

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: Mill River Unified Union School District

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

Date(s) of Administrative Review: **January 10, 2024**

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: Student eligibility was not properly transferred to the benefit issuance document.

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: (1) The number of applications verified was incorrect, and (2) one application selected for verification was not correctly 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: (1) Meals were not counted at the point of service at breakfast and lunch on the day of review, and (2) the paid breakfast meal counts exceeded the number of eligible paid students one day during the review period at Clarendon Elementary 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: (1) The fruit component was placed after the Point of Service (POS) at breakfast on the day of review, (2) fluid milk was not offered in at least two varieties at breakfast and lunch during the review period, (3) meals offered at lunch during the review period did not contain all required components, (4) standardized recipes were not completed consistently or accurately, (5) production records were not completed consistently or accurately for the review period, and (6) meals served at breakfast during the review period were incomplete and missing required components.

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: FSMC 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

Finding Detail: The SFA has not submitted the Non-Program Foods Revenue Tool for review.

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) Meal modifications that fell outside the meal pattern requirements were provided to students on the day of review without a medical statement on file, and (2) The SFA is not making an appropriate meal modification for one child with a disability that has a medical statement on file.

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

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: The FSMC is not tracking training hours to demonstrate compliance with the annual training hour requirements for their Food Service Director.

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

Finding Detail: Non-compliant products without required exception documentation were observed on-site at Clarendon Elementary School.

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

YES NO

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: (1) The Fresh Fruit and Vegetable Program is not being promoted within the school environment, (2) the Fresh Fruit and Vegetable Program is not available to all enrolled students, and (3) cost documentation submitted did not support the school's FFVP claim for reimbursement.

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