



STATE OF SOUTH CAROLINA
DEPARTMENT OF EDUCATION

MOLLY M. SPEARMAN
STATE SUPERINTENDENT OF EDUCATION

January 28, 2019

Mr. Barry Gaskey, Director of Operations
Greenville County Commission for Drug and Alcohol
975 Foothills Road
Greenville, SC 29617

Dear Mr. Gaskey:

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:

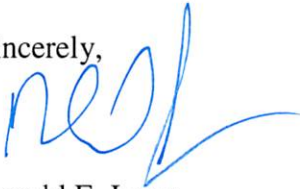
- Free and Reduced Price Meal Benefits Certification;
- Meal Access and Reimbursement;
- Resource Management;
- Nutritional Integrity of Meals and All Other Foods Sold in Schools; and
- Other Related Federal Programs.

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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/KLW

Attachment

cc: Ben Gold, Food Service Director
Kerrie Kennett, Site Manager
Donna Davis, District Services Team Leader, SCDE Office of Health and Nutrition
Krystal Waldrop, Education Associate, SCDE Office of Health and Nutrition

Greenville County Commission for Drug and Alcohol
On Site Review Dates: December 5-6, 2018

<u>Director:</u> Mr. Ben Gold	<u>Telephone:</u> 864-371-1272 <u>Email:</u> bgold@phoenixcenter.org
<u>Lead Reviewer:</u> Mrs. Krystal Waldrop	<u>Telephone:</u> 803-734-8196 <u>Email:</u> kwaldrop@ed.sc.gov
<u>Review Month:</u> October	<u>Review Week:</u> October 1-5, 2018
<u>Pre Conference Date:</u> October 30, 2018 <u>Attendance:</u> Kerrie Kennett, Ben Gold, Mrs. Krystal Waldrop, Mr. Josh Kixmiller	<u>Exit Conference Date:</u> October 12, 2018 <u>Attendance:</u> Kerrie Kennett, Ben Gold, Mrs. Krystal Waldrop, Mr. Josh Kixmiller

Site Visited	Day of Review	Reviewer	Site Manager
Greenville County Commission for Drug and Alcohol	December 6, 2018	Krystal Waldrop and Josh Kixmiller	Kerrie Kennett and Ben Gold



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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, 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.

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 Greenville City Commission on Alcohol 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, 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, 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 February 20, 2019.

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Upon completion of the Corrective Action Plan by the target date of February 20, 2019, please forward the required documentation to Mrs. Krystal Waldrop. 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: Phoenix Center

Date of On-Site AR: December 6, 2018

Date CAP due: February 28, 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 Compliance: Professional Standards	<p>Upon request of evidence of training, it was found that the SFA had not retained proper documentation to demonstrate compliance within the professional standards training regulations.</p> <p>Upon request of the professional standards training log, it was discovered that the SFA did not have a method for logging professional standards training hours.</p> <p>Upon review of the training documentation it was found that the FSD had not completed food safety training.</p> <p><i>Federal Register, Vol. 80, No. 40. Each school year, must complete at least 15 hours of annual continuing education/training in core areas, such as nutrition, operations, administration, communications, and marketing. Additional hours and topics may be specified by FNS annually, as necessary.</i></p> <p><i>CFR 210.30(g) School food authority oversight. Each school year, the school food authority director must document compliance with the requirements of this section for all staff with responsibility for school nutrition programs, including directors, managers, and staff. Documentation must be adequate to establish, to the State's satisfaction during administrative reviews, that employees are meeting the minimum professional standards. The school food authority must certify that: (1) The school nutrition programs director meets the hiring standards and training requirements set forth in paragraph (b) of this section; and (2) Each employee has completed the applicable training requirements in paragraphs (c) and (d) of this section no later than the end of each school year.</i></p>	The SFA must draft, and provide, a plan to ensure compliance for the remainder of this school year, and future school years.		

		<i>CFR 210.18(h)(2)(E)(ix) Professional standards. The State agency shall ensure the local educational agency and school food authority complies with the professional standards for school nutrition program directors, managers, and personnel established in §210.30.</i>			
Phoenix Center	Performance Standard 2 General Program Compliance – School Level Food Safety	<p>The SFA had only been receiving on health inspection each year. Additionally, no evidence requesting a second inspection was provided.</p> <p>Regulation 7 CFR 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>	Please provide a copy of a request for two health inspections per year.		

Signature of SFA Representative:	Date:
Signature of School Foodservice Representative:	Date:
Signature of Administrative Reviewer:	Date:

SFA: Phoenix Center

Date of On-Site AR: December 6, 2018

Location SFA Office or Site (1)	Areas Requiring TA (2)	TA Received Supporting Documentation (3)	TA Provided by: Person Receiving TA: (4)
Phoenix Center	<p>USDA Performance Standard 1 General Program Compliance:</p> <p>Civil Rights</p>	<p>TA was given on-site to complete the civil rights training. Log was uploaded.</p> <p>210.23 (b) <i>Civil rights</i>. 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 15, 15a, and 15b</u>); and FNS Instruction 113-1.</p> <p>DR 4120-001 (6)(c)(1)(a) annual mandatory and supplemental civil rights training to their respective employees, managers and supervisors, and civil rights practitioners pursuant to the OASCR-approved final annual civil rights training plan.</p> <p>210.23 (C) Retention of records. State agencies and school food authorities may retain necessary records in their original form or on microfilm. State agency records shall be retained for a period of 3 years after the date of submission of the final Financial Status Report for the fiscal year. School food authority records shall be retained for a period of 3 years after submission of the final Claim for Reimbursement for the fiscal year. In either case, if audit findings have not been resolved, the records shall be retained beyond the 3-year period as long as required for the resolution of the issues raised by the audit.</p> <p>CFR § 200.333 Retention requirements for records. Financial records, supporting documents, statistical records, and all other <u>non-Federal entity</u> records pertinent to a Federal award must be retained for a period of three years from the date of submission of the final expenditure report or, for Federal awards that are renewed quarterly or annually, from the date of the submission of the quarterly or annual financial report, respectively, as reported to the <u>Federal awarding agency</u> or <u>pass-through entity</u> in the case of a <u>subrecipient</u>. Federal awarding agencies and pass-through entities must not impose any other record retention requirements upon non-Federal entities.</p>	<p>Provided by: Josh Kixmiller</p> <p>Received by: Ben Gold</p>

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