



# 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: Edgecombe County Public Schools**

**SFA Agreement Number: 330**

**Date of Administrative Review (Entrance Conference Date): October 20, 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

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## REVIEW FINDINGS

### A. Program Access and Reimbursement

**YES** **NO**

**Certification and Benefit Issuance** – Validation of the SFA's certification of students' eligibility for free or reduced-price meals benefits

Finding Detail:

**Verification** – Validation of the process used by the SFA to confirm selected students' eligibility for free and reduced-price meal benefits

Finding Detail:

**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**

**Meal Components and Quantities** – Validation that meals claimed for reimbursement contain the required meal components and quantities

Finding Detail: The Production Record is the official document used as an internal control to monitor, record, and confirm that adequate foods are prepared and served to substantiate the reimbursable meals claimed. The site must record the total quantity of each meal component/food item actually prepared for the entire day's meal service in the "Quantity Available" column fourteen (14) on the production record. Use purchase units as listed in the USDA Food Buying Guide or production units indicated on accurate quantity-based recipes (i.e. pounds, #10 cans, each, etc.) for prepared foods.

**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: On the day of the review, OVS requirements were not consistently understood. Reviewers provided technical assistance to ensure all students received a reimbursable meal. Assistance was necessary when students who had already selected reimbursable meals were unnecessarily sent back to choose additional items, while others attempted to proceed through the line without the required fruit or vegetable on their tray. Additionally, students were observed entering their identification numbers and exiting the line without staff verifying that their meal selections met OVS standards.

**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 *trans* fat

Finding Detail:

### C. School Nutrition Environment

**YES** **NO**

**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: The National School Lunch Act requires School Food Authorities (SFAs) to purchase, to the maximum extent practicable, domestic commodities or products. All non-domestic food items must receive written pre-approval from the School Nutrition Administrator prior to being accepted for use in the school food service program. The following items observed were missing from the approved list:

- Broccoli from Poland
- Collards from China
- Canned Fruit Salad from Thailand
- Canned Mixed Fruit from China
- Fresh Cherry Tomato from

<ul style="list-style-type: none"> <li>• Guatemala</li> </ul>		
<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 checked="" type="checkbox"/>	<input 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: Pepsi Nature’s Twist Orangeade was being sold on the day of review that did not comply with the Smart Snack beverage nutrition standards. This beverage contained 260 calories and 64 grams of added sugar per serving, exceeding the allowable limits. The Alliance for a Healthier Generation Smart Snacks Product Calculator results can verify a product’s Smart Snack compliance.		
<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 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: Cash handling and deposit procedures at the sites reviewed did not consistently comply with established internal control requirements or district policies.		
<ul style="list-style-type: none"> <li>• A deposit dated September 30 was not made until October 1, resulting in noncompliance with the required month-end deposit deadline. Although a night deposit was completed, it did not adhere to established procedures, as confirmed by the School Nutrition Administrator.</li> <li>• Guidance and procedures defining when petty cash should be used were not clearly established or consistently applied, particularly regarding the counting of petty cash prior to breakfast meal service. In addition, petty cash was not properly secured during the day; the locked cash box was observed in full sight on the manager’s desk.</li> <li>• Funds were handled securely during the counting process; however, proper safeguards were not maintained once counting was complete.</li> <li>• Cashiers were observed using another employee’s credentials to process meal transactions when the assigned cashier was away from the register.</li> <li>• Final deposit cash receipts were not counted and verified by two people, however, paperwork reflected two verifying signatures.</li> </ul>		
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<b>Other – Procurement</b>
Finding Detail: The School Food Authority did not adequately execute the Procurement Plan in accordance with the principles of “free and open” competition. The Request for Proposal (RFP) documentation for Bull’s Eye/SmartMouth Pizza included specifications that were considered restrictive, thereby limiting fair competition. Adhering to Procurement Plan procedures is essential to ensure consistency and promote equitable opportunities for all vendors.		