



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: Rockingham County Schools

SFA Agreement Number: 790

Date of Administrative Review (Entrance Conference Date): January 8, 2024

Date review results were provided to the SFA: January 12, 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: The School Nutrition Manager is not entering daily attendance into the Edit Check report. Edit checks must be completed for all meals daily to ensure more meals are not claimed than the number of students in attendance.</p> <p>Finding Detail: Two (2) Kindergarten classes received a meal and were required to go directly to a table without passing the Point of Sale/Service at Moss Street Elementary School. After the students were seated, one (1) teacher verbally told the cashier the students who received a meal and the second handed the cashier student information cards. Each student must provide a Verbal/Coded ID Card to the cashier as stated in the site agreement (School Nutrition Technology System).</p> <p>Finding Detail: For two (2) days of thirteen (13) operating days in the month of review (December 2023) at breakfast, meals served to Lawsonville Head Start, meals prepared at Moss Street Elementary School, were not claimed for reimbursement. December 6, 2023 – Thirty-one (31) breakfast and December 7, 2023 – Thirty-one (31) breakfast.</p> <p>There will be a credit for meals not claimed at breakfast for sixty-two (62) meals; the amount of the credit for December 2023, at breakfast is \$166.91.</p> <p>The credit calculation is sixty-one (61) free breakfasts and one (1) paid breakfast is based on the claiming percentage of 99.34% free and 0.66% paid.</p> <p>Finding Detail: For one (1) operating day at lunch in the month of review (December 2023) meals served to Lawsonville Head Start students were not claimed for reimbursement. December 6, 2023 – thirty-one (31) lunches.</p> <p>There will be a credit for meals not claimed at lunch for thirty-one (31) meals; the amount of the credit for December 2023, at lunch is \$134.85.</p> <p>The credit calculation is thirty (31) free lunches is based on the claiming percentage of 99.34% free and 0.66% paid.</p> <p>Finding Detail: During breakfast, an accurate meal counting and claiming system was not implemented for the Exceptional Children (EC) students consuming meals in the classroom at the school.</p> <p>Students receiving a breakfast remain in the classroom while the teacher is picking up the student’s breakfast in the cafeteria, and the cashier is entering each student receiving a meal from a roster into the Point of Sale prior to receiving the breakfast.</p> <p>Finding Detail: Production records for three (3) of thirteen (13) operating days for the month of review (December 2023) were not completed to justify reimbursable meals at breakfast at the school. The production records were not completed on the following days, which will result in a reclaim of</p>		

breakfast meals:

December 1, 2023 – Two hundred and seventy-four (274) breakfast meals, December 18, 2023 – Two hundred and sixty-seven (267) breakfast meals and December 19, 2023 – One hundred and ninety-three (193) breakfast meals.

There will be a reclaim for the missing production records at breakfast for seven hundred and thirty-four (734) meals; the amount of the reclaim for December 2023, at breakfast is \$1,992.07.

The reclaim calculation is Seven hundred and twenty-nine (729) free breakfast, and five (5) paid breakfast based on the claiming percentage of 99.34% free and 0.66% paid.

Finding Detail: Production Records for one (1) of the thirteen (13) operating days for the month of review (December 18, 2023) were not completed to justify reimbursable meals at breakfast at the school.

Production Records for one (1) of the thirteen (13) operating days for the month of review (December 1, 2023) were partially completed for the Snacker Packer menu item only at Moss Street Elementary School.

There will be a reclaim of meals on the following days:

December 1, 2023 – Seventy-nine (79) lunch meals and December 18, 2023 – Two hundred and sixty-one (261) lunch meals.

There will be a reclaim for the missing or partially completed production records at lunch for three hundred and forty (340) meals; the amount of the reclaim for December 2023, at lunch is \$1,471.30.

The reclaim calculation is Three hundred and thirty-eight (338) free lunches, and two (2) paid breakfast based on the claiming percentage of 99.34% free and 0.66% paid.

B. Meal Patterns and Nutritional Quality

YES	NO	
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Meal Components and Quantities – Validation that meals claimed for reimbursement contain the required meal components and quantities

Finding Detail: On the day of review at Moss Street Elementary School, three (3) meals were non-reimbursable due to no fruit or vegetable on the tray at the Point of Sale.

There will be a reclaim for non-reimbursable meals at lunch for three (3) meals; the amount of the reclaim for January 2024, at lunch is \$13.05.

The reclaim calculation is three (3) free lunches is based on the claiming percentage of 99.34% free and 0.66% paid.

<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
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Finding Detail: During the school review, breakfast and lunch menu signage was not available on each serving line to indicate what constitutes a reimbursable meal.

Signage must be posted near or at the beginning of the serving line explaining what constitutes a reimbursable meal at breakfast and lunch.

<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
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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 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 type="checkbox"/>	<input checked="" type="checkbox"/>	Civil Rights – Validation of the SFA’s compliance with civil rights requirements as applicable to the School Nutrition Programs
Finding Detail:		

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: School Nutrition funds were used for the demolition of a wall, frame bulkhead, hang drywall and hang acoustical ceiling for access at Reidsville High School cafeteria. This is an unallowable use of School Nutrition funds for construction purposes in a cafeteria. There was a charge of \$4,488.20 in the 2022-2023 school year and \$17,952.80 in the 2023-2024 school year.		
Finding Detail: The School Nutrition Manager did not follow the current written procedure requiring the petty cash to be counted and verified prior to the start of lunch meal service.		

<input checked="" type="checkbox"/>	<input type="checkbox"/>	Other – After School Snack Program
Finding Detail: Production Records were not completed in the 2023-2024 school year in the After School Snack Program at Moss Street Elementary. The program started on September 6, 2023, and State Agency reviewers were onsite on January 11, 2024.		
There will be reclaim of snacks served in the following months:		
September 2023 – Seven hundred and thirteen (713) snacks. A reclaim of \$834.21.		
October 2023 – Eight hundred and forty-two (842) snacks. A reclaim of \$985.14.		
November 2023 – Six hundred and fifty-four (654) snacks. A reclaim of \$765.18.		
December 2023 – Three hundred and forty-two (342) snacks. A reclaim of \$400.14.		
January 2024 – One hundred and eighty-nine (189) snacks. A reclaim of \$221.13.		
There will be a reclaim for the missing production records in the After School Snack Program for Two thousand, seven hundred and forty (2,740) snacks; the amount of the reclaim for September 6, 2023,		

through January 11, 2024, in the After School Snack Program is \$3,205.80.

Finding Detail: Program monitoring reviews are being completed by the School Nutrition Managers instead of a School Nutrition Central Office staff member. Since the School Nutrition Managers oversee the program as well as complete the monitoring report, there is no separation of duties in this aspect of the program.

Finding Detail: The After School Snack Program guidance requires that snacks provided to students be served after the school day ends and an enrichment activity be conducted. On the day of review at the school, the snack was served at 2:05pm. The posted class schedule indicates that school dismissal occurs at 2:15pm.