



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: Haliwa Saponi Tribal School

SFA Agreement Number: 93A

Date of Administrative Review (Entrance Conference Date): March 4, 2024

Date review results were provided to the SFA: March 6, 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 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: For February 2024, the month of review, there were five (5) days at lunch when the School Food Authority did not maintain the Point-of-Sale rosters to justify the numbers of meals claimed and confirm that it was one meal per student. The following days will have a reclaim: February 23, 2024 – Ninety (90) lunches. February 26, 2024 – Ninety (90) lunches. February 27, 2024 – Ninety (90) lunches. February 28, 2024 – Ninety (90) lunches, February 29, 2024 – Ninety (90) lunches. There will be a reclaim for meal counting and claiming errors at lunch for four hundred and fifty (450) lunches; the amount of the reclaim for February 2024 at lunch is \$1,957.50. Finding 2: On March 1, 2024, the School Food Authority (SFA) did not maintain the Point-of-Sale rosters to justify the numbers of meals claimed and confirm that it was one meal per student. Finding 1: For February 2024, the month of review, there were five (5) days at breakfast when the School Food Authority did not maintain the Point-of-Sale rosters to justify the numbers of meals claimed and confirm that it was one meal per student. The following days will have a reclaim: February 23, 2024 – Thirty-five (35) breakfast. February 26, 2024 – Thirty-five (35) breakfast. February 27, 2024 – Sixty-one (61) breakfast. February 28, 2024 – Thirty-five (35) breakfast. February 29, 2024 – Thirty-five (35) lunches. There will be a reclaim for meal counting and claiming errors at breakfast for two hundred and one (201) breakfast; the amount of the reclaim for February 2024 (Month of Review) at breakfast is \$548.73. Finding 2: On March 1, 2024, the School Food Authority did not maintain the Point-of-Sale rosters to justify the numbers of meals claimed and one meal per student at breakfast.</p>		
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 checked="" type="checkbox"/>	<input 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: Documentation was not available for staff training on Offer vs. Serve. Offer versus Serve (OVS) allows students to decline some of the food offered. Annual training of OVS strengthens accurate meal counting of reimbursable meals.		
<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

Finding Detail: The daily, weekly, and monthly monitoring forms were not completed for January, February and March and must be completed as required by the School Food Authority's Food Safety Hazard Analysis Critical Control Point (HACCP) Plan.		
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Local School Wellness Policy – Review of the SFA’s established Local School Wellness Policy
Finding Detail: The Local Wellness Policy (LWP) must be revised and updated to meet all the requirements of the Final Rule for Local Wellness Policies effective July 1, 2017. Revise and update the Local Wellness Policy to include the following: Language addressing requirement that Local Education Agencies (LEAs) adhere to federal Smart Snacks competitive food regulations for all food and beverages sold to students during the school day. Measurable goals in the areas of nutrition education, nutrition promotion, and other school-based strategies for wellness. Information that informs the public of the implementation and assessment of the LWP. Finding 2: The triennial assessment of the district Local Wellness Policy (LWP) was due by June 30, 2023. As of the date of the review, the week of March 4, 2024, 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		
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
Finding Detail: 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. Finding 2: The Non-Discrimination Statement (NDS) is missing from the Community Eligibility Provision (CEP) notification letter to parents. Finding 3: The United States Department of Agriculture (USDA) “And Justice for All” poster is not displayed in a prominent location and visible to recipients of benefits. While there is a non-discrimination statement displayed, it is not in a visible location.		
E. Resource Management		
YES	NO	
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Resource Management – Validation of the SFA’s compliance with overall financial health of the School Nutrition Program
Finding:		
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Other – Procurement
Finding Detail: The written Procurement Plan was not signed and dated. Additionally, it did not include Attachment A, Code of Ethics and/or Conflict of Interest Policy.		
Finding:		
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Other – Production Records
Finding Detail: Finding 1: Production Records for six (6) of thirteen (13) operating days in February 2024 at breakfast did not match rosters to justify the number of meals claimed when compared to the daily rosters. There was an underclaim of ten (10) meals at breakfast. There will be a credit for production records errors at breakfast for ten (10) breakfast; the amount of the credit for February 2024 (Month of Review) at breakfast is \$27.30. Finding 2: Production Records for two (2) of thirteen (13) operating days in February 2024 at lunch did not match rosters to justify the number of meals claimed		

when compared to the daily rosters. There was an over-claim of twelve (12) meals at lunch. There will be a reclaim for production records errors at lunch for twelve (12) lunches; the amount of the reclaim for February 2024 (Month of Review) at lunch is \$52.20.