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: Hickory City Schools

SFA Agreement Number: 181

Date of Administrative Review (Entrance Conference Date): November 14, 2016

Date review results were provided to the SFA: November 17, 2016

General Program Participation

1. What Child Nutrition Programs does the School Food Authority participate in? (Select all that apply)
   - [x] School Breakfast Program
   - [x] National School Lunch Program
   - [x] 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)
   - [x] 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?
   - [x] Yes
   - [ ] No

4. Is there fiscal action associated with findings identified during the review of this School Food Authority?
   - [ ] Yes
   - [x] No
## REVIEW FINDINGS

### A. Program Access and Reimbursement

<table>
<thead>
<tr>
<th>YES</th>
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#### Certification and Benefit Issuance – Validation of the SFA’s certification of students’ eligibility for free or reduced-price meals benefits

#### Verification – Validation of the process used by the SFA to confirm selected students’ eligibility for free and reduced-price meal benefits

Finding Detail: The NCDPI has an electronic Direct Verification (DV) matching system. The School Food Authority used the DV process but did not understand the eligibility had to be a perfect match. A student in the household selected for verification did appear in the DV file; however, the eligibility in DV was free and the eligibility determination on the household application was reduced. Since the match was not perfect, the SFA should have sent a selection letter to the household and received a response. Since this was the last day of verification, the SFA was able to receive the income information from the household. No further corrective action is required.

#### 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: Accurate meal counting and claiming and offer versus serve were not implemented properly during breakfast for the 7th and 8th graders. The reviewer observed breakfast service and the meal counting process for 7th and 8th graders in the cafeteria on November 15, 2016. Several students went through the line and did not take the required ½ cup fruit component. The reviewer reminded the cashier that the students did not select a reimbursable meal, so the cashier called the students back to obtain a fruit component; however, two students still proceeded to pass the point of sale without a fruit component. Two breakfasts meals are disallowed on November 15, 2016 for a potential reclaim of $2.33.

### B. Meal Patterns and Nutritional Quality

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<tr>
<th>YES</th>
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#### Meal Components and Quantities – Validation that meals claimed for reimbursement contain the required meal components and quantities

Finding Detail:

#### 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:

#### 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:

### C. School Nutrition Environment

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<tr>
<th>YES</th>
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#### 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: Hickory City School’s Central Office has three different central food storage locations. The Central Warehouse location at an old school that is within very close proximity to the Hickory City School Nutrition Office and used mainly for USDA commodity canned foods and paper supplies. There is a designated freezer at Hickory High School and a designated space for frozen food that is located
within the Catawba County Central freezer. The NC Hazard Analysis Critical Control Points (HACCP) Plan has not been fully implemented in two of the three central office storage locations, Hickory High School and Catawba County Central freezer. An area requiring attention includes receipt date marking for inventory to include the month and year to meet requirements for first-in, first-out (FIFO) inventory management.

The Central Warehouse HACCP Plan is limited to the dry storage area for canned USDA commodity foods and paper supplies. The Central Warehouse HACCP Plan should include the frozen food stored in the designated freezer at Hickory High School and also at the Catawba County Central freezer. The NC Hazard Analysis Critical Control Points (HACCP) Plan has not been fully implemented. An area requiring attention includes receipt date marking for inventory to include the month, day, and year to meet requirements for First In First Out (FIFO) inventory management. The majority of items in inventory only had the month and day received.

<table>
<thead>
<tr>
<th>Local School Wellness Policy</th>
<th>Review of the SFA’s established Local School Wellness Policy</th>
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<tbody>
<tr>
<td>Competitive Foods</td>
<td>Validation of the SFA’s compliance with regulations for all food and beverages to students outside of the reimbursable meal</td>
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<tr>
<td>Professional Standards</td>
<td>Validation of the SFA’s compliance with required hiring standards and annual training requirements</td>
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D. Civil Rights

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<tr>
<th>YES</th>
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<tr>
<td>Civil Rights</td>
<td>Validation of the SFA’s compliance with civil rights requirements as applicable to the School Nutrition Programs</td>
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E. Resource Management

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<th>YES</th>
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<tbody>
<tr>
<td>Resource Management</td>
<td>Validation of the SFA’s compliance with overall financial health of the School Nutrition Program</td>
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Other

Finding Detail: