



NORTH CAROLINA DEPARTMENT OF PUBLIC INSTRUCTION

Maurice "Mo" Green, Superintendent of Public Instruction

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STATE AGENCY ADMINISTRATIVE REVIEW SUMMARY

Section 207 of the HHFKA amended section 22 of the NSLA (42 U.S.C. 1769c) to require State agencies (SA) to report the 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) requires the SA to post a summary of the most recent final administrative review results for each School Food Authority (SFA) on the SA publicly available website no later than 30 days after the SA provides the results of the administrative review to the SFA. The SA must also make a copy of the final administrative review report available to the public upon request.

School Food Authority (SFA) Name: Sampson County Schools

SFA Agreement Number: 820

Date of Administrative Review (Entrance Conference Date): November 17, 2025

Date review results were provided to the SFA: January 21, 2026

General Program Participation

1. What Child Nutrition Programs does the School Food Authority participate in? (Select all that apply)

- ☒ 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? (Select all that apply)

- ☒ Community Eligibility Provision
- ☐ Special Provision 1
- ☐ Special Provision 2
- ☐ Special Provision 3

Review Findings

3. Were any findings identified during the review of this School Food Authority?

- ☒ Yes
- ☐ No

4. Is there fiscal action associated with findings identified during the review of this School Food Authority?

- ☒ Yes
- ☐ No

OFFICE OF SCHOOL NUTRITION AND AUXILIARY SERVICES

Rachel Findley, MS, RDN, LDN, Senior Director | rachel.findley@dpi.nc.gov
6324 Mail Service Center, Raleigh, North Carolina 27699 | (984) 236-2901

| REVIEW FINDINGS | | |
|---|-------------------------------------|---|
| A. Program Access and Reimbursement | | |
| YES | NO | |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Certification and Benefit Issuance – Validation of the SFA’s certification of students’ eligibility for free or reduced-price meals benefits |
| Finding Detail: | | |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Verification – Validation of the process used by the SFA to confirm selected students’ eligibility for free and reduced-price meal benefits |
| Finding Detail: | | |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Meal Counting and Claiming – Validation of the SFA’s meal counting and claiming system that accurately counts, records, consolidates, and reports the number of reimbursable meals claimed by category |
| <p>Finding Detail: Union Intermediate School claimed school nutrition employee meals as reimbursable under the National School Lunch Program (NSLP). In accordance with 7 CFR 210.2 and 7 CFR 210.7, only meals served to eligible students may be claimed for federal reimbursement. Adult meals, including those provided to teachers, staff, or visitors, are not allowable for reimbursement under USDA regulations. This practice places the SFA out of compliance with federal requirements and results in inaccurate meal counts and claims. Documentation confirmed that a total of 243 adult meals were incorrectly claimed at the free reimbursement rate, including 47 meals in August, 94 meals in September, and 102 meals in October.</p> <p>There will be a reclaim for meal counting and claiming errors at lunch for one hundred and two (102) meals; the amount of the reclaim for the month of review, October 2025 at lunch is \$480.42.</p> <p>There will be a reclaim for meal counting and claiming errors at lunch for ninety-four (94) meals; the amount of the reclaim September 2024 (Other Period) at lunch is \$442.74.</p> <p>There will be a reclaim for meal counting and claiming errors at lunch for forty-seven (47) meals; the amount of the reclaim August 2025 (Other Period) at lunch is \$221.37.</p> | | |
| B. Meal Patterns and Nutritional Quality | | |
| YES | NO | |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Meal Components and Quantities – Validation that meals claimed for reimbursement contain the required meal components and quantities |
| Finding Detail: | | |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Offer versus Serve (OVS) (provision that allows students to decline some of the food components offered) – Validation of the SFA’s compliance with OVS requirements, if applicable |
| Finding Detail: | | |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Dietary Specifications and Nutrient Analysis – Validation that meals offered to children through the School Nutrition programs are consistent with federal standards for calories, saturated fat, sodium, and <i>trans</i> fat |
| Finding Detail: | | |
| C. School Nutrition Environment | | |
| YES | NO | |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Food Safety – Validation that all selected schools meet the food safety and storage requirements, and comply with the Buy American provisions specified by the regulations |
| <p>Finding Detail: Midway Middle School is not properly recording cool temperature logs as required under the School Nutrition Program’s food safety plan. In accordance with 7 CFR 210.13(c) and USDA HACCP guidance, SFAs must maintain accurate records to demonstrate that food is cooled safely and within required timeframes (i.e., from 135°F to 70°F within 2 hours and from 70°F to 41°F within an additional 4 hours, per FDA Food Code standards).</p> | | |

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| Failure to consistently document cooling temperatures places the SFA out of compliance with federal food safety requirements and hinders the ability to verify that critical control points are being met. | | |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Local School Wellness Policy – Review of the SFA’s established Local School Wellness Policy |
| Finding Detail: | | |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Competitive Foods – Validation of the SFA’s compliance with regulations for all food and beverages to students outside of the reimbursable meal |
| Finding Detail: | | |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Professional Standards – Validation of the SFA’s compliance with required hiring standards and annual training requirements |
| Finding Detail: | | |

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| D. Civil Rights | | |
| YES | NO | |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Civil Rights – Validation of the SFA’s compliance with civil rights requirements as applicable to the School Nutrition Programs |
| Finding Detail: | | |
| E. Resource Management | | |
| YES | NO | |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Resource Management – Validation of the SFA’s compliance with overall financial health of the School Nutrition Program |
| <p>Finding Detail 1: The SFA has not updated its cash handling procedures to reflect current operational practices. In accordance with 2 CFR 200.303, SFAs are required to maintain accountability for all program funds and ensure that internal controls are in place to safeguard assets and support program integrity. The review identified that existing written procedures do not fully align with the methods currently used by School Nutrition Managers and cashiers to manage point-of-sale transactions, vending machine operations and deposits. This lack of alignment places the SFA at risk of inconsistent practices across sites, reduced efficiency, and potential errors in cash management. Without updated procedures, the SFA cannot ensure that cash handling practices are standardized, compliant, and reflective of School Nutrition Program best practices.</p> <ul style="list-style-type: none"> • The School Nutrition staff at Midway Middle School does not consistently ensure that funds are stored in a secure, designated location. This practice does not align with federal internal control requirements outlined in 2 CFR 200.303, which mandate that non-Federal entities establish and maintain effective internal controls over federal awards to safeguard assets and ensure compliance with program requirements. Storing funds in unsecured areas may compromise the integrity of financial operations and increases the risk of loss, theft, or misappropriation. • The School Nutrition staff at Hobbs High School is not securing the cash collected at the point of sale during the meal service. In accordance with 2 CFR 200.303, SFAs are required to establish and maintain effective internal controls to safeguard program assets and ensure accountability for all funds. Best practices in School Nutrition Program operations include the use of secure, locking cash drawers or comparable measures to protect funds from loss, theft, or mismanagement during meal service. <p>Finding Detail 2: The SFA has not accurately reconciled monthly and yearly financial reports in a timely manner. In accordance with 7 CFR 210.14(a), SFAs are required to maintain a nonprofit school food service account and ensure that revenues and expenditures are properly documented to support program accountability. Accurate and timely reconciliation of financial records is essential to ensure the integrity of the School Nutrition Program and to provide the SFA with reliable data for informed financial decision making. Failure to reconcile reports has resulted in the submission of inaccurate financial information to the State Agency beginning with the 2024–2025 school year. This practice places the SFA out of compliance with federal requirements and hinders the ability to demonstrate proper stewardship of program funds.</p> | | |

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| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Other – Procurement |
| <p>Finding Detail 1: During the Administrative Review, it was determined that the SFA's Procurement Plan did not reflect the current USDA micro-purchase threshold requirements established under 2 CFR 200.320(a). The plan did not incorporate the allowable threshold of \$10,000 up to \$50,000 with appropriate written justification and certifying documentation. As a result, certain micro-purchases exceeded the regulatory limit, placing the SFA out of compliance with federal procurement standards for the School Nutrition Programs.</p> <p>Finding Detail 2: During the Administrative Review, the SFA did not provide documentation demonstrating compliance with federal procurement regulations. Specifically, records were not available to show that price or rate quotations were obtained from at least two (2) qualified sources when conducting small purchases, as required under 2 CFR 200.320 and USDA School Nutrition Program guidance. Furthermore, the SFA did not adhere to the informal procurement procedures outlined in its approved procurement plan.</p> <p>Finding Detail 3: In accordance with federal micro-purchase regulations under 2 CFR 200.320(a), program operators are required to distribute micro-purchases equitably among qualified suppliers to the maximum extent practicable. Review of procurement records indicated that several items were repeatedly purchased from the same vendor. Specifically, forty-three (43) transactions were conducted with Amazon. These purchases could have been more equitably distributed among other qualified vendors offering similar goods and services, consistent with USDA School Nutrition Program procurement standards.</p> | | |