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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: **Washington Northeast Supervisory Union**

Self-operated

Food Service Management Company Contract

Date(s) of Administrative Review: December 11-13, 2018

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

N/A

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. 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 Supervisory Union does not have adequate paperwork showing how claiming percentages were established provision 2 in the base year of 15-16.
- The SU has been collecting free and reduced price lunch applications instead of household income forms to establish household income information for unrelated programs.

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  NO

**Finding Detail:**

- The meal counts in the pre k- 6 grade classrooms is an attendance based system therefore meal counts are not taken correctly.
- None of the breakfasts observed in the classroom were reimbursable as each student was not served all the necessary components.

### 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:**

- Accurate meal pattern documentation is not being completed or kept on file.
- Pre K meal counts are attendance based.

- Pre k students that are not comingled must receive meals that meet the CACFP meal pattern.
- Beverage cups for milk are too small for the required 8 ounces of milk.
- Menu worksheets indicate that the legume vegetable subgroup is not being offered.

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:**

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:**

- It is not clear if menus have the proper nondiscrimination statement.
- There is no implemented civil rights complaint procedure.
- The appropriate staff have not completed the correct annual civil right 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:**

- On-site monitoring for the 2017-18 school year was not conducted.

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

YES  NO

**Finding Detail:**

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:**

- Some of the products sold at Cabot schools were not Smart Snack Compliant.

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

YES  NO

**Finding Detail:**

- Professional development training hours for staff are not 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:**

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

YES  NO

**Finding Detail:**

- Non-compliant Buy American Provision products were identified during the onsite review that did not have proper exception documentation.

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

YES  NO

**Finding Detail:**

- Backup documentation for the Provision 2 base year was not maintained on file.

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:**

- Non program food costs are not currently being tacked correctly.