

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: Rutland City School District

Self-operated ☐

Vended ☐

Food Service Management Company (FSMC) Contract ☒

Date(s) of Administrative Review: February 7, 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: Meal counts were not taken at Point of Service (POS) for students served meals in the classrooms at Rutland Intermediate-Middle School and Northeast Elementary School.

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: Not all required recipes and labels were submitted for the review period month for Rutland Intermediate-Middle School and Northeast Elementary School. The homemade muffin recipe was not credited correctly.

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: Newly hired cashiers had not received training on Offer vs. Serve (OVS). Lunch OVS signage was missing at Rutland Intermediate-Middle School.

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: Documentation was not provided to show that all staff involved in the Child Nutrition Programs received Civil Rights training. The SFA needs to ensure medical statements are on file for meal modifications to accommodate disabilities that fall outside the meal pattern requirements.
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 ☐
Finding Detail: The Wellness Policy is missing a policy for food and beverage marketing and the SFA has not completed an assessment of 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: Rutland Intermediate-Middle School sold non-compliant Smart Food popcorn.
5. **Professional Standards** – Validation of the SFA compliance with required hiring standards and annual training requirements.
YES ☒ NO ☐
Finding Detail: The submitted Professional Standards Tracking Tool for the Food Service Management Company (FSMC) did not include information for all employees and additional documentation is needed to validate the information reported on the tracking tools for the FSMC and Food Service Coordinator.

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: At Rutland Intermediate/Middle School, tongs were not available for the baskets of ready-to-eat fruit. At Northeast Elementary School, staff were not familiar with the HACCP-based Standard Operating Procedures (SOPs).

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

YES ☒ NO ☐

Finding Detail: There were non-compliant products, without exception justification, observed on site at Rutland Intermediate-Middle School and Northeast Elementary School.

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: FFVP is not widely promoted at Rutland Intermediate-Middle School.

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 ☒