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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 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 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 Name: **Franklin Northwest Supervisory Union**

Self-operated

Food Service Management Company Contract

Date(s) of Administrative Review: March 12-14th, 2019

Date review summary was publicly posted: June 18, 2019

General Program Participation

1. 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

2. 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

Special Provision 1

Special Provision 2

Special Provision 3

N/A

Review Findings

3. Were any findings identified during the review of this SFA? YES NO
If yes, indicate the areas and what issues were identified in the findings review below.

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:

- Applications were calculated incorrectly or missing required information.

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 Verification Report is not complete.
- The number of applications verified is incorrect.

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:

- Franklin Elementary school December meal counts do not match the December claim for reimbursement.

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:

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:

3. **Dietary Specifications and Nutrient Analysis** – Validation that meals offered to children through the school meal programs are consistent with federal standards
YES NO

Finding Detail:

C. 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:

- Civil rights training documentation for Franklin Elementary School was not submitted for review.

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:

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 out of date and missing key components.

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:

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

YES NO

Finding Detail:

- Professional development documentation for Franklin Elementary School was not submitted for review.
- Professional development documentation for the Food Service Director/ Business Associate was not submitted for review.

6. **Water** – Documentation that children have access to water during the lunch and breakfast meal services

YES NO

Finding Detail:

7. **Food Safety and Storage** – Validation that schools meet food safety and storage requirements

YES NO

Finding Detail:

- It was observed that the cutting board table at Highgate Elementary School has deep grooves and divots from years of continual use making it difficult to sanitize, potentially causing cross contamination.

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

YES NO

Finding Detail:

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

YES NO

Finding Detail:

- It was observed that Franklin Elementary school is continuously seen by the SFA as separate from other schools within the SFA because they are self-operated. The lack of cohesiveness throughout the SFA has resulted in a lack of required documentation and inaccurate organizational practices in regards to reporting and record keeping for the school nutrition programs.

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

YES NO

Finding Detail:

D. 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:

- Highgate elementary school did not conduct the first onsite monitoring of their after school program within the required first four weeks of operation.
- The forms used to conduct onsite monitoring were out of date.

2. **Seamless Summer Option** – Evidence that the SFA adheres to the same meal service rules and claiming procedures used during the regular school year

YES NO N/A

Finding Detail:

3. **Fresh Fruit and Vegetable Program** – 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 promotion of the Fresh Fruit and Vegetable Program at Highgate is insufficient.

4. **Special Milk Program** – 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

Finding Detail:

E. 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 is offering breakfast at no charge to students at Highgate, MVU, Swanton, and Sheldon schools without identifying the non-federal funds used to pay for the meals for “paid” status students.