



STATE OF SOUTH CAROLINA
DEPARTMENT OF EDUCATION

MOLLY M. SPEARMAN
STATE SUPERINTENDENT OF EDUCATION

October 25, 2018

Mr. David Green, Executive Director
AMIKids Piedmont
20238 Hwy 72 East
Clinton, SC 29325

Dear Mr. Green:

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.

Mr. Green
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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/tt

Attachment

cc: Ms. Tomika Allen, Business Manager
Donna Davis, District Services Team Leader, SCDE Office of Health and Nutrition
Tonza Thomas, Education Associate, SCDE Office of Health and Nutrition

AMIKids Piedmont

September 27-28, 2018

<u>Director:</u> David Green	<u>Telephone:</u> (864) 833-4505 <u>Email:</u> piedmont-ed@amikids.org
<u>Lead Reviewer:</u> Tonza Thomas	<u>Telephone:</u> (803)734-8204 <u>Email:</u> tthomas@ed.sc.gov
<u>Review Month:</u> August 2018	<u>Review Week:</u> August 20-26, 2018
<u>Pre Conference Date:</u> August 8, 2018 <u>Attendance:</u> Tomika Allen	<u>Exit Conference Date:</u> September 28, 2018 <u>Attendance:</u> Tomika Allen

Site Visited	Day of Review	Reviewer	Site Manager
AMIKids Piedmont	September 27,2018	Tonza Thomas	



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Administrative Review Process

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.

Meal Access and Reimbursement

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 AMIKids Piedmont was evaluated during the onsite visitation.

Key Functional Areas Covered: Free and reduced eligibility applications (if applicable), certification and benefit issuance, verification and meal counting and claiming.

Actual Performance: Based on evaluation of eligibility records and meal counting and claiming procedures at the selected schools, exceptions were identified and are annotated on the attached Corrective Action Plan.

Meal Pattern and Nutritional Quality

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 eligibility records and meal counting and claiming procedures at the selected schools, exceptions were identified and are annotated on the attached Corrective Action Plan.

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 eligibility records and meal counting and claiming procedures at the selected schools, 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 eligibility records and meal counting and claiming procedures at the selected schools, exceptions were identified and are annotated on the attached Corrective Action Plan.

Other Federal Program Reviews- SFA and School Level

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 eligibility records and meal counting and claiming procedures at the selected schools, all success criteria were met.

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: Not applicable

Closure

The next step of the AR Process is for you to execute and return the attached Corrective Action Plan by December 3, 2018.

Upon completion of the Corrective Action Plan by the target date of December 3, 2018, please forward the required documentation to Tonza Thomas. *Fiscal action is only required if the amount cited is above the \$600 threshold; therefore, no repayment of funds is required for this review.* 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: AMIKids Piedmont

Date of On-Site AR: September 27-28, 2018

Date CAP due: December 10, 2018

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)
AMIKids Piedmont	USDA Performance Standard 1 School Food Authority: Counting and Claiming	Ensure counting and claiming procedures are accurate and consistent. <i>210.18(g)(1) Performance Standard 1 (All free, reduced price and paid school meals claimed for reimbursement are served only to children eligible for free, reduced price and paid school meals, respectively; and are counted, recorded, consolidated and reported through a system which consistently yields correct claims.)</i> The State agency must follow review procedures stated in this section and as specified in the <i>FNS Administrative Review Manual</i> to ensure that the school food authority's certification and benefit issuance processes for school meals offered under the National School Lunch Program, and School Breakfast Program are conducted as required in part 245 of this chapter, as applicable.	SFA revised and resubmitted August 2018 claims for lunch, and afterschool snack. In addition the SFA must submit September 2018 meal counting rosters and summary sheets for the breakfast, lunch and afterschool snack program. Claim preparer must complete the Counting and Claiming training through inTEAM and submit certificate of completion.	The value of breakfast claimed in non-compliance with USDA certification and benefit issuance requirements for August 2018 is \$3.39. 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 does not relieve the SFA of its obligation to complete all required corrective action associated with this finding.	
	USDA Performance Standard 2 General Compliance: Local Wellness Policy	The SFA must ensure that the Local Wellness policy meets the Healthy, Hunger-Free Kids Act of 2010 (HHFKA) regulations as well as USDA meal pattern requirements <i>210.18(x) Local school wellness.</i> The State agency shall ensure the local educational agency complies with the local school wellness requirements set forth in §210.30. <i>210.12(e) Local school wellness policies.</i> Local educational agencies must comply with the provisions of §210.30(d)	Submit supporting documentation that Local School Wellness Policy and assessment was made available to the public via web address, distribution packet, or email.		

		regarding student, parent, and community involvement in the development, implementation, and periodic review and update of the local school wellness policy.			
	USDA Performance Standard 2 General Compliance: Meal Components and Quantities	<p>The SFA must ensure the meal pattern requirements are met for the appropriate age/grade groups on all reimbursable meal service lines.</p> <p>210.18 (g) (2) <i>Performance Standard 2 (Lunches claimed for reimbursement by the school food authority meet the meal requirements in §210.10, as applicable to the age/grade group reviewed. Breakfasts claimed for reimbursement by the school food authority meet the meal requirements in §220.8 of this chapter, as applicable to the age/grade group reviewed.)</i> The State agency must follow review procedures, as stated in this section and detailed in the FNS Administrative Review Manual, to ensure that meals offered by the school food authority meet the food component and quantity requirements and the dietary specifications for each program, as applicable.</p> <p>220.8(c) (c) <i>Meal requirements for breakfasts.</i> A school must offer the food components and quantities required in the breakfast meal pattern established. Schools must offer 1 cup of fruit daily and 5 cups of fruit weekly. Vegetables may be substituted for fruits, but the first two cups per week of any such substitution must be from the dark green, red/orange, beans and peas (legumes) or "Other vegetables" subgroups, as defined in §210.10(c)(2)(iii) of this chapter.</p>	Email was sent to AMIKids corporate office detailing menu error. Deshawn submitted revised breakfast menu to reflect the appropriate fruit quantities for breakfast.		
	USDA Performance Standard 2 General Compliance: Food Safety	<p>SFA must ensure temperature log forms are completed daily as specified in the HACCP Plan.</p> <p>210.13(c) <i>Facilities management.</i> 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</p>	SFA must submit temperature log forms for the month of October 2018.		

paragraph (c)(2) of this section, and the requirements in §210.15(b)(5).

210.15(b)(5) Reporting and recordkeeping.
In order to participate in the Program, a school food authority or a school, as applicable, must maintain records to demonstrate compliance with Program requirements. These records include but are not limited to: Records from the food safety program for a period of six months following a month's temperature records to demonstrate compliance with §210.13(c), and records from the most recent food safety inspection to demonstrate compliance with §210.13(b);

Signature of SFA Representative:

Date:

Signature of School Foodservice Representative:

Date:

Signature of Administrative Reviewer:

Date:

Location SFA Office or Site (1)	Areas Requiring TA (2)	TA Received Supporting Documentation (3)	TA Provided by: Person Receiving TA: (4)
AMIKids Piedmont	USDA Performance Standard 2 School Food Authority: 300-Meal Counting and Claiming	<p>There is no signage explaining what constitutes a reimbursable meal to students including the requirement to select at least 1/2 cup fruit or vegetable.</p> <p>Appropriate signage for breakfast and lunch was printed and mailed to AMIKids Piedmont. Signage was place on serving line.</p> <p>210.18(g)(2) (I) Observe a significant number of program meals, as described in the <i>FNS Administrative Review Manual</i>, at each serving line and review the corresponding documentation to determine whether all reimbursable meal service lines <i>offer</i> all of the required food components/items and quantities for the age/grade groups being served, as required under §210.10, as applicable, and §220.8 of this chapter, as applicable. Observe meals at the beginning, middle and end of the meal service line, and confirm that signage or other methods are used to assist students in identifying the reimbursable meal. If the State agency identifies missing components or inadequate quantities prior to the beginning of the meal service, it must inform the school food authority and provide an opportunity to make corrections. Additionally, if visual observation suggests that quantities offered are insufficient or excessive, the State agency must require the reviewed schools to provide documentation demonstrating that the required amounts of each component were available for service for each day of the review period.</p>	<p>Provided by: <u>Tonza Thomas</u></p> <p>Received by: <u>Tomika Allen,</u> <u>Business Manager</u></p>

AMIKids Piedmont	USDA Performance Standard 1 School Food Authority: 700- Resource Management	SLP-4 Financial Form was completed and submitted, however the form was completed incorrectly. Appropriate corrections were made and the SLP-4 Financial Form was resubmitted. 210.14 (a) <i>Resource management.</i> Nonprofit school food service. School food authorities shall maintain a nonprofit school food service. Revenues received by the nonprofit school food service are to be used only for the operation or improvement of such food service, except that, such revenues shall not be used to purchase land or buildings, unless otherwise approved by FNS, or to construct buildings. Expenditures of nonprofit school food service revenues shall be in accordance with the financial management system established by the State agency under §210.19(a) of this part. School food authorities may use facilities, equipment, and personnel supported with nonprofit school food revenues to support a nonprofit nutrition program for the elderly, including a program funded under the Older Americans Act of 1965 (42 U.S.C. 3001 et seq.).	Provided by: <u>Tonza Thomas</u> Received by: <u>Tomika Allen,</u> <u>Business Manager</u>
AMIKids Piedmont	USDA Performance Standard 2 School Food Authority: 1700 - Afterschool Snack	Program was not monitored within the first 4 weeks of operation, however it was monitored towards the beginning of the school year. 210.9(c)(7) <i>Afterschool care requirements.</i> Those school food authorities with eligible schools (as defined in §210.10(n)(1)) that elect to serve meal supplements during afterschool care programs, shall agree to: Review each afterschool care program two times a year; the first review shall be made during the first four weeks that the school is in operation each school year, except that an afterschool care program operating year round shall be reviewed during the first four weeks of its initial year of operation, once more during its first year of operation, and twice each school year thereafter.	Provided by: <u>Tonza Thomas</u> Received by: <u>Tomika Allen,</u> <u>Business Manager</u>