



# **NORTH CAROLINA DEPARTMENT OF PUBLIC INSTRUCTION**

Maurice "Mo" Green, Superintendent of Public Instruction

[www.dpi.nc.gov](http://www.dpi.nc.gov)

## **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: Columbus County Schools**

**SFA Agreement Number: 240**

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

**Date review results were provided to the SFA: December 1, 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](mailto:rachel.findley@dpi.nc.gov)  
6324 Mail Service Center, Raleigh, North Carolina 27699 | (984) 236-2901

REVIEW FINDINGS		
<b>A. Program Access and Reimbursement</b>		
<b>YES</b>	<b>NO</b>	
<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
<p>Finding Detail 1: The School Food Authority (SFA) is required to continue issuing direct certification eligibility notifications to households, regardless of whether the children attend a school participating in the Community Eligibility Provision (CEP), in accordance with 7 CFR 245.6(c)(6)(ii). This obligation cannot be satisfied through public notification alone.</p> <p>Finding Detail 2: The source documentation supporting the Identified Student Percentage (ISP) of the Community Eligibility Provision was not retained. During the review, a recalculation of the ISP indicated a decrease from 66.64% to 65.76%. Despite this adjustment, the SFA continues to claim a 100% free rate.</p>		
<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 type="checkbox"/>	<input checked="" 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:		
<b>B. Meal Patterns and Nutritional Quality</b>		
<b>YES</b>	<b>NO</b>	
<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
<p>Finding Detail: Food items stored in coolers, freezers, and dry storage areas at Acme Delco Elementary School are not consistently date-marked, both when kept in their original packaging and after being removed from it. This lack of proper labeling can lead to food safety risks and non-compliance with storage regulations. Additionally, temperature logs indicate that:</p> <ul style="list-style-type: none"> <li>•The walk-in freezer has recorded temperatures ranging from 9°F to 19°F, which is above the required range of 0°F or colder for frozen food storage. The walk-in refrigerator has recorded temperatures ranging from 37°F to 45°F, with the upper end exceeding the required maximum of 39°F for refrigerated food.</li> </ul>		
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<b>Local School Wellness Policy</b> – Review of the SFA’s established Local School Wellness Policy
Finding Detail: The results of the latest Triennial Assessment (2022-2023) school year have not been made publicly available. The next Triennial Assessment will need to be completed by June 30, 2026.		

<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 Documentation</b> – Validation of the SFA’s compliance with civil rights requirements as applicable to the School Nutrition Programs
Finding Detail: The Non-Discrimination Statement (NDS) is not located on the Columbus County Schools website. The US Department of Agriculture’s (USDA) Food and Nutrition Service Instruction 113-1 USDA requires the Non-Discrimination statement to be listed on appropriate program materials, including but not limited to the SFA website, direct certification letters, and Community Eligibility Notification (CEP).		

<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
<p>Finding Detail 1: The monthly financial reports have not been accurately reconciled in a timely manner, hindering the School Nutrition Program's ability to make informed financial decisions. Consequently, inaccurate reports have been submitted to the state agency since the third quarter of the 2022–2023 school year. Furthermore, according to the reports, no documentation exists to confirm that the SFA has received its annual Sales and Use Tax revenue.</p> <p>Finding Detail 2: The School Food Authority (SFA) has written cash management procedures; however, these procedures were not being followed on the day of review and need additional detail to reflect best practices for safeguarding federal funds. On the day of review, money was counted in the school office by the secretary/bookkeeper at the front check-in desk in the presence of parents, students and other school staff.</p>		

<input checked="" type="checkbox"/>	<input type="checkbox"/>	<b>Other – On-Site Review</b>
<p>Finding Detail: According to 7 CFR 210.8(a)(1) and 7 CFR 220.11(d)(1), every school year, prior to February 1, each School Food Authority (SFA) with more than one (1) school must perform no less than one (1) on-site review and follow-up (if necessary) of the meal counting and claiming system and readily observable general areas of review identified under 7 CFR 210.8(h) in each school operating the National School Lunch Program (NSLP) and 50% of schools operating the School Breakfast Program (SBP) under its jurisdiction. During the 2024–2025 school year, all twelve School Food Authority (SFA) sites underwent lunch service reviews, while six of these sites were reviewed during breakfast service. In comparison, only four school sites received breakfast service reviews during the 2023–2024 school year. Specific concerns identified are outlined below:</p> <ul style="list-style-type: none"> <li>• The following schools were reviewed at breakfast during both the 2023–2024 and 2024–2025 school years: Chadbourn Elementary, Nakina Middle, Olddock Elementary, and South Columbus High School.</li> <li>• The following schools were not reviewed at breakfast during either school year: Acme Delco Elementary, East Columbus Junior/Senior High School, Tabor City School, West Columbus High School, and Williams Township School.</li> <li>• Acme Delco Elementary: The onsite review form indicated that a follow-up review was required; however, there is no documentation confirming that the follow-up review was conducted.</li> <li>• West Columbus High School: The onsite review form was incomplete, with questions 1, 12, and 13 under the "Meal Counting and Claiming" section left unmarked. Although</li> </ul>		

<p>corrective action and follow-up were noted as required, there is no evidence that a follow-up review was performed.</p> <ul style="list-style-type: none"> <li>• West Columbus School: A follow-up review for lunch service was required and did occur; however, it was conducted beyond the 45-calendar-day requirement. The initial review took place on January 29, 2025, and the follow-up review was completed on March 28, 2025. To comply with the 45-day requirement, the follow-up should have been finalized by March 15, 2025.</li> </ul> <p>Williams Township School: The onsite review form indicated that a follow-up review for lunch service was necessary, but there is no indication that such a review was completed.</p>		
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<b>Other – Procurement</b>
<p>Finding Detail: There were no written procedures for obtaining quotes from vendors on items purchased under the School Food Authority's small purchase threshold that included an extension clause. Written procedures are required to ensure consistency with free and open competition among all vendors.</p>		