



219 North Main Street, Suite 402  
Barre, VT 05641 (p) 802-479-1030 | (f) 802-479-1835

## 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: **Vermont Permanency Initiative**

Self-operated

Food Service Management Company Contract

Date(s) of Administrative Review: October 17-18, 2018

Date review summary was publicly posted: **November 16, 2018**

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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

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:**

- The Eligibility Documentation sheet used to account for residential students does not include all of the required columns.

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 meal counting and claiming system does not yield accurate counts.
- Staff responsible for checking that students are receiving a reimbursable meal have not received adequate training.

### 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:**

- Accurate meal pattern documentation is not being completed or kept on file.
- Menu certification worksheets were not completed to validate the continuation of the performance based reimbursement.

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:**

- Signage indicating that a half of a cup of fruit or vegetable must be taken to receive a reimbursable meal was not posted.
- Kitchen staff have not been properly trained as to what comprises a complete reimbursable meal.

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:**

- Menus do not have the proper nondiscrimination statement.
- There is no implemented 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

**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:**

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 training hours for staff are not 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:**

- A Health inspection has not been scheduled for the 2019-19 school year.
- Non program food used for dinners and non-reimbursable snacks is not clearly delineated from program food.

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

YES  NO

**Finding Detail:**

- Non-compliant Buy American Provision 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:**

- This year's sub recipient form has not been submitted to the Statewide Grants Administrator within the Vermont Dept. of Finance & Management.

**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:**

- Snack counts are not being counted at the point of service.
- Menu items listed do not indicate serving sizes.
- On site monitoring of the Afterschool program has not been conducted.

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:**

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:**

- No prices have been set to account for adult meals.