



NORTH CAROLINA DEPARTMENT OF PUBLIC INSTRUCTION

Catherine Truitt, *Superintendent of Public Instruction*

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: Fort Liberty Schools

SFA Agreement Number: 1007

Date of Administrative Review (Entrance Conference Date): February 26, 2024

Date review results were provided to the SFA: June 17, 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 checked="" type="checkbox"/> | <input type="checkbox"/> | Certification and Benefit Issuance – Validation of the SFA’s certification of students’ eligibility for free or reduced-price meals benefits |
| Finding Detail: In the review of printed online applications, the Determining Official is listed as the software provider. The software provider cannot be the Determining Official or Confirming Official as part of the Second Party Review of Applications. | | |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Verification – Validation of the process used by the SFA to confirm selected students’ eligibility for free and reduced-price meal benefits |
| <p>Finding Detail:</p> <p>Finding 1: In the review of Verification, the following issues were observed:</p> <ul style="list-style-type: none"> •Eight (8) applications selected did not receive a second notice to adequately respond to the request for verification prior to November 15, 2023. The second notice was not sent until December 8, 2023. Verification activities must conclude by November 15th. An incorrect letter was used to notify families of verification selection. The SFA used a software template. The approved letters from North Carolina Department of Public Instruction (NCDPI) School Nutrition must be used for all verification notifications. The software template did not have the correct nondiscrimination statement on the document. The SFA did not maintain copies of the Letter of Verification results sent to families once documentation of income was reviewed. Sufficient documentation was not retained to show that additional efforts were made to contact households that were nonresponsive to the initial notification letter prior to November 15, 2023. Software errors allowed the denied households selected for verification to remain at the initially determined status through March 1, 2024, which was well over the ten (10) day required notification of adverse action. Information regarding the method used for verification was incorrect on the Verification Report submitted to NCDPI. The SFA was approved to use the Alternate Method for verification. The correct number of applications were selected. <p>Finding 2: Several errors in the verification process were noted resulting in inaccurate benefits issuance to students. Errors included:</p> <p>One (1) application with three students (3) selected for verification was classified initially as reduced. After verification documentation was submitted November 15, 2023, and reviewed the application was classified as paid in error. One (1) application with two (2) students submitted documentation November 15, 2023, qualifying the household to remain free status. The application was changed to paid. One (1) application with one (1) student submitted documentation on qualifying the household to remain free status. The application was changed to paid.</p> | | |
| <input checked="" type="checkbox"/> | <input 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 |
| <p>Finding Detail:</p> <p>Finding 1: Production records for one (1) of eighteen (18) operating days for the month of review (January 2024) did not accurately document the amount of fruit for students as part of the reimbursable meal at breakfast. There were eighteen (18) breakfasts on January 31, 2024, for which fruit was not accurately documented as part of the reimbursable meal.</p> <p>There is a potential reclaim for incomplete production records at breakfast for eighteen (18) meals; the amount of the reclaim for January 2024, at breakfast is \$22.69.</p> <p>Finding 2: Production records for one (1) of seventeen (17) operating days for the month onsite (February 2024) did not accurately document the amount of fruit for students as part of the reimbursable meal at breakfast. There were five (5) breakfasts on February 2, 2024, for which fruit was not accurately documented as part of the reimbursable meal.</p> <p>There is a potential reclaim for incomplete production records at breakfast for five (5) meals; the amount of the potential reclaim for February 2024, at breakfast is \$4.25.</p> | | |

NOTE: Production Records include information for Shugart Elementary School and Shugart Middle School.

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 checked="" type="checkbox"/> | <input 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 |
| <p>Finding Detail:</p> <p>Buy American - Foods and beverages of non-domestic origin are not to be accepted and used unless they comply with USDA's Buy American procurement guidelines and have been approved in advance by the SFA's School Nutrition Administrator. A current list of currently approved non-domestic products is not available. Any food or beverage of non-domestic origin not previously approved must be rejected at the time of delivery so a credit may be issued to the School Nutrition account.</p> <p>Devers Elementary School - In the review of the schools, the Hazard Analysis Critical Control Point (HACCP) books, the following sections were incomplete: Verification of HACCP Plan, Monitoring and Record Keeping Summary and As Needed Monitoring Forms Summary.</p> <p>Shugart Middle School - In the review of the schools, the Hazard Analysis Critical Control Point (HACCP) books, the following sections were incomplete: Verification of HACCP Plan, Monitoring and Record Keeping Summary, As Needed Monitoring Forms Summary and Daily Kitchen Assessment.</p> | | |
| <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 checked="" type="checkbox"/> | <input type="checkbox"/> | Civil Rights Documentation – Validation of the SFA's compliance with civil rights |

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|---|--|---|
| | | requirements as applicable to the School Nutrition Programs |
| Finding Detail: The Civil Rights Compliance Worksheet for the Central office and, for each school site for 2023-2024 school year were not completed by the due date of December 15, 2023. The Civil Rights Compliance Worksheet must be completed for each school and the Central office by December 15th of each school year and maintained on file for review by the State Agency (SA) or other regulatory authority. | | |

| 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 (Shugart Middle School): There are written cash management procedures in place; however, these procedures do not reflect current practices. The School Nutrition Manager and School Nutrition Cashier did not count the petty cash and place it in the register prior to breakfast service as procedures require and The School Nutrition Manager did not observe the cashier count the money and sign the Daily Cash Count for Petty Cash form after meal service. | | |

| | | |
|--------------------------|-------------------------------------|---|
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Other – After School Snack Program |
| Finding Detail: | | |