



STATE OF SOUTH CAROLINA
DEPARTMENT OF EDUCATION

MOLLY M. SPEARMAN
STATE SUPERINTENDENT OF EDUCATION

March 12, 2019

SENT VIA CERTIFIED MAIL

Dr. Baron Davis, Superintendent
Richland School District Two
124 Risdon Way
Columbia, SC 29223

Dear Dr. Davis:

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/rak

Attachment

cc: Melinda O'Connell, Child Nutrition Program Director
Nicole Holley, 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
Stanley Montgomery, Fiscal Analyst III, SCDE, Office of Grants Accounting

Richland School District Two

On Site Review Dates: February 12-15, 2019

<u>Director</u> : Melinda O'Connell	<u>Telephone</u> : 803-736-3774 <u>Email</u> : moconnell@richland2.org
<u>Lead Reviewer</u> : Rebecca Kenner	<u>Telephone</u> : 803-734-9818 <u>Email</u> : rkenner@ed.sc.gov
<u>Review Month</u> : January	<u>Review Week</u> : January 14-18, 2019
<u>Pre Conference Date</u> : December 18, 2018 <u>Attendance</u> : Melinda O'Connell, Jane Kay, Debbie Vanover, Michelle Jones, Nicole Holley, and Rebecca Kenner	<u>Exit Conference Date</u> : February 19, 2019 <u>Attendance</u> : Will Anderson, Melinda O'Connell, Jane Kay, Debbie Vanover, Nicole Holley, Ellen Mason, and Rebecca Kenner

Site Visited	Day of Review	Reviewer	Site Manager
Killian Elementary	2/13/19	Josh Kixmiller and Ellen Mason	Sandra Mungin
Jackson Creek Elementary	2/14/19	Rebecca Kenner	Mary Sharpe
Longleaf Middle	2/13/19	Rebecca Kenner and Ellen Mason	Devita Johnson
Richland Northeast High	2/14/19	Josh Kixmiller and Ellen Mason	Maria Rivera



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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, 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 School and Killian Elementary School and Longleaf Middle schools 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, 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.

Commendations: All serving lines at all school sites showcased excellent line presentation. All food varieties and choices were displayed beautifully and were appealing and pleasing to students.

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: 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 April 15, 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:

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

Subject to a decision to appeal these findings, please remit a check, payable to the South Carolina Department of Education, for \$1,314.86. 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.

Upon completion of the Corrective Action Plan by the target date of April 15, 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: Richland School District Two

Date of On-Site AR: February 12-15, 2019

Date CAP due: April 15, 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: Counting and Claiming	<p>The number of meals claimed were not accurate. The SFA over claimed 17 free lunch meals and under claimed by 8 full pay lunch meals at Longleaf Middle School. Ensure counting and claiming procedures are accurate, consistent, and consolidated correctly for all sites.</p> <p><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 FNS <i>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.</p>	Submit March 2018 meal counting edit checks for all sites and summary sheets for the lunch and breakfast for all schools.	\$54.51	
SFA Office	USDA Performance Standard 1 General Compliance: Civil Rights	<p>The SFA must ensure the webpage and all program printed documents contain the correct long or short non-discrimination statement, as applicable, on program materials.</p> <p><u><i>FNS Instruction 113 for Civil Rights (IX) (A)</i></u> <u><i>(3) Nondiscrimination Statement.</i></u> All information materials and sources, including Web sites, used by FNS, State agencies, local agencies, or other sub recipients to inform the public about FNS programs must contain a nondiscrimination statement. It is not required that the nondiscrimination statement be included on every page of the program information Web site. At the minimum, the nondiscrimination</p>	All items were corrected on site. No further action is needed.		

		statement, or a link to it, must be included on the home page of the program information.			
SFA Office	USDA Performance Standard 1 General Compliance: Civil Rights	<p>The SFA did not have a policy or procedure for filing discrimination complaints.</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 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.</p>	All items were corrected on site. No further action is needed.		
SFA Office	USDA Performance Standard 1 General Compliance: Local Wellness Policy	<p>The SFA must ensure that the Local Wellness policy meets the Healthy, Hunger-Free Kids Act of 2010 (HHFKA) regulations as wells as USDA meal pattern requirements.</p> <p>210.12(e) <i>Local school wellness policies</i>. Local educational agencies must comply with the provisions of §210.31(d)(e) regarding student, parent, and community involvement in the development, implementation, and periodic review and update of the local school wellness policy. At least once every three years, assess schools' compliance with the local school wellness policy, and make assessment results available to the public.</p> <p>210.18(x) <i>Local school wellness</i>. The State agency shall ensure the local educational agency complies with the local school wellness requirements set forth in §210.31.</p> <p>210.31 (a) <i>Local school wellness policy</i>. Each local educational agency must establish a local school wellness policy for all schools participating in the National School Lunch Program and/or School Breakfast Program under the jurisdiction of the local educational agency. The local school wellness policy is a written plan that includes methods to promote student wellness, prevent and reduce childhood obesity, and provide assurance that school meals and other food and beverages sold and otherwise made available on the school campus during the school day are consistent with applicable minimum Federal standards.</p>	Submit a timeline schedule for updating Local School Wellness Policy to include estimated date of completion of policy, district assessment, meeting dates for committee leader and members, and expected date of board presentation and approval. Also include submit with explanation of how the district intends to make Local School Wellness Policy and completed assessment available to the public (via web address, distribution packet, or email).		
SFA Office	USDA Performance Standard 2 Nutritional Quality and Meal Pattern-SFA Level: Meal components and quantities	<p>The site had an insufficient quantity of vegetable served on January 18, 2019. The SFA only had ½ cup on planned production records for all sites. The daily minimum is ¾ cup to 1 cup depending on grade group. This is a first time finding for insufficient vegetable quantities.</p> <p>210.18 (c)(iii) <i>Meal requirements for school lunches</i>. Vegetables component. Schools must offer vegetables daily as part of the lunch menu. Fresh, frozen, or canned vegetables and</p>	Submit lunch production record for February 15 for Longleaf Middle, Killian Elementary, Jackson Creek Elementary, and Richland Northeast High. Corrective Action has been received for this item. No further action is needed.		

dry beans and peas (legumes) may be offered to meet this requirement.

Food components	Lunch meal pattern		
	Grades K-5	Grades 6-8	Grades 9-12
	Amount of food ^a per week (minimum per day)		
Vegetables (cups) ^b	3¼ (¾)	3¼ (¾)	5 (1)

Killian Elementary	USDA Performance Standard 2 Nutritional Quality and Meal Pattern-SFA Level: Meal Components and Quantities - Breakfast	<p>Fluid milk was not available to all students is two required varieties as some classrooms ran out of flavored milk prior to all children receiving breakfast. Furthermore, production records indicate that fluid milk was only available in one variety during the review period. This is a first time finding.</p> <p>220.8 (d) <i>Fluid milk requirement.</i> A serving of fluid milk as a beverage or on cereal or used in part for each purpose must be offered for breakfasts. Schools must offer students a variety (at least two different options) of fluid milk.</p>	Submit written plan to make sure all teachers are aware of what to do if they run out of a food item/milk choice during breakfast. Submit March production records for breakfast for Killian Elementary to the state agency.		
Killian Elementary	USDA Performance Standard 2 Nutritional Quality and Meal Pattern-SFA Level: Offer vs. Serve	<p>Upon observation of the meal serve, it was found that the serving staff was not allowing for students to choose from the vegetables provided.</p> <p>(e) <i>Offer versus serve for grades K through 12.</i> School lunches must offer daily the five food components specified in the meal pattern in paragraph (c) of this section. Under offer versus serve, students must be allowed to decline two components at lunch, <i>except that</i> the students must select at least ½ cup of either the fruit or vegetable component.</p>	Submit documentation demonstrating that the staff was retrained on OVS.		
Killian Elementary and Longleaf Middle	USDA Performance Standard 2 Nutritional Quality and Meal Pattern-SFA Level: Meal Components and Quantities - Lunch	<p>Upon observation of the meal service it was found that the serving staff was inconsistent on the serving sizes for the potatoes and greens.</p> <p>Additionally, the roll that was listed on the menu was not set out at the beginning of the meal serve. This issue was corrected onsite.</p> <p>210.10 (c) <i>Meal pattern for school lunches.</i> Schools must offer the food components and quantities required in the lunch meal</p>	Retrain staff and provide training material which demonstrates proper serving methods or techniques.		

		pattern. (5) <i>Standardized recipes</i> . All schools must develop and follow standardized recipes. A standardized recipe is a recipe that was tested to provide an established yield and quantity using the same ingredients for both measurement and preparation methods.			
Killian Elementary	USDA Performance Standard 2 General Compliance- Site Level: Food Safety	The loading dock was cluttered and full of junk. After further questioning food service stated that the items were maintenance department items. After asking maintenance to clean up the mess, I noticed that the maintenance guy did not appear to be interested. The reviewer spoke with assistant principals to address the ongoing issue.	Please provide photographic evidence that the loading dock and surrounding areas are cleaned and properly maintained.		
Killian Elementary, Longleaf Middle, and Jackson Creek Elementary	USDA Performance Standard 2 General Compliance- Site Level: Food Safety	Upon review of the temperature logs, it was found that the school was not recording temperatures twice per day for the freezer. The site must check all refrigerated and freezer equipment twice per day as prescribed in the SC HACCP plan. 210.18(h)(vi) <i>Food safety</i> . The State agency must examine records to confirm that each school food authority under its jurisdiction meets the food safety requirements of §210.13.	Please submit completed and updated temperature logs to reflect that the school sites are recording temperatures twice per day.		
Longleaf Middle	USDA Performance Standard 2 General Compliance- SFA Level: Food Safety	Day of review: HACCP principle violations including, but are not limited to: proper personal hygiene is evident (e.g., hairnets, gloved hands, appropriate hand washing); cross contamination is prevented; food temperatures are monitored; refrigerator and freezer temperatures are monitored; food preparation and service areas are clean; clean utensils and equipment are used for food preparation and meal service; and no obvious evidence of pests is present. 210.18(h)(vi) <i>Food safety</i> . The State agency must examine records to confirm that each school food authority under its jurisdiction meets the food safety requirements of §210.13.	Retrain all Longleaf staff on food safety handling practice, especially properly changing gloves. Submit documentation of retraining.		
Killian Elementary, Longleaf Middle, and Jackson Creek Elementary	USDA Performance Standard 2 Other Federal Programs- SFA Level: Afterschool Snack Program	Killian Elementary (540 snack), Longleaf Middle (208), and Jackson Creek Elementary (637) over claimed 1385 afterschool snacks collectively. Site Counting and Claiming Issues – Meal counts not taken at the point-of-service. Claims for snack exceed the number of students in attendance for the program on several days, and every day the program reported the same number of students in attendance. Site Counting and Claiming Issues – Students are not taking both required components but are still being claimed for	Submit a written statement describing the process used by the school food authority to count, record, consolidate, and report the number of reimbursable snacks served are in compliance with program requirements and yield correct claims.	\$1260.35	

reimbursement. Production records reflect that not enough components were offered to support claims.

Site Meal Component/Quantity Issues – Fruit or vegetable was offered as one of the snack components, but does not meet the $\frac{3}{4}$ cup portion size requirement. On several days, both components that were offered were the same.

210.10 (o) *Afterschool snacks*. 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) *Afterschool snack requirements for grades K through 12*. 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

Submit March menu, count sheets, and production records for all after school snack programs at Killian Elementary, Jackson Creek Elementary, and Longleaf Middle.

Retrain menu planner, site managers and after school snack coordinators using the inTEAM after school snack module. Submit sign in sheets and posttest.

Signature of SFA Representative:

Date:

Signature of School Foodservice Representative:

Date:

Signature of Administrative Reviewer:

Date:

Technical Assistance (TA) for Administrative Review (AR)

SFA: Richland School District Two

Date of On-Site AR: February 12-15, 2019

Location SFA Office or Site (1)	Areas Requiring TA (2)	TA Received Supporting Documentation (3)	TA Provided by: Person Receiving TA: (4)
SFA Office	USDA Performance Standard 1 School Food Authority: 100-Certificate and Benefit Issuance	The SFA was informed that the software provider, Nutrikids, should have the ability to automatically change status at the 30th day of school. The SFA is reaching out to Nutrikids to set this up as an automatic default at the 30-day mark for each school year.	Provided by: <u>Ellen Mason</u> Received by: <u>Nicole Holley,</u> <u>District Liaison</u>
SFA Office	USDA Performance Standard 2 Nutritional Quality and Meal Pattern- School Level 600 – Dietary Specifications and Nutrient Analysis	The nutrition analysis was not properly analyzed and weighted for all menu lines for Longleaf Middle, targeted school. The dietitian corrected while on-site during review. All menus were compliant.	Provided by: <u>Rebecca Kenner</u> Received by: <u>Michelle Jones,</u> <u>Dietitian</u>
SFA Office	USDA Performance Standard 1 General Compliance: 1200 - Professional Standards	For professional standards tracking, please code agendas for operator and manager tracking.	Provided by: <u>Ellen Mason and</u> <u>Rebecca Kenner</u> Received by: <u>Jane Kay,</u> <u>Operations Manager</u>
SFA Office	USDA Performance Standard 1 General Compliance: 900 – SFA On-Site Monitoring	Use the correct On-Site Monitoring forms for lunch.	Provided by: <u>Ellen Mason</u> Received by: <u>Jane Kay,</u> <u>Operations Manager</u>
Jackson Creek Elementary	USDA Performance Standard 2 Meal Access and Reimbursement:	On the day of review, a field trip was planned. I inquired with the manager of when meals were entered into POS. She stated they were ringing prior to the student's departure. Technical assistance was given stating that a roster can be only be used to preplan. It should be sent with field trip lunches and marked	Provided by: <u>Rebecca Kenner</u> Received by: <u>Mary Sharpe,</u> <u>Manager, and Jane Kay,</u> <u>Operations Manager</u>

	300 – Meal counting and claiming procedures	when the student received the meal and then entering into POS after the field trip returns.	
Longleaf Middle	USDA Performance Standard 2 Nutritional Quality and Meal Pattern-School Level: 400 Meal Components and Quantities - Lunch	In comparison to the production records (i.e. super salad) for the week of review, some of the production records appeared to be questionable for quantities served since the recipe was not being followed.	Provided by: <u>Ellen Mason and Rebecca Kenner</u> Received by: <u>Debbie Vanover, and Jane Kay, Operations Managers</u>
Longleaf Middle	USDA Performance Standard 2 Nutritional Quality and Meal Pattern-School Level: 400 Meal Components and Quantities - Lunch	All components were offered. The selections on the menu that was supposed to be offered did not match the vegetable menu. Refried beans were missing and later added. Celery Sticks were subbed for broccoli florets on the "Fast Takes" line.	Provided by: <u>Rebecca Kenner</u> Received by: <u>Linda Greene, Area Manager, Manager, and Debbie Vanover, Operations Manager</u>