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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: **St. Johnsbury Town School District**

Self-operated

Food Service Management Company Contract

Date(s) of Administrative Review: December 18 & 19, 2018

Date review summary was publicly posted: March 6, 2019

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### 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. Commendations:

Carolee should be commended for her commitment to providing meal modifications to accommodate students with disabilities and for her commitment to proper procurement and supporting local producers.

4. 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:**

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:**

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 current meal counting procedure leaves too much room for error. Meal counts must be assessed for accuracy prior to submission. The adult meal count procedure is insufficient. Some breakfast meals may not be claimed 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:** Non-co-mingled Pre-K students are not provided the CACFP meal pattern.

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:** Not all program staff have received the USDA Child Nutrition Civil Rights training. “And Justice for All” non-discrimination posters were not posted in all required locations. The SFA does not have a procedure for handling complaints of discrimination.

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 did not contain all of the required elements.

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 standards hours are not being tracked.

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:** Not all staff were wearing proper hair restraints. The share table procedures need to be adjusted and dishwasher temperatures were not being monitored and recorded. Procedures for offering condiments and ready-to-eat fruit need to be adjusted.

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

YES  NO

**Finding Detail:** Non-domestic products were identified during the onsite review that did not have proper exception documentation.

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

YES  NO

**Finding Detail:**

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:**

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:** FFVP is not widely publicized. Administrative time spent is not tracked.

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:** Non-Program Food Revenue Tool needs to be completed. The adult meal prices are too low.