



# PUBLIC SCHOOLS OF NORTH CAROLINA

DEPARTMENT OF PUBLIC INSTRUCTION | Mark Johnson, *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: Guilford Preparatory Academy**

**SFA Agreement Number: 41C**

**Date of Administrative Review (Entrance Conference Date): May 14, 2018**

**Date review results were provided to the SFA: May 16, 2018**

### 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

### SCHOOL NUTRITION SERVICES

### SCHOOL OPERATIONS DIVISION

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AN EQUAL OPPORTUNITY/AFFIRMATIVE ACTION EMPLOYER

## REVIEW FINDINGS

### A. Program Access and Reimbursement

YES	NO	
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<b>Certification and Benefit Issuance</b> – Validation of the SFA’s certification of students’ eligibility for free or reduced-price meals benefits
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<b>Verification</b> – Validation of the process used by the SFA to confirm selected students’ eligibility for free and reduced-price meal benefits
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<b>Meal Counting and Claiming</b> – 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
Finding Detail:		

### B. Meal Patterns and Nutritional Quality

YES	NO	
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<b>Meal Components and Quantities</b> – Validation that meals claimed for reimbursement contain the required meal components and quantities
Finding Detail:		
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<b>Offer versus Serve (OVS)(provision that allows students to decline some of the food components offered)</b> – Validation of the SFA’s compliance with OVS requirements, if applicable
Finding Detail:		
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<b>Dietary Specifications and Nutrient Analysis</b> – 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"/>	<b>Food Safety</b> – Validation that all selected schools meet the food safety and storage requirements, and comply with the Buy American provisions specified by the regulations
Finding Detail: Guilford Preparatory has two preparation kitchens on site. The following Food Safety issues were noted during the review: Monthly temperature logs and monitoring forms are not being labeled or completed for each kitchen. On the daily kitchen assessment, the sanitizer strength (PPM) is not being recorded.		
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<b>Local School Wellness Policy</b> – Review of the SFA’s established Local School Wellness Policy
Finding Detail: LWP requirements of the Healthy Hunger- Free Kids Act (HHFKA) of 2010, outlined in USDA Policy Memo SP 42-2011 and the LWP Final Rule effective August 29, 2016 have not been met. The current LWP adopted in 2014 does not contain the minimum requirements. The missing items include: The name of the official responsible for LWP oversight or the position/title of the person; Information related to permitting the public to participate in LWP development, implementation, & review of policy. Include broad representation of stakeholders; Information related to the requirement to adhere to federal meal regulations; Information related to the federal (Smart Snacks) and state rules that govern competitive food sales; Specific guidelines related to foods provided but not sold to students on campus, including classroom parties, classroom snacks, etc.; The language regarding food and beverage marketing on campus that adheres to Smart Snacks guidelines, North Carolina regulations, or stricter local guidelines, during the school day; One or more goals for Nutrition		

Education, using evidence-based strategies; One or more goals for Nutrition Promotion, using evidence-based strategies; One or more goals for Physical Education, using evidence-based strategies; One goal on School-Based Activities that Promote Student Wellness, using evidence-based strategies; Language regarding the completion of at least a triennial assessment; Language regarding informing the public about the content and implementation of the LWP, any updates to the policy, and the results of the most recent assessment of the policy, and specify in the policy how the SFA will be in compliance with this requirement.

<input type="checkbox"/>	<input checked="" type="checkbox"/>	<b>Competitive Foods</b> – Validation of the SFA’s compliance with regulations for all food and beverages to students outside of the reimbursable meal
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Finding Detail:

<input type="checkbox"/>	<input checked="" type="checkbox"/>	<b>Professional Standards</b> – Validation of the SFA’s compliance with required hiring standards and annual training requirements
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Finding Detail:

**D. Civil Rights**

YES	NO	
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<b>Civil Rights</b> – Validation of the SFA’s compliance with civil rights requirements as applicable to the School Nutrition Programs

Finding Detail: Guilford Preparatory has indicated in the electronic application that the North Carolina Complaint of Discrimination template has been adopted for use. It was noted during the Administrative Review that Guilford Preparatory does not have a Civil Rights Complaint Procedure in place.  
 Finding 2: The Non-Discrimination Statement (NDS) is not posted on the school or school nutrition web page. The NDS is also missing from the Community Eligibility Provision (CEP) notification letter to parents.  
 Finding 3: The Civil Rights Compliance Worksheet for the school site for 2017-2018 school year was not completed. The Civil Rights Compliance Worksheet must be completed for the Central office and school site by December 15th of each school year. It must be maintained on file for review by the State Agency (SA) or other regulatory authority.

**E. Resource Management**

YES	NO	
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<b>Resource Management</b> – Validation of the SFA’s compliance with overall financial health of the School Nutrition Program

Finding Detail: A review of the Transaction History Report Year to Date 2017-2018 revealed several expenses have been charged to the School Nutrition account that are unallowable expenses for School Nutrition federal funds. The expenses paid to US Foods and Wal-Mart for snacks for the after school program have been coded to 5.7200.035.451 and must be removed from School Nutrition expenses. Additionally, Pizza Hut and Subway student lunch expenses have been charged to the School Nutrition account in error and must be refunded to the School Nutrition account. September 13, 2017- US Foods (chips, crackers and cookies) \$462.43; September 13, 2017 - US Foods (water, chips, juice and crackers) \$417.79; September 28, 2017 - Wal-Mart (water, Pepsi and Dr Pepper) \$51.36; September 28, 2017 - Wal-Mart (cups, tablecloths and plates) \$71.53; September 28, 2017 - Pizza Hut (student lunch) \$548.30; October 17, 2017 - Wal-Mart (chips, chocolate and granola) \$103.10; November 28, 2017 - Subway (student lunches) \$160.13; February 16, 2018 - Pizza Hut (student lunches) \$354.52; April 26, 2018 - Pizza Hut (student lunches) \$62.42; May 9, 2018 - US Foods (water, chips, crackers and juice) \$310.12 The expenses totaling \$2,541.70 are considered unallowable to the non-profit School Nutrition account and must be refunded. Guilford Preparatory has written cash management procedures; however, these procedures do not reflect current practices which include participation in the Community Eligibility Provision (CEP).

<input type="checkbox"/>	<input checked="" type="checkbox"/>	<b>Other</b>
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Finding Detail:		