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September 14, 2009

Ms. Kathy Houghton
Superintendent of Schools
New York Mills Union Free School District
1 Marauder Boulevard
New York Mills, New York 13417

Report Number: S9-9-31

Dear Ms. Houghton 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 New York Mills Union Free 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 and indicated they would initiate corrective action. 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 established a health and safety committee. The most recent State Education

Department (SED) review in 2007 found that the BOCES servicing the District did not fully comply with Federal guidelines. Subsequent to the review, steps were taken to bring the school lunch program into compliance. In addition, no foods or beverages are sold in school stores, and interviews of District personnel who conduct school events indicate that they are aware of the District's wellness policy.

We found that the District could improve its efforts to promote healthy eating habits. The wellness policy does not establish a plan to monitor District compliance, nor does it detail nutritional standards that guide the food and beverage choices provided or sold to students. District officials told us they do not use any comprehensive nutritional standards to guide food and beverage snack and vending choices for students.

There are no prescribed standards in NYS 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,¹ 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. Since the District does not have nutritional guidelines for competitive foods and beverages, we compared the 10 items to the IOM standards and found that nine of 10 items would not 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 a variety of teas, flavored waters, sports drinks, breakfast pastries, fruit flavored snacks, cookies, chips and a variety of ice creams a variety, 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 New York Mills Union Free School District (District) is located in Oneida County. There is one school in operation within the District, with approximately 600 students attending during 2008-09. The District's budgeted expenditures for 2008-09 are approximately \$11.6 million for the general fund and \$30,165 for the cafeteria fund. During 2007-08, 31 percent of the District's students qualified for Free and Reduced Meals, and the District had a 6 percent minority student population.

¹ 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 utilizes the Oneida-Herkimer-Madison Board of Cooperative Education Services (BOCES) to provide management oversight of its meal service to students, through the use of a Food Service Director and food service employees. The Food Service Director oversees the District food service program on a daily basis, which includes six employees working in one building. There is one building, which houses both the elementary school and junior/senior high school:

- The elementary school is composed of students in grades K through 6. Lunch periods run for 25 minutes starting at 12:25 pm and ending at 1:40 pm.
- The junior/senior high school is composed of students in grades 7 through 12. Lunch periods run for 39 minutes starting at 11:03 am and ending at 12:24 pm.

The District has one cafeteria for student use, which serves approximately 310 lunches per day. The daily lunch menu options include a choice of one of two entrée selections, or an alternative choice of assorted salad plates, assorted deli sub sandwiches (junior/senior high school), a peanut butter and jelly sandwich (elementary school), with milk (white and chocolate), hot or cold vegetables, and canned or fresh fruit.

The District has four vending machines for student use located throughout the building. The vendors order and stock all machines with food and beverage items allowed by the District, with recommendation of products by the District.

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.²

The District has adopted a local school wellness policy. However, the policy does not establish a specific plan for monitoring to ensure compliance with the policy. The policy states, “Nutritional Guidelines shall be established for all foods and beverages available, focusing on maximizing nutritional value by decreasing fat and added sugars, increasing nutritional density and moderation of portion size of each individual food or beverage sold within the school environment (vending and à la carte).” Although the District has these goals in the policy, officials do not have guidelines to use as criteria for its vending, including snacks, beverages, and à la carte items. Additionally, the policy is not specific to a monitoring function to ensure compliance with the policy. Clearly, the policy could be enhanced by including more direction. While we recognize that the Reauthorization Act of 2004 does not establish nutritional standards for District officials to use when adopting their policy,³ we believe that the more stringent guidelines promoted by the IOM should be considered by District officials to promote healthier eating habits.

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

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

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.⁴ 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 committee's 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 established a health and safety committee, which is composed of 16 members including District administrators, a member from the police and fire departments, school nurse, parent teacher student organization member, a community member, Athletic Director, Assistant Transportation Director and a village trustee. The committee meets approximately two times per year to discuss topics related to nutrition, health, and physical activity. This includes school menus, time for unstructured recess, inside physical activity during bad weather days, dance program, walking program, after school activities, dealing with a shared gymnasium and cafeteria, and finding time to teach wellness education.

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."⁵ 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 and recipes are used, and tests are conducted using nutrition analysis software to compare food products to requirements.

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

⁵ 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.

The District's lunch program is part of the Oneida-Herkimer-Madison BOCES school lunch program. The Oneida-Herkimer-Madison BOCES receives an SMI review conducted by SED. The review findings, dated January 17, 2007, are summarized into two areas. The first finding area found that "current production records need modification to ensure they contain all the necessary information." The second area of review was for Nutritional Analysis. The report states that the BOCES "is meeting the nutrient standards for cholesterol, fiber, calcium, vitamin A, Vitamin C, and protein, for students in grades 7-12. The menu is low in calories and iron and high in total and saturated fat for students in grades 7-12."

The BOCES responded to the recommended improvements by implementing a variety of measures of corrective action.

Vending

In addition to the foods and beverages provided by the School Lunch Program, "competitive foods"⁶ (snacks and beverages) are available to students during the school lunch period from four 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.⁷

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."

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

⁶ Child Nutrition and WIC Reauthorization Act of 2004 section 210.11

⁷ 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.

products⁸ 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.

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 have not adopted guidelines regarding vending and à la carte items; although the District’s local school wellness plan states that nutritional guidelines would be established. The vendors order items with guidance from District officials of what is offered to students in the District.

Based on the lack of detailed District criteria for snack and beverages, we judgmentally selected 10 snack items to test for compliance with the District’s goal of providing healthier alternatives by using the IOM standards. We found that nine items did not meet the IOM guidelines, as detailed in the following table:

VENDING AND À LA CARTE ITEMS	
Snack Item	Meets IOM Standards
Orange Flavored Sport Drink	No
Corn Chips	No
Potato Chips	No
Bacon Cheddar Potato Chips	No
Peanut Butter Crackers	No
Cheddar Snack Mix	No
Chocolate Peanut Caramel Candy Bar	No
Cinnamon Brown Sugar Breakfast Pastries	No
Gummy Fish Candy	No
Peanut Butter Granola Bar	Yes

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

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 — The school building has a selection of à la carte items available for sale. The selection of à la carte items are the same for the junior/senior high school and elementary school as both share the same cafeteria. The District's students are not restricted as to the quantity that can be purchased of à la carte items that are for sale. The items available during the lunch period included water, flavored waters, sport drinks, juice drinks, flavored milk, breakfast pastries, fruit snacks, granola bars, snack mix, low calorie cookies, baked chips, chips, and a variety of ice cream novelties.
- 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 a variety of ice teas and flavored waters, were available for purchase during lunch periods. Further, the vending machine that contained items restricted by Education Law and SED guidelines that were available for student use was on a timer and not made available until the end of the school day.

The District offers food and beverage choices that provide minimal nutritional value and compete with school meal options. For example, students can purchase items such as flavored waters, sport drinks, breakfast pastries, fruit flavored snacks, snack mix, cookies, chips, and a variety of ice creams during the lunch period 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 that vending snacks and beverages are offered because students are in the schools after hours and provides them the ability to purchase a snack if necessary. The revenues from vending for the scope period were approximately \$9,500 and the 2008-09 cafeteria budget is \$30,165. While we recognize the District may have a need to offer students refreshments outside of normal cafeteria hours, 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 has a store, located in its elementary school. Items for sale include pencils, pens, erasers, and educational materials. We observed that no food was sold in the store.

In addition, the District conducted school events, such as in-class activities and fundraisers. We judgmentally selected and interviewed two teachers and two principals to determine awareness

of, and compliance with, the local school wellness policy. The Principal at the junior/senior high school stated that there is a no food or drink in the classroom policy within the student handbook. However, teachers at both the elementary and junior/senior high school stated that it is up to the individual teacher whether to allow food in the classroom and that there are no written policies prohibiting food or drink in the classroom, however acknowledged that healthy choices for snacks are encouraged. All District officials interviewed were aware of the District's wellness policy. Celebration and snack items given as examples included vegetable platters, homemade cupcakes, breakfast pastries, soda, as well as other various snack items. Fundraiser examples included the sale of candy, cookie dough, and a bake sale held on Election Day, a non-school day.

While such items would generally comply as healthy choices and non-food items, items such as homemade cupcakes, soda and breakfast pastries would not always comply with the 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 ensure that all foods and beverages that are served to students are authorized by the local school wellness policy.
5. District officials should ensure that the traditional school lunch provided by the BOCES is consistent with SED SMI standards.
6. District officials should consider limiting the competitive foods available to students.
7. 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 provided to our office within 90 days, with a copy forwarded to the Commissioner of Education. 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.



1 Marauder Boulevard
New York Mills, NY 13417

Kathy S. Houghton
Superintendent of Schools

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May 27, 2009

Patrick Carbone, Chief Examiner
Office of the State Comptroller
State Office Building, Room 1702
44 Hawley Street
Binghamton, NY 13901-4417

Dear Mr. Carbone,

Thank you for providing the New York Mills Union Free School District with the opportunity to respond to the preliminary draft findings of the Nutrition Audit Team led by [REDACTED], Associate Examiner, Division of Local Government and School Accountability. [REDACTED] conducted an introductory Nutrition Audit meeting on Friday, November 21st with our district administration, BOCES Food Service Director, and Board of Education representative. Following that meeting, his team began the process of talking with administrators, teachers, and food service staff regarding our school nutrition policies and procedures. School-based work proceeded from Monday, November 24th through Thursday, December 4th (not including Thanksgiving break, which was Wednesday, November 26th through Friday, November 28th) and concluded with an exit briefing on Thursday, December 4th at 3:00 p.m.

On Thursday, April 29th we received the preliminary draft findings, as well as a cover letter scheduling an exit discussion with district representatives on Monday, May 4th at 1:30 p.m. On May 4th, we were given the opportunity to verbally respond to any inaccuracies we felt existed in the report, as well as discuss the recommendations of the audit team. At that time, I shared with [REDACTED] that our District Health & Safety Committee was scheduled to meet on Tuesday, May 26th at 6:30 p.m. This group includes district administration and supervisors, teachers, parents, Board of Education members, and community leaders (fire department, police, mayor, village trustee). Below, is our district response to the recommendations presented to us in the preliminary findings of the Nutrition Audit:

1. *District officials should amend the local school wellness policy to establish a plan for measuring implementation of the policy.*

The Health & Safety Committee was actively involved in the development of our School Wellness Policy. Each year, they meet quarterly to review, discuss, and revise district policies, procedures, and programs that affect the health and safety of our students,

staff, and school community. This includes our School Wellness Policy. The Superintendent sits on the committee, as well as both building principals, supervisory staff, representatives from the School Board of Education, and teachers. The Committee annually discusses our school wellness efforts; however, we will utilize a more formal approach in the future. This will include special attention to the specific areas of focus included in our policy: nutrition education, physical activity, other school-based activities, and nutritional guidelines. We will also include nutrition and wellness questions on our annual shared decision-making needs assessments that are completed by parents, teachers, and staff. Summary information will be shared with the Health & Safety Committee to aid them in their evaluation of the policy's implementation on a district-wide level.

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.*

The Health & Wellness Committee considered both the Institute of Medicine (IOM) standards that were recommended to us by the Nutrition Audit Team and the New York State Education Department's Nutrient Based Menu Planning Nutrient Standards for Lunch that are now utilized by our BOCES Food Service Program Director when planning our cafeteria menus. We agree that the IOM standards are more stringent; however, we also believe that there are no "good" or "bad" foods, and that all foods in moderation are acceptable choices for both children and adults. We plan to recommend that the Board of Education revise our School Wellness Policy to include the New York State Education Department's Nutrient Based Menu Planning Standards as our nutritional guidelines for foods and beverages available on school campus during the school day. These standards include limits on calories, cholesterol, sodium, total fat, and saturated fat.

3. *District officials should consider adopting the IOM standards for the local school wellness policy.*

As stated above in #2, the Health & Safety Committee considered the IOM standards, along with those from the New York State Education Department. We have chosen to recommend that the Board of Education adopt NYSED's Nutrient Based Menu Planning Standards as part of our School Wellness Policy. We have enclosed for your reference a copy of these Nutrient Standards, which were provided to us by the BOCES Food Service Program Director.

4. *District officials should ensure that all foods and beverages that are served to students are authorized by the local school wellness policy.*

We will continue to work with our BOCES Food Service Program Director to monitor and revise as necessary foods that are offered as part of the cafeteria's a la carte menu.

We have five vending machines in the school district, four of which are owned and stocked by Pepsi. The fifth machine is owned by a private vendor, who is a long-time resident of the school district and has been allowed to fill the machine freely over the years. However, it is not turned on until after school so students do not have access to the choices provided until the instructional day has ended. Of the four Pepsi machines, one is in the faculty lounge and is not available to students at any time. Two are housed in our boys and girls secondary locker rooms and are stocked with plain and flavored water and diet iced tea. The fifth machine is in the cafeteria hallway and is stocked with the same items as those in the locker rooms. The Health & Wellness Committee will continue to monitor the use of our Pepsi machines. The superintendent will contact the owner of the fourth machine and request that he use NYSED's standards when stocking his machine or remove the machine from the building.

5. *District officials should ensure that the traditional school lunch provided by the BOCES is consistent with SED SMI standards.*

The School Meals Initiative (SMI) for Healthy Children is designed to improve the nutritional quality of school meals by providing schools with educational and technical resources that can be used to assist food service personnel in preparing nutritious and appealing meals and to encourage children to eat more healthful meals. The Nutrient Based Menu Planning Standards that are in place in our BOCES Food Service Program are also used by NYSED when conducting SMI reviews in order to determine if the School Food Authority (SFA) is meeting standards. The district will continue to work with our BOCES Food Service Program Director and Health & Safety Committee to ensure that students who purchase the traditional school lunch are receiving nutritionally sound menu items that adhere to NYSED's Nutrient Based Menu Planning Standards.

6. *District officials should consider limiting the competitive foods available to students.*

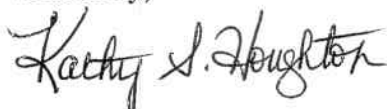
The Health & Safety Committee and superintendent will work with the BOCES Food Service Program Director and food vending machine owner (if he wishes to adhere to specified standards) to ensure that the competitive foods offered to students meet NYSED's Nutrient Based Menu Planning Standards. However, due to the fact that our school building is the center of activity for our small community, we feel that it is essential that snack foods and drinks are available to students after school hours so that they may refuel themselves prior to meetings, rehearsals, sports practices, and other school events when they need to remain at school at the end of the instructional day.

7. *District officials should consider providing only healthy snacks to students for in classroom activities and fundraisers.*

Our teachers, staff, and administration recommend that parents send healthy snacks to school with their children. We do allow the students to eat whatever they bring for a snack, because it is usually at least four and a half to five hours between breakfast and lunch for these youngsters. Due to our shared K-12 cafeteria, our elementary students do not begin their lunch periods until 12:25 p.m. and the last group to be served (grades 4-6) does not end their lunch period until 1:40 p.m. Also, teachers often provide their own supply of snacks for children who do not have their own and they make healthy, albeit economical choices for these extra food items. However, for birthdays and other special occasions, we still allow parents to bring in special treats for their child's class. Many classes include at least one child with a food allergy or other medical condition, so alternate choices are consistently provided and these are available for all students as a second option. The Health & Safety Committee is beginning our discussion of fundraisers and the types of food items that are traditionally sold by our parent and boosters groups, student clubs, and classes. This topic will take some time to research, consider, and develop recommendations for our Board of Education. It would be premature for us to communicate a decision to you at this time.

The Nutrition Audit Team has provided our Health & Safety Committee, Shared Decision Making Teams, Board of Education, and administration, faculty, staff, parents, and community members much "food for thought." We thank you and the Nutrition Audit Team for your willingness to work collaboratively with the New York Mills Union Free School District as we research, discuss, and revise our School Wellness Policy to reflect appropriate changes that will benefit the health and wellness of our students and school community. Please feel free to contact the district office at (315) 768-8127 if you have questions or need additional information regarding our responses to your recommendations.

Sincerely,



Kathy Houghton
Superintendent of Schools

Cc: Gary Hadfield, Jr.-Sr. High School Principal
Tom Pfisterer, BOCES Food Service Director
Lisa Stamboly, District Treasurer
James Salamy, Board of Education President
Rene' Wilson, Elementary Principal
Janet Wroblecki, Board of Education Member/Nutrition Audit Committee