes, a number that falls far below the 40% of high school students reporting attendance at the State level. Proposal 2, Comprehensive School Physical Activity Programming, should specifically state the importance of daily Standards-based Physical Education classes as a cornerstone to the program. The following outlines PCHD Board of Health's support for these essential proposals;
 - a. **Proposal 1) Allow students time to eat nutritious meals at school.** According to Census data, in Pima County, 21.6% of students under the age of 18 live below the poverty line. In many cases for this population, one of the only meals is coming from their schools. The 2013 YRBS reports that anywhere from 13%-20% of high school students had not eaten breakfast in the past 7 days at the time of survey administration. Breakfast and lunch in school cafeterias meet the federal guidelines for nutritional content, and we need to ensure that our students have enough time to consume these meals. Encouraging initiatives like "lunch after recess" and "smarter lunchrooms" are tools that help our kids get the energy they need to succeed.

 - b. **Proposal 2) Increase the number of minutes students receive for daily recess.** According to 2011 National Survey of Children's Health (NSCH) data, 19.8% of children ages 10-17 in Arizona were obese. 2013 YRBS data shows 45% of Pima County high school students reported 60 minutes of Physical activity 5 or more days a week. In the state of Arizona, this number drops to 42%. The link between physical activity and obesity is strong and this proposal is adamantly supported by the PCHD Board of Health. By increasing the number of minute's students have to play and move, Arizona moves forward.

 - c. **Proposal 3) Increase access to fresh and healthy food for use in schools.** Currently, there are 24 school gardens in the state of Arizona. 14 of these are in Pima County. School gardens are essential to educating students about food security and biological sciences. The PCHD has worked with our local community food bank to help

streamline the process of allowing school farm-to-table initiatives at the state level because Pima County views this as a critical issue. The CDC supports the link between healthy nutritional habits and academic performance and the PCHD Board of Health acknowledges this position.

- d. **Proposal 4) Implement a Comprehensive School Physical Activity Program**. The foundation or cornerstone of this program is Physical Education. In 2013, 19% of Pima County high-school students reported involvement in a physical activity class (YRBS). 32% of these students also reported 3+ hours spent playing video games daily. These numbers build the case for this proposal, but the PCHD Board of Health highly recommends emphasizing the importance of mandatory K-12 requirements for Physical Education. The CDC states, “Schools should ensure that physical education is provided to all students in all grades and is taught by qualified teachers.” The CDC also supports that “Schools should require daily physical education for students in kindergarten through grade 12 (150 minutes per week for elementary schools and 225 minutes per week for secondary schools).” Arizona schools do not begin to approach this benchmark and the PCHD Board of Health strongly supports the CDC’s recommendations.
- 4) Health Education is mentioned in § 299.19 of the AZ SEA consolidated plan, and the PCHD Board of Health would like to see Health Education included as a fifth proposal under *Leveraging Health to Advance Student Achievement*. The progress in the proposals *Leveraging Health* is to be applauded, but we cannot afford to gloss over the importance of Health Education as a part of a Well-Rounded Education. Evidence-based curricula that address risk and protective factors that influence student proclivity toward substance abuse, depression / anxiety, delinquency, teen pregnancy, school dropout and violence (behaviors linked with these factors) must be implemented not only to support academic and health success, but to also reduce long term budgetary expenditures like prison and hospital costs. Specific diversified and inclusive education on emotional, mental / behavioral health, and relationships are critical for our youth and will not only reduce negative behavior, but will increase attendance and improve an overall positive school climate. The PCHD Board of Health strongly suggests the inclusion of this important proposal.
 - 5) Schools across the United States will be required to update their Local Wellness Policy (LWP) before July of 2017 to meet the new federal requirements. There are several areas where LWP update overlaps *Arizona Kids Can’t Wait!* proposals. According to the federal guidelines, LWP must include the following:
 - a. Specific goals for nutrition promotion and education, physical activity, and other school-based activities that promote student wellness. LEAs are required to review and consider evidence-based strategies in determining these goals.
 - b. Standards and nutrition guidelines for all foods and beverages sold to students on the school campus during the school day that are consistent with Federal regulations for: School meal nutrition standards, and the *Smart Snacks in School* nutrition standards.

- c. Standards for all foods and beverages provided, but not sold, to students during the school day (e.g., in classroom parties, classroom snacks brought by parents, or other foods given as incentives).
- d. Policies for food and beverage marketing that allow marketing and advertising of only those foods and beverages that meet the *Smart Snacks in School* nutrition standards.
- e. Description of public involvement, public updates, policy leadership, and evaluation plan

Districts must also assemble Wellness Coalitions that triennially assess LWP, a great opportunity to leverage work mandated by LWP requirements to meet requirements for the Comprehensive Needs Assessment needed for ESSA implementation. The PCHD Board of Health suggests utilizing the co-occurring momentum for improved health that the ESSA and LWP implementation provides to move Arizona into the forefront of health in schools.

The PCHD Board of Health is honored to have an opportunity as a public stakeholder in education to provide feedback during this process. Right now is a critical time for our county, our state and our nation. The implementation of these recommendations is key to student success academically and in life-long health for it is only by empowering our children that we can truly change the future.

Let's make sure that future is full of the experience that living a healthy life can offer.

Sincerely,

A handwritten signature in blue ink, appearing to read "Paul R. Horwitz, M.D.", with a stylized flourish at the end.

Paul R. Horwitz, M.D.
President
Pima County Board of Health

Cc: Governor Douglas Ducey
Senator Sylvia Allen, Chairwoman, Senate Education Committee