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## 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 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 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 Name: **Barre Supervisory Union**

Self-operated

Food Service Management Company Contract

Date(s) of Administrative Review: February 12 & 13, 2018

Date review summary was publicly posted: **June 14, 2018**

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## General Program Participation

1. 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

2. 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

Special Provision 1

Special Provision 2

Special Provision 3

## Review Findings

3. Commendations:  
Lunch at Spaulding featured a variety of delicious and creative options.
4. Were any findings identified during the review of this SFA?       YES       NO  
*If yes, indicate the areas and what issues were identified in the findings review below.*

### REVIEW FINDINGS

#### A. Program 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:** Documentation was reviewed for a statistical sample of students approved for free and reduced-price meals was reviewed and some income applications were incorrectly approved. There were inconsistencies between student benefit status on the Master List and in the Point of Sale system.
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 Verification Official did not have training. The required steps and timeline were not followed for the Verification process.
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:** Someone from the SU was not reviewing the meal counts prior to submitting the Claim for Reimbursement.

#### 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:** Production records did not include information about vegetable subgroups, not all grain items served were whole grain-rich, and the Pre-K meal

service must be co-mingled or the CACFP meal pattern followed for Pre-K students.

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:**

3. **Dietary Specifications and Nutrient Analysis** – Validation that meals offered to children through the school meal programs are consistent with federal standards

YES  NO

**Finding Detail:**

### C. 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:** Not all necessary staff had taken the required Civil Rights training.

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 required On-Site Monitoring was not conducted by the February 1<sup>st</sup> deadline for all schools and the forms were not thoroughly completed.

3. **Local School Wellness Policy and School Meal Environment**– Documentation of compliance with the established Local School Wellness Policy

YES  NO

**Finding Detail:** The Wellness Policy is missing the required “Policy for Food and Beverage Marketing” component.

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:** Non-Smart Snack compliant items were sold during the school day.

5. **Professional Standards** – Validation of the SFA compliance with required hiring standards and annual training requirements  
YES  NO   
**Finding Detail:** Professional standards hours were not sufficiently tracked. Documentation is needed to determine that staff are on their way to meeting the requirements.
6. **Water** – Documentation that children have access to water during the lunch and breakfast meal services  
YES  NO   
**Finding Detail:**
7. **Food Safety and Storage** – Validation that schools meet food safety and storage requirements  
YES  NO   
**Finding Detail:** There were food safety storage violations in the dry storage area at Spaulding High School. Food temperatures need to be monitored and recorded for the Spaulding breakfast cart.
8. **Buy American** – Documentation that schools comply with Buy American provision and policy specified by regulation  
YES  NO   
**Finding Detail:** Sufficient documentation for the Buy American Provision exemptions is not maintained to support the purchase of food from foreign countries.
9. **Reporting and Recordkeeping** – Evidence that reports are submitted and maintained with other program records as required  
YES  NO   
**Finding Detail:**
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  
YES  NO   
**Finding Detail:**

#### D. 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:** Monitoring of the program was not conducted in a timely manner, production records are not thoroughly completed, and the non-discrimination poster was missing.

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

**Finding Detail:**

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

**Finding Detail:** Unallowable foods accompanied the snack, there is not enough program promotion, and a disparity between fruits served compared to the number of vegetables.

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

**Finding Detail:**

#### E. 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:** Non-program food is not kept physically separate from or tracked financially separately from program food. There was an error in the adult meal prices listed in the SFA’s application to participate in the program.