VERMONT
AGENCY OF EDUCATION

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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: Greater Rutland County SU

Self-operated	☒
Vended	☐
Food Service Management Company (FSMC) Contract	☒

Date(s) of Administrative Review: 03/01/2023
Date review summary was publicly posted: 10/04/2023

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

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 some incomplete free and reduced-price meal applications. There were incorrectly categorized applications and additional information needed to document students via direct certification.

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: Applications were not selected from the error prone applications. There was no documentation to show a confirmation review or second-follow up attempt occurred for some of the applications.

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:

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: The CACFP meal pattern was not followed for non-co-mingled PreK students. Some products were missing appropriate meal pattern documentation.

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: On the day of review at West Rutland School, breakfast and lunch meals were observed without the correct number of items and components.

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: Catering funds were not deposited into the non-profit school food service account.

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 most recent version of the non-discrimination statement was not on the website and the Civil Rights Complaint Procedure was not up to date.

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:

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: A non-complaint beverage was sold to middle school students at West Rutland School.

5. **Professional Standards** – Validation of the SFA compliance with required hiring standards and annual training requirements
   YES ☒ NO☐
   Finding Detail: Back-up documentation was not provided to validate training.

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: At Proctor Elementary School, thermometers were needed for the cold storage units, one staff member did not ha a proper hair restraint, no tongs were provided for the bowl of apples, and staff were not familiar with the HACCP-based Food Safety Plan.

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 Sumer 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: Monitoring of the program was not completed within the first 4 weeks of program operation.

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: The submitted invoices did not validate all of the produce reported in the claim for reimbursement. FFVP is not widely publicized at Proctor Elementary 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: