

## Administrative Review Summary

Section 207 of the HHKFA amended section 22 of the NSLA (42 U.S.C. 1769c) to require State agencies to report the final results of the Administrative Review to the public in an accessible, easily understood manner in accordance with guidelines promulgated by the Secretary. Regulations at 7 CFR 210.18(m) require the State agency to post a summary of the most recent final administrative review results for each SFA on the State agency's publicly available website. It is the policy of the Vermont State agency to provide each SFA with review findings at the exit conference.

School Food Authority Name: Barre Unified Union School District

Self-operated

Vended

Food Service Management Company (FSMC) Contract

Date(s) of Administrative Review: November 9<sup>th</sup>, 2022

Date review summary was publicly posted: March 24<sup>th</sup>, 2023

### General Program Participation

1. What Child Nutrition Programs does the School Food Authority operate?

School Breakfast Program

National School Lunch Program

Fresh Fruit and Vegetable Program

Afterschool Snack

Special Milk Program

Seamless Summer Option

2. Does the School Food Authority operate under any Special Provisions? *(These provisions are an alternative to household applications for free and reduced-price meals in high poverty areas.)*

Community Eligibility Provision (CEP)

Special Provision 1

Special Provision 2

Special Provision 3

N/A

## Review Findings

3. Commendations: Since the Administrative Review, the SFA has hired a dedicated staff member to oversee the food service program. This additional oversight of the program should significantly improve program operations.

Were any findings identified during the review of this SFA?       YES       NO

*If yes, indicate the areas and what issues were identified in the findings review below.*

### REVIEW FINDINGS

#### A. Meal Access and Reimbursement

1. **Certification and Benefit Issuance** – Validation of the SFA certification of students' eligibility for free or reduced-price meals

YES  NO

**Finding Detail:** There were incorrectly categorized applications and additional information needed to document students directly certified via another student in the household.

2. **Verification** – Validation of the process used by the SFA to confirm selected students' eligibility for free and reduced-price meals

YES  NO

**Finding Detail:** The SFA should have verified 2 applications, but only 1 was verified.

3. **Meal Counting and Claiming** – Validation of the SFA meal counting and claiming system that accurately counts, records, consolidates, and reports the number of reimbursable meals claimed by category

YES  NO

**Finding Detail:** August 2022 and September 2022 meal counts at Barre Town Middle and Elementary School were not tracked by student name or eligibility status. Meal counts for the kindergarten and first grade students were not taken at the Point of Service. The meal counting system did not prevent overt identification of free and reduced-price meal status.

#### B. Meal Pattern and Nutritional Quality

1. **Meal Components and Quantities** – Validation that meals claimed for reimbursement contain the required meal components / food components and quantities

YES  NO

**Finding Detail:** There was no milk choice and not enough fruit offered at breakfast. Not all grains served were whole grain-rich. Not all products had the necessary documentation to validate their contribution to the meal pattern.

2. **Offer versus Serve (OVS)** – Validation of SFA compliance with provision that allows students to decline some of the food components offered

YES  NO

**Finding Detail:** There was no reimbursable signage. Staff did not know how to identify a reimbursable meal.

3. **Dietary Specifications and Nutrient Analysis** – Validation that meals offered to children through the school meal programs are consistent with federal standards

YES  NO

**Finding Detail:**

### C. Resource Management

1. **Resource Management** – Validation that SFA ensures the overall financial health of the school food service including non-profit food service account, paid lunch equity, revenue from non-program foods, and indirect costs

YES  NO

**Finding Detail:** Milk was provided to students at no charge without a non-program source of funds to cover the cost. The SFA needs to submit a detailed ledger to assess catering revenue.

### D. General Program Compliance

1. **Civil Rights** – Validation of SFA compliance with civil rights requirements as applicable to the Child Nutrition Programs

YES  NO

**Finding Detail:** The correct non-discrimination statement was not used on all necessary materials. Not all personnel involved in the program had Civil Rights training.

2. **SFA On-site Monitoring** – Validation that each SFA with more than one school operating the NSLP performs required onsite reviews as specified by regulations

YES  NO

**Finding Detail:**

3. **Local School Wellness Policy and School Meal Environment**– Documentation of compliance with the established Local School Wellness Policy  
YES  NO   
**Finding Detail:** The Wellness Policy was not assessed for compliance.
  
4. **Smart Snacks in School** – Validation of the SFA compliance with regulations for all food and beverages to students outside of the reimbursable meal  
YES  NO   
**Finding Detail:**
  
5. **Professional Standards** – Validation of the SFA compliance with required hiring standards and annual training requirements  
YES  NO   
**Finding Detail:** Not all staff have received the necessary training hours.
  
6. **Water** – Documentation that children have access to water during the lunch and breakfast meal services  
YES  NO   
**Finding Detail:**
  
7. **Food Safety and Storage** – Validation that schools meet food safety and storage requirements  
YES  NO   
**Finding Detail:** Temperatures of food, cold storage units, and the dish machine are consistently recorded.
  
8. **Buy American** – Documentation that schools comply with Buy American provision and policy specified by regulation  
YES  NO   
**Finding Detail:** Non-domestic products were observed on-site without exception documentation on file.
  
9. **Reporting and Recordkeeping** – Evidence that reports are submitted and maintained with other program records as required  
YES  NO   
**Finding Detail:**
  
10. **School Breakfast Program and Summer Food Service Program Outreach** – Validation that SFA informs families of the availability of breakfasts offered

under the School Breakfast Program and meals offered through the Summer Food Service Program (SFSP)

YES  NO

**Finding Detail:**

#### **E. Other Federal Program Reviews**

- 1. The NSLP Afterschool Snack Service** – Documentation that nutritionally-balanced snacks are served, appropriate educational or enrichment activities are provided and counting and claiming is accurate

YES  NO  N/A

**Finding Detail:**

- 2. Seamless Summer Option** – Evidence that the SFA adheres to the same meal service rules and claiming procedures used during the regular school year

YES  NO  N/A

**Finding Detail:**

- 3. Fresh Fruit and Vegetable Program** – Validation that participating schools increase children's exposure to and consumption of a variety of fruits and vegetables and operate the program as prescribed

YES  NO  N/A

**Finding Detail:** FFVP is not widely publicized at Barre City Elementary and Middle School.

- 4. Special Milk Program** – Documentation that the SFA is operating the program in compliance with regulatory requirements and in accordance with the State Agency approved agreement

YES  NO  N/A

**Finding Detail:**