



STATE OF SOUTH CAROLINA
DEPARTMENT OF EDUCATION

MOLLY M. SPEARMAN
STATE SUPERINTENDENT OF EDUCATION

April 18, 2019

Dr. William James, Jr., Superintendent
Lexington School District Two
715 Ninth Street
West Columbia, SC 29169

Dear Dr. James:

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:

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- 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.

In addition to an evaluation of key SFA administrative processes and records, onsite visitations were 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/rak

Attachment

cc: Rion Skinner, Child Nutrition Program Director
Pam Bienkoski, School District Liaison
Donna Davis, District Services Team Leader, SCDE Office of Health and Nutrition
Rebecca Kenner, Education Associate, SCDE Office of Health and Nutrition

Lexington School District Two

On Site Review Dates: March 26-29, 2019

<u>Director</u> : Rion Skinner	<u>Telephone</u> : 803-739-4010 <u>Email</u> : Rion.Skinner@sodexo.com
<u>Lead Reviewer</u> : Rebecca Kenner	<u>Telephone</u> : 803-734-9818 <u>Email</u> :
<u>Review Month</u> : February	<u>Review Week</u> : February 11-15, 2019
<u>Pre Conference Date</u> : February 5, 2019 <u>Attendance</u> : Pam Bienkoski, Rion Skinner, Emelia Brown, and Rebecca Kenner	<u>Exit Conference Date</u> : March 29, 2019 <u>Attendance</u> : Pam Bienkoski, Rion Skinner, Emelia Brown, Marty Rawls, and Rebecca Kenner

Site Visited	Day of Review	Reviewer	Site Manager
Airport High	March 26, 2019	Rebecca Kenner and Carla Garland	Pam Sanders
Pine Ridge Middle	March 28, 2019	Rebecca Kenner	Tonya Martin
Wood Elementary and Congaree/Wood Early Childhood Center	March 28, 2019	Carla Garland	Gladys Moore



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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 (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, 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 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, all success criteria were met.

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 Wood/Congaree-Wood Early Childhood Center and Pine Ridge Middle School were 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, all success criteria were met.

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.

Commendations: Tonya Martin, manager at Pine Ridge Middle School, displayed excellent communication and organizational skills with her staff as well as all school staff in administering Breakfast in the Classroom. Additionally, all serving lines were bright, vibrant, and full of healthy choices. Ms. Martin and her staff ensure that each grade level had the fresh choices and handled all foods in a safe manner.

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, exceptions were identified and are annotated on the attached Corrective Action Plan.

Closure

The next step of the AR Process is for you to execute and return the attached Corrective Action Plan by May 20, 2019.

Upon completion of the Corrective Action Plan by the target date of May 20, 2019, please forward the required documentation to Rebecca Kenner. 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: Lexington School District Two

Date of On-Site AR: March 26-29, 2019

Date CAP due: May 20, 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 School Food Authority: Free and reduced eligibility applications	<p>One denied application with one income with monthly frequently was denied incorrectly. Based USDA eligibility manual. The application should have been processed based on the monthly income stated without annual conversion. PCS software was contacted.</p> <p>210.(g)(1)(i) <i>Certification and benefit issuance.</i> The State agency must gather information and monitor the school food authority's compliance with program requirements regarding benefit application, direct certification, and categorical eligibility, as well as the transfer of benefits to the point-of-service benefit issuance document. To review this area, the State agency must obtain the benefit issuance document for each participating school under the jurisdiction of the school food authority for the day of review or a day in the review period, review all or a statistically valid sample of student certifications, and validate that the eligibility certification for free and reduced price meals was properly transferred to the benefit issuance document and reflects changes due to verification findings, transfers, or a household's decision to decline benefits. If the State agency chooses to review a statistically valid sample of student certifications, the State agency must use a sample size with a 99 percent confidence level of accuracy.</p>	<p>Changes were made within the district system to ensure that applications with one income frequency is processed as such according to the IEG and eligibility manual. Application has been updated and reprocessed accordingly. All other denied and reduced applications were doubled check for other potential errors.</p> <p>No further action is required regarding updating application.</p> <p>Any person converting income or processing application must attend Eligibility 101 training in July.</p>		
Airport High	USDA Performance Standard 2 General Compliance: Civil Rights	<p>The school/site failed to have the approved "And Justice for All" poster is posted in a prominent location and visible to all program participants.</p> <p>210.18(h)(ii) <i>Civil rights.</i> The State agency must examine the school food authority's compliance with the civil rights provisions specified in §210.23(b) to ensure that no child is</p>	<p>Place one poster in dining area for after the gates are pulled down and public can access information. Poster was moved to dining area.</p> <p>No further action is needed.</p>		

		denied benefits or otherwise discriminated against in any of the programs reviewed under this section because of race, color, national origin, age, sex, or disability.			
Airport High	USDA Performance Standard 2 General Program Compliance – School Level Food Safety	<p>The site/school failed to post the most recent food safety inspection report in a publicly visible location.</p> <p>210.13(b) <i>Food safety inspections.</i> 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.</p>	<p>The inspection report was moved to the dining area.</p> <p>No further action is needed.</p>		
Airport High	USDA Performance Standard 2 Other Federal Programs – School Level	<p>Afterschool Snack Program (ASP) menu offerings did not match the production records. The ASP production record indicated inadequate portion sizes for meal components. On multiple days the fruit/juice offering on the production records, indicated only a 1/2 cup or 4 oz. serving. All fruit and vegetables must be 3/4 cup or 6 oz. in their portion size. This results in an over claim of 166 snacks in the amount of \$151.06. Fiscal action is only required if the amount cited is above the \$600 threshold; therefore, no repayment of funds is required for this review. This does not alleviate the SFA's responsibility to ensure that correct portion sizes are served.</p> <p>210.10(a)(ii) <i>Requirements for afterschool snacks.</i> Schools offering afterschool snacks in afterschool care programs must meet the meal pattern requirements in paragraph (o) of this section. Schools must plan and produce enough food to offer each child the minimum quantities under the meal pattern in paragraph (o) of this section.</p> <p>210.10 (o) <i>Afterschool snacks.</i> Eligible schools operating afterschool care programs may be reimbursed for one afterschool snack served to a child (as defined in §210.2) per day. (2) <i>Afterschool snack requirements for grades K through 12.</i> Afterschool snacks must contain two different components from the following four:(i) A serving of fluid milk (ii) A serving of meat or meat alternate (iii) A serving of vegetable or fruit, or full-strength vegetable or fruit juice, or an equivalent quantity of any combination of these foods. Juice must not be served when fluid milk is served as the only other component. (iv) A serving of whole-grain or enriched bread</p>	<p>Submit April afterschool snack menu and production records.</p> <p>The manager at Airport High must complete the inTEAM module for Afterschool Snack Program. Submit posttest as evidence of completion.</p>		

Wood Elementary and Congaree Wood Early Childhood Center	USDA Performance Standard 2 General Program Compliance – School Level Food Safety	Apples served during the Breakfast in the Classroom (BIC) were delivered in a large plastic bag, however, the bag was open in a way that allowed students to touch more than one apple at a time with their bare hands. HACCP policy for a food service worker states, “Workers do not touch exposed cooked or ready-to-eat foods with their bare hands. <i>These foods must be handled using properly cleaned and sanitized utensils; non-latex, single-use gloves; deli tissues; or other acceptable utensils (South Carolina CK – Hygiene, Sanitation, and Facility Standards, pg. 29).</i> ”	Update BIC procedures to reflect how fruit with edible peel should be served (with tong, gloved hand, or individually wrapped). Submit revised copy to the State Agency.		
Signature of SFA Representative:				Date:	
Signature of School Foodservice Representative:				Date:	
Signature of Administrative Reviewer:				Date:	

Technical Assistance (TA) for Administrative Review (AR)

SFA: Lexington County School District Two

Date of On-Site AR: March 26-29, 2019

Location SFA Office or Site (1)	Areas Requiring TA (2)	TA Received Supporting Documentation (3)	TA Provided by: Person Receiving TA: (4)
Airport High School	USDA Performance Standard 2 Nutritional Quality and Meal Pattern – School Level Meal Components and Quantities	The recipe and production record for Shepard's Pie had one portion/one serving, but did not specifically say what the required portion/serving size by weight or volume. The plan-o-gram for line setup had the serving/scoop size indicted. The SFA was advised to update the recipe to include the volume/weight portion.	Provided by: <u>Rebecca Kenner</u> Received by: <u>Pam Sanders, Manager, and Maxine Grubbs, Field Supervisor</u>
Wood/CWECC	USDA Performance Standard 2 Nutritional Quality and Meal Pattern – School Level Meal Components and Quantities	<p>SFA did not update the Breakfast Menu to reflect items served on two different days.</p> <p>Food production records are the only records that demonstrate that meals and snacks served and claimed met meal requirements and are entitled to reimbursement. They are therefore required when planning and serving meals and/or snacks (SC Program Reference Manual, pg. 20-2).</p> <p>The SFA explained that it was necessary to swap the two days because some of the breakfast items were very ripe and ready to eat. Although, the action was necessary, they were reminded to update the menu indicating that a change was made and to ensure the menu and the production record match.</p>	Provided by: <u>Rebecca Kenner</u> Received by: <u>Gladys Moore, Manager, and Maxine Grubbs, Field Supervisor</u>