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: Guilford County Juvenile Detention Center

SFA Agreement Number: 1167

Date of Administrative Review (Entrance Conference Date): November 29, 2016

Date review results were provided to the SFA: December 1, 2016

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  ☐
## REVIEW FINDINGS

### A. Program Access and Reimbursement

<table>
<thead>
<tr>
<th></th>
<th>YES</th>
<th>NO</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Certification and Benefit Issuance</strong> – Validation of the SFA’s certification of students’ eligibility for free or reduced-price meals benefits</td>
<td>☐</td>
<td>☒</td>
</tr>
<tr>
<td><strong>Verification</strong> – Validation of the process used by the SFA to confirm selected students’ eligibility for free and reduced-price meal benefits</td>
<td>☐</td>
<td>☒</td>
</tr>
<tr>
<td><strong>Meal Counting and Claiming</strong> – 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</td>
<td>☒</td>
<td>☐</td>
</tr>
</tbody>
</table>

**Finding Detail:** (Breakfast) The rosters for breakfast are being completed before students receive their meals. The rosters must be completed at a point of sale/service for all meals at the time students receive their reimbursable meals.

In the month of review for breakfast, October 2016, there is one (1) day (October 23rd) when the production record count does not match the roster count, which results in an over-claim of meals.

*There is a potential reclaim for meal counting and claiming errors at breakfast for the review period; the amount of the potential reclaim is $2.04.*

(Lunch) The rosters for lunch are being completed before students receive their meals. The rosters must be completed at a point of sale/service for all meal services at the time students receive their reimbursable meals.

In the month of review, October 2016, there are days when the lunch production record count does not match the roster count, which results in an over-claim of meals. Over-claimed meals were observed on the following days: October 3rd – one (1) meal; October 4th – one (1) meal; October 17th – one (1) meal; October 18th – two (2) meals; October 23rd – one (1) meal; October 25th – two (2) meals; October 26th – two (2) meals; and October 27th – one (1) meal.

*There is a potential reclaim for meal counting and claiming errors at lunch for eleven (11) meals; the potential reclaim is $35.64.*

(After School Snack Program) In the month of review (October, 2016) for the After School Snack Program (ASSP), there are days when the production record count does not match the roster count, which results in an over-claim of meals. Meals were over-claimed on the following days: October 13th – two (2) snacks; October 15th – one (1) snack; October 16th – one (1) snack; October 19th – one (1) snack; and October 23rd – one (1) snack.

*There is a potential reclaim for meal counting and claiming errors in the ASSP for six (6) meals; the potential reclaim is $5.16.*

### B. Meal Patterns and Nutritional Quality

<table>
<thead>
<tr>
<th></th>
<th>YES</th>
<th>NO</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Meal Components and Quantities</strong> – Validation that meals claimed for reimbursement contain the required meal components and quantities</td>
<td>☒</td>
<td>☐</td>
</tr>
</tbody>
</table>

**Finding Detail:** (Lunch) The following issues were noted during the review of lunch meal service:

On the day of review (November 30, 2016), the total amount of vegetable servings provided to the students during lunch meal service for grades 9-12, did not meet required daily minimum requirement of one (1) cup. The recipe card serving size for diced tomatoes was one-half (1/2) cup but a one-fourth (1/4) cup of diced tomatoes was provided on each student’s tray. The total amount of offered vegetable was three-fourths (3/4) cup (one-half (1/2) cup corn and one-fourth (1/4) cup of diced tomatoes), which was short by one-fourth (1/4) cup for the daily minimum requirement for grades 9-12.

A staff member was unsure if students were required to have all meal components with their lunch. In this situation, two (2) students did not want their milk with their lunch and offer versus serve is not implemented.
Two (2) students in the After School Snack Program did not want their milk; however, the roster had been marked noting all students received a snack that included milk. Reviewers checked the rosters to ensure these snacks were not claimed for Federal reimbursement.

### 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

### 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 *trans* fat

### Finding Detail:

<table>
<thead>
<tr>
<th>C. School Nutrition Environment</th>
<th>YES</th>
<th>NO</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Food Safety</strong></td>
<td>☒</td>
<td>☐</td>
</tr>
<tr>
<td>(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: Non-domestic food items such as mandarin oranges from China, broccoli cuts from Guatemala and pineapple tidbits from the Philippines were discovered in storage areas during the review. The School Nutrition Program is not approving non-domestic products, which is inconsistent with the Buy American provision required in Federal regulations. The SFA must hold the Food Service Management Company (FSMC) accountable for the service of non-domestic products.)</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

| **Local School Wellness Policy** | ☒ | ☐ |
| (Review of the SFA’s established Local School Wellness Policy) |

| **Competitive Foods** | ☒ | ☐ |
| (Validation of the SFA’s compliance with regulations for all food and beverages to students outside of the reimbursable meal) |

| **Professional Standards** | ☒ | ☐ |
| (Validation of the SFA’s compliance with required hiring standards and annual training requirements) |

### D. Civil Rights
- **Civil Rights** – Validation of the SFA’s compliance with civil rights requirements as applicable to the School Nutrition Programs

### E. Resource Management
- **Resource Management** – Validation of the SFA’s compliance with overall financial health of the School Nutrition Program

### Other

Finding Details: