

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: **Franklin West Supervisory Union**

Self-operated

Vended

Food Service Management Company (FSMC) Contract

Date(s) of Administrative Review: **April 12, 2023**

Date review summary was public posted: **June 9, 2023**

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:** Food service staff have a great rapport with students and school staff, there was a wide and colorful variety of fruits and veggies on the salad bar at lunch, and kitchen staff were following proper food safety standards.

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: Three students were incorrectly certified for reduced-price meals based on 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: (1) The Income Verification process was not completed by November 15th, (2) the SFA verified more applications than required, (3) four applications selected for Verification were not error-prone, (4) two applications were incorrectly verified based on income documentation provided by the households selected, (5) families were not notified 10 calendar days' prior to decrease in benefit status as a result of verification, (6) and a confirmation review was not conducted on the applications selected for verification.

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 reduced-price lunch meal counts exceeded the number of eligible students and the number of attendance adjusted eligible students multiple days during the review period at Bellows Free Academy – Fairfax.

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: (1) The yogurt & grahams meal offered at breakfast on the day of review did not contain sufficient quantities and (2) the SFA is not following the Child and Adult Care Food Program (CACFP) meal pattern for the non-co-mingled Pre-K age/grade group.

2. **Offer versus Serve (OVS)** – Validation of SFA compliance with provision that allows students to decline some of the food components offered.

YES NO

3. **Dietary Specifications and Nutrient Analysis** – Validation that meals offered to children through the school meal programs are consistent with federal standards.

YES NO

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: (1) The Nonprofit School Food Service Account has an excess fund balance that exceeds three months' average operating expenses, (2) The SFA has not submitted documentation for the comprehensive Resource Management review of Maintenance of the Nonprofit School Food Service Account and Revenue from Non-Program Foods, (3) and the Food Service Management Company (FSMC) provides free meals to non-program adults, not in accordance with the contract.

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: The letter to households informing families about the availability of free and reduced-price meals did not include the entire non-discrimination statement.

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

3. **Local School Wellness Policy and School Meal Environment**– Documentation of compliance with the established Local School Wellness Policy.
YES NO

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: Non-compliant snacks and beverages for sale in the cafeteria at Bellows Free Academy - Fairfax on the day of review included Harvest Cheddar Sun Chips (over 35% fat from calories) and flavored Poland Spring seltzer water (only allowable for the 9-12 age/grade group).

5. **Professional Standards** – Validation of the SFA compliance with required hiring standards and annual training requirements.
YES NO

6. **Water** – Documentation that children have access to water during the lunch and breakfast meal services.
YES NO

7. **Food Safety and Storage** – Validation that schools meet food safety and storage requirements.
YES NO

8. **Buy American** – Documentation that schools comply with Buy American provision and policy specified by regulation.
YES NO
Finding Detail: Non-compliant products without required exception documentation was observed on-site at Bellows Free Academy – Fairfax including frozen Dole strawberries from Chile, frozen green beans from Canada, and gluten free bread from Canada.

9. **Reporting and Recordkeeping** – Evidence that reports are submitted and maintained with other program records as required.
YES NO

- 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

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
- 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
- 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
- 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