

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: **Orange Southwest Unified Union School District**
Self-operated
Vended
Food Service Management Company (FSMC) Contract

Date(s) of Administrative Review: **October 25, 2023**
Date review summary was publicly posted: **December 1, 2023**

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



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) One student's eligibility was not properly transferred to the benefit issuance document and (2) 55 students were directly certified for free meals based on the reduced-price Medicaid category, "Medicaid 185 FPL", as indicated on the Direct Certification list.

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 SFA did not complete the Verification process by November 15th.

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

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) Alternate meals offered at lunch on the day of review did not contain sufficient grain quantities including the fruit and yogurt parfait with granola and the fruit smoothie with granola. (2) Fluid milk was not offered in at least two varieties at breakfast on the day of review.

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.

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 flagged for review of the non-program food section of Resource Management. (1) The SFA does not clearly label or separate non-program foods for catering events from program foods in the dry storage and cold storage areas. (2) The SFA did not submit catering documentation for one catering event or meeting in the current school year.

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 SFA does not have a civil rights complaint procedure for School Nutrition Programs.

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

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) The SFA does not have a developed a food safety plan at any of the sites. (2) Internal thermometers were not maintained in the milk cooler, walk-in refrigerator, walk-in freezer, or reach-in coolers. (3) Improper food storage was observed.

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

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 Sumer 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** – 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** – 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** – 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