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September 14, 2009

Mr. Terry Dougherty  
Superintendent of Schools  
Hancock Central School District  
67 Education Lane  
Hancock, New York 13783

Report Number: S9-9-43

Dear Mr. Dougherty and Members of the Board of Education:

A top priority of the Office of the State Comptroller is to help school district officials manage their districts efficiently and effectively and, by so doing, provide accountability for tax dollars spent to support district operations. The Comptroller oversees the fiscal affairs of districts statewide, as well as districts' compliance with relevant statutes and observance of good business practices. This fiscal oversight is accomplished through our audits, which identify opportunities for improving district operations and Board of Education governance. Audits also can identify strategies to reduce district costs and to strengthen controls intended to safeguard district assets.

In accordance with these goals, we conducted an audit of 20 school districts throughout New York State to determine whether school districts are ensuring that all food available to students during the school day and at school activities meets established nutritional guidelines to promote healthy eating habits and proper nutritional goals. We included the Hancock Central School District (District) in our audit. The audit period was from September 1, 2007 to October 31, 2008.

This report of examination letter contains our audit results specific to the District. We discussed the findings and recommendations with District officials and considered their comments, which appear in Appendix A, in preparing this report. District officials generally agreed with our findings and recommendations. Appendix B includes our comments to an issue raised in the District's response letter. At the completion of our audit of the 20 school districts, we prepared a global report that summarizes the significant issues identified at the districts audited.

### **Summary of Findings**

While District officials have taken steps to ensure that students may purchase healthy food and beverages items, the District still offers food and beverages that do not meet established

nutritional guidelines and compete with the healthier choices offered. The District has adopted a wellness policy and the most recent State Education Department (SED) review, in 2006, found that the District did not fully comply with Federal guidelines and subsequent to the review, steps were taken to bring the school lunch program into compliance.

We found that the District could improve its efforts to promote healthy eating habits. The wellness policy does not establish a plan for measuring implementation of the local wellness policy, nor has the District reported on compliance as required per its policy. The District has not established a nutrition committee, although the Superintendent meets monthly with the Board of Education to discuss topics related to nutrition. We found the staff are not fully aware of the contents of the wellness policy. District officials told us they use comprehensive nutritional standards (i.e., Choose Sensibly) to guide food and beverage choices for students.

There are no prescribed standards in the State regarding competitive foods available in school districts. Based on the lack of guidance, the Comptroller's Office met with various health professionals from NYSHEPA, American Cancer Society, American Heart Association, New York State Nutrition Association and Department of Health. After these meetings, we decided to compare district offerings to the Institute of Medicine (IOM) guidelines. Currently, school districts are not required to follow these guidelines, which were used during our audit for comparison purposes.

An IOM report,<sup>1</sup> conducted with the Center for Disease Control at the direction of Congress, concluded that federally reimbursable school nutrition programs should be the main source of nutrition at schools, and that opportunities during the school day for competitive foods (e.g., snacks and beverages) should be limited. In contrast, the District provides its students with a variety of snacks and beverages in its à la carte and vending machine choices. Specifically, all of the 10 items we tested were in compliance with the District's own standards. However, when compared to the IOM guidelines, none of the 10 items would have met the standards.

Finally, District officials adequately prevented students from accessing prohibited foods and beverages before the end of the last scheduled meal period, as required by Education Law and SED guidelines. However, foods and beverages restricted per IOM standards, such as low-calorie sports beverages and flavored waters, were available for purchase during lunch periods. By making such products available to students, District officials are limiting the impact of their efforts to encourage healthy food choices.

## **Background and Methodology**

The Hancock Central School District (District) is located in Delaware County. There are two schools in operation within the District, with approximately 450 students attending during 2008-09 school year. The District's budgeted expenditures for 2008-09 are approximately \$10 million for the general fund and \$311,000 for the cafeteria fund. During 2007-08, 52 percent of the District's students qualified for Free and Reduced Meals, and the District had an 8 percent minority student population.

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<sup>1</sup> A 2007 report entitled, "Nutrition Standards for Healthy Schools: Leading the Way Toward Healthier Youth" authored by the IOM and the Food and Nutrition Board organizations.

The New York State Department of Health (DOH) has declared childhood obesity a major health problem. The DOH estimates that one in four New Yorkers under the age of 18, or approximately 1.1 million young people, are obese. Over the past 30 years, the obesity rate has nearly tripled for children ages 2 to 5 and youth ages 12 to 19, and it has quadrupled for children ages 6 to 11. According to the United States Centers for Disease Control and Prevention, 28 percent of New York high school students are overweight or at risk of becoming overweight. Further, New York ranks second in the United States in adult obesity medical expenditures, with annual spending estimates at nearly \$6.1 billion. The childhood obesity crisis is fueling a health care cost crisis. Estimated annual health care costs attributed to obese children total \$242 million, which is putting an even greater strain on the New York State budget.

District officials have the responsibility to provide a safe and healthy learning environment for children. That responsibility requires District officials to ensure that all food available to students during the school day and at school activities meets established nutritional guidelines to promote healthy eating habits and proper nutritional goals.

The District has a Cafeteria Manager who oversees the food service program and vending operations, which includes eight employees working in two buildings. There is one elementary school and a middle/ high school:

- The elementary school is composed of students in grades K through 4. Lunch periods run for 20 minutes starting at 10:40 am and ending at 11:50 pm.
- The middle/high school is composed of students in grades 5 through 12. Lunch periods run for 30 minutes starting at 10:27 am and ending at 1:06 pm.

The District has two cafeterias for student use, which serve approximately 330 lunches per day. The daily lunch menu options include an entrée or an alternative of a peanut butter and jelly sandwich for all grades. Additionally, for students in grades 5 through 12, subs, salads, or wraps are offered as options along with the peanut butter and jelly sandwich. All meals include a choice of a milk variety, hot or cold vegetables, and canned or fresh fruit.

The District has three vending machines for student use located throughout the District, located in the middle/high school cafeteria. The cafeteria manager orders and stocks two of the machines, while the third machine is managed by a student organization. The items stocked are based on the choose sensibly guidelines.

We interviewed District officials to determine if the District had adopted a local school wellness policy and had established a child nutrition committee. We reviewed the District's most recent School Meals Initiative report from the State Education Department, compared the wellness policy to the school's chosen external guidelines if available and/or other standards, and assessed whether the food and beverage choices available to students complied with the District's policies and SED requirements, where applicable.

We conducted this performance audit in accordance with generally accepted government auditing standards (GAGAS). Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objective. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objective.

## **Audit Results**

### **Local School Wellness Policy**

The Child Nutrition and WIC Reauthorization Act of 2004 (Reauthorization Act of 2004) provides that not later than the first day of the school year beginning after June 30, 2006, each school district participating in a National School Lunch Program (NSLP) must establish a local school wellness policy that, at a minimum:

- Includes goals for nutrition education, physical activity and other school-based activities that are designed to promote student wellness in a manner that the local educational agency determines is appropriate
- Includes nutrition guidelines selected by the local educational agency for all foods available on each school campus under the local educational agency during the school day with the objectives of promoting student health and reducing childhood obesity
- Provides assurance that nutrition guidelines for the NSLP are met
- Establishes a plan for measuring implementation of the policy
- Involves parents, students, and representatives of the school food authority, school board, and school administrators in the development of the policy.<sup>2</sup>

The District has adopted a local school wellness policy. However, the policy does not include specifics for measuring implementation of the local wellness policy. In addition, the policy states that the Superintendent will develop a summary report on compliance, but since the adoption of the Wellness Policy in April 2007, the Superintendent has not yet completed a summary report. District officials informed us however, that the cafeteria manager does provide the Board of Education (Board) with an update to the Board on issues related to the school cafeteria program twice a year. In addition, the policy provides guidelines that stipulate “all foods and beverages made available on campus (including through vending, concessions, à la carte, student stores, parties and fundraising) during the school day shall be consistent with the United States Dietary Guidelines for Americans. The district shall provide school breakfasts and lunches that meet the nutritional standards required by state and federal school breakfast and lunch programs.” For example, although District officials use the “Choose Sensibly” guidelines for vending, including beverages, à la carte items, in-class activities and fundraising, the guidelines are not specifically referenced in the policy. Clearly, the policy could be enhanced by including more direction.

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<sup>2</sup> Section 204 of Public Law 108-265—June 30, 2004 Child Nutrition and WIC Reauthorization Act of 2004

While we recognize that the Reauthorization Act of 2004 does not establish nutritional standards for District officials to use when adopting their policy,<sup>3</sup> we believe that the more stringent guidelines promoted by the IOM should be considered by District officials to promote healthier eating habits.

The lack of a comprehensive local school wellness policy increases the risk that the food and beverages available to students will not meet established nutritional guidelines to promote healthy eating habits and proper nutritional goals.

### **Child Nutrition Advisory Committee**

Every school district is authorized and encouraged to establish a child nutrition advisory committee.<sup>4</sup> Committee members, who represent all aspects of school nutrition, are encouraged to meet at least quarterly to review topics that relate to the current nutritional policies of the district. The law encourages parents of students to be notified of the committees' existence, ability to participate, and scheduled meeting dates. Lastly, the Committee is encouraged to formally update the Board of Education once a year to give the status of the District's programs to improve student's nutritional awareness and to promote healthy diets.

The District has not established a child nutrition advisory committee. Therefore, the committee does not do any of the items encouraged by section 918 of NYS Education Law. The Superintendent, however, has indicated that he meets monthly with the high school and elementary school principals as well as the cafeteria manager to discuss nutrition-related topics, but no documentation was maintained to support the existence of these informal meetings.

### **School Lunch Program**

Schools that participate in the NSLP must meet Federal nutrition guidelines as outlined in the Department of Health and Human Services' "Dietary Guidelines for Americans."<sup>5</sup> In March 2008, the State Education Department (SED) issued a memo "Incorporating the 2005 Dietary Guidelines for Americans into School Meals," which instructs school districts to implement the 2005 guidelines within the current meal pattern requirements and nutritional standards. The memo further outlines the promotion of "increased consumption of whole grains, fruits and vegetables, fat-free or low-fat milk, and dairy products."

The SED conducts School Meals Initiative (SMI) reviews for each school district on a five-year rotating basis to determine if the lunch program complies with Federal nutrition guidelines. For these reviews, SED conducts a nutrient analysis test, for at least five menu days, using supporting documentation including menus, production reports, standard recipes and nutritional labels. In addition, an on-site observation is performed to confirm that the reported ingredients

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<sup>3</sup> Section 204 of Public Law 108-265—June 30, 2004 Child Nutrition and WIC Reauthorization Act of 2004

<sup>4</sup> Section 918 of NYS Education Law Article 19, Section 918 – School District Nutrition Advisory Committee

<sup>5</sup> For example, the guidelines recommend that no more than 30 percent of calories come from fat, with less than 10 percent from saturated fats. In addition, school lunches should provide one-third of the recommended dietary allowances of protein, vitamins A and C, iron, calcium and calories.

and recipes are used, and tests are conducted using nutrition analysis software to compare food products to requirements.

The last SMI review was conducted for the Hancock Central School District (K-12) for the period February 6 through 10, 2006. The review findings, dated August 7, 2006, are summarized into two areas. The first finding area found that menus, production records and standardized recipes “are appropriate and support the nutrient analysis.” The second area of review was for Nutritional Analysis. The report states: “Hancock is meeting the nutrient standards for calories, cholesterol, fiber, calcium, Vitamin A, Vitamin C, and protein for all students. The menu is high in sodium, and total and saturated fat for all students.”

The District responded to the recommended improvements listed above, with the following plan:

1. Offering hot sauce with some vegetables and other menu items and omitting margarine
2. Processing some government commodities into items that are prepared resulting in a reduction in fat
3. Purchasing low sodium dressing mix and using non-fat yogurt in place of half of the mayonnaise
4. Serving creamy coleslaw that uses fat-free sour cream and increasing the carrots resulting in decreasing the fat and increasing the Vitamin A
5. Purchasing turkey franks instead of regular franks
6. Switching to portion pack ketchup, mayo and mustard
7. Substituting ground turkey for half of the ground beef in the pasta bar recipe
8. Using culinary cream in place of heavy butter in several recipes such as alfredo sauce, corn chowder, clam chowder and cheesy broccoli soup.

## **Vending**

In addition to the foods and beverages provided by the School Lunch Program, “competitive foods”<sup>6</sup> (snacks and beverages) are available to students during the school lunch period from three vending machines for student use and à la carte items in the cafeteria. While such foods and beverages are allowed by the District’s wellness policy, IOM guidance would suggest that federally reimbursable school nutrition programs should be the main source of nutrition at schools, and that opportunities for competitive foods (e.g., snacks and beverages) be limited.<sup>7</sup>

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<sup>6</sup> Child Nutrition and WIC Reauthorization Act of 2004 section 210.11

<sup>7</sup> A 2007 report entitled, “Nutrition Standards for Healthy Schools: Leading the Way Toward Healthier Youth” authored by the IOM and the Food and Nutrition Board organizations.

Competitive foods are not included in the basic school lunch program and there are no Federal nutrition guidelines for these items. However, in New York State, a District may not serve soda or candy before the last lunch period ends. Education Law, Article 19, Section 915 provides that “from the beginning of the school day until the end of the last scheduled meal period; no sweetened soda water, no chewing gum, no candy including hard candy, jellies, gums, marshmallow candies, fondant, licorice, spun candy and candy coated popcorn, and no water ices except those which contain fruit or fruit juices, shall be sold in any public school within the state.” SED guidelines also provide that beverages labeled as, “aerated” or that bubble and fizz for several minutes after opening are to be categorized as “Soda Water.” However, other than this clarification, the SED has not published or endorsed criteria for competitive foods. An SED official told us “we do not provide an approved listing because it would be too extensive and would change every day as new products come on to the market.”

The New York State School Nutrition Association has created the “Choose Sensibly” guidelines for snacks and beverages. According to the guidelines, sensible snack choices should have no more than:

- 7 grams of fat
- 2 grams of saturated fat
- 360 milligrams of sodium
- 15 grams of sugar

Beverage choices include low-fat milk and low-fat flavored milk, juice with 25 percent or more fruit juice, water or flavored water with no added sugar, artificial sweeteners or caffeine, and beverages with 10 milligrams or less of caffeine per serving

There are no prescribed standards in the State regarding competitive foods available in school districts. Based on the lack of competitive food guidance in New York State, the Comptroller’s Office met with various health professionals from NYSHEPA, American Cancer Society, American Heart Association, New York State Nutrition Association and Department of Health. After these meetings, we decided to compare district offerings to the Institute of Medicine (IOM) guidelines. The IOM standards were not required to be adopted and followed by school districts as part of our audit.

The IOM report entitled “Nutritional Standards for Foods in Schools” establishes standards for nutritive food components. The report concludes that if competitive foods are made available, they should consist of nutritious fruits, vegetables, whole grains, and combination products<sup>8</sup> and non-fat or low-fat milk and dairy products. It also recommends imposing restrictions on the sale of foods and beverages with high fat, saturated fat, sodium, etc.

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<sup>8</sup> Combination products must contain a total of one or more servings as packaged of fruit, vegetables or whole grain products as portioned.

According to the report, snack choices should have no more than 200 calories, and no more than 35 percent of the calories should be from fat while no more than 10 percent of the calories should be from saturated fat. Further, snack choices should have no more than 200 mg of sodium or 480 milligrams of sodium if served à la carte as an entrée portion. They also should be trans-fat-free, and have no more than 35 percent of total calories from sugars. Acceptable beverage choices include water without flavoring, additives or carbonation; low-fat and non-fat milk; portion sized 100 percent fruit juice; and, beverages that are caffeine-free with the exception of trace amounts of naturally occurring caffeine substances. Sports drinks should not be available except when provided for student athletes participating in sports programs that involve vigorous activity of more than one-hour’s duration.

Compliance with Policy and IOM Standards

District officials indicated that vending and à la carte items were subject to the “Choose Sensibly” guidelines, although the District’s local school wellness plan did not clearly specify this was the case. We judgmentally selected 10 snack items to test for compliance with the District’s own nutritional standards and comparisons to the more stringent IOM standards. We found that all items met the District’s own standards for fat, saturated fat, sodium and sugar. Conversely, had the District adopted the IOM standards, none of the items tested met the IOM standards, as detailed in the following table:

<b>VENDING AND À LA CARTE ITEMS</b>		
<b>Snack Item</b>	<b>Meets District Standards</b>	<b>Meets IOM Standards</b>
White Cheddar Popcorn	Yes	No
Baked Nacho Flavored Chips	Yes	No
Nacho Flavored Chips	Yes	No
Fudge Ice Cream Bar	Yes	No
Reduced-Fat Vanilla Ice Cream Sandwich	Yes	No
Low-fat Ice Cream Cup	Yes	No
Cookies and Cream Ice Cream	Yes	No
Fruit Flavored Snack	Yes	No
Orange Ice Cream Bar	Yes	No
Cherry Pop Ice Cream	Yes	No

Compliance with Education Law and SED Guidelines

We also found that District officials adequately limited access to prohibited foods and beverages until the end of the last lunch period as required by Education Law and SED guidelines. Specifically:

- À La Carte Items —Each school building has a selection of à la carte items available for sale. The selection of à la carte items at the middle/ high school is more extensive than at

the elementary school cafeteria, which has a limited number of items offered. According to the District's cafeteria manager, students are restricted to only one item per day. The items available during the lunch period included white cheddar popcorn, baked chips, multigrain chips, baked nachos, mixed fruit snacks, and a variety of ice creams.

- Vending Machines — We found that all vending machines were operated in accordance with Education Law and SED guidelines (during the lunch period). However, beverages restricted per IOM standards, such as low calorie sports beverages and flavored waters, were available for purchase during lunch periods. Positively, the vending machines that were available for student use were on timers.

The District offers food and beverage choices that provide minimal nutritional value and compete with school meal options. For example, after the end of the last lunch period, students can purchase items such as soda, teas and sports beverages. Worse, during lunch period, students can purchase low calorie sports beverages, chips, fruit flavored snacks, and a variety of ice cream rather than eat the meal that the District is serving. Further, these items generally do not comply with the IOM guidelines.

We asked District officials why such products were offered on school grounds. District officials indicated vending items generate small commissions, which are used to offset cafeteria expenses. The revenues from vending for the scope period were approximately \$24,500 and the 2008-09 cafeteria budget was \$311,000. While we recognize the District has a need to offset cafeteria expenses, by making such products available to students, District officials are limiting the impact of their efforts to encourage healthy food choices.

### **School Stores and Events**

District personnel that sell or serve food and beverages on school grounds or at school events must be aware of, and comply with, the District's local school wellness policy to ensure that students are offered nutritious food and beverage choices.

The District does not have a school store. However non-food items such as pencils, pens and erasers, are sold at various times from a push cart in the hallways.

In addition, the District conducted school events, such as in-class activities and fundraisers. We judgmentally selected and interviewed a teacher and a principal to determine awareness of, and compliance with the local school wellness policy. One individual indicated that they were not aware of the policy; however both individuals stated that the District promotes healthy food during fundraiser and in-classroom activities. Both acknowledged that in most fundraiser activities, students do sell foods such as pizza, hamburgers, hot dogs, candy, popcorn and coffee. While such items may generally comply with the District's wellness policy, they would not always comply with the more stringent IOM guidelines. By making such products available to students, District officials are limiting the impact of their efforts to encourage healthy food choices.

## Recommendations

1. District officials should amend the local school wellness policy to establish a plan for measuring implementation of the policy.
2. District officials should amend the local wellness policy to specify which standards should be used to guide food and beverage choices offered to students.
3. District officials should consider adopting the IOM standards for the local school wellness policy.
4. District officials should consider creating a Nutrition Advisory Committee to discuss and communicate nutrition topics.
5. District officials should ensure that the traditional school lunch always meet the SED requirements.
6. District officials should ensure that all foods and beverages that are served to students are authorized by the local school wellness policy.
7. District officials should consider limiting the competitive foods available to students.
8. District officials should consider providing only healthy snacks to students for in-classroom activities and fundraisers.

The Board has the responsibility to initiate corrective action. Pursuant to Section 35 of the GML, Section 2116-a (3)(c) of the Education Law and Section 170.12 of the Regulations of the Commissioner of Education, a written corrective action plan (CAP) that addresses the findings and recommendations in this report must be prepared and forwarded to our office within 90 days. To the extent practicable, implementation of the CAP must begin by the end of the next fiscal year. For more information on preparing and filing your CAP, please refer to our brochure, *Responding to an OSC Audit Report*, which you received with the draft audit report. The Board should make the CAP available for public review in the District Clerk's office.

Sincerely,

Steven J. Hancox  
Deputy Comptroller  
Office of the State Comptroller  
Division of Local Government and  
School Accountability

## **APPENDIX A**

### **RESPONSE FROM DISTRICT OFFICIALS**

The District officials' response to this audit can be found on the following pages.

# HANCOCK CENTRAL SCHOOL

ADMINISTRATION  
Terrance P. Dougherty, Superintendent  
Carol A. Daddezio, 5-12 Principal  
Jason Hans, K-4 Principal/CSE Chair  
Scott R. MacDowall, Business Manager

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BOARD OF EDUCATION  
Terry Whitt, President  
Linda K. O'Brien, Vice-President  
Frank J. Brown  
Rebecca L. Smith  
Robert C. Wrighter, Sr.  
Lothar Holbert, Wayne Highlands Rep.

The Hancock Central School District recently completed a comprehensive nutrition audit with the New York State Comptroller's Office. Throughout the audit process, Hancock Central School District officials fully cooperated with the auditors, believing the audit process could only serve to improve the District's food service and nutrition programs. Superintendent Terrance P. Dougherty commented "We take the audit findings seriously and fully intend to utilize the recommendations to assist our efforts to strengthen policy and procedures within the food service operation." As such, the District immediately addressed areas in need of improvement cited by the auditor.

First, with respect to the wellness policy, the District has formulated a wellness committee comprised of the superintendent of schools, food service manager, middle/high school and elementary school principals, and faculty and student representatives. The committee will be scheduled to meet immediately upon the onset of the 2009-2010 academic school year. Meeting agendas, minutes, and accountability reports will be generated and archived at the District office. The contents of the wellness policy will be included in faculty and staff handbooks starting with the 2009-2010 school year.

Second, with regard to the finding pertaining to the absence of *Institute of Medicine Guidelines* in the food service program, the District feels the guidelines outlined in the *Choose Sensibly* program are more than sufficient to meet desired nutritional standards for its students. This program is endorsed by the New York State Education Department and is widely utilized in school Districts throughout New York State. Furthermore, the Hancock Central School District Food Service has been externally audited no fewer than three times and deemed to be in compliance with regard to widely accepted nutritional guidelines and standards for its students. That said, per the guidance of this report, the District will investigate the efficacy and effectiveness of transitioning to the *Institute of Medicine Guidelines* in the future school years.

Finally, with regard to the finding that the District is serving high calorie, high sodium sports drinks and flavored waters during school day, the District now offers low calorie and low sodium sports drinks per the *Choose Sensibly* nutritional guidelines. At no time has the District offered or sold flavored water.

See Note 1 Page 14
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**New York State Comptroller's Nutrition Audit**  
**Corrective Action Plan**  
**Hancock Central School District**  
**September 1, 2007- October 31, 2008 Audit Period**

Risk Area	Finding	Corrective Action	Status
<p><b>Policy Implementation</b></p>	<p>1. District failed to report on compliance to wellness policy and has failed to establish a nutrition committee. Wellness policy has not been communicated to faculty and staff.</p>	<p>1. District recently created wellness committee (June 2009) comprised of superintendent, building administrators, food service representatives, and faculty and staff included in future editions of employee handbooks.</p>	<p>1. Completed.</p>
<p><b>Nutritional Standards</b></p>	<p>1. No evidence of compliance to the <i>Institute of Medicine Nutrition Guidelines</i> within the food service program.</p> <p>2. Low calorie sports drinks and flavored waters were made available to students during school hours.</p>	<p>1. District believes the existing <i>Choose Sensibly Guidelines</i> sufficiently comply with State Education Department nutrition standards. Per the guidance of the New York State Comptroller's Audit, however, the District will investigate the efficacy of transitioning to the <i>Institute of Medicine Guidelines</i>.</p> <p>2. District is limiting sales and availability of low calorie, low sodium sports drinks during the lunch periods, per the guidance of the <i>Choose Sensibly Guidelines</i>. Flavored water has never been sold by the school district.</p>	<p>1. Ongoing.</p> <p>2. Completed.</p>

## **APPENDIX B**

### **OSC COMMENTS ON DISTRICT OFFICIALS' RESPONSE**

#### Note 1

During audit fieldwork, we observed 20-ounce portions of bottled water in various flavors in the vending machine in the high school cafeteria dining area.