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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: Windham Southeast Supervisory Union

Self-operated

|   | Service Management Company Contr<br>s) of Administrative Review: October |   |  |  |  |
|---|--|---|--|--|--|
| Date review summary was publicly posted: February 1, 2019 |  |   |  |  |  |
| Genei   | al Program Participation   |   |  |  |  |
| 1.  | What Child Nutrition Programs does the School Food Authority operate?    |   |  |  |  |
|   | School Breakfast Program   |   |  |  |  |
|   | National School Lunch Program  | $\boxtimes$   |  |  |  |
|   | Fresh Fruit and Vegetable Program  | $\boxtimes$   |  |  |  |
|   | Afterschool Snack  |   |  |  |  |
|   | Special Milk Program   |   |  |  |  |
|   | Seamless Summer Option   |   |  |  |  |
| 2.  | , 1  | erate under any Special Provisions? (These provisions ions for free and reduced price meals in high poverty |  |  |  |
|   | Community Eligibility Provision  |   |  |  |  |
|   | Special Provision 1  |   |  |  |  |
|   | Special Provision 2  |   |  |  |  |
|   | Special Provision 3  |   |  |  |  |
|   | N/A  |   |  |  |  |
|   |  |   |  |  |  |

## **Review Findings**

| Comn | nendations:   |
|------|---|
| Were | any findings identified during the review of this SFA? $\boxtimes$ YES $\square$ NC If yes, indicate the areas and what issues were identified in the findings review below.  |
|      | REVIEW FINDINGS   |
| A. M | eal Access and Reimbursement  |
| 1.   | <b>Certification and Benefit Issuance</b> – Validation of the SFA certification of students' eligibility for free or reduced-price meals  YES ☒ NO□   |
|      | <b>Finding Detail:</b> There were some incorrectly approved applications. There were errors in the applications for Provision 2 school which may impact their base year claiming percentages.                               |
| 2.   | Verification – Validation of the process used by the SFA to confirm selected students' eligibility for free and reduced-price meals YES ☒ NO□   |
|      | <b>Finding Detail:</b> There were errors with the SY2017-2018 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□             |
|      | <b>Finding Detail:</b> Point of Service meal counting was not being done at Academy School, Green Street School, or Oak Grove School. Meal counts were not able to be validated. Second lunches were being claimed at BUHS. |
|      | ŭ   |
|      | eal Pattern and Nutritional Quality   |
| 1.   | <b>Meal Components and Quantities</b> – Validation that meals claimed for reimbursement contain the required meal components / food components and quantities   |
|      | YES ⊠ NO□   |
|      | <b>Finding Detail:</b> Non-Whole Grain Rich Bread was served. Staff needed additional training on meal counting and claiming and the "Serve" method of service.   |



allows students to decline some of the food components offered YES ⊠ NO□ **Finding Detail:** Staff need additional OVS training. 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:** Additional staff need civil rights training. Procedures for selecting which statement to use and requirements for medical statements are incorrect. One medical statement on file wasn't signed. 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:** In SY17-18 lunch was not reviewed at one site. 3. Local School Wellness Policy and School Meal Environment– Documentation of compliance with the established Local School Wellness Policy YES  $\square$  NO $\boxtimes$ **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: A planned fundraiser was to use non-compliant popcorn. Non compliant items and accompaniments were sold. **5. Professional Standards** – Validation of the SFA compliance with required hiring standards and annual training requirements YES ⊠ NO□ **Finding Detail:** Backup documentation was not provided.

2. Offer versus Serve (OVS) – Validation of SFA compliance with provision that



|    | 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 several sanitation and storage concerns, and staff  |
|    |     | need additional training.  |
|    | 8.  | Buy American – Documentation that schools comply with Buy American provision and policy specified by regulation YES ☒ NO□  |
|    |     | <b>Finding Detail:</b> Non-domestic items were observed without justification documentation.   |
|    | 9.  | Reporting and Recordkeeping – Evidence that reports are submitted and maintained with other program records as required  YES □ NO⊠  Finding Detail:  |
|    | 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 Sumer Food Service Program  YES □ NO⊠  Finding Detail: |
| D. | Otl | ner 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⊠<br>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:** There were concerns with accounting for administrative time that is charged to the program. Volunteers assisting with the program need training. There were food storage concerns.

**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:** Requested documentation was not provided.

