



STATE OF SOUTH CAROLINA
DEPARTMENT OF EDUCATION

MOLLY M. SPEARMAN
STATE SUPERINTENDENT OF EDUCATION

January 11, 2019

Dr. Lance Radford, Superintendent
Spartanburg County School District Two
3231 Old Furnace Road
Chesnee, SC 29323

Dear Dr. Radford:

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:

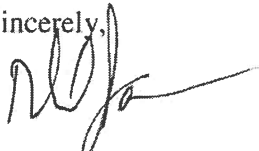
- Free and Reduced Price Meal Benefits Certification;
- Meal Access and Reimbursement;
- Resource Management;
- Nutritional Integrity of Meals and All Other Foods Sold in Schools; and
- Other Related Federal Programs.

Dr. Radford
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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: Kelly Richardson CFO Two
Noah Rucker, Child Nutrition Program Director District Two
Joy Atkins, School District Liaison
Donna Davis, District Services Team Leader, SCDE Office of Health and Nutrition
Krystal Waldrop, Education Associate, SCDE Office of Health and Nutrition

Spartanburg County School District Two

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On Site Review Dates: November 6-9, 2018

<u>Director:</u> Mr. Noah Rucker	<u>Telephone:</u> 864-515-5145 <u>Email:</u> Noah.Rucker@spartanburg2.k12.sc.us
<u>Lead Reviewer:</u> Mrs. Krystal Waldrop	<u>Telephone:</u> 803-734-8196 <u>Email:</u> kwaldrop@ed.sc.gov
<u>Review Month:</u> September 2018	<u>Review Week:</u> September 24-28, 2018
<u>Pre Conference Date:</u> September 5, 2018 <u>Attendance:</u> Mr. Noah Rucker, Mrs. Paulette Ford, and Mrs. Joy Atkins	<u>Exit Conference Date:</u> November 9, 2018 <u>Attendance:</u> Mrs. Kelly Richardson, Mr. Noah Rucker, Mrs. Paulette Ford, and Mrs. Joy Atkins

Site Visited	Day of Review	Reviewer	Site Manager
Boiling Springs Middle School	November 7, 2018	Mrs. Heather Zwiker	Mrs. Karen Holland
Chesnee High School	November 7, 2018	Mrs. Krystal Waldrop	Mrs. Pennie Carpenter
Mayo Elementary	November 8, 2018	Mrs. Heather Zwiker	Mrs. Tammy Robbins



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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.

Commendations: Joy Atkins the Free and Reduced Specialist, is very detailed oriented with all benefit issuance documentation to ensure the federal regulations are followed and compliance is maintained.

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

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 Chesnee High and Boiling Springs Middle schools 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: Paulette Ford, field supervisor, is a team player, organized and efficient in the daily work load and processes.

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.

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.

Closure

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

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

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

SFA: Spartanburg County School District

Date of On-Site AR: November 6-9, 2018

Date CAP due: February 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)
SY 17-18 \$15,069.60 SY 18-19 \$13,411.10 Total \$28,480.70	USDA Performance Standard 1 General Compliance:	<p>Upon review of the PLE tools provided, it was found that the SFA was compliant with school year 16-17 PLE requirements by increasing paid lunch prices by \$.10. However, upon review of the SY 17-18 and SY 18-19 PLE tools, the SFA only increased their prices by \$.05, and no nonfederal funds transfer was made. The SFA has not provided evidence for a PLE exemption request.</p> <p>7 CFR 210.14 (e)(2) <i>Average paid lunch price is equal to/greater than the reimbursement difference</i>. When the average paid lunch price from the prior school year is equal to or greater than the difference in reimbursement rates as determined in paragraph (e)(1)(iii) of this section, the school food authority shall establish an average paid lunch price for the current school year that is not less than the difference identified in (e)(1)(iii) of this section; except that, the school food authority may use the procedure in paragraph (e)(4)(ii) of this section when establishing prices of paid lunches.</p> <p>(4) <i>Price Adjustments</i>. (i) <i>Maximum required price increase</i>. The maximum annual average price increase required under this paragraph shall not exceed ten cents.</p> <p>(ii) <i>Rounding of paid lunch prices</i>. Any school food authority may round the adjusted</p>	<p>In accordance with 7 CFR 210.14 and SP-39-2011; when the SFA completes the Paid Lunch Equity Tool and the SFA is found noncompliant, the SFA must increase paid lunch price or use non-federal funds to become compliant.</p> <p>The LEA is required to reimburse the nonprofit school food service account (through local funds) in the amount of \$15,069.60 for SY 17-18, and \$13,411.10 for SY 18-19. With a total funds transferred of \$28,480.70. Or, provide sufficient evidence of PLE exemption approval.</p> <p>Additionally, SFA must provide a written plan of action that the SFA/LEA will record these two movements of funds in the "transfer from other funds" line of the financial report, and comment in the comment box at the bottom, the year and the amount transferred for each year.</p>		Noah Rucker/ Food Service Director and Kelly Richardson/CFO

		<p>price of the paid lunches down to the nearest five cents.</p> <p>(iii) <i>Optional price increases.</i> A school food authority may increase the average price by more than ten cents.</p> <p>(5) <i>Reduction in average price for paid lunches.</i> (i) Any school food authority may reduce the average price of paid lunches as established under this paragraph if the State agency ensures that funds are added to the nonprofit school food service account in accordance with this paragraph.</p> <p>The minimum that must be added is the product of:</p> <p>(A) The number of paid lunches claimed by the school food authority in the previous school year multiplied by</p> <p>(B) The amount required under paragraph (e)(3) of this section, as adjusted under paragraph (e)(4) of this section, minus the average price charged.</p> <p>Since, the SFA was found noncompliant with the federal paid lunch requirements.</p>	<p>Provide documentation showing communication to stop separating the male and female students during meals. Provide documentation explaining what resolution was decided upon.</p>	<p>Noah Rucker/Food Service Director and Roger Williams/Principal Boiling Springs Middle School</p>
	<p>USDA Performance Standard 2 General Program Compliance-School level</p> <p>800 – Civil Rights – Boiling Springs Middle School</p>	<p>The school is separating students into male and female lines, and then they sit on separate sides of the lunch room. Memo code: SP 31-2015 CACFP 12-2015, SFSP-14-2015. The memo states that separation by gender during meal service is prohibited. "In general, SFAs, institutions, and organizations participating in the Child Nutrition Programs are not permitted to separate children on any protected basis during the service of Program meals or snacks, in keeping with Federal non-discrimination laws and policies as outlined for the Department of Agriculture (USDA)</p>		

			purpose of conducting infrequent school-sponsored fundraisers, as specified in the HHFKA. The provision included in the IFR was that exempt fundraiser frequency would be determined by the State agency during such periods that schools are in session. The IFR also required that no specially exempted fundraiser foods or beverages may be sold in competition with school meals in the food service area during the meal service.			
Signature of SFA Representative:				Date:		
Signature of School Foodservice Representative:				Date:		
Signature of Administrative Reviewer:				Date:		