



STATE OF SOUTH CAROLINA
DEPARTMENT OF EDUCATION

MOLLY M. SPEARMAN
STATE SUPERINTENDENT OF EDUCATION

December 14, 2018

Mr. Brian Myrup
Managing Director
York Preparatory Academy
1047 Golden Gate Court
Rock Hill, SC 29732

Dear Mr. Myrup:

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:

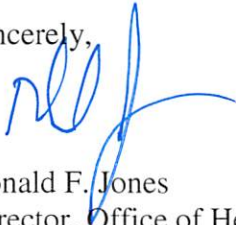
- Free and Reduced Price Meal Benefits Certification;
- Meal Access and Reimbursement;
- Resource Management;
- Nutritional Integrity of Meals and All Other Foods Sold in Schools; and
- Other Related Federal Programs.

Mr. Brian Myrup
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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/tt

Attachment

cc: Heather Hudson, Food Service Director
Donna Davis, District Services Team Leader, SCDE Office of Health and Nutrition
Tonza Thomas, Education Associate, SCDE Office of Health and Nutrition

York Preparatory Academy

October 30-31, 2018

<u>Director:</u> Heather Van Camp Hudson	<u>Telephone:</u> (803)324-4400 <u>Email:</u> heather.hudson@yorkprep.org
<u>Lead Reviewer:</u> Tonza Thomas	<u>Telephone:</u> (803)734-8204 <u>Email:</u> tthomas@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> Heather Van Camp Hudson	<u>Exit Conference Date:</u> October 31, 2018 <u>Attendance:</u> Heather Van Camp Hudson

Site Visited	Day of Review	Reviewer	Site Manager
York Preparatory Academy	October 30-31, 2018	Tonza Thomas	Heather Van Camp Hudson



STATE OF SOUTH CAROLINA
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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, 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, 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, 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 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, 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 8, 2019.

Upon completion of the Corrective Action Plan by the target date of February 8, 2019, please forward the required documentation to Tonza Thomas. *Fiscal action is only required if the amount cited is above the \$600 threshold; therefore, no repayment of funds is required for this review.* 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: York Preparatory Academy

Date of On-Site AR: October 30-31, 2018

Date CAP due: February 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)
York Preparatory Academy	USDA Performance Standard 1 School Food Authority: Counting and Claiming	Counting and claiming procedures were identified for the review month of September 2018. <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.	SFA must submit January 2019 meal counting rosters and summary sheets for the breakfast and lunch program. Claim preparer must complete the Counting and Claiming training through inTEAM and submit certificate of completion.	The value of breakfast and lunch claimed in non-compliance with USDA certification and benefit issuance requirements for September 2018 is \$345.29. This amount is below the \$600.00 USDA disregard threshold for adverse fiscal action. As such, the SFA is not required to repay SCDE. This does not relieve the SFA of its obligation to complete all required corrective action associated with this finding.	
York Preparatory Academy	USDA Performance Standard 1 Resource Management: Paid Lunch Equity	2018-19 Paid Lunch Equity Tool was not completed. <i>210.14(e)(1) Resource management.</i> Pricing paid lunches. For each school year beginning July 1, 2011, school food authorities shall establish prices for paid lunches in accordance with this paragraph. (1) Calculation procedures. Each school food authority shall:	SFA must complete and submit 2018-19 Paid Lunch Equity Tool		

		<p>(i) Determine the average price of paid lunches. The average shall be determined based on the total number of paid lunches claimed for the month of October in the previous school year, at each different price charged by the school food authority. (ii) Calculate the difference between the per meal Federal reimbursement for paid and free lunches received by the school food authority in the previous school year (i.e., the reimbursement difference); (iii) Compare the average price of a paid lunch under paragraph (e)(1)(i) of this section to the difference between reimbursement rates under paragraph (e)(1)(ii) of this section.</p>			
York Preparatory Academy	USDA Performance Standard 2 General Compliance: Professional Standards	<p>Child Nutrition Director did not obtain the required food safety certification.</p> <p>210.30(v) <i>School nutrition program professional standards.</i> School nutrition program directors for all local educational agency sizes. All school nutrition program directors, for all local educational agency sizes, must have completed at least eight hours of food safety training within five years prior to their starting date or complete eight hours of food safety training within 30 calendar days of their starting date. At the discretion of the State agency, all school nutrition program directors, regardless of their starting date, may be required to complete eight hours of food safety training every five years.</p>	Child Nutrition Director must complete food safety training and submit certificate of completion.		
York Preparatory Academy	USDA Performance Standard 2 General Compliance: Professional Standards	<p>SFA did not have a tracking mechanism in place to track professional standards.</p> <p>210.18(h)(2)(E)(ix) <i>Professional standards.</i> 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.</p> <p>210.30(g) <i>School food authority oversight.</i> Each school year, the school food authority director must document compliance with the requirements of this</p>	Submit report from tracking mechanism that includes trainee name and title, key area (refer to learning objectives), topic, participants, training time and completion date. Submit a timeline of planned training to meet the training requirements before the end of the current school year.		

		<p>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.</p>			
<p>York Preparatory Academy</p>	<p>USDA Performance Standard 2 General Compliance:</p> <p>Production Records</p>	<p>Production records for breakfast were incomplete.</p> <p>210.15(b) <i>Recordkeeping summary.</i> In order to participate in the Program, a school food authority or a school, as applicable, must maintain records to demonstrate compliance with Program requirements. These records include but are not limited to: (2) Production and menu records as required under §210.10 and documentation to support performance-based cash assistance, as required under §210.7(d)(2). 210.10(3) <i>Production and menu records.</i> Schools or school food authorities, as applicable, must keep production and menu records for the meals they produce. These records must show how the meals offered contribute to the required food components and food quantities for each age/grade group every day. Labels or manufacturer specifications for food products and ingredients used to prepare school meals must indicate zero grams of trans fat per serving (less than 0.5 grams). Schools or school food authorities must maintain records of the latest nutritional analysis of the school menus conducted by the State agency. Production and menu records must be maintained in accordance with FNS guidance.</p>	<p>The Food Service Director must complete the Food Production Record Course and Post Test through inTEAM and submit the certificate of completion.</p>		

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

Technical Assistance (TA) for Administrative Review (AR)

SFA: York Preparatory Academy

Date of On-Site AR: October 30-31, 2018

Location SFA Office or Site (1)	Areas Requiring TA (2)	TA Received Supporting Documentation (3)	TA Provided by: Person Receiving TA: (4)
York Preparatory Academy	USDA Performance Standard 1 School Food Authority: RMCR- Paid Lunch Equity	<p>SFA did not complete the Paid Lunch Equity Tool as required by USDA. SFA was provided with the Paid Lunch Equity Tool.</p> <p>210.14(e)(1) <i>Resource management</i>. Pricing paid lunches. For each school year beginning July 1, 2011, school food authorities shall establish prices for paid lunches in accordance with this paragraph. (1) Calculation procedures. Each school food authority shall: (i) Determine the average price of paid lunches. The average shall be determined based on the total number of paid lunches claimed for the month of October in the previous school year, at each different price charged by the school food authority. (ii) Calculate the difference between the per meal Federal reimbursement for paid and free lunches received by the school food authority in the previous school year (i.e., the reimbursement difference); (iii) Compare the average price of a paid lunch under paragraph (e)(1)(i) of this section to the difference between reimbursement rates under paragraph (e)(1)(ii) of this section.</p>	<p>Provided by: <u>Tonza Thomas</u></p> <p>Received by: <u>Heather Van Camp Hudson, School Meals Program Manager</u></p>
York Preparatory Academy	USDA Performance Standard 1 School Food Authority: Meal Counting and Claiming	<p>The SFA over-claimed for lunch and breakfast for the review month of September 2018. SFA was advised to develop a more efficient counting and claiming process. State Agency provided direction on how to use PowerLunch in order to prevent counting and claiming errors in the future. SFA was instructed to contact the State Agency when PowerLunch is fully implemented.</p> <p>210.18(g)(1) <i>Performance Standard 1</i> (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.) The State agency must follow review procedures stated in this section and as specified in the FNS Administrative</p>	<p>Provided by: <u>Tonza Thomas</u></p> <p>Received by: <u>Heather Van Camp Hudson, School Meals Program Manager</u></p>

		Review Manual 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.	
York Preparatory Academy	USDA Performance Standard 2 School Food Authority: 200- Verification	<p>SFA could not locate one verified application (Free based on income). SFA stated the documentation may have been lost during move to new room. SFA was instructed to ensure all supporting documentation is maintained and secure at all times.</p> <p>210.15(b)(4) <i>Reporting and recordkeeping.</i> In order to participate in the Program, a school food authority or a school, as applicable, must maintain records to demonstrate compliance with Program requirements. These records include but are not limited to: (4) Currently approved and denied certification documentation for free and reduced price lunches and a description of the verification activities, including verified applications, and any accompanying source documentation in accordance with 7 CFR 245.6a of this Title.</p>	<p>Provided by: <u>Tonza Thomas</u></p> <p>Received by: <u>Heather Van Camp Hudson, School Meals Program Manager</u></p>
York Preparatory Academy	USDA Performance Standard 2 School Food Authority: 700- Certification and Benefit Issuance	<p>SFA stated households were notified via mail, however a copy of the notification letters were not kept on file. SFA was instructed to attach a copy the notification letter to each application processed.</p> <p>210.15(b)(4) <i>Reporting and recordkeeping.</i> In order to participate in the Program, a school food authority or a school, as applicable, must maintain records to demonstrate compliance with Program requirements. These records include but are not limited to: (4) Currently approved and denied certification documentation for free and reduced price lunches and a description of the verification activities, including verified applications, and any accompanying source documentation in accordance with 7 CFR 245.6a of this Title.</p>	<p>Provided by: <u>Tonza Thomas</u></p> <p>Received by: <u>Heather Van Camp Hudson, School Meals Program Manager</u></p>
York Preparatory Academy	USDA Performance Standard 2 School Food Authority: 1200- Professional Standards	<p>SFA did not have a tracking mechanism in place to track professional standards. SFA was provided with a variety of professional standards tracking tools.</p> <p>210.18(h)(2)(E)(ix) <i>Professional standards.</i> The State agency shall ensure the local educational agency and school food authority complies with the professional standards for school</p>	<p>Provided by: <u>Tonza Thomas</u></p> <p>Received by: <u>Heather Van Camp Hudson, School Meals Program Manager</u></p>

		<p>nutrition program directors, managers, and personnel established in §210.30.</p> <p>210.30(g) <i>School food authority oversight.</i> 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.</p>	
	<p>USDA Performance Standard 2 School Food Authority:</p>	<p>Breakfast productions records were incomplete. SFA was provide with additional information regarding food production records. Email was sent with additional information. In addition, production records provided by Rock Hill School District 3 did not comply with the State Agency requirement. SFA contacted York School District 3 to rectify the situation.</p> <p>210.15(b) <i>Recordkeeping summary.</i> In order to participate in the Program, a school food authority or a school, as applicable, must maintain records to demonstrate compliance with Program requirements. These records include but are not limited to: (2) Production and menu records as required under §210.10 and documentation to support performance-based cash assistance, as required under §210.7(d)(2).</p> <p>210.10(3) <i>Production and menu records.</i> Schools or school food authorities, as applicable, must keep production and menu records for the meals they produce. These records must show how the meals offered contribute to the required food components and food quantities for each age/grade group every day. Labels or manufacturer specifications for food products and ingredients used to prepare school meals must indicate zero grams of trans fat per serving (less than 0.5 grams). Schools or school food authorities must maintain records of the latest nutritional analysis of the school menus conducted by the State agency. Production and menu records must be maintained in accordance with FNS guidance.</p>	<p>Provided by: <u>Tonza Thomas</u></p> <p>Received by: <u>Heather Van Camp Hudson, School Meals Program Manager</u></p>

<p>York Preparatory Academy</p>	<p>USDA Performance Standard 2 School Food Authority:</p> <p>1700 - Afterschool Snack</p>	<p>Program was not monitored within the first 4 weeks of operation, however it was monitored towards the beginning of the school year.</p> <p>210.9(c)(7) <i>Afterschool care requirements.</i> Those school food authorities with eligible schools (as defined in §210.10(n)(1)) that elect to serve meal supplements during afterschool care programs, shall agree to: Review each afterschool care program two times a year; the first review shall be made during the first four weeks that the school is in operation each school year, except that an afterschool care program operating year round shall be reviewed during the first four weeks of its initial year of operation, once more during its first year of operation, and twice each school year thereafter.</p>	<p>Provided by: <u>Tonza Thomas</u></p> <p>Received by: <u>Heather Van Camp Hudson, School Meals Program Manager</u></p>
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