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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: Orange Southwest Unified Union School District

Self-operated

Food Service Management Company Contract

Date(s) of Administrative Review: 12/4/18 – 12/6/18

Date review summary was publicly posted: **March 1, 2019**

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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. 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:**

**4 applications from the sample size were missing required information**

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:**

**There was an error on the verification report submitted to the state.**

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:**

**Meal counting procedure for breakfast in the classroom was not standardized.**

#### 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 meals served contained required meal components**

**Preschool meals needs to meet the CACFP meal pattern or students need to be comingled with the K-6 school meals environment.**

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:**

**Required signage was missing.**

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 program staff received USDA Child Nutrition Civil Rights training**

**USDA non-discrimination statement was not posted on the SFA website.**

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:**

**SFA did not complete onsite monitoring.**

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 did not contain all of the 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:**

**Not all snacks being sold met smart snack dietary requirements.**

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

YES  NO

**Finding Detail:**

**Not all staff have received the required professional development hours.**

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 repeated findings on the health inspection that had not been addressed.**

**HACCP plan was not readily available at the school sites.**

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

YES  NO

**Finding Detail:**

**The SFA is not documenting Buy American Provision exceptions.**

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

YES  NO

**Finding Detail:**

**The SFA is not keeping the required meal count documentation.**

**The SFA is not maintaining temperature logs.**

**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:**

**The School was serving unallowable items.**

**FFVP was not widely publicized in the school.**

- 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 SFA does not have a process in place to assess non program food costs.**