



NORTH CAROLINA DEPARTMENT OF PUBLIC INSTRUCTION

Catherine Truitt, *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: Paul R Brown Leadership Academy

SFA Agreement Number: 09A

Date of Administrative Review (Entrance Conference Date): April 29, 2024

Date review results were provided to the SFA: May 1, 2024

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

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AN EQUAL OPPORTUNITY/AFFIRMATIVE ACTION EMPLOYER

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 checked="" type="checkbox"/>	<input type="checkbox"/>	Local School Wellness Policy – Review of the SFA’s established Local School Wellness Policy
Finding Detail: Finding 1: The Local Wellness Policy does not have all of the required components. The following elements are missing: There were no specific goals for nutrition promotion and education, physical activity, and other school-based activities that are designed to promote student wellness, The policy lacked standards and nutrition guidelines for all foods and beverages available on the school campus during the school day that are, at a minimum, consistent with Federal regulations for program meals and the Smart Snacks in School nutrition standards, and designed to promote student health and reduce childhood obesity, There were no evidence-based strategies in determining local school wellness goals, The school did not involve, inform, and update the public (including parents, students, and other stakeholders) about the content and implementation of the local school wellness policy, The school did not conduct the required assessment to determine compliance, progress, and the extent to which the policy compares to model local school wellness policies, The school has not assessed compliance with the local school wellness policy or made assessment results available to the public.		

Finding 2: A triennial assessment of the school's Local Wellness Policy (LWP) was to be completed by June 30, 2023. As of the review date, the LWP triennial assessment has not been completed.		
<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 Documentation		
YES	NO	
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Civil Rights – Validation of the SFA's compliance with civil rights requirements as applicable to the School Nutrition Programs
<p>Finding Detail:</p> <p>Finding 1: The Non-Discrimination Statement (NDS) is not posted on the school or school nutrition web page.</p> <p>Finding 2: The Civil Rights Compliance Worksheet for both the central office and school site during the 2023-2024 school year remains outstanding. It is imperative that this worksheet be diligently completed for the school as well as the central office by December 15th of every academic year. Furthermore, these records must be maintained on file for subsequent review by the State Agency (SA) or any other relevant regulatory authority.</p> <p>Finding 3: Civil Rights training was not provided to all staff involved in the School Nutrition Program before the December 15 due date.</p>		
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
Finding Detail: The Adult meal price is insufficient. The adult charge should be at least the amount of reimbursement received for a free lunch plus the per-meal value of both entitlement and bonus commodities or for breakfasts, the rate established for free meals.		
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Other – Smart Snacks, Program Monitoring (Self-Assessment), Cash Management, Community Eligibility Provision (CEP), and Procurement
<p>Finding Detail:</p> <p>Finding (Smart Snacks): A review of all foods and beverages sold by the School Nutrition program revealed all snacks sold did not meet Smart Snacks Nutrition Standards. These items included Otis Spunkmeyer chocolate chip and sugar cookies, Miss Vickie's jalapeno chips, Sweet Chili Doritos, and Cheetos Puffs.</p> <p>Finding (Program Monitoring, Self-Assessment): In the 2023-2024 school year, the second self-assessment was not completed by the due date of April 1st of the current school year.</p> <p>Finding (Cash Management): Paul R. Brown Leadership Academy has established cash management procedures; however, the protocols and procedures do not accurately align with their current practices.</p> <p>Finding (Community Eligibility Provision): The source documentation and CEP data used to determine the 2022-2023 base year was not available for verification.</p> <p>Finding 1 (Procurement): Although the bid was awarded based on the most competitive price, the food distributor is now invoicing a different price than the originally agreed-upon terms in the 2022-2023</p>		

school food and supplies contract. This deviation is not aligned with the bid specifications. Food items received are not the food items represented on the original bid document. Sufficient bid oversight has not been provided.

Finding 2 (Procurement): The bid request had the required bid language except the provision to comply with the Iran Divestment Act of 2015.

Finding 3 (Procurement): There is no evidence (from the previous School Nutrition Director) that more than one grocery distributor was contacted concerning an interest in bidding.

Finding 4 (Procurement): The SFA has not executed the procurement plan adequately in the area of “free and open” competition. Invitations for Bid released for the 2022-2023 school year were advertised from August 9-12, 2022. The bid opening was on August 11, 2022. The advertisement did not provide sufficient time for free and open competition nor was it advertised in a major publication.