

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: **Lincoln Town SD**

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

Date(s) of Administrative Review: **December 13, 2023**

Date review summary was publicly posted: **January 30, 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: (1) Two students were incorrectly certified for free meals based on income, (2) one household application was incorrectly denied, (3) free and reduced-price meal applications were not approved in a timely manner, (4) the SFA did not draw down the direct certification list in the required time frame, and (5) the SFA does not currently have a designated determining official.

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: Note: Verification was not required because the SFA did not have approved applications in file on October 1 due to their failure to approve applications timely.

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: The claim for reimbursement was incorrectly consolidated for breakfast and lunch during the review period.

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: (1) An unallowable milk type was served during the week of review, (2) production records were not completed consistently or accurately for the review period, (3) $\frac{3}{4}$ cup of the vegetable component was not offered as required on three occasions during the week of review, (4) the "milk enhancer" alternate meal offered on the day of review did not contain a grain or vegetable component, and (5) hot vended meals delivered for lunch on the day of review were not transported in insulated bags or containers.

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: Staff are not adequately trained on Offer versus Serve (OVS) requirements.

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

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: (1) The SFA does not have a civil rights complaint procedure for School Nutrition Programs, and (2) the SFA did not have documentation on file to show program staff and district staff that have duties related to the program completed required 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

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

YES NO

Finding Detail: Standards for all foods and beverages provided, but not sold, to students during the school day was not included in the current 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

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

YES NO

Finding Detail: (1) The new Food Service Director (FSD) in the 2023-2024 school year did not have documentation on file to show an 8-hour food safety training course was completed within the first 30 calendar days of being hired, and (2) Lincoln Town School District is a new public SFA in the 2023-2024 school year and was approved to begin operating the School Nutrition Programs (SNP) on September 8, 2023. Upon approval, the interim Superintendent assumed the roles of Food Service Director, Business Manager, Claim Contact, Determining Official, and Verifying Official. The interim Superintendent's last day was December 15, 2023, and the SFA has not designated staff to take over Program roles.

- 6. Water** – Documentation that children have access to water during the lunch and breakfast meal services.

YES NO

- 7. Food Safety and Storage** – Validation that schools meet food safety and storage requirements.

YES NO

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

YES NO

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

YES NO

Finding Detail: (1) The SFA did not complete the Verification Collection Report by December 15, 2023, and (2) the SFA did not complete the Site Enrollment Collection Report by December 15, 2023.

- 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: (1) The School Breakfast Program (SBP) is not being promoted as required, and (2) the Summer Food Service Program (SFSP) is not being promoted as required.

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: The SFA is not operating a planned NSLP Afterschool Snack Program and did not submit documentation to support snacks served in October were counted and claimed appropriately or met meal pattern requirements.

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

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