

**STATE OF SOUTH CAROLINA**  
**DEPARTMENT OF EDUCATION**

**MOLLY M. SPEARMAN**  
*STATE SUPERINTENDENT OF EDUCATION*

April 18, 2019

Dr. Marcella Heyward, Superintendent  
Barnwell School District 29  
12255 Main Street  
Williston, SC 29853

Dear Dr. Heyward:

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:

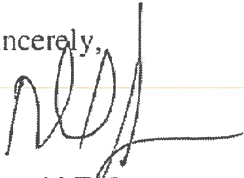
- Free and Reduced Price Meal Benefits Certification;
- Meal Access and Reimbursement;
- Resource Management;
- Nutritional Integrity of Meals and All Other Foods Sold in Schools; and
- Other Related Federal Programs.

Dr. Heyward  
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In addition to an evaluation of key SFA administrative processes and records, onsite visitation 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,

A handwritten signature in black ink, appearing to read 'RFJ', with a horizontal line extending to the right.

Ronald F. Jones  
Director, Office of Health and Nutrition

RFJ/hz

Attachment

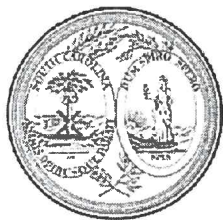
cc: Teresa Zorn, Child Nutrition Program Director, Barnwell School District 29  
Rose Anderson, Chief Financial Officer, Barnwell School District 29  
Donna Davis, District Team Leader, SCDE Office of Health and Nutrition  
Heather Zwiker, Education Associate, SCDE Office of Health and Nutrition

Barnwell School District 29

On Site Review Dates: March 20-22, 2019

<u>Director:</u> Teresa Zorn	<u>Telephone:</u> (803) 266-7878
	<u>Email:</u> tzorn@bsd45.net
<u>Lead Reviewer:</u> Heather Zwiker	<u>Telephone:</u> (803) 734-6049
	<u>Email:</u> hzwiker@ed.sc.gov
<u>Review Month:</u> February 2019	<u>Review Week:</u> Feb. 4-8, 2019
<u>Pre Conference Date:</u> January 9, 2019	<u>Exit Conference Date:</u> March 22, 2019
<u>Attendance:</u> Rose Anderson, CFO Teresa Zorn, SFS Director Heather Zwiker, Education Associate	<u>Attendance:</u> Teresa Zorn, SFS Director Heather Zwiker, Education Associate Recorded for Superintendent

Site Visited	Day of Review	Reviewer	Site Manager
Kelly Edwards Elementary	March 21, 2019	Heather Zwiker	Lila Smith



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**Administrative Review Process**

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**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.

**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.

Commendations: Rose Anderson did a great job assisting the SFS staff while they operated without a SFS Director for the first half of the year. This helped to ensure a smooth Administrative Review. Teresa Zorn was hired just days before the Administrative Review. She recovered a significant amount of claim money that had initially been missed. She saved the program a significant amount of money.

**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.

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## **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 Kelly Edwards Elementary 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.

**Commendations:** Lila Smith, and the SFS staff at Kelly Edwards Elementary School, did a commendable job ensuring the program ran smoothly, and maintained standards, when they did not have a Director for the first half of the school year. Thank you all for your dedication to feeding South Carolina students healthy meals.

### **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.

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**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. Fresh Fruit and Vegetable Program will be reviewed at a later date.

**Closure**

The next step of the AR Process is for you to execute and return the attached Corrective Action Plan by May 24, 2019.

Upon completion of the Corrective Action Plan by the target date of May 24, 2019, please forward the required documentation to Heather Zwiker. Once your Corrective Action Plan has been approved, a final closure letter will then be mailed to you.

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

SFA: Barnwell 29

Date of On-Site AR: March 20-22, 2019

Date CAP due: May 24, 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 Level	USDA Performance Standard 1 General Compliance: Civil Rights	The SFA did not publish a public release as required for the SY being reviewed.  § 210.12 Student, parent, and community involvement.  (d) <i>Outreach activities.</i> (1) To the maximum extent practicable, school food authorities must inform families about the availability breakfasts for students. Information about the School Breakfast Program must be distributed just prior to or at the beginning of the school year. In addition, schools are encouraged to send reminders regarding the availability of the School Breakfast Program multiple times throughout the school year.	SFS should provide the SA a statement of how they will ensure the media release goes out each SY.		
SFA Level	USDA Performance Standard 1 General Compliance: Reporting & Record Keeping	Claims have been turned in late for the whole SY.  § 210.15 Reporting and recordkeeping.  (a) <i>Reporting summary.</i> Participating school food authorities are required to submit forms and reports to the State agency or the distributing agency, as appropriate, to demonstrate compliance with Program requirements.	Provide a plan to ensure claims are entered on time.		
SFA Level Kelly Edwards Elementary School	USDA Performance Standard 1 General Compliance: Food Safety	Section 2-3 Operation Assessment was not completed.  § 210.13 Facilities management.  (c) <i>Food safety program.</i> 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.	Provide copy of completed HACCP Section 2-3.		
Kelly Edwards Elementary School	USDA Performance Standard 2 Nutritional Quality & Meal Pattern:	The cherry & apple strudel does not meet the grain requirements.	Provide a written statement on how the SFA will meet the grain requirements for days they are serving cherry & apple strudel.		

Meal Components &  
Quantities - Breakfast

According to the Simplified Nutrient Analysis, the calories are too low for Breakfast. Possibly due to not recording the milk on the 6 cent wkst. Discussed the need to put milk on 6 Cent Wkst.

Grain based desserts are served during breakfast for CACFP, and juice was served twice in a day.

**§ 210.18Administrative reviews.**

*(2) 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.)* 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. Review of these critical areas may occur off-site or on-site. The State agency must also follow procedures consistent with this section, as specified in the FNS *Administrative Review Manual*, to review applicable areas of Performance Standard 2 in the National School Lunch Program's Afterschool Snacks and Seamless Summer Option, and in the Special Milk Program.

*(i) Food components and quantities.* For each school selected for review, the State agency must complete a USDA-approved menu tool, review documentation, and observe the meal service to ensure that meals offered by the reviewed schools meet the meal patterns for each program. To review this area, the State agency must:

(A) Review menu and production records for the reviewed schools for a minimum of one school week (*i.e.*, a minimum number of three consecutive school days and a maximum of seven consecutive school days) from the review period. Documentation, including food crediting documentation, such as food labels, product formulation statements, CN labels and

Director attended the 6 Cent Worksheet Workshop on March 26-27, 2019. This finding is completed and no other action is needed.

Provide a menu for Pre-K breakfast, and a written plan for ensuring Pre-K students only receive one juice daily. Menu should also include grains that meet the Pre-K grain requirements.



bid documentation, must be reviewed to ensure compliance with the lunch and breakfast meal patterns. If the documentation review reveals problems with food components or quantities, the State agency must expand the review to, at a minimum, the entire review period. The State agency should consider a school food authority compliant with the school meal pattern if:

(1) When evaluating the daily and weekly range requirements for grains and meat/meat alternates, the documentation shows compliance with the daily and weekly minimums for these components, regardless of whether the school food authority has exceeded the recommended weekly maximums for the same components.

**Signature of SFA Representative:**

**Dale:**

**Signature of School Foodservice Representative:**

Date: \_\_\_\_\_

**Signature of Administrative Reviewer:**

Date: \_\_\_\_\_