



**STATE OF SOUTH CAROLINA**  
**DEPARTMENT OF EDUCATION**

**MOLLY M. SPEARMAN**  
*STATE SUPERINTENDENT OF EDUCATION*

February 25, 2019

Dr. William Roach, Superintendent  
Union County  
P.O. Box 907  
Union, SC 29379

Dear Dr. Roach:

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:

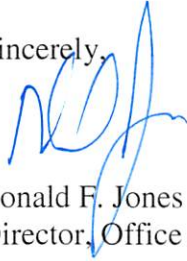
- Free and Reduced Price Meal Benefits Certification;
- Meal Access and Reimbursement;
- Resource Management;
- Nutritional Integrity of Meals and All Other Foods Sold in Schools; and
- Other Related Federal Programs.

Dr. Roach  
Page 2 of 6  
February 25, 2019

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

Attachment

cc: Jonathan Smoak, Child Nutrition Program Director  
Donna Davis, District Services Team Leader, SCDE Office of Health and Nutrition  
Shamere Young, Education Associate, SCDE Office of Health and Nutrition

SFA Name: Union County School District

On Site Review Dates: January 22-24, 2019

<u>Director</u> : Jonathan Smoak	<u>Telephone</u> : 864.429.1748, ext. 717 <u>Email</u> : jsmoak@union.k12.sc.us
<u>Lead Reviewer</u> : Shamere Young	<u>Telephone</u> : 803-734-0325 <u>Email</u> : syoung@ed.sc.gov
<u>Review Month</u> : November 2018	<u>Review Week</u> : November 12-16, 2018
<u>Pre Conference Date</u> : November 16, 2018 <u>Attendance</u> : Jonathan Smoak - FSD	<u>Exit Conference Date</u> : January 24, 2019 <u>Attendance</u> : Jonathan Smoak – FSD Lynn Lawson – Finance & Operations Director

Site Visited	Day of Review	Reviewer	Site Manager
Monarch Elementary School	January 22, 2019	Shamere Young	Cheryl Webiley
Sims Middle School	January 23, 2019	Shamere Young	Judy Turner



**STATE OF SOUTH CAROLINA**  
**DEPARTMENT OF EDUCATION**

**MOLLY M. SPEARMAN**  
*STATE SUPERINTENDENT OF EDUCATION*

**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, 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 Sims Middle School 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.

**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**

Based on this review, this letter serves to close the Administrative Review process. We appreciate all of the assistance our staff received during the reviews.

\*\*\*\*\*

Technical Assistance (TA) for Administrative Review (AR)

SFA: Union County

Date of On-Site AR: January 22-24, 2019

Location SFA Office or Site (1)	Areas Requiring TA (2)	TA Received  Supporting Documentation (3)	TA Provided by:  Person Receiving TA: (4)
Monarch Elementary School	General Area:  1400: Food Safety	<p>In a review of the agriculture food components, a violation was found. Canned peaches were on the shelf that were made in China. This indicates a violation of the Buy American provision.</p> <p>FSD informed that documentation is needed if vendor is unable to provide items that are not within Buy American Provisions, and to keep that documentation on file.</p> <p>210.21(d) (d) Buy American—(1) Definition of domestic commodity or product. In this paragraph (d), the term 'domestic commodity or product' means—</p> <p>(i) An agricultural commodity that is produced in the United States; an</p> <p>(ii) A food product that is processed in the United States substantially using agricultural commodities that are produced in the United States</p> <p>(2) Requirement. (i) In general. Subject to paragraph (d)(2)(ii) of this section, the Department shall require that a school food authority purchase, to the maximum extent practicable, domestic commodities or products.</p> <p>(ii) Limitations. Paragraph (d)(2)(i) of this section shall apply only to</p> <p>(A) A school food authority located in the contiguous United States; and</p> <p>(B) A purchase of domestic commodity or product for the school lunch program under this part.</p>	<p>Provided by: <b>Shamere Young</b></p> <p>Received by: <b>Jonathan Smoak</b></p>

		(3) Applicability to Hawaii. Paragraph (d)(2)(i) of this section shall apply to a school food authority in Hawaii with respect to domestic commodities or products that are produced in Hawaii in sufficient quantities to meet the needs of meals provided under the school lunch program under this part.	
<b>SFA</b>	<b>General Area:</b> 800: Civil Rights	SFA utilized the incorrect short non-discrimination statement on menus.  FSD corrected the menus on-site.	Provided by: <b>Shamere Young</b>  Received by: <b>Jonathan Smoak</b>