

219 North Main Street, Suite 402 Barre, VT 05641 (p) 802-479-1030 | (f) 802-479-1835

### **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: Caledonia Central S	Supervisory Union
Self-operated	$\boxtimes$
Food Service Management Company Contract	
Date(s) of Administrative Review: February 20 & 2	1, 2018

Date review summary was publicly posted: October 12, 2018

#### **General Program Participation**

1. What Child Nutrition Programs does the School Food Authority operate?

School Breakfast Program	
National School Lunch Program	$\boxtimes$
Fresh Fruit and Vegetable Program	
Afterschool Snack	$\boxtimes$
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	$\boxtimes$
---------------------------------	-------------

- Special Provision 1
- Special Provision 2  $\Box$
- Special Provision 3

#### **Review Findings**

- 3. Commendations:
- 4. The New Food Service Director position has helped to improve coordination of the meals programs for CCSU. With new leadership, the SU can work toward benchmarks for participation, program quality, and program integrity.
- 5. 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

- Certification and Benefit Issuance Validation of the SFA certification of students' eligibility for free or reduced-price meals
   YES □ NO⊠
   Finding Detail:
- 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

#### $YES \boxtimes NO \square$

### **Finding Detail:**

- The meal counting and claiming procedure at Walden and Peacham is insufficient.
- The POS for breakfast at Danville is not located at the end of the line.

#### B. Meal Pattern and Nutritional Quality

 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 are not thoroughly completed and do not always reflect the correct meal pattern components.
- Meal signage at Danville and Walden is insufficient.
- Water was offer in competition with milk at Barnet.
- 1% flavored milk was served at Barnet
- Pre-K meals must either be provided at the same time as the other students meals or follow the CACFP meal pattern.
- 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 at Danville School need more training on the OVS requirements.
- 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:

At Danville School, calories, saturated fat (percentage of total calories), and sodium-levels are too high.

## 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:

- 36 staff still need to complete the required annual USDA Civil Rights training.
- The nondiscrimination statement was not used on all pertinent materials.
- The "And Justice for All" non-discrimination poster was not posted in all necessary locations.
- 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:** On-site monitoring was conducted on time, however some forms were missing a few required components.

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



### YES $\boxtimes$ NO $\square$

### Finding Detail:

The Wellness Policy did not include a food and beverage marketing policy.

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:

- Not all products sold met the SmartSnack guidelines.
- Smart Snacks were sold at the same time as the FFVP program was offered.
- 5. Professional Standards Validation of the SFA compliance with required hiring standards and annual training requirements
   YES □ NO⊠
   Finding Detail:
- 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

 $YES \square NO \square$ 

# Finding Detail:

- Temperatures of food and storage units were not monitored and recorded daily.
- There were food storage violations.
- 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 is not maintained to support the purchase of food from foreign countries.

**Reporting and Recordkeeping** – Evidence that reports are submitted and maintained with other program records as required
 YES ⊠ NO□



**Finding Detail:** In prior years, some schools in the SU were not maintaining their records for the time period required by USDA.

 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 nutritionallybalanced snacks are served, appropriate educational or enrichment activities are provided and counting and claiming is accurate.

YES  $\boxtimes$  NO $\square$  N/A $\square$ 

Finding Detail:

- The meal counting and claiming procedure used is insufficient.
- Some grain items were not large enough to meet the serving size requirements.
- Unallowable substitutions were made.
- 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:

- FFVP purchases were not tracked separately from the other programs.
- The program needs to be promoted more
- More attention should be paid to food safety and sanitation.
- 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

 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 costs and revenue were not properly tracked.
- Non-program food needs to be stored separate from program food.

