



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: North East Carolina Preparatory

SFA Agreement Number: 33A

Date of Administrative Review (Entrance Conference Date): April 24, 2017

Date review results were provided to the SFA: May 11, 2017

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 checked="" type="checkbox"/>	<input type="checkbox"/>	Certification and Benefit Issuance – Validation of the SFA’s certification of students’ eligibility for free or reduced-price meals benefits
<p>Finding Detail: All Eligibility activities must be conducted in accordance with the most current edition of the “Eligibility Manual for School Meals: Federal Policy for Determining and Verifying Eligibility.” Four (4) benefit issuance errors were found. The errors are noted below: One (1) eligibility application was classified by the School Food Authority (SFA) as Free and was determined by the reviewer to be at the reduced price level. One (1) eligibility application was marked by the SFA as “DC” (Directly Certified) and in the computerized point of sale (POS) system as “Free” without supporting documentation. Two (2) eligibility applications were classified correctly as reduced price eligible, but were incorrectly keyed in the computerized POS system as eligible for free meal benefits. Note: Benefit issuance errors were corrected immediately. Prior to the reviewers leaving the school, the Point of Sale (POS) system was updated to accurately reflect student eligibility status for all students and households were notified in writing providing a ten (10) day notice of reduction in benefits due to errors found during the benefits issuance review. The amount of Federal funds to be reclaimed due to the error in benefit issuance is listed below: Early Elementary School (Breakfast - \$9.35, Lunch - \$19.56), Elementary School (Breakfast - \$30.40, Lunch - \$63.08), Middle/High School (Breakfast - \$5.30, Lunch - \$28.02). Potential reclaim for eligibility certification and benefit issuance errors for breakfast meals served is assessed in the amount of \$45.05. A reclaim for eligibility certification and benefit issuance errors for lunch meals served will be assessed in the amount of \$110.66.</p>		
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Verification – Validation of the process used by the SFA to confirm selected students’ eligibility for free and reduced-price meal benefits
<p>Finding Detail: Eight (8) eligibility applications were verified. Although correctly verified, documentation for the individual applications is inadequate. For each application verified, the school must keep the following information on file: Records of the source of information used to verify the application such as copies of all relevant correspondence between the households selected for verification and the school, Notices of adverse action documentation for any change in eligibility as a result of verification, The title, signature of the verifying official and pertinent comments with dates (See the most current edition of the Eligibility Manual for School Meals: Determining and Verifying Eligibility).</p>		
<input type="checkbox"/>	<input checked="" 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:</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
<p>Finding Detail:</p>		
<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
<p>Finding Detail:</p>		
<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
<p>Finding Detail:</p>		

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: Finding 1: Sections of the Central Kitchen HACCP Plan notebook parts 2 and 3 for the 2016-2017 school year have not been completed. The incomplete sections are listed below: HACCP Binder, Part 2, which includes the HACCP Plan Assessment; HACCP Binder, Part 2 Food Safety Team (pg1-1); HACCP Binder, Part 2 Commercial Kitchen School Description (pgs. 2-1 to 2-8) and on page 2-7, list of vendors; HACCP Binder, Part 2 Annual Operations Assessment (pgs. 3-1 to 3-12), on page 3-4 equipment maintenance schedule, on page 3-8 kitchen cleaning schedule and on page 3-11 health inspections; HACCP Binder, Part 2 Verification of HACCP Plan (pgs. 5-2 to 5-4); and HACCP Binder, Part 3 Monitoring and Records Keeping Summary (pgs. 2-3). Finding 2: Cooling logs are not completed correctly on a consistent basis. Food is not always cooled to 70 degrees before staff leaves for the day and within the two (2) hour window. Some days, staff are recording temperatures too early, not at the end of their day, and decisions regarding appropriate corrective action is not taking place. Finding 3: The NC Hazard Analysis Critical Control Points (HACCP) Plan has not been fully implemented. An area requiring attention includes receipt date marking for inventory to include the month, day, and year to meet requirements for First In First Out (FIFO) inventory management. Items in the dry storage, cooler and freezer were dated with the month and day and did not have the year recorded.</p>		
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Local School Wellness Policy – Review of the SFA’s established Local School Wellness Policy
<p>Finding Detail: Some of the requirements as set by the Local Wellness Policy Final Rule under the Healthy Hunger Free Kids Act (HHFKA) 2010 have not been written into the school's Local Wellness Policy and need to be included in the written policy. The missing items are listed below: Specific goals for nutrition promotion and education, physical activity, and other school-based activities that promote student wellness; Standards and nutrition guidelines for all foods and beverages sold to students on the school campus during the school day that are consistent with Federal regulations for School meal nutrition standards, and the Smart Snacks in School nutrition standards; Standards for all foods and beverages provided, but not sold, to students during the school day (e.g., in classroom parties, classroom snacks brought by parents, or other foods given as incentives); Policies for food and beverage marketing that allow marketing and advertising of only those foods and beverages that meet the Smart Snacks in School nutrition standards; Description of public involvement, public updates, policy leadership, and evaluation plan; Permissions for participation by the general public and the school community in the wellness policy process.</p>		
<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
<p>Finding Detail:</p>		
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Professional Standards – Validation of the SFA’s compliance with required hiring standards and annual training requirements
<p>Finding Detail:</p>		

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
<p>Finding Detail:</p>		

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
Finding Detail: The revenues of School Nutrition funds from Adult Meal Sales were not deposited by the last business day of the month for October and November, 2016 as required. The written cash management procedure does not reference that deposits must be made when cash equals or exceeds two hundred and fifty dollars (\$250).		

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