



# 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: Dillard Academy**

**SFA Agreement Number: 96C**

**Date of Administrative Review (Entrance Conference Date): December 8, 2025**

**Date review results were provided to the SFA: January 26, 2026**

### 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

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## REVIEW FINDINGS

### A. Program Access and Reimbursement

YES	NO	
<input type="checkbox"/>	<input checked="" 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:		
<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
<p>Finding Detail: The counting and claiming procedures currently in use are not compliant with the requirements set forth in 7 CFR 210.8(a)(2), which mandate that SFAs maintain a meal counting system that yields an accurate daily count of reimbursable meals served by eligibility category. In review of meal counting and claiming, reviewers identified a discrepancy in the meal count reporting at breakfast and lunch. Meal Count Sheets, Daily Edit Checks, and the SFS-4A did not match the claim for reimbursement. In the Month of Review, November 2025, there was a breakfast overclaim of fifty-one (51) meals and a lunch underclaim of fifty-three (53) meals. The November errors were adjusted during the Administrative Review.</p> <p>In August 2025, there was a breakfast overclaim of twelve (12) meals and a lunch underclaim of thirty-six (36) meals.</p> <p>In September 2025, there was a breakfast underclaim of seventy-two (72) meals and a lunch overclaim of one-hundred and sixty-five (165) meals.</p> <p>In October 2025, there was a breakfast overclaim of thirty (30) meals and a lunch underclaim of five (5) meals.</p> <p>Additionally, Edit Checks must be conducted and used appropriately to identify and prevent errors before claims are submitted for reimbursement. The SFA must ensure that daily meal counts accurately reflect the number of reimbursable meals served and that required Edit Checks are consistently and effectively implemented to support accurate monthly claims.</p> <p>There will be a reclaim for meal counting and claiming errors at breakfast and lunch.</p> <p>The amount of the underclaim for August 2025 (Other Period) for breakfast and lunch is \$134.28. There will be an underclaim for thirty-six (36) lunch meals and a reclaim for twelve (12) breakfast meals.</p> <p>The amount of the reclaim September 2025 (Other Period) at breakfast and lunch is \$565.47. There will be a reclaim for meal counting and claiming errors at breakfast and lunch for seventy-two (72) underclaimed breakfast meals and one hundred and sixty-five (165) overclaimed lunch meals.</p> <p>The amount of the reclaim for October 2025 (Other Period) for breakfast and lunch is \$64.65. There will be a reclaim for meal counting and claiming errors at lunch for five (5) underclaimed meals and at breakfast for thirty (30) overclaimed meals.</p> <p>Total reclaim for August 2025 – October 2025 equals \$495.84.</p>		

### B. Meal Patterns and Nutritional Quality

YES	NO	
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<b>Meal Components and Quantities</b> – Validation that meals claimed for reimbursement contain the required meal components and quantities

Finding Detail:		
<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
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
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: A review of the monthly temperature monitoring log for the walk-in freezer shows that temperatures are consistently recorded as zero (0) degrees. However, during the on-site review, the actual temperature was observed to be around twenty (20) degrees. This discrepancy does not meet HACCP requirements, which mandate that frozen foods must be maintained at 0°F or below to preserve quality and ensure safety. Under the SFA's NCDPI-approved HACCP-based food safety plan, corrective actions must be taken when storage temperatures fall outside of established critical limits. Prompt maintenance is necessary to restore the freezer to proper operating conditions and ensure monitoring logs accurately reflect actual temperatures. In addition, monthly temperature logs are not being completed for the two (2) hot-holding boxes in the kitchen. HACCP plans require SFAs to document procedures that verify hot held foods remain at or above 135°F, as outlined in the HACCP plan's hot-holding critical control point. Failure to maintain these records constitutes noncompliance with HACCP recordkeeping requirements. Furthermore, the kitchen assessment, hand sink assessment, storage area assessment, and the five (5) monthly food safety inspections are not being completed.		
<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 type="checkbox"/>	<input checked="" type="checkbox"/>	<b>Professional Standards</b> – Validation of the SFA's compliance with required hiring standards and annual training requirements
Finding Detail:		

<b>D. Civil Rights</b>		
<b>YES</b>	<b>NO</b>	
<input checked="" type="checkbox"/>	<input 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: Student allergy information was found posted on the wall in the cafeteria in a location visible to students, visitors, and individuals who do not have a legitimate educational need to access this information. Publicly displaying student-specific health or disability-related information is not permitted. Student allergen information is considered personally identifiable information (PII) and is protected under the Family Educational Rights and Privacy Act (FERPA), 34 CFR Part 99, as well as Section 504 of the Rehabilitation Act. These regulations require school districts and School Food Authorities (SFAs) to protect the confidentiality of student records and limit access only to staff with a legitimate need to know for purposes of ensuring student safety.		
<b>E. Resource Management</b>		
<b>YES</b>	<b>NO</b>	

<input type="checkbox"/>	<input checked="" type="checkbox"/>	<b>Resource Management</b> – Validation of the SFA's compliance with overall financial health of the School Nutrition Program
Finding Detail:		
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<b>Other – Procurement</b>
<p>Finding Detail: Although the SFA has an established, board-approved Procurement Plan, documentation indicates that required formal bid procedures were not followed for the recent catering services procurement. Specifically, records of the public bid opening, including a sign-in sheet and documentation of attendees were not available for review. In addition, award letters and non-award letters were not provided. Federal regulations require that formal procurements be conducted transparently, and 2 CFR 200.320(c)(2)(iii) mandates that public bid openings be properly documented to ensure full and open competition. To maintain compliance with USDA procurement regulations and uphold program integrity, the SFA must follow the formal procurement procedures outlined in its Procurement Plan and ensure comprehensive documentation is retained for all procurement activities, including public bid openings and bid award notifications.</p>		