



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: Franklin County Schools

SFA Agreement Number: 350

Date of Administrative Review (Entrance Conference Date): January 22, 2024

Date review results were provided to the SFA: January 25, 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 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
Finding Detail: : Verification was completed on November 16th. Verification must be completed no later than November 15th of each school year. Finding 2: Several procedural issues were noted regarding Verification. Original copies of the application determinations were not retained. More household applications were verified than required. The number of students directly certified through Food Nutrition Services and through other programs was incorrectly recorded on the Verification Report. The correct Verification method, Standard, was not correctly recorded in the report. One application selected for review was not verified correctly. The incorrect income was calculated from the pay stubs provided by the household.		
<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
Finding Detail: An accurate meal counting and claiming system was not implemented for the Exceptional Children (EC) students consuming breakfast meals in the classroom at Cedar Creek Middle.		

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: The serving size for juice at breakfast was six (6) ounces. No more than half of the fruit offered over the week can be in liquid form.		
<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
Finding Detail: Finding: Hazard Analysis Critical Control Point (HACCP) logs are not being completed correctly. Staff completed the dish sink wash and sanitizing section on the Daily Kitchen Assessment form before the sinks were set up. Staff did not verify the wipe/spray sanitizer parts per million (ppm). The Clean-Up section was completed at the start of the day rather than at end of day. The instructions for the Daily Kitchen Assessment have been removed from the bottom of the page. The instructions are an aid to help staff understand how to complete the form.		
<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 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 type="checkbox"/>	<input checked="" type="checkbox"/>	Other – Procurement
<p>Finding Detail: There were errors noted in the currently approved Procurement Plan. Those errors requiring correction are listed below: The Procurement Plan has listed the Micro Purchase threshold of \$10,000 on page three; however, it is listed inconsistently several times as \$3,500 throughout the Procurement Plan. The correct amount is \$10,000. Finding 2: There were no written procedures for obtaining quotes from vendors for items purchased under the School Food Authority's small purchase threshold. Written procedures are required to ensure consistency with free and open competition among all vendors. Finding 3: The Invitation for Bid (IFB) for Chemicals, Milk and Beverages did not include the following required Federal language. Adding the additional required terms and conditions to the current Contract does not constitute a material change in the contract(s). Non-collusion statement, Assurance of ethical practices, Escalation/de-escalation clause, Buy American statement and instructions, Bid/proposal protest procedures, Remedy for non-performance/termination of contract, HUB statement to involve minority business where possible, Equal Employment Opportunity” compliance statement (\$10,000+), Energy Policy and Conservation Act statement, Clean Air/Water Act statement (\$100,000+), Civil Rights Act Statement, Jessica Lunsford Act requirement, Return of Discounts, Credits and Rebates to SFA statement, Record retention and record access requirements, Compliance with Jessica Lunsford Act, Finding 4: The School Food Authority has not executed the procurement plan adequately in the area of “free and open” competition. Invitations for Bids released for Chemicals in the 2021-2022 school year and Beverages in the 2022-2023 school year were not advertised in a major newspaper/media, IPS Website, or other widely publicized communication. Finding 5: The School Food Authority did not have the amendment on file for the 2022-2023 school year for an Invitation for Bid procuring Chemicals. The original contract for the 2021-2022 school year included the option of an extension clause. Prices increased for the 2022-2023 without documentation between both the vendor and the School Food Authority.</p>		