



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) Sallie B Howard School

SFA Agreement Number: 98A

Date of Administrative Review (Entrance Conference Date): December 9, 2024

Date review results were provided to the SFA: March 18, 2025

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 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
Finding Detail:		
B. Meal Patterns and Nutritional Quality		
YES	NO	
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Meal Components and Quantities – Validation that meals claimed for reimbursement contain the required meal components and quantities
<p>Finding Detail 1: Based on the review of production records and item specification sheets, the planned menu quantities for the review period were not all met each week.</p> <p>The Hawaiian rolls used for a turkey sandwich are only 1oz grain eq. This does not meet the daily or weekly requirements for the 9-12 meal pattern. On the week of November 18th, there were not enough red/orange vegetables served across the week for the 9-12 meal pattern. Across the week 1 1/8 cup of red/orange vegetables were served but 1 1/4 cup is required for the 9-12 meal pattern. Both the red/orange vegetables and the Hawaiian roll quantities meets the K-8 meal pattern being served at the site.</p> <p>Finding Detail 2: review of production records indicated a recording error in the Quantity Available, column 14. The manager is transferring the number from the Planned Quantity, column 12, to the Quantity Available, column 14. The correct amounts that are prepared daily are recorded in a notebook by staff during food preparation but are not transferred to the production record. Due to the available documentation, this will be considered a production record error, and meals will not be disallowed or reclaimed. Production record numbers must be accurate to show exact amounts of food prepared and leftover daily.</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
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 type="checkbox"/>	<input checked="" 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
Finding Detail:		
<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:		

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 type="checkbox"/>	<input checked="" type="checkbox"/>	Resource Management – Validation of the SFA’s compliance with overall financial health of the School Nutrition Program

<input checked="" type="checkbox"/>	<input type="checkbox"/>	Other – After School Snack Program
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Finding Detail 1: During the month of August 2024, the following dates revealed errors in meal counting and claiming resulting in over-claims. Rosters were matched to Production Records and Daily Participation Reports.

- August 14, 2024 – twenty-three (23) snacks
- August 15, 2024 – eight (8) snacks
- August 20, 2024 – ten (10) snacks
- August 27, 2024 – ten (10) snacks
- August 29, 2024 – seventy (70) snacks

Finding Detail 2: During the month of August 2024, the following dates revealed errors in meal counting and claiming resulting in under-claims. Rosters were matched to Production Records and Daily Participation Reports.

- August 22, 2024 – forty (40) snacks
- August 23, 2024 – nineteen (19) snacks

Finding Detail 3: During the month of August, the following dates revealed errors in meal counting and claiming from duplicate snacks served. Multiple rosters revealed that students were served more than one (1) reimbursable snack per student per day.

- August 15, 2024 – one (1) snack
- August 23, 2024 – one (1) snack

Finding Detail 4: During the month of September 2024, the following dates revealed errors in meal counting and claiming resulting in over-claims. Rosters were matched to Production Records and Daily Participation Reports.

- September 3, 2024 – ten (10) snacks
- September 4, 2024 – ten (10) snacks
- September 5, 2024 – ninety-two (92) snacks
- September 10, 2024 – three (3) snacks
- September 11, 2024 – ten (10) snacks
- September 16, 2024 – fifteen (15) snacks
- September 17, 2024 – forty-two (42) snacks

Finding Detail 5: During the month of September 2024, the following dates revealed errors in meal counting and claiming resulting in under-claims. Rosters were matched to Production Records and Daily Participation Reports.

- September 6, 2024 – thirty-two (32) snacks
- September 7, 2024 – twenty-two (22) snacks
- September 12, 2024 – seven (7) snacks

Finding Detail 6: During the month of September 2024, the following dates revealed errors in meal counting and claiming. Rosters only listed the students' first name. Without a student's full name, it is not possible to ensure only one (1) reimbursable snack was served.

- September 3, 2024 – two (2) snacks
- September 5, 2024 – two (2) snacks
- September 7, 2024 – two (2) snacks
- September 10, 2024 – two (2) snacks

Finding Detail 7: During the month of September 2024, one (1) day revealed errors in meal counting and claiming. Rosters were duplicated and counted twice.

- September 16, 2024 – nineteen (19) snacks

Finding Detail 8: During the month of September 2024, the following dates revealed errors in meal counting and claiming from duplicate snacks served. Multiple rosters revealed that students were served more than one (1) reimbursable snack per student per day.

- September 5, 2024 – two (2) snacks
- September 10, 2024 – six (6) snacks
- September 12, 2024 – three (3) snacks
- September 17, 2024 – one (1) snack
- September 19, 2024 – one (1) snack
- September 23, 2024 – one (1) snack
- September 24, 2024 – three (3) snacks
- September 25, 2024 – one (1) snack
- September 26, 2024 – three (3) snacks

Finding Detail 9: During the month of October 2024, the following dates revealed errors in meal counting and claiming resulting in over-claims. Rosters were matched to Production Records and Daily Participation Reports.

- October 15, 2024 – nineteen (19) snacks
- October 16, 2024 – nineteen (19) snacks
- October 18, 2024 – eighteen (18) snacks

Finding Detail 10: During the month of October 2024, the following dates revealed errors in meal counting and claiming from duplicate snacks served. Multiple rosters revealed that students were served more than one (1) reimbursable snack per student per day.

- October 21, 2024 – one (1) snack
- October 22, 2024 – four (4) snacks
- October 23, 2024 – one (1) snack
- October 24, 2024 – one (1) snack

Finding Detail 11: During the month of October 2024, the following dates revealed errors in meal counting and claiming. Rosters only listed the students' first name. Without a student's full name, it is not possible to ensure only one (1) reimbursable snack was served.

- October 15, 2024 – one (1) snack
- October 22, 2024 – one (1) snack
- October 29, 2024 – one (1) snack

Finding Detail 12: During the November 2024 month review, the following dates revealed errors in meal counting and claiming resulting in over-claims. Rosters were matched to Production Records and Daily Participation Reports.

- November 6, 2024 – five (5) snacks
- November 19, 2024 – six (6) snacks
- November 20, 2024 – thirteen (13) snacks

Finding Detail 13: During the November 2024 month review, the following dates revealed errors in meal counting and claiming resulting in under-claims. Rosters were matched to Production Records and Daily Participation Reports.

- November 12, 2024 – three (3) snacks
- November 21, 2024 – thirteen (13) snacks

Finding Detail 14: During the month of November 2024, the following dates revealed errors in meal counting and claiming from duplicate snacks served. Multiple rosters revealed that students were served more than one (1) reimbursable snack per student per day.

- November 7, 2024 – one (1) snack
- November 14, 2024 – two (2) snacks
- November 19, 2024 – three (3) snacks
- November 21, 2024 – three (3) snacks
- November 25, 2024 – one (1) snack
- November 26, 2024 – four (4) snacks

Finding Detail 15: During the month of November 2024, the following dates revealed errors in meal counting and claiming. Rosters only listed the students' first name. Without a student's full name, it is not possible to ensure only one (1) reimbursable snack was served.

- November 5, 2024 – one (1) snack
- November 12, 2024 – one (1) snack
- November 19, 2024 – two (2) snacks

Finding Detail 16: During the month of November 2024, the following dates revealed errors in meal counting and claiming. Unallowable snacks were served to a school faculty member. Reimbursable snacks are allowed for students participating in an approved afterschool activity.

- November 12, 2024 – one (1) snack
- November 14, 2024 – one (1) snack
- November 19, 2024 – one (1) snack
- November 20, 2024 – one (1) snack
- November 21, 2024 – one (1) snack
- November 22, 2024 – one (1) snack
- November 25, 2024 – one (1) snack
- November 26, 2024 – one (1) snack

Finding Detail 17: During the month of December 2024, the following dates revealed errors in meal counting and claiming from duplicate snacks served. Multiple rosters revealed that students were served more than one (1) reimbursable snack per student per day.

- December 2, 2024 – one (1) snack
- December 3, 2024 – nine (9) snacks
- December 8, 2024 – eight (8) snacks

Finding Detail 18: During the month of December 2024, the following dates revealed errors in meal counting and claiming. Unallowable snacks were served to a school faculty member. Reimbursable snacks are allowed for students participating in an approved afterschool activity.

- December 2, 2024 – one (1) snack
- December 3, 2024 – one (1) snack
- December 4, 2024 – one (1) snack

- December 5, 2024 – one (1) snack

Finding Detail 19: During the month of December 2024, the following dates revealed errors in meal counting and claiming. Rosters only listed the students' last name. Without a student's full name, it is not possible to ensure only one (1) reimbursable snack was served.

- December 5, 2024 – eleven (11) snack

There will be a reclaim for the meal counting and claiming errors in the After School Snack Program for Three hundred thirty-three (333) snacks; the amount of the reclaim for August 2024 through November 2024, in the After School Snack Program is \$402.93.
December 2024 meal counting errors were corrected prior to submitting the claim.



Other – Procurement

Finding Detail 1: The written Procurement Plan did not include Attachment A, Code of Ethics and/or Conflict of Interest Policy.

Finding Detail 2: There was no record of the public bid opening, including a sign-in sheet, for the food and supply, produce, ice cream, ice cream, icy and milk bids. Such records are required in accordance with Federal procurement policy.

Finding Detail 3: Although the terms and conditions of the Milk Bid did include Bid evaluation and award language, product specifications and packaging were not listed in the Bid solicitation. The School Food Authority did not award the Milk Bid to the lowest price bidder. The School Food Authority accepted a bid from Sysco with plastic bottling package, which was different from US Foods carton packaging.

Finding Detail 4: Documentation for Invitation for Bid for Produce, Smart Snaks, Ice Cream, Food and Supplies did not contain the lists of items to be purchased, specifications for the foods, or estimated usage for the foods. Better pricing can be obtained when vendors have an indication of volume of sales to be expected.

Finding Detail 5: In review of the Invitation for Bid for Food and Supplies, there are two vendors (US Foods and Sysco) providing items. Documentation for different product specifications was not provided.

Finding Detail 6: Bid price documentation was not provided for the Produce Bid (Ford's Produce). Documentation is required in accordance with Federal procurement policy.

Finding Detail 7: Trident Beverage increased prices for the 2024-2025 that exceeded the cap by the Consumer Price Index, Cost of Food Away from Home. Therefore, sufficient bid oversight has not been provided.