



STATE OF SOUTH CAROLINA
DEPARTMENT OF EDUCATION

MOLLY M. SPEARMAN
STATE SUPERINTENDENT OF EDUCATION

February 28, 2019

Dr. Tim Newman, Superintendent
Darlington County School District
PO Box 1117
Darlington, SC 29540

Dear Dr. Newman:

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). The findings of the review (to include a Corrective Action Plan, if applicable) were discussed 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:

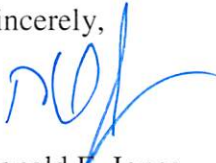
- Free and Reduced Price Meal Benefits Certification;
- Meal Access and Reimbursement;
- Resource Management;
- Nutritional Integrity of Meals and All Other Foods Sold in Schools; and
- Other Related Federal Programs.

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In addition to an evaluation of key SFA administrative processes and records, onsite visitation(s) were/was made 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 your lead reviewer.

Sincerely,



Ronald F. Jones
Director, Office of Health and Nutrition

RFJ/ejm
Attachment

cc: Dawn Johnson, Child Nutrition Program Director
Donna Davis, District Services Team Lead, SCDE Office of Health and Nutrition
Ellen Mason, Education Associate, SCDE Office of Health and Nutrition

Darlington County School District

On Site Review Dates: November 27-30, 2018

<u>Director</u> : Dawn Johnson	<u>Telephone</u> : 843-398-2315 <u>Email</u> : dawn.johnson@darlington.k12.sc.us
<u>Lead Reviewer</u> : Ellen Mason	<u>Telephone</u> : 803-734-8199 <u>Email</u> : emason@ed.sc.gov
<u>Review Month</u> : December 2018	<u>Review Week</u> : January 23-25, 2019
<u>Pre Conference Date</u> : November 7, 2018 <u>Attendance</u> : Dawn Johnson, Carolyn Vaughan, Ellen Mason, Josh Kixmiller	<u>Exit Conference Date</u> : January 25, 2019 <u>Attendance</u> : Dr. Tim Miller, Renee Douglas, Dawn Johnson, Krystal Waldrop, Ellen Mason, and Josh Kixmiller

Site Visited	Day of Review	Reviewer	Site Manager
Washington Street Elementary	January 23, 2019	Krystal Waldrop and Josh Kixmiller	
Brunson-Dargon Elementary	January 24, 2019	Ellen Mason	
Thornwell School for the Arts	January 24, 2019	Krystal Waldrop and Josh Kixmiller	



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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, 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.

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

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

Key Functional Areas Covered: Civil rights, SFA onsite monitoring, Local School Wellness Policy and school meal environment, smart snacks, professional standards, water availability, Food Safety, storage, and Buy American, reporting and record keeping, food safety, School Breakfast and Summer Food Service Program outreach.

Actual Performance: Based on evaluation of documentation, exceptions were identified and are annotated on the attached Corrective Action Plan.

Commendations: The district office staff was easy to work with and always quick to respond to every request made by the review team.

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 Washington Street and Thornwell School of the Arts 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.

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: Meal components and quantities, offer versus serve, dietary specifications and nutrient analysis and certifying a School Food Authority for performance-based reimbursement.

Actual Performance: Based on evaluation of documentation and observations made during the onsite visitation, exceptions were identified and are annotated on the attached Corrective Action Plan.

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, food safety, storage and buy American.

Actual Performance: Based on evaluation of documentation and observations made during the onsite visitation, exceptions were identified and are annotated on the attached Corrective Action Plan.

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

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

Key Functional Areas Covered: Afterschool Snack service, Seamless Summer Option, and Fresh Fruit and Vegetable Program.

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

Closure

The next step of the AR Process is for you to execute and return the attached Corrective Action Plan by March 29, 2019.

Upon completion of the Corrective Action Plan by the target date of March 29, 2019, please forward the required documentation to Ellen Mason. Once your Corrective Action Plan has been approved, a final closure letter will then be mailed to you.

Corrective Action Plan (CAP) for Administrative Review (AR)

SFA: Darlington County School District

Date of On-Site AR: January 23-25, 2019

Date CAP due: March 29, 2019

Location SFA Office or Site (1)	Areas Needing Corrective Action (2)	On-Site Observation Federal Citation (3)	Required Corrective Action (4)	Fiscal Action (5)	Please List Person(s) Responsible Name/Title (6)
SFA Office	USDA Performance Standard 1 General Program Compliance: Civil Rights	<p>The procedure for handing Civil Right complaints did not include the full non-discrimination statement.</p> <p><u>NS Instruction 113 for Civil Rights</u> <u>(IX) (A) (3) Nondiscrimination Statement.</u> All information materials and sources, including Web sites, used by FNS, State agencies, local agencies, or other subrecipients to inform the public about FNS programs must contain a nondiscrimination statement. It is not required that the nondiscrimination statement be included on every page of the program information Web site. At the minimum, the nondiscrimination statement, or a link to it, must be included on the home page of the program information.</p> <p>210.23 (b) Civil rights. In the operation of the Program, no child shall be denied benefits or be otherwise discriminated against because of race, color, national origin, age, sex, or disability. State agencies and school food authorities shall comply with the requirements of: Title VI of the Civil Rights Act of 1964; title IX of the Education Amendments of 1972; section 504 of the Rehabilitation Act of 1973; the Age Discrimination Act of 1975; Department of Agriculture regulations on nondiscrimination (<u>7 CFR parts</u> 15, 15a, and 15b); and FNS Instruction 113-1.</p>	Revise the Civil Rights complaint form to include the correct non-discrimination statement and submit it to the state agency.		
SFA Office	USDA Performance Standard 1 General Compliance: School Meal Environment	<p>Students were not allowed to select meals when going through the cafeteria line. Although the school receives, a count prior to service for meals students must be allowed to change their minds once in the serving line.</p> <p>7 CFR 210.10- (e)Offer versus serve for grades K through 12. School lunches must offer daily the five food components specified in the meal pattern in paragraph (c) of this section. Under offer versus serve, students must be allowed to decline two components at lunch, except that the students must select at least 1/2 cup of either the fruit or vegetable component. Senior high schools (as defined by the State educational agency) must participate in offer versus serve.</p>	Retrain all managers and staff that students are allowed to make choices once they enter the cafeteria line no matter what they pre-ordered. Please submit training material, agenda, and sign-in sheet to state agency.		

		Schools below the senior high level may participate in offer versus serve at the discretion of the school food authority.			
SFA Office	USDA Performance Standard 2 Nutritional Quality and Meal Pattern-School: Nutrient Analysis	<p>Dietary specifications and recipes have not been changed to reflect new products and pack sizes from Gordon versus US Food</p> <p>§ 210.10 Meal requirements for lunches and requirements for afterschool snacks. (4)Adjustments to the school menus. Schools must adjust future menu cycles to reflect production and how often the food items are offered. Schools may need to change the foods offerings given students' selections and may need to modify recipes and other specifications to make sure that meal requirements are met.</p> <p>(5)Standardized recipes. All schools must develop and follow standardized recipes. A standardized recipe is a recipe that was tested to provide an established yield and quantity using the same ingredients for both measurement and preparation methods. Standardized recipes developed by USDA/ FNS are in the Child Nutrition Database. If a school has its own recipes, they may seek assistance from the State agency or school food authority to standardize the recipes. Schools must add any local recipes to their local database as outlined in FNS guidance.</p>	Submit recipes and updated nutrient analysis for the review week to reflect new products and product numbers from Gordon to state agency.		
Thornwell School for the Arts	Performance Standard 2 General Program Compliance – School Level Food Safety	<p>Upon review of the temperature logs it was found that the walk-in freezer temperatures had varied from 10 degrees to negative 10 degrees. Upon further examination and interviewing of employees, it was found that the freezer has been a persistent problem.</p> <p>210.13 Facilities management- 2 (d) Storage. The school food authority shall ensure that the necessary facilities for storage, preparation and service of food are maintained. Facilities for the handling, storage, and distribution of purchased and donated foods shall be such as to properly safeguard against theft, spoilage and other loss.</p>	Please submit a copy of the work order to show that a routine maintenance check has been completed.		

Signature of SFA Representative:

Date:

Signature of School Foodservice Representative:

Date:

Signature of Administrative Reviewer:

Date:

Technical Assistance (TA) for Administrative Review (AR)

SFA: Darlington

Date of On-Site AR: January 23-25, 2019

Location SFA Office or Site (1)	Areas Requiring TA (2)	TA Received Supporting Documentation (3)	TA Provided by: Person Receiving TA: (4)
SFA Office	USDA Performance Standard 1 School Food Authority: 900-SFA On Site Monitoring	<p>The old on-site monitoring form was used for the 2017-18 and the start of 2018-19 school year. The new form was printed and will be used for the remainder of the 2018-19 reviews and subsequent school year.</p> <p>210.8(a)(1) On-site reviews. Every school year, each school food authority with more than one school shall perform no less than one on-site review of the counting and claiming system and the readily observable general areas of review cited under § 210.18(h), as prescribed by FNS for each school under its jurisdiction. The on-site review shall take place prior to February 1 of each school year. Further, if the review discloses problems with a school's meal counting or claiming procedures or general review areas, the school food authority shall: ensure that the school implements corrective action; and, within 45 days of the review, conducts a follow-up on-site review to determine that the corrective action resolved the problems.</p>	Provided by: <u>Krystal Waldrop</u> Received by: <u>Dawn Johnson</u>
Battery Creek High School	USDA Performance Standard 2 General Program Compliance School Level 1409- Food safety	<p>Make sure all food safety inspections are visible even when cafeteria doors are closed.</p> <p>210.13 Facilities management- (b) Food safety inspections. Schools shall obtain a minimum of two food safety inspections during each school year conducted by a State or local governmental agency responsible for food safety inspections. They shall post in a publicly visible location a report of the most recent inspection conducted, and provide a copy of the inspection report to a member of the public upon request. Sites participating in more than one child nutrition program shall only be required to obtain two food safety inspections per school year if the nutrition programs offered use the same facilities for the production and service of meals. (c) Food safety program. The school food authority must develop a written food safety program that covers any facility or part of a facility where food is stored, prepared, or served. The food safety program must meet the requirements in paragraph (c)(1) or paragraph (c)(2) of this section, and the requirements in §210.15(b)(5).</p>	Provided by: <u>Josh Kixmiller</u> Received by: <u>Dawn Johnson</u>