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: Charlotte Mecklenburg Schools

SFA Agreement Number: 600

Date of Administrative Review (Entrance Conference Date): April 16, 2018

Date review results were provided to the SFA: April 26, 2018

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
   - [ ] Fresh Fruit and Vegetable Program
   - [ ] Afterschool Snack
   - [ ] Special Milk Program
   - [x] 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>
<th>NO</th>
<th>Certification and Benefit Issuance – Validation of the SFA’s certification of students’ eligibility for free or reduced-price meals benefits</th>
</tr>
</thead>
<tbody>
<tr>
<td>![check]</td>
<td>![x]</td>
<td>Finding Detail: One (1) household selected for verification had five (5) household members and was originally approved based on free eligibility. The mother, a member of the household listed on the application sent in a typed letter on plain paper stating she was the President of a framing company and the husband is paid weekly. Official letters need to be on company letterhead. The School Food Authority (SFA) accepted this documentation; however, this household must be considered as self-employed and additional documentation must be submitted to support the income of the household.</td>
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<table>
<thead>
<tr>
<th>![x]</th>
<th>![check]</th>
<th>Verification – Validation of the process used by the SFA to confirm selected students’ eligibility for free and reduced-price meal benefits</th>
</tr>
</thead>
<tbody>
<tr>
<td>![check]</td>
<td>![x]</td>
<td>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</td>
</tr>
</tbody>
</table>

| ![x] | ![x] | Finding Detail: A variation to the collection procedure was used on the day of review (April 18, 2018) to count breakfast participation for Pre-K students at the school. The students are served breakfast and move to the Point of Sale (POS) where they hand the cashier a card or stick with their name on it for the cashier to identify the student and enter them in the POS. On the day of review the cashier left the POS while students were still coming through the line. The students would leave their card or stick at the POS for the cashier to enter the students’ information in the POS upon her return. Although on the day of review the Reviewer was confident that all students that left a card or stick were the only students entered in the POS, this procedure has the potential to claim federal reimbursement for meals not received by students. Finding: Meals were keyed in the Point of Sale system by the cashier prior to the students receiving a reimbursable meal at breakfast for the students in the Exceptional Children’s Classroom. A student roster was not available to check off student names after they received a reimbursable meal at breakfast. Finding: On the day of review (April 17, 2018) field trip lunches were not accounted for at the point of service. The cashiers entered meals based on lunches that were ordered in advance and confirmed attendance on the trip, not when the student received their meal. |

## B. Meal Patterns and Nutritional Quality

<table>
<thead>
<tr>
<th>YES</th>
<th>NO</th>
<th>Meal Components and Quantities – Validation that meals claimed for reimbursement contain the required meal components and quantities</th>
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</thead>
<tbody>
<tr>
<td>![check]</td>
<td>![x]</td>
<td>Finding Detail: On the day of review at breakfast (April 18, 2018), two (2) meals did not contain the required one-half (½) cup serving of fruit and were counted as reimbursable. At breakfast, students must select at least one-half (½) cup serving of fruit with two additional items. A potential reclaim exists for two (2) non-reimbursable meals at breakfast; the amount of the potential reclaim is $2.39. On the day of review at lunch (April 18, 2018), two (2) meals did not contain the required one-half (½) cup serving of fruit or vegetable and were counted as reimbursable. At lunch, students must select one-half (½) cup of fruit or vegetable with at least two (2) additional components. A potential reclaim exists for two (2) non-reimbursable meals at lunch; the amount of the potential reclaim is $3.70. Finding: On the day of review at lunch (April 19, 2018), two (2) meals did not contain the required one-half (½) cup serving of fruit or vegetable and were counted as reimbursable. At lunch, students must select one-half (½) cup of fruit or vegetable with at least two (2) additional components. In addition, the cashier sent students back for additional components on several occasions when the meal was already reimbursable. A potential reclaim exists for two (2) non-reimbursable meals at lunch; the amount of the potential reclaim is $3.70. Finding: A review of production records as well as an account by the employee serving the food item, found that on April 16, 2018, the one-half (½) cup of pineapple rice served with...</td>
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the sweet and spicy chicken provided one (1) grain equivalent with no other grain serving available to students that selected this entree choice. As the minimum daily grain requirement for grades 9-12 is two (2) servings and the weekly minimum grain requirement is ten (10), this resulted in an insufficient daily and weekly grain meal component. Finding: On the day of review (April 17, 2018) at breakfast, two (2) students passed the Point of Sale (POS) without the required fruit item on their tray. The reviewer corrected the error and each student selected a fruit/juice to make the meal reimbursable. Finding: On the day of review at breakfast (April 17, 2018) fifteen (15) students passed the Point of Sale (POS) without three (3) items on their tray. The fifteen (15) students identified as not having a reimbursable meal had a grain serving and a fruit serving but were missing the third item. A potential reclaim exists for fifteen (15) non-reimbursable meals at breakfast; the amount of the potential reclaim is $22.10 and $.30 in state 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

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

YES NO

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

Local School Wellness Policy – Review of the SFA’s established Local School Wellness Policy

Finding Detail:

Competitive Foods – Validation of the SFA’s compliance with regulations for all food and beverages to students outside of the reimbursable meal

Finding Detail:

Professional Standards – Validation of the SFA’s compliance with required hiring standards and annual training requirements

Finding Detail:

D. Civil Rights

YES NO

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

Resource Management – Validation of the SFA’s compliance with overall financial health of the School Nutrition Program

Finding Detail: On the day of review (April 18, 2018), money was not counted in a secure location. Money should not be counted at the register stand by the individual cashiers. Per the SFA’s written Cash Management procedures, before the serving period begins, the cashier is to count the change in
the register drawer in the presence of the Manager or designee before opening the line. Finding: An acceptable receipting method is not being used each time money changes hands. Petty cash is not being verified correctly prior to breakfast meal service as required by the School Food Authority’s (SFA’s) written Cash Management procedures. The cashier is to count the change in the register drawer in the presence of the manager or designee, before opening the line. The amount of change is to be recorded on the cashier’s record and initialed by the Manager or designee and the cashier. Finding: On the day of review (April 17, 2018) at the end of breakfast, cashiers were counting money at the Point of Sale (POS) in the dining/serving area which is not a secure location. Finding: To maintain strong internal cash management procedures at South Mecklenburg High, each cashier should have a unique sign on number to operate a register. On the day of review (April 17, 2018), two (2) different staff cashiered on the same register, utilizing the same cash register fund. Finding: Petty cash is not being verified correctly prior to each meal service as required by the School Food Authority’s (SFA’s) written procedures. The cashier is to count the change in the register drawer in the presence of the manager or designee, before opening the line. The amount of change is to be recorded on the Cashier’s Record and initialed by the manager or designee and the cashier.

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<th>Other</th>
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<tr>
<td></td>
<td></td>
<td>Finding Detail:</td>
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