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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: **Bennington-Rutland Supervisory Union**

Self-operated

Food Service Management Company Contract

Date(s) of Administrative Review: 1/23-1/24/18

Date review summary was publicly posted: 3/22/2018

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:

All district and school staff have positive attitudes and the willingness to make changes which is much appreciated. The consolidation from a supervisory union to a school district offers a nice opportunity to introduce efficiencies into the program and move into full compliance.

Hiring a Food service coordinator, consolidating the Supervisory Union and, acquiring a new meal counting system that can be accessed from the Supervisory office are all positive changes that should increase the efficiency of the School Nutrition program, as well as, provide more consistency and quality in all of the schools.

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:

Two benefit issuance miscalculations were found. One of the errors was corrected on site and one error has yet to be fixed.

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:

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:

The Meal Charge Policy will need to include after what amount of time debt will be declared uncollectable "bad debt".

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:

Currently Pre-K meals are delivered directly to the classroom at Mettawee Community School. If the Pre-K meal service Point of Service is separate from the other grades in the school, these meals must meet the Child and Adult Care Food Program (CACFP) meal pattern requirements. In order to continue following the School Breakfast Program (SBP) requirements, the Pre-K students must come to the kitchen to get their meals.

Reimbursable meal signage and “And Justice for All” non-discrimination posters needed to be added to the breakfast carts.

Mettawee Community School and Currier Memorial School were both serving non-compliant grains for lunch.

Production Records were not thoroughly completed at Mettawee Community School or Currier Memorial School.

Mettawee Community School and Currier Memorial School did not include the ½ cup minimum fruit and/or vegetable requirement on cafeteria signage. The SunButter, and ham/turkey sandwich recipes at Mettawee were updated to include a 1 ounce cheese stick offered with each sandwich to ensure students had sufficient meat/meat alternate.

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:

Students at Currier Memorial School that chose the bagel/yogurt/cheese stick meal could take two pats of butter, more than planned in the nutrient specifications.

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:

The Supervisory Union did not have a sufficient Civil Rights Complaint procedure for handling complaints of discrimination.

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:

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

YES NO

Finding Detail:

The policy needs to be updated to include information about Food and Beverage Marketing.

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 Dorset School holds a bake sale on Election Day each year. The items sold at the bake sale are not currently SmartSnack compliant.

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

YES NO

Finding Detail:

The food service staff at Carrier Memorial School have only received 1 hour of professional development thus far.

There were no tracking tools for Sunderland, Dorset, Flood Brook, or Mt. Tabor. The only training done at these schools is Civil Rights training completed by some staff.

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:

Currier Memorial School is not tracking and documenting food temperatures. Kitchen staff, as well as teachers that assisted in the lunch meal service had gloves on, but no appropriate form of hair restraint. A standard operating procedure for meals sent to Mt. Tabor from Currier Memorial and a standard operating procedure for Mt. Tabor for meals received from Currier Memorial School must be created to ensure food safety is maintained.

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

YES NO

Finding Detail:

Non-Buy American Provision Compliant Products found at Currier Memorial School include:

- Culinary Secrets garlic powder from China
- Bountiful Harvest canned mandarin oranges from China
- Bountiful Harvest canned pineapple from Indonesia
- Ardmore juice from a variety of countries
- Dole bananas from Costa Rica
- Supreme Berry Farms Strawberries from Mexico
- Red Grapes from Chile
- Separate teachers oils

Non-Buy American Provision Compliant Products found at Mettawee Community UD#47 include:

- Culinary Secrets garlic powder from China
- Bountiful Harvest canned mandarin oranges from China
- Applesnax applesauce from Canada
- Bountiful Harvest canned pineapple from Indonesia
- Ardmore juice from a variety of countries
- Cucumbers from Mexico
- Lotus Garden canned baby corn from Thailand

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 Summer 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:

Snack must be comprised of two different components; each student must have two different snacks in order to be recorded as a reimbursable snack.

Serving sizes were not noted on the snack menu.

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:

Currier Memorial School will need to add a promotional element to their Fresh Fruit and Vegetable Program.

Cooked vegetables had been served without an accompanying nutrition education lesson.

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:

The vended meals agreement does not specify a price for milk. The agreement must be amended to include a set milk price or proper procurement methods must be followed when purchasing milk.