



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: Montgomery County Schools

SFA Agreement Number: 620

Date of Administrative Review (Entrance Conference Date): October 6, 2025

Date review results were provided to the SFA: December 8, 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

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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 type="checkbox"/>	<input checked="" type="checkbox"/>	Meal Components and Quantities – Validation that meals claimed for reimbursement contain the required meal components and quantities
Finding Detail:		
<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 checked="" type="checkbox"/>	<input type="checkbox"/>	Resource Management – Validation of the SFA’s compliance with overall financial health of the School Nutrition Program

<p>Finding Detail: Cash Management - During the review, it was noted that the School Nutrition Team does not consistently ensure that funds are counted in a secure, designated location. This practice does not align with federal internal control requirements outlined in 2 CFR § 200.303, which mandate that non-Federal entities establish and maintain effective internal controls over federal awards to safeguard assets and ensure compliance with program requirements.</p> <p>Counting funds in unsecured areas may compromise the integrity of financial operations and increase the risk of loss, theft, or misappropriation. Instances of unsecured money counting were observed at Candor Elementary School, East Middle School, and Montgomery Central High School.</p>		
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Other – Procurement
<p>Finding Detail: During the Administrative Review, it was observed that the School Nutrition Program's Procurement Plan did not reflect the current USDA's micro-purchase threshold of \$10,000 - \$50,000 (with certifying documentation). As a result, some micro-purchases exceeded the allowable limit.</p>		
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Other – After School Snack Program (ASSP)
<p>Finding Detail: During the on-site Administrative Review, it was determined that corrective action will be required for the Afterschool Snack Program (ASSP) menu due to non-compliance with the final meal pattern rule changes effective July 1, 2025.</p> <p>Specifically, the menu did not reflect the updated requirement regarding fruit and vegetable juice limits. Per the USDA's Final Rule, juice may not be offered more than half of the total fruits and vegetables served over the course of the week.</p> <p>The current menu, as written and implemented, exceeds this threshold. To ensure compliance, the site must revise its snack menu to limit juice offerings accordingly and ensure that whole fruits or vegetables are served at least half the time across the weekly service period.</p>		