

## 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: White River Valley Supervisory Union

Self-operated

Vended

Food Service Management Company (FSMC) Contract

Date(s) of Administrative Review: December 13 and 14, 2023

Date review summary was publicly posted: February 8, 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:** Direct Certification (DC) lists were not saved with the date they were drawn from the state. The date of DC eligibility determinations were not consistently tracked on 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

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:** There was an underclaim in the Bethel School in October 2023 claim for reimbursement. Point of Service (POS) meal counts were not taken at Stockbridge Central School on the day of review and the pre-k meal count sheets contained the students' eligibility statuses.

### 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:** Stockbridge Central School production records did not consistently record the milk component and milk choice offerings. The pre-k meals at Bethel School are non-co-mingled, but were not following the Child and Adult Care Food Program (CACFP) meal pattern. The milk cup size for pre-k meals at Bethel School was too small to provide a 6-ounce minimum portion.

2. **Offer versus Serve (OVS)** – Validation of SFA compliance with provision that allows students to decline some of the food components offered.

YES  NO

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 in Revenue from Non-Program Foods and did not submit the requested documentation.

**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:** Documentation was not provided to show that all staff involved in the Child Nutrition Programs received Civil Rights training. The SFA did not have a current Civil Rights Complaint Procedure. The short non-discrimination statement was not used correctly on menus and promotional materials.
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:** Lunch on-site monitoring was not conducted for Chelsea Public School in 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 completed an assessment of 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:** The popcorn sold at Bethel School on Wednesdays was not assessed for Smart Snacks compliance.
5. **Professional Standards** – Validation of the SFA compliance with required hiring standards and annual training requirements.

YES  NO

**Finding Detail:** Documentation was not submitted to validate the information on the Professional Standards Tracking Tool. Documentation was not submitted to show pre-k teachers had received training related to their Child Nutrition duties.

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:** The HACCP-based Standard Operating Procedures were not customized. At Bethel School, boxes of food were stored directly on the floor, there was no thermometer in the milk cooler, and tongs were not provided for ready-to-eat fruit.

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

YES  NO

**Finding Detail:** There were non-compliant products, without exception justification, observed on site.

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

**Finding Detail:** There was an underclaim in the Bethel School in October 2023 snack claim for reimbursement.

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:** FFVP at Bethel School is not offered outside of breakfast and lunch meal service times. It is not widely promoted in the school. FFVP on the day of review was not offered to all children enrolled in the school. Back-up documentation was not provided to validate all information on the November 2023 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