



**THOMAS P. DiNAPOLI**  
COMPTROLLER

STATE OF NEW YORK  
**OFFICE OF THE STATE COMPTROLLER**  
110 STATE STREET  
ALBANY, NEW YORK 12236

**STEVEN J. HANCOX**  
DEPUTY COMPTROLLER  
DIVISION OF LOCAL GOVERNMENT  
AND SCHOOL ACCOUNTABILITY  
Tel: (518) 474-4037 Fax: (518) 486-6479

September 14, 2009

Ms. Adele Bovard  
Superintendent of Schools  
Webster Central School District  
119 South Avenue  
Webster, New York 14580

Report Number: S9-9-35

Dear Ms. Bovard 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 Webster Central School District (District) in our audit. The audit period was from September 1, 2007 to February 28, 2009.

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 some 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, established a child nutrition advisory committee, and the most recent State Education Department (SED) review, in 2008, 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. In addition, no foods or beverages are sold in school stores, and interviews of District personnel that conduct school events indicate that generally staff 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 nutritional standards referenced in the policy that guide the food and beverage choices provided or sold to students. District officials use the "Choose Sensibly" guidelines for à la carte items, provide guidance on snacks for in-class activities and fundraising, and use a snack color coding system to educate students on snacks to choose rarely (red), choose occasionally (yellow) and best choice (green) for food vending items. However, the guidelines are not specifically referenced in the policy, nor are nutritional guidelines established that define the snack color-coding system used for vending. The District indicated that its Food Service Department has adopted the "Choose Sensibly" criteria.

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 Centers for Disease Control and Prevention 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 wide variety of snacks and beverages in its à la carte and vending machine choices. Specifically, eight of the 10 items tested did not comply with the District's own standards. While the District used its color coding system of choosing rarely (red), occasionally (yellow) and best choice (green) to educate its students on snack selection, those products at the very minimum did not meet the "Choose Sensibly" guidelines that the District voluntarily adopted. Further, when compared to the IOM guidelines, nine of the 10 items would not have met the standards.

Finally, District officials adequately prevented students from accessing certain 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 crackers, chips, pretzels, cookies, chocolate peanut butter cookie bars, rolled fruit, fruit flavored snacks, graham crackers, granola bars, breakfast toaster treats, dried meat novelty item, 16 ounce specialty, were available for purchase during lunch periods. Beverages available for purchase

---

<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

included flavored milks, teas, vitamin enhanced water, juices containing less than 100% fruit juice, flavored water, a variety of regular and low calorie sports drinks, and ice creams. 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 Webster Central School District (District) is located in Monroe and Wayne Counties. There are 11 schools in operation within the District, with approximately 9,100 students attending during 2008-09. The District's budgeted expenditures for 2008-09 are approximately \$134.5 million for the general fund and \$2.7 million for the cafeteria fund. During 2007-08, 12 percent of the District's students qualified for free and reduced meals and the District had an 8 percent minority student population.

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 Director of School Food Services who oversees the food service program and snack vending operations, which include 68 employees working in 11 buildings. There are seven elementary schools, two middle schools and two high schools:

- The elementary school is composed of students in grades K through 5. Lunch periods run for 35 minutes starting at 11:05 am and ending at 1:10 pm.
- The middle schools are composed of students in grades 6 through 8. Lunch periods run for approximately 40 minutes starting as early as 10:51 am and ending at as late as 1:46 pm.
- The high schools are composed of students in grades 9 through 12. Lunch periods run for approximately 40 minutes starting as early as 9:38 am and ending at 1:06 pm.

The District has 11 cafeterias for student use, which serve approximately 3,800 lunches per day. Lunch options at the elementary school include a choice of entree or a substitute which includes

peanut butter and jelly, grilled chicken patty on a bun, veggie burger, salad plate or yogurt lunch, and a choice of up to three of the following: bread, vegetable, fruit cup, fruit juice, fresh fruit choice and milk. Also, a choice of soup is offered three times per week during October through May. The middle and high school lunch options include a choice of the entrée of the day or a substitute, which includes a selection from one of the following: peanut butter and jelly or marshmallow spread sandwich, expressway (grilled chicken patty on a bun, veggie burger, hot dog or pizza), salad bar, subway station, yogurt lunch or pasta bar (high school only), and a choice of up to four of the following: vegetable, fruit cup, fruit juice, fresh fruit choice and milk. The option of soup is the same for middle and high school students as it is for elementary.

The District has 35 vending machines for student use located throughout the District in the elementary, middle and high schools. The District uses outside vendors to stock the machines instead of food service personnel. The vendors are charged with stocking the machines based on the District's snack color coding system to educate students on snacks to choose rarely (red), choose occasionally (yellow) and best choice (green). Food service personnel review the food choices stocked by the vendors through observation of the machines.

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 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. The District’s stated goal “is to encourage healthy lifelong eating habits by providing foods that are high in nutrients, low in fat and added sugars and of moderate portion size.” In regard to in-class activities, the District’s wellness policy indicates that both principals and staff will encourage non-food rewards, non-food celebrations and encourage healthy classroom snacks. However, the policy could be further enhanced.

For example, the District’s “facts about student lunches” document states that the District follows “Choose Sensibly” guidelines for the à la carte and food vending program, specifically stating “a voluntary action taken by the Webster Food Service Department is to incorporate the “Choose Sensibly Criteria.” The document further references an attached handout which provides a listing of “Choose Sensibly” items that the District offers. Despite the language in this document, the District Officials indicate that “Choose Sensibly” is not all encompassing and only pertains to 32 specific à la carte items. In addition, District officials stated that the “Choose Sensibly” guidelines are also used in providing guidance on snacks for in-class activities and fundraising. Further, the District uses a snack color coding system to educate students on vending machine snacks to choose rarely (red), choose occasionally (yellow) and best choice (green). However, the District does not define the nutritional guidelines that make up the color coding system behind each color choice. In addition, each of the guidelines used in practice are not specifically referenced in the policy. In addition, 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 committee’s existence, ability to participate, and scheduled meeting dates. Lastly, the committee is encouraged to

---

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

<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

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 child nutrition advisory committee, which is composed of 18 members including District administrators, Director of Food Services, a member of the community, faculty, parents, a nurse, a Parent Teacher Organization member, a Board of Education member, and the Supervisor of Athletics, Health and Physical Education. The committee meets approximately three to four times per year to discuss topics related to nutrition, health, and physical activity. This includes reviewing current nutrition related policies, introducing a no food celebration policy, the creation of wellness toolkits, and subscribing to "nutrition nuggets" newspaper.

### **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 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 Webster Central School District's Plank Road South Elementary School (grades K through 5) for the period December 8 through 12, 2008. The review findings, dated May 1, 2009, are summarized into two areas. The first finding area, Menus/Production Records/Standardized Receipts, states that "menus, production records and standardized receipts are used appropriately". The second area of review was for Nutritional Analysis. It states that "Webster CSD's Plank Road South ES (grades K-5) is meeting the needs of the students for calories, cholesterol, sodium, iron, calcium, vitamins A & C, protein and total and saturated fat as a percentage of calories. Students are showing a deficiency in fiber."

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

1. Including more whole grain products within the lunch program by changing submarine rolls to multigrain rolls and changing from white flour tortillas to whole wheat

---

<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.

2. Changing regular baked fries to be a mixture of ½ baked regular fries and ½ baked sweet potato fries
3. Incorporating the use of dried beans in soups to increase fiber content.

## **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 day from 35 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 be limited.<sup>7</sup>

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.

---

<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

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" also 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.

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 mg 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 food vending was subject to a snack color coding system to educate students on snacks to choose rarely (red) or occasionally (yellow), and to indicate the best choice (green), and that à la carte items were subject to the "Choose Sensibly" guidelines. However, District officials acknowledged that the District's local school wellness plan did not clearly specify this was the case. However, a separate document under the heading of "à la carte and food vending program" indicated that the Webster Food Service Department had taken voluntary action to incorporate "Choose Sensibly" criteria.

We judgmentally selected 10 snack items to test for compliance with the District's own nutritional standards (i.e., "Choose Sensibly") and comparisons to the more stringent IOM standards. We found that eight items did not meet the District's own standards ("Choose Sensibly"). While the District used its color coding system of choosing rarely (red), occasionally (yellow) and best choice (green) to educate its students on snack selection, those products at the very minimum did not meet the "Choose Sensibly" guidelines that the District voluntarily adopted. Further, had the District adopted the IOM standards, nine of the items tested would not have met the IOM standards, as detailed in the following table:

---

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

<b>VENDING AND À LA CARTE ITEMS</b>		
<b>Snack Item</b>	<b>Meets District Standards</b>	<b>Meets IOM Standards</b>
Mint Flavored Milk 16 oz.	No	No
Cappuccino Vanilla 16 oz	No	No
Original Potato Chips	Yes	No
Cheese Crackers (yellow)	No	No
Cheddar Cheese Pretzel Novelty (green)	No	No
Peanut Butter Chocolate Candy Bar (red)	No	No
Cherry Breakfast Toaster Snack (yellow)	No	No
Pineapple Trail Mix (yellow)	No	No
Vanilla Ice Cream Bar	No	No
Popcorn	Yes	Yes

Compliance with Education Law and SED Guidelines

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

- À La Carte Items — District officials indicated that the District’s food service point of sale system allows parents of elementary, middle and high school students to place restrictions on the à la carte items their child can purchase. The à la carte items available include animal crackers, snack mix, a variety of chips, cookies, rolled fruit snacks, crackers, granola bars, homemade fruit crisp, fruit flavored snacks, snack packs in single and double packs, breakfast toaster treats, pretzels, meat snack novelty item, 16 ounce specialty milks including chocolate, strawberry, mint and cappuccino flavored, teas and juices and a variety of ice creams. In addition, the secondary schools have cookies in larger portion sizes, specialty cookies such as half moons and large hot cheese filled pretzels.
- Vending Machines — We found that all vending machines were operated in accordance with Education law and SED guidelines (during lunch period).

The District offers food and beverage choices that provide minimal nutritional value and compete with healthy school meal options. For example, during lunch period, students can purchase snack items such as crackers, chips, pretzels, cookies, chocolate peanut butter cookie bars, rolled fruit, fruit flavored snacks, graham crackers, granola bars, breakfast toaster treats, dried meat novelty item, and 16 ounce specialty milks. Beverages available for purchase included flavored milks, teas, vitamin enhanced water, juices containing less than 100 percent

fruit juice, flavored water, a variety of regular and low calorie sports drinks, and ice creams. These items were available for students to purchase during lunch period rather than eat the healthy meal that the District is serving. Further, these items generally do not comply with the District's local school wellness policy, the "Choose Sensibly" guidelines, or the IOM guidelines.

We asked District officials why such products were offered on school grounds. District officials indicated that snack vending items are offered for students that have before or after school events going on and they want to grab a snack since they are at school late sometimes. Revenues from vending for the scope period were approximately \$16,000, and the 2008-09 cafeteria budget is \$2.7 million. While we recognize the District has 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 two stores, located in each of the high schools, that were closed during the 2008-2009 school year.

In addition, the District conducted school events, such as in-class activities and fundraisers. We judgmentally selected and interviewed three teachers and three principals to determine awareness of, and compliance with, the local school wellness policy. All interviewees, except one, stated that they were aware of the policy and that they believed that healthy food choices were being offered for in-class activity events. Celebration and snack item examples offered included fruit, salad, sandwich, cake, snacks and soda. The District uses its website to offer non-food related fundraiser ideas. While such items would 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 wellness policy to specify which standards should be used to guide food and beverage choices offered to students.
2. District officials should consider adopting the IOM standards for the local school wellness policy.
3. District officials should ensure that all foods and beverages that are served to students are authorized by the local school wellness policy.
4. District officials should ensure that the traditional school lunch is consistent with SED SMI standards.

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

**Adele A. Bovard**  
*Superintendent of Schools*  
adele\_bovard@websterschools.org  
(585) 216-0001

**Mark Pettitt**  
*Chief Human Resources Officer*  
Mark\_Pettitt@websterschools.org  
(585) 216-0013

**James S. Fichera**  
*Chief Financial Officer*  
james\_fichera@websterschools.org  
(585) 216-0017

**WEBSTER**




**CENTRAL SCHOOL DISTRICT**

**Shelly Cahoon**  
*Director of Pupil Services*  
Shelly\_cahoon@websterschools.org  
(585) 216-0036

**Jan Lutterbein**  
*Director of Secondary Education*  
Jan\_lutterbein@websterschools.org  
(585) 216-0024

**Linda Sykut**  
*Director of Elementary Education*  
Linda\_sykut@websterschools.org  
(585) 216-0024

To: [REDACTED]  
Office of the State Comptroller  
State Office Building, Room 1702  
44 Hawley Street  
Binghamton, NY 13901-4417

From: Adele Bovard   
Superintendent

Date: June 22, 2009

Re: Report Number S9-9-35  
OCS Audit – School District Food Services

**RECOMMENDATION**

**District officials should amend the local wellness policy to specify which standards should be used to guide good and beverage choices offered to students.**

The Wellness Committee will continue to review both the policy and the standards upon which it is based and will make recommendations as appropriate.

**RECOMMENDATION**

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

It is important to note that the IOM is an additional standard for nutritional wellness that is above and beyond New York State requirements. The District complies with standards outlined in the National School Lunch Program and Federal and State guidelines.

## RECOMMENDATION

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

Under the “Choose Sensibly Criteria,” the District estimates that 75% of the ala carte items sold do meet that standard. Educating students to make appropriate choices for their individual need is also a priority wherein nutrition education is embedded in curriculum.

## RECOMMENDATION

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

As in our response to the last SMI review in which the only deficiency was in the amount of fiber in our lunches (currently 7 grams with the standard of 8 grams), the District issued a plan to include more whole grain products, change to a mixture of regular baked fries and baked sweet potato fries and incorporate the use of dried beans to soups to increase fiber content.

## RECOMMENDATION

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

This audit found that access to prohibited food and beverages is adequately restricted and compliant with Education Law and SED guidelines. This audit also found that all vending machines were operated in accordance with law and guidelines.

## RECOMMENDATION

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

This audit found that current offerings for classroom celebrations, activities, and fundraisers meet SED guidelines and District Wellness Policy. Every district works within the context of its larger community. The Board of Education will charge the Wellness Committee to conduct a review of guidelines for celebrations, activities, and fundraising based, as in the past, on the community environment and sensitivities.

- c: Cheryl Buckley, Manager of Food Services  
James Fichera, Chief Financial Officer  
Shelly Cahoon, Co-chair Wellness Committee  
Tara Masci, Supervisory of Health and FACS