

## **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 Southwest SU**

Self-operated

Vended

Food Service Management Company (FSMC) Contract

Date(s) of Administrative Review: **April 2, 2024**

Date review summary was publicly posted: **June 7, 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 (POS) in the classrooms at Twin Valley Elementary School or in the cafeteria at Readsboro Central 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) Meals served at breakfast on the day of review and at lunch during the review period at Twin Valley Elementary School did not contain all required components and were incomplete. (2) Meals served at breakfast and lunch on the day of review and during the review period at Twin Valley Elementary School and Readsboro Central School did not contain sufficient quantities. (3) Fluid milk was not offered in at least two varieties at breakfast on the day of review at Twin Valley Elementary School. 2% milk was served and is now an allowable milk type. (4) Production records were not maintained as required at Readsboro Central School. (5) Crediting documentation was not maintained on file at Readsboro Central School, and crediting documentation was insufficient at Twin Valley Elementary School.

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 (OVS) requirements at Readsboro Central 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:** A lack of financial management is leading the program to operating at a loss. Meals are being over produced and inventory is not being utilized appropriately. The SFA makes consistent general fund transfers each fiscal year between \$10,000 - \$70,000 to subsidize Program losses, which could be reduced with proper oversight.

#### **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) Multiple Program and non-program staff that have duties related to the program did not complete annual Civil rights training, and (2) 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**   
**Finding Detail:** The SFA did not complete lunch on-site monitoring for Halifax School and Twin Valley Middle/High School in the 2023-2024 school year.
- 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 and as addressed in the current Local School 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

5. **Professional Standards** – Validation of the SFA compliance with required hiring standards and annual training requirements.

YES  NO

**Finding Detail:** (1) Trainings completed towards Professional Standards training hour requirements are not being tracked consistently or accurately, and (2) there is a significant lack of oversight in the SFA's School Meals Program and the SFA does not have a single designated individual in the Food Service Director role.

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) Twin Valley Elementary School and Readsboro Central School do not have a food safety plan on site, (2) temperatures were not properly monitored or recorded for food served and for the dish machines at Twin Valley Elementary School and Readsboro Central School, (3) the internal thermometer in the reach-in freezer at Readsboro Central School appeared to be broken, and (4) outdated food items were observed in the reach-in freezer and dry storage areas from 2021 at Readsboro Central School on the day of review.

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 required exception documentation observed on-site at Twin Valley 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**   
**Finding Detail:** Twin Valley Elementary 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) Cost documentation submitted for Twin Valley Elementary School did not support the school’s February 2024 FFVP claim for reimbursement and resulted in an overclaim, and (2) the FFVP is not available to all enrolled students at Twin Valley 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**