



219 North Main Street, Suite 402
Barre, VT 05641 (p) 802-479-1030 | (f) 802-479-1835

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 Southwest Supervisory Union**

Self-operated

Food Service Management Company Contract

Date(s) of Administrative Review: March 26 & 27, 2019

Date review summary was publicly posted: July 18, 2019

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

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. 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:

- A thorough assessment of all required benefit issuance documentation revealed the Master and Benefit Issuance lists for Twin Valley Elementary School, Twin Valley Middle/ High School, Stamford Elementary, Halifax Elementary and Readsboro Elementary are not properly managed or kept up to date. Readsboro Elementary is erroneously collecting free and reduced meal applications even though they are participating in the Community Eligibility Provision.

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 Report that is due annually by the 15th of December was not completed on time.
- An Electronic Benefits Transfer (EBT) card was accepted as proof of 3SquaresVT eligibility for a student at the Twin Valley Middle High School.
- Students from Readsboro Elementary school were selected for verification. Readsboro Elementary school participates in the Community Eligibility program making them exempt from 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:

- Point of service meal count practices were found to be inconsistent.

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:

- The lunch served on the day of review at Halifax Elementary school did not meet the meal pattern requirements.

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:

- The four staff members that assist in counting students at the point of service for breakfast and lunch at Halifax Elementary school do not have civil rights training.
- The civil rights statement on the menus provided from Halifax Elementary school is incorrect.

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:

- Only Halifax received on site monitoring of their breakfast program. At least two other sites within the School Food Authority (SFA) should have also been viewed.

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 is out of date and missing key 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:

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 is no food safety plan onsite in the kitchen of the Halifax Elementary School.
- The milk for lunch service was left out at room temperature.

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:

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:

- Halifax Elementary School spent all of their FFVP money by April.

- 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 tracked correctly.
- The SFA purchased equipment exceeding \$5,000 without getting prior approval from the state agency.
- Stamford Elementary School is applying indirect costs without an approved indirect rate from Agency of Education.