



STATE OF SOUTH CAROLINA
DEPARTMENT OF EDUCATION

MOLLY M. SPEARMAN
STATE SUPERINTENDENT OF EDUCATION

February 21, 2017

Dr. Connie Dennis, Superintendent
Clarendon County School District Three
P.O. Box 270
1177 Atkinson Street
Turbeville, SC 29162

Dear Dr. Dennis:

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) that was conducted by Rebecca Kenner on February 7-9, 2017. The findings of the review were discussed with you and Gwen Phillips 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. Connie Dennis
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In addition to an evaluation of key SFA administrative processes and records for the review month of December 2016, the following schools: Walker Gamble and East Clarendon Middle High School were selected to receive onsite visitation 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 Rebecca Kenner at (803) 734-9818 or rkenner@ed.sc.gov.

Sincerely,



Ronald F. Jones
Director, Office of Health and Nutrition

RJ/DD:rk

Attachment

cc: Rebecca Kenner, Education Associate, SCDE, Office of Health and Nutrition
Gwen Phillips, Director, Clarendon County School District Three
Donna Davis, District Services Interim Team Leader, SCDE, Office of Health and Nutrition



STATE OF SOUTH CAROLINA
DEPARTMENT OF EDUCATION

Administrative Review
of
Clarendon County School District Three
Child Nutrition Programs

Conducted by
Rebecca Kenner
Office of Health and Nutrition

February 7-9, 2017

Ronald F. Jones
Director, Office of Health and Nutrition
SC Department of Education
1429 Senate Street, Room 703
Columbia, SC 29201

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 with one exception.

The price for adult lunch meal, \$3.50, did not meet the minimum established for the 2016-2017 school year. The minimum adult lunch meal price for 2016-17 is \$3.55 for lunch, plus any additional local tax on sales of prepared foods. The SFA may establish prices higher than the minimum.

Corrective action: The SFA must increase the adult meal price to a minimum of \$3.55 for lunch. Submit documentation by published memo, printed menu or receipts of the price increase for adult meals by March 31, 2017.

General Program Compliance-SFA level

This section evaluates whether the SFA followed general program compliance as indicated by USDA guidelines.

Key Functional Areas Covered: Civil rights, onsite monitoring, Local School Wellness Policy, school environment report card, 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 Walker Gamble Elementary 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: Menu, standardized recipes, meal components and quantities, food production records, offer-versus-serve guidelines, dietary specifications, and nutrient analysis.

Actual Performance: Based on evaluation of documentation and observations made during the onsite visitation, all success criteria were met.

Commendation: The organization of the walk-in coolers and freezers at Walker Gamble Elementary was exceptional considering the limited space. All items were clearly marked facing outward and easily readable which helps ensure proper first in, first out (FIFO) rotation of all products.

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 and storage, and Buy American.

Actual Performance: Based on evaluation of documentation and observations made during the onsite visitation, all success criteria were met with one exception.

At East Clarendon Middle-High School, the canteen sold food items not in compliance with the Local School Wellness Policy, Local Competitive Food Policy, and USDA Smart Snack guidelines. Based on the previous Administrative Review, this is a repeat violation.

Corrective Action: The canteen operates during school hours which are contrary to the Local Competitive Food Policy. All food items sold during the school day must be Smart Snack complaint or deemed an exempt fundraiser. Should the canteen remain open, the principal or principal's designee must maintain and update annually a comprehensive, detailed Smart Snack list of approved items sold at East Clarendon Middle High School.

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-School Level

This section evaluates compliance with other related federal programs, as may be applicable.

Key Functional Areas Covered: Afterschool Snack Program (ASP), Fresh Fruit and Vegetable Program and Special Milk Program.

Actual Performance: This SFA participates in Afterschool Snack Program. Based on the evaluation of documentation and observations made during the onsite visitation, all success criteria were met.

Closure

The next step of the AR Process is to obtain a signature from you and Mrs. Gwen Phillips acknowledging that you have received the Corrective Action Plan document and agree to its terms and conditions.

Upon completion of the Corrective Action Plan by the target date of March 31, 2017, please forward the required documentation to Rebecca Kenner. If you have any questions concerning the review processes, please contact Rebecca Kenner at (803) 734-9818 or rkenner@ed.sc.gov. Once your corrective action plan has been approved, a final closure letter will then be mailed to you.

Corrective Action Plan for Administrative Review (AR)

SFA: Clarendon Three School District

Site (s): Walker Gamble Elementary

Date of On-Site AR: 2/8/201

Areas needing Corrective Action (1)	Planned Corrective Action Activities (2)	Person(s) Responsible (3)	Timeframe (4)	Verification (5)
Resource Management- Pricing of Adult Meals	The SFA must increase the adult meal price to a minimum of \$3.55 for lunch.	Food Service Director	March 31, 2017	Submit documentation by published memo or printed menu of the price increase for adult meals by March 31, 2017.
Local School Wellness Policy and Competitive Foods Policy	Foods sold were not in compliance to the Local School Wellness Policy, the District's Competitive Foods Policy, and USDA Smart Snack Guidelines	Superintendent, Foodservice Director, Principals	March 31, 2017	Establish canteen operation hours that are in compliance with the Local Competitive Food Policy. Should the canteen remain open during school hours, a current list of items must be submitted. The principal or principal's designee must maintain and update annually a comprehensive, detailed Smart Snack list of approved items sold at East Clarendon Middle High School.

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