



Titusville Area School District  
301 East Spruce Street, Titusville, PA 16354  
(814) 827-2715

## Wellness Policy Triennial Assessment 2023

Members of the Wellness Committee met on Thursday, May 18, 2023 to review the District's School Wellness Policy 246.

As a result, the Wellness policy will be updated to include: behavioral economics techniques to encourage consumption of whole grains, fruits and vegetable and decrease waste, provide the nutrition content of school meals to the school community, planning school activities with the wellness policy in mind and ensuring indoor air quality is a part of our healthy learning environment program.

Under implementation in the area of nutrition, the district will seek to increase integration of nutrition education into other subjects of our curriculum, increase family engagement in our nutrition efforts (monthly newsletter), participate more in Farm to School activities and provide resources to families in order to prepare healthy meals. In the area of physical activity, we will strive to add more before and after school activities for students. Under the other school-based wellness activities, we will add more water bottle filling stations, include students and parents in menu selections through taste testing and surveys, train staff annually on the components of the wellness policy during opening professional development meetings and communicate information to parents to support healthy diets and physical activity. During school-sponsored events, we will offer healthy food and beverage options. We will also provide a list of non-food items and healthy alternatives to staff and families.

Over the past three years, the Wellness Committee has been implementing the goals of the policy. The district remains strong in the area of physical activity and education and other school-based wellness activities.

Wellness Committee members May 2023 included:  
Stephanie Keebler, Superintendent  
Amy Herman, Administration - Director of Student Services  
Michael Hlad, Director of Food Service  
Marci Kelly, School Health  
Autumn Kelley, Parent  
Lynn Cressman, School Board  
Kevin Dawson, PE Teacher  
Brooke Kelley, Student  
Rachel Rubaker, Community member



# Wellness Policy Assessment Tool and Report Template

---

## Background

Federal regulations at [7 CFR 210.31](#) require local education agencies (LEAs) participating in the National School Lunch Program to complete an assessment of their local school wellness policy at least once every three years and make the results available to the public. This triennial assessment must measure the implementation of the local school wellness policy and include:

- The extent to which schools under the jurisdiction of the LEA are in compliance with the local school wellness policy;
- The extent to which the LEA's local school wellness policy compares to model local school wellness policies; and
- A description of the progress made in attaining the goals of the local school wellness policy.

LEAs may use a variety of methods to assess compliance and determine progress of their goals and objectives. Action planning documents that contain timelines, goals, and key tasks may assist in assessing changes over time. For example, the [School Health Index](#) (SHI) from the Centers for Disease Control and Prevention is a comprehensive self-assessment tool that helps with action planning and recordkeeping (a shorter version of the SHI is available from [Alliance for a Healthier Generation](#)), and the [WellsAT 3.0](#) is an online tool that indicates the strengths and weaknesses of your written policy.

## Triennial Assessment Tool and Report Template

When completed in full, this form may serve as both a triennial assessment tool and public report to meet the requirements in federal regulations and prepare for the Administrative Review by the Pennsylvania Department of Education (PDE), Division of Food and Nutrition. This document is intended to be completed using LEA-level information; however, the LEA may determine that a report from each school site, or alternatively, each school level (i.e., elementary, middle, high school) works better in assessing compliance and progress over time. For larger school districts, reporting on a district level may be challenging due to variation in sites' programs and progress in attaining wellness goals. If completing this report for the entire LEA, answer questions using the best available information and consider noting individual building variations or concerns in the "notes" sections.

In the left columns, indicate whether the listed goal or practice is included in your local school wellness policy. **Bolded** policy elements are required by federal regulation. When bolded items are not in the local policy, include an explanation. This tool uses the Pennsylvania School Boards Association's school wellness policy template (available on PDE's [Local School Wellness Policy Information webpage](#)) as the model wellness policy for comparison purposes, but it can be used regardless of the template used to develop your local policy.

In the right columns, indicate implementation of the goal or practice at schools within the LEA. LEAs are always encouraged to develop additional policy elements and goals for schools under their jurisdiction to create a supportive environment for student nutrition and physical activity.

Space is provided at the end of the form for the LEA to describe the progress made in attaining the goals of the local school wellness policy as required.

## Wellness Policy Assessment Tool and Report Template

LEA / District Name: Titusville Area School District

Date Completed: 05/18/2023

Name(s) of Reviewer(s): Stephanie Keebler

School Name (if applicable):

Select grades:

PK  K  1  2  3  4  5  6  7  8  9  10  11  12

Included in the written policy?

Yes No

Implemented in the school building(s)?

Fully in Place Partially in Place Not in Place

### Public Involvement, Notification, and Assessment

- |                                  |                       |  |                                  |                       |                       |
|----------------------------------|-----------------------|--|----------------------------------|-----------------------|-----------------------|
| <input checked="" type="radio"/> | <input type="radio"/> | <p><b>We have LEA official(s)/designee(s) in charge of wellness policy compliance.</b><br/>                 Name(s)/Title(s): Stephanie Keebler, Superintendent</p>  | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| <input checked="" type="radio"/> | <input type="radio"/> | <p><b>We complete an assessment of the local school wellness policy at least every three years ("triennial assessment").</b><br/> <b>Triennial assessment results are made available to the public in an easily accessible manner.</b><br/>                 Website address and/or description of how to access copy:<br/>                 www.gorockets.org, departments, food service, triennial wellness policy assessment</p>  | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| <input checked="" type="radio"/> | <input type="radio"/> | <p><b>At least every three years we use the results of the triennial assessment to update or modify the wellness policy as needed.</b><br/> <b>The LEA informs and updates the public about the contents, updates, and implementation of the wellness policy at least annually and the policy is accessible to the public.</b><br/>                 Website address for policy and/or description of how to access copy:<br/>                 www.gorockets.org, district board of directors, board policies, 246<br/>                 We retain records as required by federal regulations including:</p>   | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| <input checked="" type="radio"/> | <input type="radio"/> | <p><input checked="" type="checkbox"/> The written school wellness policy,<br/> <input checked="" type="checkbox"/> Documentation of making the wellness policy publicly available,<br/> <input checked="" type="checkbox"/> Documentation of outreach efforts inviting stakeholders to participate in the wellness committee / wellness policy process, and<br/> <input checked="" type="checkbox"/> Copy of triennial assessment and documentation of reporting results to public.<br/> <b>The LEA utilizes a wellness committee that includes these community stakeholders in the development, implementation, review, and update of the wellness policy:</b></p> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| <input checked="" type="radio"/> | <input type="radio"/> | <p><input checked="" type="checkbox"/> Administrators   <input checked="" type="checkbox"/> Food service staff   <input checked="" type="checkbox"/> School health professionals<br/> <input checked="" type="checkbox"/> Parents   <input checked="" type="checkbox"/> School board members   <input checked="" type="checkbox"/> PE teachers   <input checked="" type="checkbox"/> Students<br/> <input checked="" type="checkbox"/> Public</p> <p>Other stakeholders (describe):</p>  | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> |

Notes on public involvement, notification, and assessment:  
 The committee agreed that this area was compliant.

### Nutrition Education\*

- |                                  |                       |   |                                  |                       |                       |
|----------------------------------|-----------------------|---|----------------------------------|-----------------------|-----------------------|
| <input checked="" type="radio"/> | <input type="radio"/> | <p>Nutrition education is provided within PDE's sequential, comprehensive health education standards.</p> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| <input checked="" type="radio"/> | <input type="radio"/> | <p>We teach, model, encourage, and support healthy eating through nutrition education.</p>                | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> |

## Wellness Policy Assessment Tool and Report Template

Included in the written policy?		Implemented in the school building(s)?				
Yes	No	Fully in Place	Partially in Place	Not in Place		
<input checked="" type="radio"/>	<input type="radio"/>	We provide all students with knowledge and skills for healthy lives via nutrition education.		<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<input checked="" type="radio"/>	<input type="radio"/>	We offer age-appropriate nutrition education and activities to students in: <input checked="" type="checkbox"/> Elementary School <input checked="" type="checkbox"/> Middle School <input checked="" type="checkbox"/> High School		<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<input checked="" type="radio"/>	<input type="radio"/>	Our nutrition education curriculum teaches behavior-focused skills such as menu-planning, reading nutrition labels, and media awareness.		<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<input checked="" type="radio"/>	<input type="radio"/>	School food service and nutrition education classes work together to create a learning laboratory.		<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
<input checked="" type="radio"/>	<input type="radio"/>	In addition to meeting academic standards for nutrition education, we integrate nutrition education into a variety of subjects (e.g., math, science, language arts).		<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
<input checked="" type="radio"/>	<input type="radio"/>	We reinforce lifelong lifestyle balance by linking nutrition and physical activity.		<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<input checked="" type="radio"/>	<input type="radio"/>	Staff providing nutrition education receive standards-based training and professional development.		<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<input checked="" type="radio"/>	<input type="radio"/>	We engage and involve families and the community in nutrition education efforts.		<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

Other goal (describe):

Encourage all students to start each day with a healthy breakfast. (In board policy and fully implemented)

### Notes on goals for nutrition education:

Increase communication with families by sending the Nutrition Inc. montly newsletter to all families.

## Nutrition Promotion\*

<input checked="" type="radio"/>	<input type="radio"/>	We use evidence-based techniques and nutrition messages in school and encourage participation in school meal programs.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
<input checked="" type="radio"/>	<input type="radio"/>	We participate in Farm to School activities such as having a school garden, taste-testing local products, incorporating local foods into school meals, and educating students in the classroom and on field trips about local agriculture.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
<input checked="" type="radio"/>	<input type="radio"/>	We cooperate with community agencies and organizations to provide opportunities for student projects related to nutrition.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
<input type="radio"/>	<input checked="" type="radio"/>	We implement behavioral economics techniques in the cafeteria to encourage consumption of whole grains, fruits, and vegetables and to decrease plate waste.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
<input checked="" type="radio"/>	<input type="radio"/>	We display and disseminate consistent nutrition messages in schools, classrooms, cafeterias, homes, community, and media.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
<input type="radio"/>	<input checked="" type="radio"/>	Our staff model healthy eating in front of students and avoid using unhealthy foods in classroom lesson plans.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
<input checked="" type="radio"/>	<input type="radio"/>	We offer health and nutrition resources to parents to help them provide healthy meals for their children.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

Other goal (describe):

### Notes on goals for nutrition promotion:

Increase communication with families by sending the Nutrition Inc. monthly newsletter.

## Physical Activity\*

<input checked="" type="radio"/>	<input type="radio"/>	We provide a variety of developmentally appropriate opportunities for physical activity during the school day for all students.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
<input checked="" type="radio"/>	<input type="radio"/>	We contribute to the effort to provide students daily opportunities to accumulate at least sixty minutes of age-appropriate physical activity daily as recommended by the CDC.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

## Wellness Policy Assessment Tool and Report Template

Included in the written policy?		Implemented in the school building(s)?				
Yes	No	Fully in Place	Partially in Place	Not in Place		
<input checked="" type="radio"/>	<input type="radio"/>	In addition to planned physical education, we offer activities such as indoor and outdoor recess, before and after school programs, intramurals, interscholastic athletics, and clubs to meet the needs and interests of our students.		<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
<input checked="" type="radio"/>	<input type="radio"/>	We maintain a physical and social environment that encourages safe and enjoyable activity for all students.		<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
<input checked="" type="radio"/>	<input type="radio"/>	We discourage extended periods of inactivity (two hours or more) for students.		<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
<input checked="" type="radio"/>	<input type="radio"/>	We provide physical activity breaks in the classroom.		<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
<input checked="" type="radio"/>	<input type="radio"/>	We offer before and/or after-school programs that include physical activity for participating children.		<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
<input checked="" type="radio"/>	<input type="radio"/>	We partner with parents/guardians and community members and organizations (e.g., YMCA, Boys & Girls Clubs, local parks, hospitals, etc.) to offer programs supporting lifelong physical activity.		<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
<input checked="" type="radio"/>	<input type="radio"/>	We do not use physical activity as a punishment (e.g., running laps).		<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
<input checked="" type="radio"/>	<input type="radio"/>	We do not withhold physical activity as a punishment (e.g., taking away recess).		<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
<input checked="" type="radio"/>	<input type="radio"/>	We encourage walking and biking to school.		<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
<input checked="" type="radio"/>	<input type="radio"/>	We encourage students and families to use our physical activity facilities, such as playgrounds and ball fields, outside of school hours in accordance with school rules.		<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
		Other goal (describe):				

### Notes on goals for physical activity:

Work to development more before and after school activities, especially for the elementary students.

## Physical Education (PE)

<input checked="" type="radio"/>	<input type="radio"/>	We implement a PE program consistent with state academic standards. All students participate in PE.		<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
<input checked="" type="radio"/>	<input type="radio"/>	PE instruction promotes skills and knowledge necessary for lifelong physical activity.		<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
<input checked="" type="radio"/>	<input type="radio"/>	PE classes provide the means for students to learn, practice, and be assessed on developmentally appropriate skills.		<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
<input checked="" type="radio"/>	<input type="radio"/>	Our curriculum promotes both team and individual activities.		<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
<input checked="" type="radio"/>	<input type="radio"/>	We offer a comprehensive PE course of study with planned instruction time for students to meet standards at the proficient level.		<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
<input checked="" type="radio"/>	<input type="radio"/>	We use a local assessment system to track student progress on state standards. Students are moderately to vigorously active as much time as possible during PE class. Accommodations are made in class for documented medical conditions and disabilities.		<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
<input checked="" type="radio"/>	<input type="radio"/>	We provide safe and adequate equipment, facilities, and resources for PE class.		<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
<input checked="" type="radio"/>	<input type="radio"/>	Certified health and PE teachers teach our classes.		<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
<input checked="" type="radio"/>	<input type="radio"/>	We provide professional development for PE staff.		<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
<input checked="" type="radio"/>	<input type="radio"/>	PE classes have a teacher-student ratio similar to other courses for safe and effective instruction.		<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
<input checked="" type="radio"/>	<input type="radio"/>	We do not use or withhold physical activity as a form of punishment in PE class.		<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
		Other goal (describe):				

School Administration will minimize the use of the gym for non-instruction use. (In board policy and fully implemented)

### Notes on goals for physical education:

## Wellness Policy Assessment Tool and Report Template

Included in the written policy?

Yes No

Implemented in the school building(s)?

Fully in Place Partially in Place Not in Place

### Other School-Based Wellness Activities\*

<input checked="" type="radio"/>	<input type="radio"/>	Free drinking water is available and accessible to students during meal periods and throughout the school day.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
<input checked="" type="radio"/>	<input type="radio"/>	School nutrition staff meet local hiring criteria and in compliance with federal regulations.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
<input checked="" type="radio"/>	<input type="radio"/>	We provide continuing education to school nutrition staff as required by federal regulations.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
<input checked="" type="radio"/>	<input type="radio"/>	We provide adequate space for eating and serving school meals.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
<input checked="" type="radio"/>	<input type="radio"/>	We provide a safe and clean meal environment for students.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
<input checked="" type="radio"/>	<input type="radio"/>	We offer students enough time to eat (10 minutes sit down time for breakfast; 20 minutes sit down time for lunch) and schedule meal periods at appropriate hours.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
<input checked="" type="radio"/>	<input type="radio"/>	We implement alternate school breakfast service models to increase participation, such as "grab & go," breakfast served in the classroom, and breakfast after first period.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
<input checked="" type="radio"/>	<input type="radio"/>	Students have access to hand washing or sanitizing before meals.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
<input checked="" type="radio"/>	<input type="radio"/>	Only authorized staff have access to the food service operation.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
<input type="radio"/>	<input checked="" type="radio"/>	We provide the nutrition content of school meals to the school community.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
<input checked="" type="radio"/>	<input type="radio"/>	We include students/parents in menu selections through taste-testing and surveys.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
<input checked="" type="radio"/>	<input type="radio"/>	We utilize outside funding and programs to enhance school wellness.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
<input checked="" type="radio"/>	<input type="radio"/>	We train all staff on the components of the school wellness policy.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
<input checked="" type="radio"/>	<input type="radio"/>	School based activities are planned with wellness policy goals in mind.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
<input checked="" type="radio"/>	<input type="radio"/>	Fundraising projects submitted for approval are supportive of healthy eating and student wellness.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
<input checked="" type="radio"/>	<input type="radio"/>	We encourage administrators, teachers, school nutrition professionals, students, parents/guardians, and community members to serve as positive role models through district programs, communications, and outreach.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
<input checked="" type="radio"/>	<input type="radio"/>	We communicate information to parents/guardians to support their efforts to provide a healthy diet and daily physical activity for their children.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
<input type="radio"/>	<input checked="" type="radio"/>	Indoor air quality is in accordance with our healthy learning environment program and applicable laws and regulations.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
		Other goal (describe):			

Notes on goals for other school-based activities:

Increase communication by sending the Nutrition Inc monthly newsletter to all families, review the wellness policy components with all staff at the opening professional development meeting, especially fundraisers information.

### Nutrition Guidelines for All Foods and Beverages at School

<input checked="" type="radio"/>	<input type="radio"/>	We consider promoting student health and reducing obesity when offering foods and beverages to students at school.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
<input checked="" type="radio"/>	<input type="radio"/>	<b>Foods and beverages provided through the National School Lunch and School Breakfast Programs comply with federal meal standards.</b>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
<input checked="" type="radio"/>	<input type="radio"/>	We offer healthy food and beverage options at school-sponsored events, such as dances and sporting events.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
<input checked="" type="radio"/>	<input type="radio"/>	<b>Foods and beverages outside of the school meal, which are sold to students at school during the school day, meet or exceed the established federal competitive food standards (USDA Smart Snacks in School). Venues include vending, school stores, non-exempt fundraisers, and a la carte items.</b>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

## Wellness Policy Assessment Tool and Report Template

Included in the written policy?			Implemented in the school building(s)?		
Yes	No		Fully in Place	Partially in Place	Not in Place
<input checked="" type="radio"/>	<input type="radio"/>	We limit the number of food fundraisers at school and have procedures in place for requesting a fundraiser exemption (i.e., selling foods that do not meet Smart Snacks) in accordance with limits set by PDE.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
<input checked="" type="radio"/>	<input type="radio"/>	<b>We have local standards in our written policy for foods and beverages offered for free to students at school, including food rewards, items offered at classroom parties and celebrations, and foods/beverages provided to the class as shared classroom snacks.</b>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
<input checked="" type="radio"/>	<input type="radio"/>	We provide a list of nonfood ideas and healthy food/beverage alternatives to staff and parents/guardians.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
<input checked="" type="radio"/>	<input type="radio"/>	<b>Only foods and beverages that meet or exceed federal nutrition standards (USDA Smart Snacks in School) are permitted to be marketed or promoted to students during the school day. Examples: posters, vending machines, menu boards, cups for beverage dispensing, coolers, trash cans.</b>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

Notes on nutrition guidelines for foods and beverages at school:

Increase communication with families about nonfood items and healthy alternatives.

**\* At least one goal for these categories must be included in the written policy per federal regulations.**

**Report on the progress made in attaining the goals of the wellness policy (REQUIRED):**

Over the past three years, the Wellness Committee has been implementing the goals of the policy. The district remains strong in the area of physical activity and education and other school-based wellness activities. Increased communication needs to occur in the area of nutrition education, nutrition promotion and nutrition guidelines for all food and beverages at school. The District will explore adding more bottle filling stations at the high school. The District will work to increase awareness of fundraising opportunities to ensure compliance with the wellness policy.