

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: KIPP Halifax

SFA Agreement Number: 42A

Date of Administrative Review (Entrance Conference Date): May 22, 2017

Date review results were provided to the SFA: May 25, 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?
- 4. Is there fiscal action associated with findings identified during the review of this School Food Authority?

SCHOOL NUTRITION SERVICES SCHOOL OPERATIONS DIVISION

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	REVIEW FINDINGS		
A. PI	rogran	n Access and Reimbursement	
YES	NO		
		Certification and Benefit Issuance – Validation of the SFA's certification of students'	
	\boxtimes	eligibility for free or reduced-price meals benefits	
	\boxtimes	Verification – Validation of the process used by the SFA to confirm selected students'	
		eligibility for free and reduced-price meal benefits	
		Meal Counting and Claiming – Validation of the SFA's meal counting and claiming	
	\square	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	
	\boxtimes	Meal Components and Quantities – Validation that meals claimed for reimbursement contain the required meal components and quantities
Findir	ng Deta	il:
	\boxtimes	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:		
	\boxtimes	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
Findir	ng Deta	il:

C. School Nutrition Environment

YES NO Food Safety - Validation that all selected schools meet the food safety and storage \boxtimes requirements, and comply with the Buy American provisions specified by the regulations Finding Detail: This finding was noted and discussed during the Exit Conference on May 25, 2017. The AR team shared with the SFA that on May 24, 2017, a School Nutrition employee was observed using his personal knife, after sanitizing it, to open a pouch of heated "boil-in bag" taco meat. The SFA shared during the discussion that school food service knives are available for use to open food packages and personal knives should not be used. The SFA provided verbal assurance during the exit conference that follow up would take place with the employee concerning appropriate knife usage. HACCP Plan -Sections of the HACCP Plan Binder 2 and 3 for the 2016-2017 school year have not been completed: Part 2 of the HACCP Plan contains, but is not limited to: Food Safety Team, School Description, School Information, Equipment and Assets, Annual Operation Assessment, Maintenance Schedule, Cleaning Schedule, etc. These and all other applicable sections in Part 2 of the HACCP Plan must be completed fully and accurately. Part 3 of the HACCP Plan contains monitoring forms that are not being completed consistently or were unavailable to review. For example, the weekly food safety inspections are not being completed weekly for the month as required. Many of the required HACCP inspections were missing for various weeks throughout the review month. Each week contains specialized areas that must be inspected and reviewed monthly. Fruit juice, a Time-temperature Control for Safety (TCS) food, was left out on the counter in the kitchen during service of the After School Snack Program (ASSP) meal and not placed immediately in the cooler after the snack was prepared. TCS foods must remain in a temperature controlled environment until served. TCS foods that have not been under

refrigeration are to be discarded, such as those left out on the counter and those left over after snack service. Written Time as a Public Health Control (TPHC) procedures are required for fruit juice and other TCS foods taken to the classrooms for the ASSP. A copy of written TPHC procedures should be maintained in the HACCP binder. A student was observed removing a milk from the milk cooler the afternoon of the on-site review and no School Nutrition employees were notified by the student or made aware. The milk cooler should be locked when no meal service is occurring, decreasing the risk of intentional or unintentional contamination, a bio-security concern. Schools should have food defense policies in place that protect foods from intentional contamination.

	\boxtimes	Local School Wellness Policy – Review of the SFA's established Local School Wellness Policy
		Wellness Policy

Finding Detail:

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Competitive Foods – Validation of the SFA's compliance with regulations for all food and beverages to students outside of the reimbursable meal Finding Detail:

		Professional Standards – Validation of the SFA's compliance with required hiring standards and annual training requirements
Findir	ng Deta	

D. Civil Rights

YES	NO	
\square		Civil Rights – Validation of the SFA's compliance with civil rights requirements as
		applicable to the School Nutrition Programs

Finding Detail: The USDA non-discrimination statement posted on the school's website was not the current version. Civil Rights training must occur annually by December 15. One (1) employee received training on August 25, 2016 and three (3) employees received the training on April 5, 2017. At the time of the on-site review, one (1) school nutrition employee had not yet received Civil Rights training. Civil Rights Complaint procedures and complaint form were not maintained on file by the School Food Authority (SFA). The Civil Rights Compliance Worksheets required during the 2016-2017 school year for the Central office was completed on May 23, 2017 during the on-site portion of the Administrative Review which is after the due date of December 15, 2016. The Civil Rights Compliance Worksheet must be completed for both the school site and the Central office by December 15th of each school year and maintained on file for review by the State Agency (SA) or other regulatory authority.

E. Re	E. Resource Management		
YES	NO		
\boxtimes		Resource Management – Validation of the SFA's compliance with overall financial	
		health of the School Nutrition Program	
Findir	ng Deta	il: The School Food Authority (SFA) is not recording revenues in the appropriate account	
codes	provide	ed in the NC Uniform Chart of Accounts. The revenue for the Adult Lunch sales was	
record	led as (4	4314) Sales Lunch – Student Full Pay and should be recorded as Sales – Lunch Adults	
(4316). The S	SFA does not have a dependable system in place to ensure that food and supply purchases	
for the	for the school are properly coded only to the school. After reviewing the transaction history report for		
	July 1, 2016 - May 23, 2017, several school purchases were coded as Fund 5 School Nutrition Program		
expen	ses. Th	e purchases are listed below: Account code 311 Contracted, Services \$24.64, 411 Food	
Suppl	ies \$39	1.39 and 451 Food Purchases \$1,363.90 The errors were corrected during the on-site	
reviev	review on May 23, 2017 and documentation was provided to the reviewer to support the correction		
	totaling \$1,779.93. An internal procedure is needed to ensure that appropriate expense codes are being		
comm	unicate	d to the book keeping vendor, Acadia. Adult Meal Charges are not allowed in the School	
Nutrit	ion Pro	gram. Adults may prepay for meals by putting money on their individual accounts or a	
schoo	l accou	nt for adult charges could be set up and used for adults to borrow against so that the charge	

is not carried by the School Nutrition Program. Deposits were not made on the last business day of each month during March and April, 2016 as stipulated in the Agreement between the North Carolina Department of Public Instruction/State Board of Education and the KIPP – Halifax College Preparatory School. The written cash management procedure does not reference that deposits must be made on the last day of each month.

	\square	Other
Findi	ng Deta	il: