

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: **North Country SU**

Self-operated

Vended

Food Service Management Company (FSMC) Contract

Date(s) of Administrative Review: **March 6 and 7, 2024**

Date review summary was publicly posted: **April 12, 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**
- 2. Verification** – Validation of the process used by the SFA to confirm selected students' eligibility for free and reduced-price meals.
YES **NO**
- 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: Meals were not counted at the point of service at Coventry Village School and Newport City School on the day of review.

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) Coventry Village School and Newport City Elementary School do not differentiate which meal pattern is being followed for the which age/grade group being served, (2) Newport City Elementary School served cereal on the day of review that exceeded the sugar requirement for non-co-mingled Pre-K students, and (3) Meals observed and counted on the day of review at Newport City Elementary School and North Country Union High School did not contain all required meal 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: Staff are not adequately trained on Offer versus Serve requirements at Newport City Elementary School.
- 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: Indirect costs were incorrectly charged to the nonprofit school food service account as direct costs.

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 to accommodate a disability that fall outside of the meal pattern requirements were provided to students without a proper medical statement on file and (2) four district staff took an unapproved Civil Rights training to meet the annual requirement.

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: The SFA did not submit documentation to show the triennial assessment was completed as required.

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

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

Finding Detail: (1) Internal thermometers were not maintained in the milk coolers on the day of review at Newport City Elementary School and North Country Union High School and (2) temperatures were not properly monitored or recorded for the dish machines at Coventry Village School and Newport City Elementary School.

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: Daily point of service meal count sheets were not maintained on file to support the claim for reimbursement at North Country Union High School and Coventry Village School.

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

Finding Detail: *Snack documentation was reviewed for Coventry Village School:* (1) Production records were not maintained as required and (2) the school did not have back-up documentation to show snacks were counted at the point of service.

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) FFVP from the prior day was served on the day of review at Newport City Elementary School and (2) the FFVP was not available to all enrolled students at Newport City Elementary School.

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