



NORTH SLOPE BOROUGH SCHOOL DISTRICT
MEMORANDUM

TO: Esther Evikana, President
Members of the Board

THROUGH: David Vadiveloo, Superintendent *D. Vadiveloo*

FROM: Barry Broome, Maintenance & Operations Director *BB*

DATE: April 9, 2026

SUBJECT: National School Lunch Program (NSLP)
Audit Findings

Memo No. SB26-128
(Informational Item)

NSBSD Policy Manual:

BP 3550, Food Service: The School Board recognizes that students need adequate, nourishing food in order to grow and learn and to give a good foundation for their future physical well-being. The Board may provide for a food service program based on regular lunch service and including such other snack and breakfast programs as the needs of the students and the financial capacity of the district permit. The Board recognizes that the lunch program is an important complement to the nutritional responsibilities of parents/guardians. The Board that: (1) Food availability on school premises should contribute to the nutritional well-being of students; (2) Foods available should be considered as carefully as other educational support materials; (3) Foods should be prepared in ways that will appeal to students while retaining nutritive quality; (4) Food should be served in quantities appropriate to the needs of students at their age level and served in as pleasant and relaxed an atmosphere as possible.

The school Board intends that, insofar as possible, the school food services program shall be self-supporting. The Board shall review and approve of menu prices. Program financial reports shall be presented regularly for inspection by the Board.

NSBSD Strategic Plan Summary:

Financial & Operational Stewardship: Goal 7.0 – Standardize high-functioning, efficient, student-focused operations.

Issue Summary:

In compliance with BP 3550, On November 10 – 13, 2025, Child Nutrition Programs conducted an Administrative Review of the National School Lunch Program (NSLP) administered by North Slope Borough School District as required by 7 CFR 210.18. This review consisted of an Off-Site Assessment, On-Site Assessment, and Meal Compliance Assessment.

Following the audit, findings and required corrective actions were issued on February 15, 2026, with an original response deadline of 30 days from notification. During this period, the NSBSD Maintenance and Operations (M&O) Department onboarded a new Food Services Manager. In consideration of this transition, the deadline was extended to April 10, 2026.

The audit identified three deficiencies requiring resolution:





- (1) Meal count procedures (closely tied to accurate claiming practices)
- (2) Implementation and consistent use of edit checks
- (3) Proper Point of Service (POS) procedures

After further discussions with the NSBSD the department auditors directed 2 action steps:

- 1. Corrective action involved paperwork that included: meal counts, production records, consolidated checklist for reimbursement, Civil Rights statements on paperwork, policy for meal count at Barrow High School, and Policy for meal counting for Kiita. All these documents were to be submitted no later than April 10, 2026. The documents were submitted and will meet compliance required.
- 2. All previous corrective action submitted to the district for SY26 will be suspended until SY27. DEED will conduct a new administrative review and they will notify the superintendent of the schools they want to evaluate including the timeframe, this new timeline gives the food service department time to further prepare and train personnel.
- 3. The SY27 DEED audit will likely be conducted in October 2026, however this will be confirmed by DEED at a specific date.

Review Areas identified:

REVIEW AREA	SPECIFIC SECTION	FINDING	NSBSD REPOSE
Meal Access and Reimbursement	Certification and Benefit Issuance	There are no Findings in this area.	No action required
	Verification	There are no Findings in this area.	No action required
	Meal Counting and Claiming	Repeat Finding (#314, 316, 318, 320, 321): The Breakfast and lunch meal services did not provide an accurate count of meals. (Barrow High School, Fred Ipalook Elementary, Kiita Learning Community)	Corrective paperwork submitted by April 10 per DEED requirement
Meal Pattern and Nutritional Quality	Meal Components and Quantities	Finding (#404): Signage is not posted near or at the beginning of the serving line identifying what constitutes a reimbursable meal for lunch	The Food Service Manager is distributing required signage to schools. Schools are posting the signs to ensure compliance for SY27.





			DEED will reevaluate this corrective action during the SY27 administrative audit.
		Repeat Finding (#402, 403, 410, 411): Planned breakfast and lunch menu quantities at Barrow High School do not meet meal pattern requirements for the September 2025 review period. (Barrow High School, Fred Ipalook Elementary, Kiita Learning Community).	The new production records show the required meal portion per age specifications. We will also train and order color coded utensils that will help the staff meet this requirement. This corrective action will be re-evaluated during the SY27 administrative review.
	Offer Versus Serve	Finding (#500, 501): Offer versus Serve is not being implemented correctly at Barrow High School.	The Food Service Manager has begun training all sites regarding OVS. A new policy is in development allowing for sites to offer required meal components while offering additional food items to certify the district as operating OVS, particularly at our High School or where high school aged students are present. This corrective action will be re-evaluated during the SY27 administrative review.
		Finding (#502): Offer versus Serve reimbursable meal signage is not posted, including the requirement for students to select at least 1/2 cup fruit or vegetable. (Kiita Learning Community).	All schools will have the required postage and will be compliant for SY26 and SY27.
	Dietary Specifications and Nutrient Analysis	There are no Findings in this area.	No action required





Resource Management		<p>Finding (#2): The food service program documented an unresolved deficit of \$(942,459.24) during SY 24-25 as per the Detailed General Ledger provided.</p> <p>Documentation was not provided that nonfederal funds were transferred to the food service account to cover the deficit.</p>	<p>Finance Department has provided necessary clarification documentation</p>
General Program Compliance	Civil Rights	<p>Finding (#806): The sponsor did not provide documentation that all staff received civil rights training.</p>	<p>The new production records and menu calendar have been prepared by the Food Service Manager and they include the required Civil Rights statements. This has been met with the 10 April submitted documents.</p> <p>This corrective action will be re-evaluated during the SY27 administrative review.</p>
		<p>Finding (#811): No Civil Rights poster was posted in the facility.</p>	<p>This has been addressed by the Food Service Manager at all visited sites. A central shared folder is available for all sites to obtain the documentation.</p> <p>This corrective action will be re-evaluated during the SY27 administrative review.</p>
	SFA Onsite Monitoring	<p>Finding (#901): Documentation to demonstrate that onsite reviews of all sites' Lunch meal counting and claiming and 50% of Breakfast programs was not provided during the review. (Barrow High School, Fred Ipalook Elementary, Kiita Learning Community);</p>	<p>The Food Service Manager has updated documentation to meet this requirement and will be used district wide, these were also submitted to DEED on 10 April 2026. The rest of the sites will get training and the Food Service Manager plans on simplifying our record counting and documentation systems.</p>





			This Corrective action will be re-evaluated during the SY27 administrative review.
	Local School Wellness Policy and School Meal Environment	No Findings at this time – LWP is being reviewed by State Agency	No action required
	Smart Snacks in School	Finding (#1105): The Sponsor is selling items that do not meet the Smart Snacks nutrition standards for beverages sold to high school students during the school day.	Availability of non-standard foods has ceased during the school day.
	Professional Standards	Finding (#1215, 1216, 1217, 1219): The School Nutrition Program Manager did not meet the training requirements and did not have scheduled/planned trainings for the remainder of the school year to meet annual training requirements.	The Food Service Manager is compliant and has all the required hours. For SY27, all staff within food services will have the required hours. Training to be conducted online. Training logs will be kept and tracked. This corrective action will be re-evaluated during the SY27 administrative review.
	Water Availability	There are no Findings in this area.	No action required
	Food Safety, Storage, and Buy American	Finding (#1400, 1401, 1404, 1409): The SFA does not have a written Food Safety Plan. Barrow High School, Fred Ipalook Elementary, Kiita Learning Community.	This was submitted in February and has been added to an internal shared folder. The sites the Food Manager has visited have copies on site. The Food Service Manager will ensure that all other sites have a copy on hand. This corrective action will be re-evaluated during the SY27 administrative review.
	Reporting and Recordkeeping	Finding (#1502): Documentation to support the September 2025 claim for reimbursement was not available during the review.	Corrective paperwork submitted by April 10 per DEED requirement





	SBP and SFSP Outreach	Finding (#1601): The sponsor did not provide documentation that outreach was provided for the summer feeding program conducted by the mayor's office.	The Food Service Manager shared a flyer with the food service staff meeting compliance. Flier will again be sent out in May 2026 and will meet this requirement for SY27. This is basically met for SY27.
	Afterschool Snack Program	There are no Findings in this area.	No action required
	Special Provision Options	There are no Findings in this area.	No action required
	Procurement	Finding (#8): When using small purchase procedures, Sponsors must obtain price or rate quotations from an adequate number of qualified sources.	The M&O director and the Food Service Manager are working on the RFP. This will satisfy this corrective action for SY27.
		Finding (#9): Documentation of the public advertisement for the formal contract was not provided.	The M&O director and the Food Service Manager are working on the RFP and this will satisfy this corrective action for SY27.

Background:

The National School Lunch Program (NSLP) conducts periodic audits of school districts on a random basis. In 2025, NSBSD was notified of an upcoming audit initially scheduled for October 2025. Due to delays with NSLP scheduling software, the audit was rescheduled and ultimately conducted November 10–13, 2025.

Proposed Motion:

No motion is required. This is an informational Item as the purchases of supplies, materials, and equipment are within the discretion of the Superintendent or designee.

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Signature: *Barry Broome*
Barry Broome (Apr 23, 2026 10:12:40 AKDT)

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