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: Cardinal Charter Academy

SFA Agreement Number: 92W

Date of Administrative Review (Entrance Conference Date): November 13, 2018

Date review results were provided to the SFA: November 16, 2018

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>YES</th>
<th>NO</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

Finding Detail: All School Food Authorities (SFA) in North Carolina are required to conduct a second review of all Household Applications to ensure the household information provided on the application is reviewed and processed correctly. The SFA has flexibility to establish the effective date of certification for the National School Lunch Program (NSLP) and School Breakfast Program (SBP). The SFA selected Option 2 (as part of the Annual Agreement between the Charter School and the NCDPI/State Board of Education) which requires the date of eligibility as the date the SFA approves the complete Free and Reduced-Price School Meals Household Application. Staff turnover in key School Nutrition positions has occurred resulting in the second review of applications and household notification of eligibility for SY 2018-2019 not being completed in a timely manner. Several applications were not processed within ten (10) days of receipt and were not date stamped which delayed notification letters being sent home to parents as required by regulation.

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

**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: Finding: In the review of breakfast production records in the 2018-2019 school year, several days were missing and could not be located. Since the production record serves as the basis for the claim for reimbursement, in the absence of production records, all meals must be disallowed. The following is a breakdown by month of the reclaim of meals at breakfast for missing production records:

- **September 2018**: September 10, 2018 – one hundred nineteen (119) meals, September 26, 2018 – one hundred sixty (160) meals, September 27, 2018 – one hundred fifty-five (155) meals, and September 28, 2018 – one hundred sixty-two (162) meals.
- **October 2018**: October 1, 2018 – one hundred eighty-five (185) meals, October 2, 2018 – one hundred ninety-three (193) meals, October 3, 2018 – two hundred two (202) meals, October 4, 2018 – two hundred fourteen (214) meals, October 5, 2018 – two hundred seventeen (217) meals, October 8, 2018 – two hundred (200) meals, October 9, 2018 – two hundred five (205) meals, October 10, 2018 – two hundred seventeen (217) meals, October 12, 2018 – two hundred twenty-three (223) meals, October 15, 2018 – two hundred sixteen (216) meals, and October 16, 2018 – two hundred ten (210) meals.

There will be a reclaim for a missing production record at breakfast for five hundred ninety-six (596) meals; the amount of the reclaim for October 2018 for breakfast is $515.90 and $4.80 in State Breakfast Reimbursement.

In the review of lunch production records in the 2018-2019 school year, several days were missing and could not be located. Since the production record serves as the basis for the claim for reimbursement, in the absence of production records, all meals must be disallowed. The following is a breakdown by month of the reclaim of meals at lunch for missing production records:

- **September 2018**: September 10, 2018 – one hundred twenty-two (122) meals, September 26, 2018 – one hundred thirty-four (134) meals, September 27, 2018 – one hundred thirty-eight (138) meals, and September 28, 2018 – one hundred forty-two (142) meals.
- **October 2018**: October 1, 2018 – one hundred thirty (130) meals, October 2, 2018 – one hundred thirty-five (135) meals, October 3, 2018 – one hundred forty (140) meals, October 4, 2018 – one hundred forty-five (145) meals, October 5, 2018 – one hundred fifty (150) meals, October 8, 2018 – one hundred fifty-five (155) meals, October 9, 2018 – one hundred fifty (150) meals, October 10, 2018 – one hundred fifty-five (155) meals, October 12, 2018 – one hundred sixty (160) meals, October 15, 2018 – one hundred sixty-five (165) meals, and October 16, 2018 – one hundred seventy (170) meals.

There will be a reclaim for a missing production record at lunch for four hundred sixty-six (466) meals; the amount of the reclaim for October 2018 for lunch is $832.32.
meals; October 17, 2018 – two hundred twenty-nine (229) meals; and October 18, 2018 – two hundred forty-two (242) meals. There will be a reclaim for a missing production record at lunch for two thousand seven hundred fifty-three (2,753) meals; the amount of the reclaim for October 2018 for lunch is $4,200.41.

### B. Meal Patterns and Nutritional Quality

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

Finding Detail: On the day of review, green beans were not available at the start of meal service, thus three-fourth (¾) cup vegetable was not available for all students. Two (2) varieties of milk were not available throughout the entire meal service. Since the Offer vs. Serve provision was implemented, students were still able to select a reimbursable meal; however, menu planning should be improved to allow students access to as many nutritious foods as possible within the required meal pattern.

<table>
<thead>
<tr>
<th>YES</th>
<th>NO</th>
<th><strong>Offer versus Serve (OVS)(provision that allows students to decline some of the food components offered)</strong> – Validation of the SFA’s compliance with OVS requirements, if applicable</th>
</tr>
</thead>
</table>

Finding Detail: The determination of a reimbursable meal must occur at the Point of Service/Sale (POS/S). While the reviewers were able to identify the meals as reimbursable at the POS/S, the cashier being trained required on-going technical assistance to recognize the meals as reimbursable during breakfast and lunch meal service.

<table>
<thead>
<tr>
<th>YES</th>
<th>NO</th>
<th><strong>Dietary Specifications and Nutrient Analysis</strong> – Validation that meals offered to children through the School Nutrition programs are consistent with federal standards for calories, saturated fat, sodium, and trans fat</th>
</tr>
</thead>
</table>

Finding Detail:

### C. School Nutrition Environment

<table>
<thead>
<tr>
<th>YES</th>
<th>NO</th>
<th><strong>Food Safety</strong> – Validation that all selected schools meet the food safety and storage requirements, and comply with the Buy American provisions specified by the regulations</th>
</tr>
</thead>
</table>

Finding Detail: The North Carolina Hazard Analysis Critical Control Point (HACCP) plan has not been fully implemented. The missing forms include but are not limited to the following: New Employee Checklist, HACCP Monitoring for the Hand sink(s), Kitchen Assessment, and Weekly Monitoring. The HACCP plan must be implemented with fidelity in order to promote the highest food safety standards.

<table>
<thead>
<tr>
<th>YES</th>
<th>NO</th>
<th><strong>Local School Wellness Policy</strong> – Review of the SFA’s established Local School Wellness Policy</th>
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</thead>
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<tr>
<th>YES</th>
<th>NO</th>
<th><strong>Competitive Foods</strong> – Validation of the SFA’s compliance with regulations for all food and beverages to students outside of the reimbursable meal</th>
</tr>
</thead>
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Finding Detail:

<table>
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<tr>
<th>YES</th>
<th>NO</th>
<th><strong>Professional Standards</strong> – Validation of the SFA’s compliance with required hiring standards and annual training requirements</th>
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</thead>
</table>

Finding Detail:

### D. Civil Rights

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<thead>
<tr>
<th>YES</th>
<th>NO</th>
<th><strong>Civil Rights</strong> – Validation of the SFA’s compliance with civil rights requirements as</th>
</tr>
</thead>
</table>
### E. Resource Management

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

Finding Detail: The requirement to deposit all money in a banking account by the end of the month is not being implemented. Additionally, a review of records and reports indicated deposits were not made on a daily basis when the amount when cash reached $250.00. The School Food Authority’s (SFA) Written Cash Management Procedure requires that bank deposits must be made on a regular basis and at the end of the month. The SFA’s Written Cash Management Procedures for counting monies at the end of day are not being followed consistently. The Daily Cash Receipts Reconciliation Report, confirming the amount of money received and verified by the SFA and the School Operating Administrator (SOA) each day, was not completed for thirteen (13) of the twenty (20) school days in October 2018.

|   |   | Other |

Finding Detail: