



# 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: Rocky Mount Preparatory**

**SFA Agreement Number: 64A**

**Date of Administrative Review (Entrance Conference Date): November 18, 2024**

**Date review results were provided to the SFA: January 29, 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

<b>REVIEW FINDINGS</b>		
<b>A. Program Access and Reimbursement</b>		
YES	NO	
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<b>Certification and Benefit Issuance</b> – Validation of the SFA’s certification of students’ eligibility for free or reduced-price meals benefits
Finding Detail: Maintain appropriately signed and current Memorandum of Agreements (MOAs) for allowable programs for which confidential eligibility information is released in accordance with Federal USDA regulation as defined in 7CFR 245 and the 2017 USDA Eligibility Guidance manual.		
<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
Finding Detail:		
<input checked="" type="checkbox"/>	<input 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: Edit checks must be completed for all meals daily to ensure more meals are not claimed than the number of eligible students in attendance. This is a required internal control to ensure the SFA does not claim more meals (and subsequent Federal funds) than allowed. This is a critical compliance requirement that must be implemented immediately. In reviewing the month of October 2024, the daily attendance is not being entered in the daily reports to ensure more meals are not being claimed than the number of eligible students in attendance.		

<b>B. Meal Patterns and Nutritional Quality</b>		
YES	NO	
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<b>Meal Components and Quantities</b> – Validation that meals claimed for reimbursement contain the required meal components and quantities
Finding Detail: Missing Meal Components Breakfast and Lunch: Finding 1 (Breakfast): Production records for two (2) of fifteen (15) operating days for the month of September 2024, did not accurately document the amount of fruit for students as part of the reimbursable meal at breakfast. They are listed below for which fruit was not accurately documented as part of the reimbursable meal. <ul style="list-style-type: none"> <li>• September 16, 2024 – four hundred sixty-one (461) meals</li> <li>• September 25, 2024 – four hundred seventy-three (473) meals</li> </ul> <p>There will be a reclaim for production record errors at breakfast for nine hundred and thirty-four (934) meals; the amount of the reclaim for September 2024 at breakfast is \$2,652.56.</p> <p>Finding 2 (Breakfast): Production records for one (1) of twenty-two (22) operating days for the month of review, October 2024, did not accurately document the amount of fruit for students as part of the reimbursable meal at breakfast. They are listed below for which fruit was not accurately documented as part of the reimbursable meal.  <ul style="list-style-type: none"> <li>• October 9, 2024 – four hundred forty-seven (447) meals</li> </ul> <p>There will be a reclaim for production record errors at breakfast for four hundred and forty-seven (447) meals; the amount of the reclaim for October 2024 at breakfast is \$1,269.48.</p> <p>Finding 3 (Breakfast): Production records for one (1) of fifteen (15) operating days for the on-site review month of November 2024, did not accurately document the amount of fruit for students as part of the reimbursable meal at breakfast. They are listed below for which fruit was not accurately documented as part of the reimbursable meal.  <ul style="list-style-type: none"> <li>• November 21, 2024 – ten (10) meals</li> </ul> <p>There will be a reclaim for production record errors at breakfast for ten (10) meals; the amount of the reclaim November 2024 at breakfast is \$28.40.</p> </p></p>		

The November 2024 claim at breakfast was amended on December 20, 2024, for the ten (10) breakfast.

It is imperative that production records are completed in a timely and accurate manner with each meal service. The production record serves as the basis for the claim of Federal funds. The absence of production records calls into question the accuracy and validity of the claim for reimbursement of meals, since the meals are not sufficiently documented.

Finding 1 (Lunch): Production records for one (1) of fifteen (15) operating days for the month of September 2024, did not accurately document the fruit component for students as part of the reimbursable meal at lunch. Below is the date for which fruit was not accurately documented as part of the reimbursable meal.

- September 17, 2024 – six hundred nineteen (619) meals

There will be a reclaim for production record errors at lunch for six hundred and nineteen (619) meals; the amount of the reclaim for September 2024 at lunch is \$2,810.26.

Finding 2 (Lunch): Production records for six (6) of twenty-two (22) operating days for the month of review, October 2024, did not accurately document the fruit component for students as part of the reimbursable meal at lunch. They are listed below for which fruit was not accurately documented as part of the reimbursable meal.

- October 1, 2024 – six hundred and five (605) lunch meals
- October 4, 2024 – five hundred seventy-one (571) lunch meals
- October 8, 2024 – five hundred eighty-seven (587) lunch meals
- October 9, 2024 – five hundred eighty-nine (589) lunch meals
- October 15, 2024 – six hundred thirteen (613) lunch meals
- October 24, 2024 – six hundred and two (602) lunch meals

There will be a reclaim for production record errors at lunch for three thousand five hundred and sixty-seven (3,567) meals; the amount of the reclaim for October 2024 at lunch is \$16,194.18.

It is imperative that production records are completed in a timely and accurate manner with each meal service. The production record serves as the basis for the claim of Federal funds. The absence of production records calls into question the accuracy and validity of the claim for reimbursement of meals, since the meals are not sufficiently documented.

Finding Details: Insufficient Quantities Breakfast and Lunch:

Finding 1 (Breakfast): Production records for six (6) of fifteen (15) operating days for the month of September 2024, did not accurately document the number of fruits and grains for students as part of the reimbursable meal at breakfast. They are listed below for which the minimum daily requirement was not offered, resulting in insufficient quantities of a meal component.

- September 9, 2024 – four hundred fifty-six (456) breakfast meals – Fruit
- September 11, 2024 – four hundred eighty-three (483) breakfast meals – Fruit
- September 18, 2024 – five hundred ten (510) breakfast meals – Fruit
- September 23, 2024 – four hundred thirty-four (434) breakfast meals – Fruit
- September 25, 2024 – four hundred seventy-three (473) breakfast meals – Grain

Finding 2 (Breakfast): Production records for two (2) of twenty-two (22) operating days for the month of review, October 2024, did not accurately document the number of fruits for students as part of the reimbursable meal at breakfast. They are listed below for which the minimum daily requirement was not offered, resulting in insufficient quantities of a meal component.

- October 2, 2024 – four hundred sixty-eight (468) breakfast meals – Fruit
- October 28, 2024 – four hundred forty (440) breakfast meals – Fruit

Finding 3 (Breakfast): Production records for two (2) of fifteen (15) operating days for the on-site review month of November 2024, did not accurately document the number of fruits for students as part

of the reimbursable meal at breakfast. Below is the date for which the minimum daily requirement was not offered, resulting in insufficient quantities of a meal component.

- November 4, 2024 – four hundred fifty-seven (457) breakfast meals – Fruit
- November 20, 2024 – four hundred twenty-seven (427) breakfast meals – Fruit

Finding 1 (Lunch): Production records for ten (10) of fifteen (15) operating days for the month of September 2024, did not accurately document the number of fruits and vegetables for students as part of the reimbursable meal at lunch. They are listed below for which the minimum daily requirement was not offered, resulting in insufficient quantities of a meal component.

- September 9, 2024 – five hundred eighty-five (585) lunch meals – Vegetable
- September 10, 2024 – six hundred ten (610) lunch meals – Vegetable
- September 11, 2024 – six hundred twenty-three (623) lunch meals – Fruit
- September 12, 2024 – six hundred twenty-six (626) lunch meals – Fruit
- September 16, 2024 – six hundred and nine (609) lunch meals – Fruit
- September 23, 2024 – five hundred eighty-six (586) lunch meals – Fruit
- September 24, 2024 – five hundred ninety-four (594) lunch meals – Fruit
- September 25, 2024 – six hundred and three (603) lunch meals – Fruit
- September 26, 2024 – six hundred twenty-four (624) lunch meals – Fruit
- September 30, 2024 – five hundred seventy-one (571) lunch meals – Fruit

Finding 2 (Lunch): Production records for four (4) of twenty-two (22) operating days for the month of review, October 2024, did not accurately document the number of fruits, vegetables and grains for students as part of the reimbursable meal at lunch. They are listed below for which the minimum daily requirement was not offered, resulting in insufficient quantities of a meal component.

- October 1, 2024 – six hundred and five (605) lunch meals – Grain
- October 2, 2024 – five hundred ninety-nine (599) lunch meals - Vegetable
- October 29, 2024 – five hundred ninety-four (594) lunch meals – Fruit
- October 30, 2024 – five hundred seventy-five (575) lunch meals – Fruit

Finding 3 (Lunch): Production records for seven (7) of fifteen (15) operating days for the on-site review month of November 2024, did not accurately document the number of fruits and vegetables for students as part of the reimbursable meal at lunch. They are listed below for which the minimum daily requirement was not offered, resulting in insufficient quantities of a meal component.

- November 4, 2024 – six hundred and seven (607) lunch meals – Fruit and Vegetable
- November 5, 2024 – five hundred seventy-eight (578) lunch meals – Vegetable
- November 6, 2024 – five hundred seventy-six (576) lunch meals – Fruit and Vegetable
- November 7, 2024 – five hundred forty-eight (548) lunch meals – Fruit
- November 13, 2024 – five hundred seventy-four (574) lunch meals – Fruit and Vegetable
- November 14, 2024 – five hundred twenty-five (525) lunch meals – Fruit and Vegetable
- November 19, 2024 – five hundred eighty (580) lunch meals – Fruit and Vegetable

<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
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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
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Finding Detail:

<b>C. School Nutrition Environment</b>		
<b>YES</b>	<b>NO</b>	
<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: Fresh Apples were observed on the self-service line unwrapped and picked up by students without proper use of a utensil.		
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<b>Local School Wellness Policy</b> – Review of the SFA’s established Local School Wellness Policy
Finding Detail:		
<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
Finding Detail:		
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<b>Professional Standards</b> – Validation of the SFA’s compliance with required hiring standards and annual training requirements
Finding Detail: At the time of the Administrative Review, the School Nutrition Administrator had not obtained a current food safety certification from an American National Standards Institute (ANSI) approved program as part of the professional standard requirements. NOTE: The School Nutrition Administrator obtained a food safety certificate on December 13, 2024, and submitted it to the Administrative Review Specialist.		

<b>D. Civil Rights</b>		
<b>YES</b>	<b>NO</b>	
<input type="checkbox"/>	<input checked="" 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:		

<b>E. Resource Management</b>		
<b>YES</b>	<b>NO</b>	
<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: During the review of Cash Management, the following issues were noted at the school: <ul style="list-style-type: none"> <li>• The cashier did not count the drawer in the presence of another employee.</li> <li>• Cash was counted in an unsecure location.</li> <li>• Cash was left unattended while the cashier stepped away after the daily reconciliation was completed.</li> </ul> Safeguarding federal funds is vital to the financial integrity of the School Nutrition Program and maintaining adequate security to mitigate the consequences and probability of loss, misuse, unauthorized access and threat to safety of employees and students is critically important.		
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<b>Other – Procurement, Program Monitoring (Self-Assessments), Record Retention, and Program Oversight</b>
Finding Detail:		
Finding 1 (Procurement): A micro-purchase log is not being utilized for documenting micro-purchases.		
Finding 2 (Procurement): The required Procurement Plan has not been completed by the School Food Authority (SFA). Federal regulations require each School Food Authority to comply with an approved Procurement Plan. The plan must be approved by the governing board and used as a guide for making all purchases using federal School Nutrition funds.		
Finding 3 (Procurement): There were no written procedures for obtaining quotes from vendors when quotes are received on items purchased under the SFA’s small purchase threshold. Written procedures are required to ensure consistency and free and open competition among all vendors.		
Finding 4 (Procurement): A Catering Contract was awarded for the 2023-2024 school year; however, smart snack items not specified on the original solicitation are being purchased without proper		

procurement. Sufficient contract oversight has not been provided allowing actions outside the terms and conditions to be implemented in the program.

Finding 1 (Program Monitoring Self-Assessments): In the 2023-2024 school year, the second self-assessment was not completed by the due date of April 1st of the 2023-2024 school year. A follow-up review for the second self-assessment was required but not completed.

Finding 2 (Program Monitoring Self-Assessments): In the 2024-2025 school year, the first self-assessment was not administered and completed according to the review guidelines. Sections I, II, III were incomplete. They include Readily Observable General Areas, Application Approval and Direct Certification.

Finding (Record Retention): According to the Federal records retention requirement in 7 CFR 210, 215 or 220, School Food Authorities are to maintain all records and reports pertinent to the School Nutrition Program for a period of three (3) fiscal years plus the current school year or beyond, if otherwise specified. Current year records (2024-2025) are in the cafeteria office, and the previous year (2023-2024) is in the attic of the school. Prior records were not located.

Finding (Program Oversight): Production records are not sent from the caterer to the school daily. Due to production records not being reviewed by a school official daily and the other items listed in this Preliminary Report, program oversight is not in place at the school. Program oversight would have prevented issues with insufficient quantities, missing meal components and other items necessary for the successful and sustainable operation of the School Nutrition Programs.

Administrative capability and program oversight in School Nutrition programs are required to ensure effective oversight to promote accountability and integrity in the claim for and use of federal funds, ensure nutrition standards are met to support students' health and well-being and maintain the quality of food. Regular monitoring, oversight and evaluation would have identified areas not in compliance with federal, state and local regulations, minimized waste, and ensured that resources are being used efficiently. It is apparent from this review that Program oversight is severely inadequate, leading to serious deficiencies in the operation of the School Nutrition Programs.