

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: Windham Southeast Supervisory Union

Self-operated

Vended

Food Service Management Company (FSMC) Contract

Date(s) of Administrative Review: May 1, 2024

Date review summary was publicly posted: July 19, 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:

- Daily meal count sheets/rosters for the review period of February 2024 were not submitted for Oak Grove School (breakfast and lunch) and Green Street School (lunch only). Additionally, day of review meal counts were not submitted for Oak Grove School (breakfast and lunch).
- Breakfast meal counts are not being taken at the Point of Service (POS) in the classrooms at Oak Grove 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:

- It is not indicated in the SY 23-24 SNP site application in Harvest that Oak Grove School serves Pre-K students.
- It is unclear from the meal pattern documentation submitted if the SFA is following the Child and Adult Care Food Program (CACFP) meal pattern for the non-co-mingled Pre-K students at Oak Grove School.
- Fluid milk was not offered in at least two varieties at breakfast at Oak Grove School and lunch at Green Street School, on the day of review.

- Meal pattern documentation submitted for Oak Grove School is missing standardized recipes and labels. The SFA did not submit standardized recipes at Green Street School for 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

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 an in-depth review of revenue from nonprogram foods.

- The SFA has not submitted the Non-Program Foods Revenue Tool, a statement of revenues and expenses, and net assets or statement of net position (balance sheets) from the previous school year to the State agency for review to complete these areas.
- The SFA has not submitted the supporting documentation for purchases under the Supply Chain Assistance (SCA) funds.

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 Summer Food Service Program flyer has an incorrect version of the short non-discrimination statement, “WSESU & Fresh Picks Café are equal opportunity providers.”
- While there was documentation to show that SFA program and non-program staff attended the civil rights training this school year, there was no documentation submitted to show that all Food Service Management Company (FSMC) employees received Child Nutrition specific civil rights training this 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

Finding Detail:

- The on-site monitoring forms for all schools within the SFA have not been submitted for review.

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:

- A list of all school food service program employees that includes name, date hired, title/position, and approximate hours worked per week during the school year was not submitted for review.
- Back-up documentation, such as certificates and agendas with sign-in sheets, for the training recorded in the professional standards tracking tool were not submitted for review from the Food Service Management Company.

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:

- Numerous required documents were not submitted as required ahead of the review. This area of review is still under review until all documents have been submitted to the reviewer.

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:

- The Fresh Fruit and Vegetable Program (FFVP) is not widely publicized at Oak Grove 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

This institution is an equal opportunity provider.