

School Nutrition Programs 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 School Nutrition Programs 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 School Food Authority (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 (SFA) Name: Washington Central Unified Union School District
Self-operated
Vended
Food Service Management Company (FSMC) Contract

Date(s) of Administrative Review: February 22nd, 2024
Date review summary was publicly posted: April 12, 2024

General Program Participation

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

1. 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

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:

- One homeless student in the sample was classified as eligible for reduced-price meals and should have been certified as eligible for free meals.
- The benefit notification letters sent to households informing them of their child's eligibility were not submitted for review.
- It is unclear from the documents submitted if the SFA is tracking midyear changes in eligibility.
- There is an outdated application for free and reduced-price school meals on the U-32 website.

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 application selected for verification was not signed by the verifying official.
- The verification results letter was not sent out to the household.
- The document tracking the verification process was not submitted for review.
- The verification process was not completed by November 15th.

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:

- At East Montpelier, Point of Service (POS) meal counts were not being taken for breakfast.
- The daily meal counts for the month of review were not submitted for review for U-32.
- The day of review meal counts were not submitted for U-32.
- It is unclear from the information submitted in the on-site monitoring forms if the SFA has a policy for second meals at lunch.

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:

- It is not indicated in the School Nutrition Program (SNP) application in the Harvest Child Nutrition System that Pre-K students are being served meals at East Montpelier Elementary School.
- The production records submitted for breakfast and lunch during the review period have incorrect crediting and are missing serving sizes.
- A vegetable from the Bean/Pea/Legume vegetable subgroup was not offered during the review period.
- Fluid milk was not offered in at least two varieties at breakfast on the day of review at East Montpelier Elementary School. Production records for the review period indicated only one milk variety was offered at breakfast daily.
- The menu backup documentation was incomplete.
- According to the menu and production records, milk and whole fruit were not served during the review period, and the daily and weekly vegetable minimum requirements were not met for the MS/HS.
- Production records contain incorrect crediting and are not completed consistently or accurately for the review period.
- The recipes submitted are not standardized recipes.
- The recipe for the peanut butter and jelly sandwich was not submitted.
- It is not clear from the menu on the website or the production records what the vegetarian option of the day is.

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:

- There was no breakfast offer versus serve signage. The reviewer provided signage on-site.
- At lunch, students were required to take a fruit when they already had a reimbursable meal.
- At U-32, there was confusion over the requirements of Offer versus Serve (OVS). The school thought only a ½ cup of vegetable had to be offered and only 3 components had to be taken to constitute a reimbursable meal.
- There was no signage posted about the requirement to take ½ cup fruit or vegetable.
- It is unclear from the meal pattern documents submitted if OVS is made available to students that pre-order meals.

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:

- The SFA has not submitted the Non-Program Foods Revenue Tool, a statement of revenues and expenses, and net assets or statement of net position (balance sheets) from the previous school year to the State agency for review to complete these areas.
- At U-32 Middle/High School, there was unlabeled non-program food in the dry storage area with program food.

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:

- There were outdated USDA “And Justice for All” (AJFA) posters at East Montpelier Elementary School and Berlin Elementary School.
- The SFA did not submit documentation to show all staff that have duties related to the Program completed annual child nutrition specific civil rights training for the 2023-2024 school year.
- The SFA did not submit a civil rights complaint procedure for School Nutrition Programs.
- It is not clear that the SFA has procedures in place for accommodating students with disabilities.
- There is an outdated Civil Rights statement on the U-32 website.

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:

- The on-site monitoring forms were not completely filled out. The number of students eligible for by category and the site calculations were not completed for all sites.

3. Local School Wellness Policy and School Meal Environment –

Documentation of compliance with the established Local School Wellness Policy.

YES NO

Finding Detail:

- The SFA has not submitted a triennial assessment on the implementation of the Wellness Policy

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:

- One of the vending machines outside of the cafeteria sells beverages that are not compliant for middle school students, and it is not clear that the vending machine is off until 30 minutes after the school day.

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

YES NO

Finding Detail:

- The SFA does not have a system in place to track annual training for all staff that have duties related to the School Meal Program.
- As of the day of review, program and non-program staff that have duties related to the Child Nutrition Program have not completed their annual professional development training hours for the 2023-2024 school year.
- The district staff member who took over the Food Service Director (FSD) role in the 2023-2024 school year did not complete an 8-hour food safety training course within the first 30 calendar days of being hired.
- There is a significant lack of oversight of the School Meals Program.

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

Finding Detail:

- The temperature on the dish washing machine is being monitored but not recorded at East Montpelier Elementary School.
- At East Montpelier Elementary School, the Hazard Analysis Critical and Critical Control Points (HACCP)-based Standard Operating Procedures (SOPs) were a generic plan.
- Dish machine temperatures were not tracked and recorded at U-32.
- The Hazard Analysis Critical and Critical Control Points (HACCP)-based Standard Operating Procedures (SOPs) were a generic plan and had not been recently reviewed by staff at U-32.
- There was no internal thermometer in the milk cooler.
- Cases of a la carte beverages were stored directly on the ground.
- The Kitchen Manager was not wearing a beard restraint during meal service. This was a finding in the most recent Health Inspection review.
- The posted Health Inspection Report was not the most recent report.
- Tongs were not available for the bowls of ready-to eat fruit which contained apples.

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

YES NO

Finding Detail:

- Non-compliant products were observed on-site at East Montpelier Elementary School and U-32. The SFA did not have exception justification documentation on file.

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

YES NO

Finding Detail:

- Many required documents were not submitted by the required deadlines for the administrative review. As of the date of this report, many documents still have not been submitted for review.

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 (SSO)** – 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 (FFVP)** – 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 (SMP)** – 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**

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