

School Nutrition Programs 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 School Nutrition Programs 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 School Food Authority (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 (SFA) Name: Hartford Town School District

Self-operated

Vended

Food Service Management Company (FSMC) Contract

Date(s) of Administrative Review: November 15, 2023

Date review summary was publicly posted: March 15, 2024

General Program Participation

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

1. 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

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:

- The student master list did not contain the correct date of determination.

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 application selected for Verification was not signed by the verifying official.

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:

- Point of Service meal counts were not being taken at White River School for non-comingled Pre-Kindergarten at breakfast and lunch, and for all grades at lunch on the day of review.
- The daily point of Service (POS) meal count sheets for the review period and day of review were not submitted for review at White River School.
- The claim for reimbursement was incorrectly consolidated for breakfast and lunch during the review period of September 2023 at White River School and Hartford High School.

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:

- Production records were not completed consistently or correctly for the review period at White River School. Only one milk variety was offered at breakfast on two of the days in the review period, and no milk was offered at lunch.
- Product formulation statements, Child Nutrition labels, and standardized recipes were not submitted for review, and the State agency was not able to validate meal pattern compliance at White River School.
- It is unclear from the documentation submitted if the SFA is following the CACFP meal pattern for the non-co-mingled Pre-K students at White River School.
- At least two milk choices were not offered during meal service at White River School on the day of review.
- Some recipes were not submitted for meals served on the production records during the review period at Hartford high School.

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:

- During the on-site review, it was observed that the SFA is not correctly implementing the Offer Versus Serve (OVS) model of meal service for all students at White River School.
- During breakfast observation at White River School, 10 meals served in the cafeteria and 6 Pre-K meals brought back to the classroom were observed missing the required ½ cup fruit (or vegetable).

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

YES NO

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:

- The SFA has not submitted the correct Non-Program Foods Revenue Tool, a statement of revenues and expenses, and net assets or statement of net position (balance sheets) from the previous School year to the State agency for review to complete these areas.

- The SFA indicated in the Off-site Assessment that they do not have internal control procedures in place to ensure that only allowable costs were charged to the nonprofit 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:

- Breakfast and lunch menus at White River School did not contain the correct shortened non-discrimination statement.
- The benefit notification letters sent to households contained an outdated, full Civil Rights statement.
- The SFA did not submit documentation to show all staff that have duties related to the Program completed annual Civil Rights training in the 2023-2024 school year.

- 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:

- On-site monitoring forms were not submitted for review for school year 2022-2023.

- 3. Local School Wellness Policy and School Meal Environment** – Documentation of compliance with the established Local School Wellness Policy.

YES NO

Finding Detail:

- The SFA has not submitted a triennial assessment on the implementation of the Wellness Policy

- 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:

- At Hartford High School, a non-compliant snack was for sale in the cafeteria on the day of review.

5. **Professional Standards** – Validation of the SFA compliance with required hiring standards and annual training requirements.

YES NO

Finding Detail:

- Professional Standards training hours for all SFA program and non-program staff that have duties related to the Program have not been submitted for review.
- The backup documentation for trainings such as certificates, sign in sheets, and agendas for all trainings recorded in the Training Tracking Grid for USDA Professional Standards were not submitted for review from the FSMC.
- The Food Service Director did not submit documentation to show an 8-hour food safety training course was completed within the first 30 calendar days of being hired.

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:

- There was no HACCP or written food safety plan on-site on the day of review at White River School.
- Temperatures for all food served to students are being taken daily but not documented at White River School.

8. **Buy American** – Documentation that schools comply with Buy American provision and policy specified by regulation.

YES NO

Finding Detail:

- Non-compliant products were observed on-site at and the SFA did not have exception justification documentation on file.

9. **Reporting and Recordkeeping** – Evidence that reports are submitted and maintained with other program records as required.

YES NO

Finding Detail:

- Many required documents were not submitted by the required deadlines for the administrative review, and have not yet been submitted as of the date of the review report.

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

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

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

YES NO N/A

3. Fresh Fruit and Vegetable Program (FFVP) – 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 previous school years FFVP backup documentation has not been submitted for review.

4. Special Milk Program (SMP) – 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

This institution is an equal opportunity provider.