

## **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: **Vermont Achievement Center**

Self-operated

Vended

Food Service Management Company (FSMC) Contract

Date(s) of Administrative Review: **December 19, 2023**

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

**Finding Detail:** The SFA currently operates the Community Eligibility Provision and sent the Free and Reduced-Price School Meal Application to all households of enrolled preschool children instead of the Household Income Form.

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:** (1) Meals were not counted at the Point of Service (POS) at breakfast and lunch on the day of review, and (2) the October 2023 claim for reimbursement was incorrectly consolidated for breakfast, lunch, and snack during the review period.

### 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 SFA is not differentiating between meal patterns for the non-co-mingled preschool students that are required to follow the Child and Adult Care Food Program (CACFP) meal pattern and the school-age K-12 students that are required to follow the School Meals Program meal pattern, (2) production records were not maintained as required, (3) fluid milk was not offered in at least two varieties for the K-12 age/grade group, (4) the school offered an unallowable milk type on the day of review, (5) meals offered at lunch did not contain all required components during the review period, (6) meals offered at lunch did not contain sufficient quantities during the review period or on the day of review, (7) crediting documentation was not maintained during the review period as required, and (8) grains offered during the review period did not meet the whole-grain rich requirements for the K-12 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

**Finding Detail:** Staff are not adequately trained on Offer versus Serve (OVS) requirements.

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 for a review of Revenue from Non-Program Foods and Indirect Costs. (1) The SFA currently provides meals to non-program adults and does not obtain payment and/or recover the cost of those meals by other sources, (2) The SFA is not tracking costs and revenues for nonprogram foods including adult meals served, (3) the SFA does not clearly label or separate non-program foods from program foods in the dry storage and cold storage areas, and (4) The SFA is not appropriately applying the indirect cost rate to the nonprofit school food service account.

### 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 meals for the preschool did not include the 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

**Finding Detail:** (1) The Local School Wellness Policy is outdated and does not meet minimum requirements, (2) the SFA did not complete the Triennial

assessment, and (3) potential stakeholders were not made aware of their ability to participate in the development, review, update, and implementation of the local school 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:** Professional Standards training hours for all program and non-program staff that have duties related to the Program have not been tracked.

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:** Internal thermometers were not maintained in the milk cooler on the day of review.

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, were observed on-site on the day of review.

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

**Finding Detail:** (1) The SFA did not have documentation on file to show that the School Breakfast Program is being promoted, and (2) The SFA did not have documentation on file to show that the Summer Food Service Program is being promoted.

## 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

**Finding Detail:** (1) The Afterschool Snack Service was not monitored within the first 4 weeks of operation, (2) the SFA is not following the Child and Adult Food Care Program (CACFP) snack meal pattern for the non-co-mingled preschool children, (3) snack production records were not completed consistently or accurately for the review period, and (4) snack crediting documentation was not maintained for the review period.

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 Fresh Fruit and Vegetable Program is not being promoted within the school environment.

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