

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: **Burlington School District**

Self-operated ☒

Vended ☐

Food Service Management Company (FSMC) Contract ☐

Date(s) of Administrative Review: **January 23 & 24, 2024**

Date review summary was publicly posted: **March 8, 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** ☒
2. **Verification** – Validation of the process used by the SFA to confirm selected students' eligibility for free and reduced-price meals.
YES ☐ **NO** ☒
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 claim for reimbursement was incorrectly consolidated for breakfast and lunch during the review period of November 2023 at Edmunds Elementary School and Integrated Arts Academy.

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) Fluid milk was not offered in at least two varieties at breakfast on the day of review at Edmunds Elementary and Integrated Arts Academy, (2) flavored milk substitutions were provided to non-co-mingled Pre-K children, (3) the SFA is not differentiating which meal pattern is being followed for which age/grade group on production records and menus, (4) meals offered at breakfast on the day of review at Edmunds Elementary School did not contain sufficient quantities, and meals offered at lunch during the review period at all reviewed sites did not contain sufficient quantities, and (5) crediting documentation for two menu items served during the review period were not maintained on file to indicate meal pattern requirements were met.
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 ☒

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: Program letters sent to households did not include the non-discrimination statement or the non-discrimination statement was outdated.
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 ☒
5. **Professional Standards** – Validation of the SFA compliance with required hiring standards and annual training requirements.
YES ☒ NO ☐
Finding Detail: Annual civil rights training hours were not tracked as required.
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 ☒
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 (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 ☐
Finding Detail: The FFVP meal service observed at Integrated Arts Academy did not follow HACCP principles and applicable sanitation and health standards.
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 ☒