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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: Windsor Southeast Supervisory Union

Self-operated

Food Service Management Company Contract

Date(s) of Administrative Review: November 28 & 29, 2017

Date review summary was publicly posted: February 7, 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:

All documentation was very organized and school staff were very friendly and easy to work with.

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: Hartland School had a number of application errors. Technical assistance provided to the with Administrative Assistant.

Common errors found were:

- Not including child monthly income in calculation if it was listed on the application.
- Not making note of categorical eligibility for foster children.
- No indication of income frequency.
- Not signing applications.
- Not recording the total income.

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 School Year 2017-218 Verification report has not been completed yet in the online CNP system. There is no documentation to support that the total number of applications was correctly compiled or the correct sample size was selected. There is no indication that a confirmation review took place or that the Direct Certification list was checked in an attempt to directly verify the selected applications.
- Windsor Southeast Supervisory Union must submit the 2017-2018 Verification Report and indicate who will be attending Verification Training at Summer Institute in August 2018.

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:

- There is no system in place at Weathersfield Elementary to conduct sufficient meal counting and claiming should a backup cashier be responsible for the counts.
- There is no standard operating procedure throughout the Supervisory Union to ensure meal counts are correct for each school and that claims for reimbursement reflect the actual number of meals served.

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:

- Ready to eat food must be accompanied by serving tongs or individually wrapped in order to protect against food contamination.
- The meal trays appeared to be coated with a residue from long-term exposure to hard water from the municipality water supply. Scaling could be physically removed and therefore could potentially contaminate food served on the trays.
- The milk cooler did not have a thermometer inside the unit to ensure milk was held at temperatures to maintain quality and food safety.

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:

- At lunch, applesauce was the only fruit that was offered. A variety of fruit needs to be offered at both breakfast and lunch to meet the meal pattern component requirements.

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:

- Food service and administrative staff did not have the required Child Nutrition Civil Rights training. The SFA did not have a written Child Nutrition Civil Rights Complaint procedure.

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 has not yet been completed yet for all schools. The SFA has until February 1 to complete this process.
- In School Year 2016-2017, on-site monitoring was not completed for Albert Bridge School.
- The On-Site Monitoring forms for Hartland and Weathersfield were incomplete and unsigned.

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:

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

YES NO

Finding Detail:

- Professional development hours for employees outside of the school Nutrition Program whose responsibilities include duties related to the operation for the school Nutrition Program are currently not being documented, including the central office staff and administrative assistants at each school.

- Professional development hours for non-Café Services school nutrition employees are also not being 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:

- Food must be stored at least 6 inches off the floor to allow for proper ventilation, cleaning, and to prevent contamination.

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

YES NO

Finding Detail:

- Documentation was not available for Non-Buy American Provision
Compliant Products found at Weathersfield:
 - Bananas from Honduras
 - Red grapes from Chile
 - Canned diced pears from China
 - Canned pineapple from Thailand
 - Canned sliced pears from South Africa
 - Ardmore juice is from a variety of countries

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:

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:

- The adult lunch price at Weathersfield is only 3.25. The School Year 2017-2018 minimum federally- required adult lunch price is 3.60.