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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: **Rutland Southwest Supervisory Union**

Self-operated

Food Service Management Company Contract

Date(s) of Administrative Review: 12/19/2017

Date review summary was publicly posted: 3/23/2018

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:
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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:

Some Free and Reduced meal applications were incomplete.
Master List was not consistent with the benefit issuance list.

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 at Middletown Springs Elementary did not include confirmations reviews of applications or reflect an attempt to directly certify.

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:

At Middletown Springs Elementary School, meal counting was occurring before the meal components had been fully offered.

At Middletown Spring Elementary School students were occasionally responsible for meal counting.

At Middletown Springs Elementary School the October 2017 reimbursement claim was not consistent with daily meal counts.

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:

Wells Village Elementary was serving milk in cups too small to provide the correct portion of milk to each student.

Middletown Springs Elementary School was serving 2% milk, which is not part of the Federal Child Nutrition Program meal pattern.

Wells Village Elementary School were purchasing and serving non whole grain rich products which does not meet meal pattern requirements.

Wells Village Elementary School did not clearly separate program food from non-program food.

Middletown Springs Elementary School did not post the required meal signage.

Middletown Springs Elementary was not offering milk as a component of their bag lunch option.

- 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:

The staff at Middletown Springs Elementary was requiring students to take a milk with each meal when it is optional with Offer vs. Serve.

- 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:

Outdated, incorrect, or missing USDA nondiscrimination “And Justice for All” posters were observed at Middletown Springs Elementary School and Poultney Elementary School.

The outdated or incorrect nondiscrimination statement were displayed on the Middletown Elementary Springs School and Poultney Elementary School program materials.

Not all schools in the SFA have received the required annual 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:

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

YES NO

Finding Detail:

The SFA’s wellness policy did not contain all the required components.

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:

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

YES NO

Finding Detail:

Professional standards have not met USDA standards for all staff in the Supervisory Union.

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:

Staff were not wearing proper hair restraints at Middletown Springs Elementary School.

Routine temperatures for food or equipment were not being taken and recorded for all schools in the SU.

Cases of food were being stored directly on the floor at Poultney Elementary School.

No HACCP food safety plan at Poultney Elementary School.

Poultney Elementary School did not publically display the most recent health inspection report as required.

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 were found at all school sites in the SFA. The required documentation was not on file.

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

YES NO

Finding Detail:

Middletown Springs Elementary and Poultney Elementary School were not maintaining required program documentation or program documentation was incomplete.

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:

The After School Snack Program staff in the Supervisory Union need training.

The Onsite Monitoring of the After School Snack Program was not conducted.

Inconsistent or incomplete records were observed at Middletown Springs Elementary School.

At Middletown Springs Elementary School incomplete or non-creditable components were observed 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:

At Wells Village Elementary School proper purchasing procedures were not being followed for Fresh Fruit and Vegetable items.

At Middletown Springs Elementary School the Fresh Fruit and Vegetable Program was not operating despite having received program grant funding.

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:

Financial Report for the Supervisory Union was calculated and submitted incorrectly.

a la carte milk and juice provided at no charge to students were being charged to the Non-Profit Food Service Account.