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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: **Woodside Juvenile Rehabilitation Center**

Self-operated

Food Service Management Company Contract

Date(s) of Administrative Review: 11/21/2017

Date review summary was publicly posted: 3/23/2018

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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

## Review Findings

3. Commendations:
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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. Program 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:**

There is an insufficient meal counting and claiming system in place as the SFA is using attendance based meal counting.

#### 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:**

Production records are not thoroughly maintained at schools to document meals served and claimed for reimbursement. The required reimbursable meal signage was inadequate. Meals delivered to students that do not eat in the cafeteria did not contain the required 8-ounce serving size of milk. Milk was poured into 7-

ounce cups preventing an 8-ounce serving size. Not all grains served were whole grain-rich.

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:**

Three breakfasts did not contain the required minimum ½ cup of fruit or vegetable and may not be claimed for reimbursement. More OVS training is required.

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:**

Margarine with 1 gram of trans fat was observed. Foods served in the Child Nutrition Programs may not contain trans-fat, except for those that are naturally occurring. High sodium soups are available in an environment where lower sodium levels are required. Heavy-duty mayonnaise was used in meals, as opposed to a lower-fat option.

**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:**

All staff involved in the Child Nutrition Programs did not have the required VTAOE Child Nutrition-specific Civil Rights training.

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 does not include all 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:**  
Required professional development hours for all staff were not completed or 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:**  
Food temperatures are not taken and documented on a daily basis. Tongs were missing from the bowl of apples at breakfast, a ready to eat food.
8. **Buy American** – Documentation that schools comply with Buy American provision and policy specified by regulation  
YES  NO   
**Finding Detail:**  
Sufficient documentation for the Buy American provision is not maintained to support the purchase of food from foreign countries.
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:**

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 is not kept physically separate from program food. Adult meals are not being tracked.