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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: **Grand Isle Supervisory Union**

Self-operated

Food Service Management Company Contract

Date(s) of Administrative Review: December 11-13, 2017

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:
Business Manager Robert Gess and other SU and school staff were helpful and reviewers are confident that systems will be put into place to bring the SU to full compliance.
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 for all students determined eligible for free and reduced-price meal benefits was reviewed and some household applications were incorrectly approved.

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 process was not completed as required.

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:

Sufficient meal counting and claiming systems are not in place at all schools. The October 2017 Claim for Reimbursement was assessed. Twenty-four breakfasts were under-claimed at Isle La Motte. Meals on day of review at Alburgh may not be claimed for reimbursement due to the lack of an accurate counting system. Other schools in the SU counted incomplete meals as eligible 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:

Not all grains served were whole grain-rich. The required reimbursable meal signage was missing or inadequate. Five lunches from day of review at North Hero may not be claimed due to insufficient fruit or vegetable quantities.

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:

More training on OVS is necessary to ensure students have complete meals.

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:

Nachos are being served too frequently at Grand Isle resulting in empty calorie, higher fat and sodium levels regularly provided to students. Saltshakers were made available to students at Folsom in an environment where lower sodium levels are required.

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:

All staff involved in the Child Nutrition Programs did not have the required VTAOE Child Nutrition-specific Civil Rights training. The correct required nondiscrimination statement was not on all program materials.

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 not completed in School Year 2016-2017 and has yet to be conducted for School Year 2017-2018. The SU has until February 1 to complete this requirement.

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 does not include all required elements.

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 bake sale at Grand Isle on day of review did not follow the SmartSnack guidelines. All foods sold during the school day must meet nutrition standards.

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

YES NO

Finding Detail:

Required professional development hours for all staff were not completed or tracked.

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:

Temperatures for all food, refrigeration and freezer units, and dishwashers were not tracked and maintained on a daily basis. On day of review, the dishwasher at Grand Isle was not reaching the required temperatures. Health Inspection Reports were not posted to be visible to the public. Food was on the floor of walk-in freezers or refrigerators. Kitchens did not have required Food Safety Plans. The required hairnets or restraints were not worn by all staff involved in food preparation and service.

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.

9. **Reporting and Recordkeeping** – Evidence that reports are submitted and maintained with other program records as required

YES NO

Finding Detail:

The Renewal Packet was not submitted on time. Production records are not thoroughly maintained at schools to document meals served and claimed for reimbursement.

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:

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:

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 adult lunch price at Isle La Motte does not meet the required federal minimum. Paid lunch prices at Folsom, North Hero, and Grand Isle do not meet the required federal minimum. Advisory councils were not in place for the schools with Food Service Management Companies, Isle La Motte, Grand Isle, and North Hero.