

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: Lamoille North Supervisory Union

Self-operated

Vended

Food Service Management Company (FSMC) Contract

Date(s) of Administrative Review: January 11, 2024

Date review summary was publicly posted: February 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 November 2023 claim for reimbursement was assessed and there was an overclaim for breakfast and lunch at Johnson Elementary School and an overclaim for breakfast at Cambridge 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: The pre-k breakfast and lunch at Johnson Elementary School and breakfast at Cambridge Elementary School are non-co-mingled, but were not following the Child and Adult Care Food Program (CACFP) meal pattern. Some cereal and yogurt offered was too high in sugar for the CACFP meal pattern. At Johnson Elementary School, the grain component in some recipes was not credited correctly and there was no Child Nutrition (CN)-Label or Product Formulation Statement submitted for the veggie patty. At Cambridge Elementary School, the meat/meat alternate and grain component in some recipes were 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

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 flagged in Revenue from Non-Program Foods and was not tracking actual costs for non-program foods.

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 did not have a 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

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 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

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

YES NO

Finding Detail: Pre-K teachers responsible for meals in the classroom have not received training on program requirements. Additional documentation is needed to validate the information reported on the Professional Standards tracking tools.

Documentation needs to be submitted to show the Food Service Director met the hiring requirements, including a food safety certification within the last 5 years.

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 Johnson Elementary School, the HACCP-based Standard Operating Procedures were not customized, the thermometer in the milk cooler and/or the milk cooler itself were not working properly, there was no thermometer in the minifridge storing milk in the pre-k classroom to track temperatures, tongs were not provided for ready-to-eat fruit, and the most recent Health Inspection report was not publicly posted.

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

YES NO

Finding Detail: At Johnson Elementary School, there were non-compliant products, without exception justification, observed on site.

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

YES NO

Finding Detail: At Johnson Elementary School, temperature logs and pre-k daily meal count sheets were not maintained on file.

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: For Johnson Elementary School, FFVP cost documentation did not match the information reported in the November 2023 claim for reimbursement. The process for handling leftovers was not sufficient.

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