

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: **VT Organization for Jewish Education**

Self-operated

Vended

Food Service Management Company (FSMC) Contract

Date(s) of Administrative Review: **10/26/2022**

Date review summary was publicly posted: **01/19/23**

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 (CEP)

Special Provision 1

Special Provision 2

Special Provision 3

N/A

Review Findings

3. Commendations:

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. Meal 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: The benefit issuance document was not regularly updated to reflect all students enrolled during the review period. Eligibility statuses were not accurate on the benefit issuance or claim for reimbursement.

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 SFA did not conduct Verification as required to begin October 1 each year, and did not understand the verification process.

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 counts were based on student enrollment and were not taken at the point of service. Program staff were not trained on meal counting procedures.

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: Meal production records show that required components were not served on multiple days. The SFA did not meet whole-grain rich and vegetable subgroup requirements during the week of review. Supporting documentation including labels and standardized recipes were not on file for multiple menu items to validate meal pattern compliance. Unallowable milk

types were served on the day of review, which resulted in the SFA not providing the required minimum of 2 allowable milk types at each meal service. Pre-K meals do not follow the CACFP menu when not co-mingled with other age/grade groups at meal service.

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: Program staff were not trained on the OVS requirements and therefore, were not implementing OVS correctly at meal services.

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: N/A

C. 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 could not provide program financial documentation. Additionally, it was determined the SFA is not tracking nonprogram revenues, adult meals and leftovers. Leftover food was provided to school employees to take home. The SFA is not separating or labeling nonprogram food. The SFA does not have an established meal charge policy.

D. 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: It was determined program staff did not receive annual civil rights training, menus did not contain the short non-discrimination statement and the SFA does not have an established civil rights complaint procedure on file.

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 N/A

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 did not have an established Local School Wellness Policy.

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: The SFA did not complete or document annual training hours towards professional standard training requirements for all program staff.

6. **Water** – Documentation that children have access to water during the lunch and breakfast meal services

YES NO

Finding Detail: N/A

7. **Food Safety and Storage** – Validation that schools meet food safety and storage requirements

YES NO

Finding Detail: The SFA was not following proper food safety practices. On the day of review, the following was observed: food temperatures logs were not in use, gloves were not worn during meal service, food was not stored at least 6 inches off the ground and incorrect thermometers were being used in the refrigerators and freezers.

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

YES NO

Finding Detail: N/A

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

YES NO

Finding Detail: The SFA did not retain all program documents on file for a minimum of three years plus the current year and many required documents for the review were not submitted.

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 (SFSP)

YES NO

Finding Detail: N/A

E. 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: