



STATE OF SOUTH CAROLINA
DEPARTMENT OF EDUCATION

MOLLY M. SPEARMAN
STATE SUPERINTENDENT OF EDUCATION

April 5, 2017

Dr. Wanda Andrews, Superintendent
Lee County School District
Post Office Box 507
310 Roland Street
Bishopville, SC 29010

Dear Dr. Andrews:

As a participant in the National School Lunch Program and its related initiatives, every school food authority (i.e., school district, private school, charter school, or residential child care institution) is subject to periodic reviews to ensure compliance with state and federal requirements.

Attached is the summary report for the Administrative Review (AR) of your Child Nutrition Program (CNP) that was conducted by Ellen Mason on February 22-24, 2017. The findings of the review were discussed with Vance Jones and Shirley Joe during an exit conference.

The South Carolina Department of Education (SCDE) is required to conduct an AR of every school food authority (SFA) at least once every three (3) years, pursuant to regulations and policy guidelines promulgated by the United States Department of Agriculture (USDA) (7-CFR-210.18 (c)), South Carolina Code of Laws (59-1-310 and 43-168), and the Program Agreement executed between an SFA and the SCDE.

The mission of the SCDE in conducting an AR is to showcase the quality and importance of local child nutrition programs; measure compliance with state and federal requirements; and identify opportunities for improvement. At the federal level, the AR process measures general program compliance with specific emphasis on:

- *Free and Reduced Price Meal Benefits Certification;*
- *Meal Access and Reimbursement;*
- *Resource Management;*
- *Nutritional Integrity of Meals and All Other Foods Sold in Schools; and*
- *Other Related Federal Programs.*

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In addition to an evaluation of key SFA administrative processes and records for the review month of January 2016, Bishopville Primary was selected to receive an onsite visitation based on specific selection criteria.

We appreciate all of the assistance our staff received during the AR process. If you have any questions or concerns, please contact Ms. Mason at (803) 734-8199 or emason@ed.sc.gov.

Sincerely,


Ronald F. Jones,
Director, Office of Health and Nutrition

RJ/DD:em

Attachment

cc: Shirley Joe, Child Nutrition Program Director
Donna Davis, District Services Interim Team Leader, SCDE, Office of Health and Nutrition



STATE OF SOUTH CAROLINA
DEPARTMENT OF EDUCATION

**Administrative Review
of
Anderson County School District Four
Child Nutrition Programs**

**Conducted by
Ms. Ellen Mason
Office of Health and Nutrition**

February 22-24, 2016

**Ronald F. Jones
Director, Office of Health and Nutrition
SC Department of Education
1429 Senate Street, Room 703
Columbia, SC 29201**

Administrative Review Process

United States Department of Agriculture (USDA) Performance Standard 1

School Food Authority (SFA) Level

This section of the review evaluates the accuracy of free and reduced student eligibility records and their use in meal counting and claiming procedures.

Key Functional Areas Covered: Free and reduced eligibility applications (if applicable), direct certifications, income verifications, rosters, and meal counting and claiming procedures.

Actual Performance: Based on evaluation of eligibility records and meal counting and claiming procedures at the selected schools, all success criteria were met.

Technical Assistance: Technical assistance was provided to download and upload all direct certification list sent by the state into the Meal Plus software. The director was reminded that even though the district participates in the Community Eligibility Provision that all direct certification list must be processed in a timely fashion.

Resource Management-SFA Level

This section evaluates whether the SFA used food service funds pursuant to USDA guidelines.

Key Functional Areas Covered: Maintenance of the nonprofit Child Nutrition Program (CNP) account, paid lunch equity, revenue from non-program foods, indirect costs, USDA Foods, and use of food service funds per federal and state guidelines.

Actual Performance: Based on evaluation of financial documentation, all success criteria were met.

General Program Compliance-SFA level

This section evaluates whether the SFA followed general program compliance as indicated by USDA guidelines.

Key Functional Areas Covered: Civil rights, onsite monitoring, Local School Wellness Policy, school environment report card, reporting and record keeping, food safety, School Breakfast and Summer Food Service Program outreach.

Actual Performance: Based on evaluation of documentation, all success criteria were met.

Commendations: All documentation is kept within the federal guidelines and was provided in a timely manner when requested during the review.

USDA Performance Standard 2

Meal Access and Reimbursement-School Level

This section evaluates whether the lunch menus for the review month and individual lunches served during the onsite visitation of reviewed schools meet minimum state and federal meal pattern requirements. In addition, breakfast service at Bishopville Primary was evaluated during the onsite visitation.

Key Functional Areas Covered: Meal counting and claiming procedures.

Actual Performance: Based on evaluation of documentation and observations made during the onsite visitation, all success criteria were met with one (1) exception.

Finding: Attendance rosters were used as the meal count record for breakfast in the classroom.

Corrective Action: Due to the improper point of service meal count, 211 breakfast meals from the day of service will not be claimed for reimbursement by Lee County. New rosters for each classroom will be developed and submitted to the state office along with verification of training for all teachers at schools offering breakfast in the classroom. The agenda, training material, and sign in sheet for the training will be submitted to the state agency.

Nutritional Quality and Meal Pattern-School Level

This section evaluates whether the lunch and breakfast (if applicable) menus for the review month and day of review at the reviewed schools met minimum state and federal meal pattern requirements.

Key Functional Areas Covered: Menu, standardized recipes, meal components and quantities, food production records, offer-versus-serve (OVS) guidelines, dietary specifications, and nutrient analysis.

Actual Performance: Based on evaluation of documentation and observations made during the onsite visitation, all success criteria were met with two (2) exceptions.

Finding: During breakfast in the classroom observation, students were observed not taking the required half cup of fruit.

Finding: During lunch observation, the staff was observed not following Offer vs. Serve (OVS) guidelines. The line was stopped and the staff was instructed how to properly follow OVS guidelines.

Corrective Action: All child nutrition managers and staff will be trained on OVS guidelines. The training, agenda, and sign-in sheet will be submitted to the state agency. All teachers involved with breakfast in the classroom will be trained on reimbursable meals and making sure all students take all required items.

General Program Compliance-School level

This section evaluates whether the SFA followed general program compliance as indicated by USDA guidelines.

Key Functional Areas Covered: Civil rights, Local School Wellness Policy, Smart Snacks in School, water, reporting and record keeping, and food safety.

Actual Performance: Based on evaluation of documentation and observations made during the onsite visitation, all success criteria were met with two (2) exceptions.

Finding: Items observed in storage in the cooler and freezer at Bishopville Primary were not properly labeled and dated.

Finding: HACCP checklist and manager observation forms were not being completed in compliance with the HACCP policy implemented by the district.

Corrective Action: All child nutrition staff will be trained on proper labeling and dating of all items in storage. All managers will be trained on properly completing all HACCP documentation. For both trainings, an agenda, training material, and a sign in sheet will be submitted to the state agency.

South Carolina Student Health and Fitness Act-School Level

This section evaluates local progress in implementing state-specific nutrition standards for reviewed schools serving a K-5 population.

Key Functional Areas Covered: Food and beverages sold on K-5 school property during the regular school day, as well as student input on cafeteria menu and related activities.

Actual Performance: Based on evaluation of documentation and observations made during the onsite visitation, all success criteria were met.

Other Federal Program Reviews-School Level

This section evaluates compliance with other related federal programs, as may be applicable.

Key Functional Areas Covered: Afterschool Snack Program (ASP), Fresh Fruit and Vegetable Program and Special Milk Program.

Actual Performance: This district participates in Afterschool Snack Program at Bishopville Primary. Based on evaluation of documentation and observations made during the onsite visitation, all success criteria were met with one exception.

Finding: Rosters are required to ensure a proper point of service for Afterschool Snack Program. The program at Bishopville Primary was not using rosters to ensure a proper point of service and that all students were receiving a reimbursable snack.

Corrective Action: All child nutrition staff and afterschool snack staff will be trained on proper documentation required to claim snacks and how to properly maintain rosters. The agenda, training material, and sign in sheet will be submitted to the state agency.

Fiscal Action: The value of inappropriate meals served and subsequently claimed in non-compliance with USDA counting and claiming requirements is \$447.02. However, this amount is below the \$600.00 USDA disregard threshold for adverse fiscal action. As such, the SFA is not required to repay SCDE. This disregard does not relieve the SFA of its obligation to complete all required corrective action associated with this finding.

Closure

The next step of the AR Process is to obtain a signature from you and Mrs. Shirley Joe acknowledging that you have received the Corrective Action Plan document and agree to its terms and conditions. The original copy of the signed document should be returned to Ms. Mason by May 5, 2017. Fiscal action is only required if the amount cited is above the \$600 threshold; therefore, no repayment of funds is required for this review.

Upon completion of the Corrective Action Plan by the target date of May 5, 2017, please forward the required documentation to Ms. Mason. If you have any questions concerning the review processes, please contact Ms. Mason at (803) 734-8199 or emason@ed.sc.gov. Once your corrective action plan has been approved, a final closure letter will then be mailed to you.

Corrective Action Plan for Administrative Review (AR)

SFA: SC Opportunity School- Bishopville Primary

Date of Onsite AR: February 23, 2017

Areas Needing Corrective Action (1)	Planned Corrective Action Activities (2)	Person(s) Responsible (3)	Timeframe (4)	Verification (5)
USDA Performance Standard 2: Meal Counting and Claiming	Ensure proper point of service and rosters are used for breakfast in the classroom	Foodservice Director, Manager	May 5, 2017	Meal count rosters for each classroom will be developed and submitted to the state office along with training for all teachers at schools offering breakfast in the classroom. The agenda, training material, and sign in sheet for the training will be submitted to the state agency.
USDA Performance Standard 2: Offer-versus-serve (OVS) guidelines	Ensure all staff understand and implement OVS	Foodservice Director, Manager	May 5, 2017	All managers and the director must complete the Reimbursable Meals for Managers Course and Post Test provided by inTEAM. The director will print out the post test for the managers to take after watching the webinar. The completed post test will be submitted to the state agency along with a sign in sheet for the training.
USDA Performance Standard 2: Food Safety	Ensure all HACCP procedures and principals are followed.	Foodservice Director, Manager	May 5, 2017	All district child nutrition staff will be trained on proper labeling and dating of all items in storage. All managers will be trained on properly completing all HACCP documentation. For both trainings, an agenda, training material, and a sign in sheet will be submitted to the state agency.
USDA Performance Standard 2: Afterschool Snack Program	Ensure rosters are properly used for Afterschool Snack Program	Foodservice Director, Manager	May 5, 2017	All child nutrition staff and afterschool program staff will be trained on proper documentation required to claim snacks and how to properly maintain rosters. The agenda, training material, and sign in sheet will be submitted to the state agency.
Signature of SFA Representative:				Date:
Signature of Child Nutrition Program Representative:				Date:
Signature of SCDE Administrative Review Liaison:				Date: