

STATE OF SOUTH CAROLINA  
**DEPARTMENT OF EDUCATION**

MOLLY M. SPEARMAN  
*STATE SUPERINTENDENT OF EDUCATION*

March 18, 2019

SENT VIA CERTIFIED MAIL

Mrs. Kristin White, Principal  
Quest Leadership Academy  
29 Ridgeway Dr.  
Greenville, SC 29605

Dear Mrs. White:

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;

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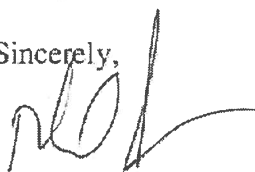
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- Nutritional Integrity of Meals and All Other Foods Sold in Schools; and
- Other Related Federal Programs.

In addition to an evaluation of key SFA administrative processes and records, onsite visitation(s) 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/hz

Attachment

cc: Deloris Summers, Child Nutrition Director  
Donna Davis, District Services Team Leader, SCDE Office of Health and Nutrition  
Heather Zwiker, Education Associate, SCDE Office of Health and Nutrition  
Stanley Montgomery, Fiscal Analyst III, SCDE, Office of Grants Accounting

Quest Leadership Academy

On Site Review Dates: 2/14/2019 – 2/15/2019

<u>Director:</u> Deloris Pinson-Summers	<u>Telephone:</u> 864-201-8591 <u>Email:</u> delorissummers1106@hotmail.com
<u>Lead Reviewer:</u> Heather Zwiker	<u>Telephone:</u> 803-734-6049 <u>Email:</u> hzwiker@ed.sc.gov
<u>Review Month:</u> January 2019	<u>Review Week:</u> January 7-11, 2019
<u>Pre Conference Date:</u> December 11, 2018  <u>Attendance:</u> Deloris Pinson-Summers, Child Nutrition Director Heather Zwiker, Education Associate	<u>Exit Conference Date:</u> 2/15/2019  <u>Attendance:</u> Deloris Pinson-Summers, Child Nutrition Director Heather Zwiker, Education Associate

Site Visited	Day of Review	Reviewer	Site Manager
Quest Leadership Academy	2/14/2019	Heather Zwiker	Deloris Pinson-Summers



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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, 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 documentation and observations made during the onsite visitation, 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 and observations made during the onsite visitation, 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 Quest Leadership Academy 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, exceptions were identified and are annotated on the attached Corrective Action Plan.

### **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:** FFVP had not been implemented at the time of the visit. This will be evaluated at another time.

**Closure**

The next step of the AR Process is for you to execute and return the attached Corrective Action Plan by April 12, 2019.

Pursuant to USDA guidelines (7-CFR-210.18(p) for State agency findings and 7-CFR 210.29(d)(3) for FNS findings) and procedures established by the SCDE, an SFA has the right to appeal any adverse administrative and/or fiscal action initiated by the SCDE Office of Health and Nutrition. Should you wish to appeal this action, you must do so in writing. Appeals must include the specific grounds for your petition and any supporting documentation that would warrant further consideration. Otherwise, your right to appeal shall be denied. Please submit the appeal via Certified Mail within fifteen (15) calendar days of receiving this notification to the following address:

Ronald F. Jones, Director  
Office of Health and Nutrition  
SC Department of Education  
1429 Senate Street, Room 704-A  
Columbia, SC 29201

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Subject to a decision to appeal these findings, please remit a check, payable to the South Carolina Department of Education, for \$4,569.34. The check should be sent to the attention of Stanley Montgomery in the SCDE Office of Grants Accounting within fifteen (15) calendar days of receiving this report. Upon receipt of the check and any required corrective action documentation, the review will be closed.

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SFA: Quest Leadership Academy

Date of On-Site AR: February 14-15, 2019

Date CAP due: April 8, 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: SFA Level  Meal Counting and Claiming	<p>The counts from all schools for the review period were not correctly consolidated and claimed by the SFA. Note: The problem was determined to be non-systemic.</p> <p>Cashier states that allergy students do not record in the POS and have to be added by hand. SFA was unable to provide any documentation to verify that claim. The meal counts in the POS must match the claim without adding in the additional students.</p> <p>After reviewing the documentation provided, Education Associate was unable to verify that the students that were added to the claim each month. They do not show on the POS end of month report, but are being added to the claim. The claim should match the End of Month Report. Currently, the SFA is submitting over claims.</p> <p><i>Administrative Review Guidance Manual 2018-2019 (pg.62)</i></p> <p><i>Fiscal action must be assessed for inaccurate meal counting and claiming for the day of review or review period occurring at the school and/or SFA level. For additional information on fiscal action, see Section VIII, Fiscal Action, of this manual.</i></p> <p><i>The SFA is allowed to correct any erroneous practices identified by the SA on the day of review. However, any error identified and any SA technical assistance provided on the day of review is still recorded on the On-site Assessment Tool. In addition, the SA must calculate</i></p>	<p>Due to the counting and claiming issues, the Director must complete a new Counting and Claiming On-Site Monitoring form for breakfast and lunch.</p> <p>Provide documentation showing that the claims and the End of Month reports for February and March 2019 reflect the same number of student claims.</p> <p>Provide certificates of completion for the following in Team courses: -Cashier must take: Counting for Cashiers Course -Director must take: Counting for Managers and Counting for Directors courses.</p>	<p>Fiscal Action included in the Meal Components and Quantities: Lunch</p>	



		<p><i>fiscal action for any violations identified prior to the correction of the erroneous practice. In these situations, the SFA should not correct their proposed Claim for Reimbursement based on the violations identified by the SA (see Section VIII, Fiscal Action, Module: Fiscal Action Formula). The SA will provide the SFA with the maximum allowable reimbursable meals based on all errors prior to the corrective action. The meals requiring fiscal action for the day of review at the school level are identified in Questions 318 and 321. The meals requiring fiscal action for the review period at the school level are identified in Questions 322 – 324.</i></p>			
SFA Office	<p><b>USDA</b> <b>Performance Standard 1: General Program Compliance</b> <b>Reporting and Recordkeeping</b></p>	<p>CEP records were not maintained for 3 years plus current. SFA was unable to provide a DC list during the visit.</p> <p><i>§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.</i></p>	<p>CEP documentation must be recreated using available documentation and submitted to the State Agency.</p> <p>Provide a written procedure for how the SFA will ensure future records are retained for the required time.</p> <p>Provide current DC list printed from the Point of Sales System.</p>		
SFA Office and Quest Leadership Academy Site	<p><b>USDA</b> <b>Performance Standard 1: SFA Level.</b> <b>Performance Standard 2: Meal Access and Reimbursement-School Level</b></p>	<p>209 meals were counted and served. However, none of the meals were reimbursable because no grain was offered. Ed, Associate informed the Director that none of those 209 meals could be claimed for reimbursement. When Ed, Associate asked them to put a grain out, so that the meals would be reimbursable, they said they didn't have one to put out. The Director was unavailable during lunch due to personal business.</p> <p><i>§210.18 (g)(B) On the day of review, the State agency must:</i></p> <p><i>(1) Observe a significant number of program meals, as described in the FNS Administrative Review Manual, at each serving line and review the corresponding documentation to determine whether all reimbursable meal service lines offer all of the required food</i></p>	<p>Director must provide certificate of completion for the "Nutritional Quality and Meal Pattern for Menu Planners" course and "Counting for Directors Course."</p>		

		<i>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.</i>			
<b>Quest Leadership Academy- School Level</b>	<b>USDA Performance Standard 2: Nutritional Quality and Meal Pattern – School Level</b>  Meal Components and Quantities: Breakfast	<p>During the visit it was discovered that for breakfast only one type of milk was offered on days with cereal (1 % white). Production Records support that discovery. Ed. Associate explained to the Director that two types of milk must be offered for every breakfast and lunch.</p> <p>Breakfast and Lunch: Production Records are not completed properly. According to Production Records the school never has any overages or underage on food. Including the day of review, which was short on several items and substitutions were made but not recorded.</p> <p><i>§210.18 (1)(2) Performance Standard 2 violations. Except as noted in paragraphs (1)(2)(iii) and (1)(2)(iv) of this section, a State agency is required to apply fiscal action for Performance Standard 2 violations as follows:</i></p> <p><i>(i) For missing food components or missing production records cited under paragraph (g)(2) of this section, the State agency must apply fiscal action.</i></p> <p><i>(ii) For repeated violations involving milk type and vegetable subgroups cited under paragraph (g)(2) of this section, the State agency must apply fiscal action as follows:</i></p> <p><i>(A) If an unallowable milk type is offered or there is no</i></p>	<p>Director should take “Nutritional Quality and Meal Pattern for Menu Planners” course on the inTeam website, and provide completion certificate.</p> <p>Director should take the “Food Production Records” course on the inTeam website, and provide completion certificate.</p>	<p><b>Fiscal Action: Breakfast</b></p> <p>Jan: 8 meals x \$2.14 = \$17.12</p> <p>Feb: 14 meals x \$2.14 = \$29.96</p> <p>Total: \$47.08</p>	

<p><b>Meal Components and Quantities:</b> Lunch</p>	<p><i>milk variety, any meals selected with the unallowable milk type or when there is no milk variety must also be disallowed/reclaimed.</i></p> <p>Production records and menus show that veggie subgroups were not being met on some weeks, grains were missing on some days, and missing the 4th fruit or veggie on most days.</p> <p><b>\$210.18 (1)(2) Performance Standard 2 violations.</b> Except as noted in paragraphs (1)(2)(iii) and (1)(2)(iv) of this section, a State agency is required to apply fiscal action for Performance Standard 2 violations as follows:</p> <p>(i) For missing food components or missing production records cited under paragraph (g)(2) of this section, the State agency must apply fiscal action.</p> <p>(ii) For repeated violations involving milk type and vegetable subgroups cited under paragraph (g)(2) of this section, the State agency must apply fiscal action as follows:</p> <p>(A) If an unallowable milk type is offered or there is no milk variety, any meals selected with the unallowable milk type or when there is no milk variety must also be disallowed/reclaimed; and</p> <p>(B) If one vegetable subgroup is not offered over the course of the week reviewed, the reviewer should evaluate the cause(s) of the error to determine the appropriate fiscal action. All meals served in the deficient week may be disallowed/reclaimed.</p> <p>(iii) For repeated violations involving food quantities and whole grain-rich foods cited under paragraph (g)(2) of this section, the State agency has discretion to apply fiscal action as follows:</p> <p>(A) If the meals contain insufficient quantities of the required food components, the affected meals may be disallowed/reclaimed;</p>	<p>Director should take Nutritional Quality and Meal Pattern for Menu Planners Course on the inTeam website, and provide completion certificate.</p> <p>Provide updated menu that meets program requirements.</p>	<p><b>Fiscal Action: Lunch</b></p> <p>Jan: 462 meals x \$3.39 = \$1,566.18</p> <p>Feb: 872 meals x \$3.39 = \$2,956.08</p> <p>Total: \$4,522.26</p> <p><b>Grand Total:</b> <b>\$4,569.34</b></p>
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	<p>(B) If no whole grain-rich foods are offered during the week of review, meals for the entire week of review may be disallowed and/or reclaimed;</p> <p>(C) If insufficient whole grain-rich foods are offered during the week of review, meals for one or more days during the week of review may be disallowed/reclaimed.</p> <p>(D) If a weekly vegetable subgroup is offered in insufficient quantity to meet the weekly vegetable subgroup requirement, meals for one day of the week of review may be disallowed/reclaimed.</p>		
Meal Components and Quantities: Lunch	<p>During lunch service no grain was offered. Ed. Associate requested they add a grain, but they stated they did not have one to add. Told Director she would not be able to claim any of the meals for lunch that day.</p> <p>Also, they ran out of sweet potatoes and replaced with later tots. They ran out of bananas and replaced with pears. Ran out of chicken nuggets and replaced with chicken patty.</p> <p>They only had 3 fruits and veggies available for the day, so Ed. Associate requested they add another fruit or veggie. They added an iceberg salad.</p> <p>\$210.18 (g)(2)(B) On the day of review, the State agency must:</p> <p>(1) Observe a significant number of program meals, as described in the FNS Administrative Review Manual, at each serving line and review the corresponding documentation to determine whether all reimbursable meal service lines offer 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</p>	<p>Director must take the Reimbursable Meals for Managers Course on the inTeam website, and provide the completion certificate.</p> <p>Provide and updated menu that meets the requirements.</p> <p>Provide a procedure to ensure kitchen does not run out of food during service.</p>	

		<i>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.</i>		
<b>Quest Leadership Academy-School Level</b>	<b>USDA Performance Standard 2: Nutritional Quality and Meal Pattern – School Level</b>  <b>Dietary Specifications and Nutrient Analysis</b>	<p>Menu Planning: Daily minimum of grains not met. Menu Planning: Missing vegetable sub group. The Simplified Nutrient Analysis was not completed. 6 Cent Worksheet was not completed correctly. Menu Compliance: Lack of supporting documentation (CN Labels).</p> <p><i>§210.10 (h) Monitoring dietary specifications.—(1) Calories, saturated fat and sodium. When required by the administrative review process set forth in §210.18, the State agency must conduct a weighted nutrient analysis to evaluate the average levels of calories, saturated fat, and sodium of the lunches offered to students in grades K and above during one week of the review period. The nutrient analysis must be conducted in accordance with the procedures established in paragraph (i)(3) of this section. If the results of the nutrient analysis indicate that the school lunches are not meeting the specifications for calories, saturated fat, and sodium specified in paragraph (f) of this section, the State agency or school food authority must provide technical assistance and require the reviewed school to take corrective action to meet the requirements.</i></p> <p><i>(2) Trans fat. State agencies must review product labels or manufacturer specifications to verify that the food products or ingredients used by the reviewed school(s) contain zero grams of trans fat (less than 0.5 grams) per serving.</i></p> <p><i>(i) Nutrient analyses of school meals—(1) Conducting the nutrient analysis. Any nutrient analysis, whether conducted by the State agency under §210.18 or by the school food authority, must be performed in accordance</i></p>	<p>Director should request enrollment and take a refresher of the 6 Cent Worksheet Workshop.</p> <p>Director should take Nutritional Quality and Meal Pattern for Menu Planners Course on the inTeam website, and provide completion certificate.</p> <p>Director should take Crediting Foods Course on the inTeam website, and provide completion certificate.</p> <p>Director must submit corrected menu and 6 Cent Worksheet with Nutrient Analysis.</p>	

		<p><i>with the procedures established in paragraph (K5) of this section. The purpose of the nutrient analysis is to determine the average levels of calories, saturated fat, and sodium in the meals offered to each age grade group over a school week. The weighted nutrient analysis must be performed as required by FNS guidance.</i></p>		
<p><b>SFA Office and Quest Leadership Academy- School Level</b></p>	<p><b>USDA Performance Standard 1: General Compliance.</b></p> <p><b>Performance Standard 2: General Compliance - School Level.</b></p> <p><b>Food Safety</b></p>	<p>A food safety concern about temperature abuse was observed by the Education Associate. Food is being pre-plated prior to service, and food has no way to maintain temperature. They trays are lined up on the top of the service line and on the tray slide, and the staff walks up and down the line filling the trays from plastic bowls. The plastic bowls hold the food between filling up the trays with no temperature control. Despite several request for them to keep the food in the warmers, and to plate the items as the student come thru the line, they continued to do things their own way.</p> <p><i>DHEC Regulation 61-25 (3-501.16) Time/Temperature Control for Safety Food, Hot and Cold Holding. (A) Except during preparation, cooking, or cooling, or when time is used as the public health control as specified under 3-501.19, and except as specified under (B) and in (C) of this section, time/temperature control for safety food shall be maintained: (1) At 135 degrees F (57 degrees C) or above, except that roasts cooked to a temperature and for a time specified in 3-401.11 (B) or reheated as specified in 3-403.11 (E) may be held at a temperature of 130 degrees F (5 degrees C) or above; or (2) At 41 degrees F (5 degrees C) or less.</i></p> <p><i>SC HACCP 2-5 (HS1) All hot-holding equipment is preheated to 150oF or hotter before hot food is placed in the unit.</i></p> <p><i>(HS2) All potentially hazardous hot foods must be cooked to the proper temperature before placement in or on a hot-holding unit.</i></p> <p><i>(HS3) All potentially hazardous cold foods are at 41°F or colder before placement on a cold-holding unit. Only full-size or half-size steam table pans or merchandizing</i></p>	<p>Provide written procedure for proper service of students coming through the line, where trays are not being pre-plated.</p> <p>Provide written procedure for proper hot and cold holding of foods on the service line.</p>	



<p><b>Food Safety: Controlling Pests</b></p>	<p><i>trays are used on the cold-holding unit. Cold foods that are in containers or the original packaging are nested directly into a bed of self-draining ice.</i></p> <p>The dish room area needs to be cleaned of unnecessary debris that can attract pests.</p> <p><b>DHEC Regulation 61-25. 6-501.111 Controlling Pests.</b>  <i>The premises shall be maintained free of insects, rodents, and other pests. The presence of insects, rodents, and other pests shall be controlled to eliminate their presence on the premises by: (A) Routinely inspecting incoming shipments of food and supplies; (B) Routinely inspecting the premises for evidence of pests; (C) Using methods, if pests are found, such as trapping devices or other means of pest control as specified under 7-202.12, 7-206.12, and 7-206.13; and 107   Regulation 61-25 (D) Eliminating harborage conditions.</i></p>	<p>Provide pictures that show the dish room clear of debris that can attract pests.</p>	
<p>Signature of SFA Representative:</p>		<p>Date:</p>	
<p>Signature of School Foodservice Representative:</p>		<p>Date:</p>	
<p>Signature of Administrative Reviewer:</p>		<p>Date:</p>	