



STATE OF SOUTH CAROLINA
DEPARTMENT OF EDUCATION

MOLLY M. SPEARMAN
STATE SUPERINTENDENT OF EDUCATION

March 20, 2019

Dr. Gerrița Postlewait, Superintendent
Charleston County School District
75 Calhoun Street
Charleston, SC 29401

Dear Dr. Postlewait:

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. Postlewait
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March 20, 2019

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

cc: Walter Campbell, Executive Director of Food Services
Donna Davis, District Services Team Lead, SCDE Office of Health and Nutrition
Ellen Mason, Education Associate, SCDE Office of Health and Nutrition

Charleston County School District

On Site Review Dates: March 5-8, 2019

<u>Director</u> : Walter Campbell	<u>Telephone</u> : 843-566-8189 <u>Email</u> : Walter_Campbell@charleston.k12.sc.us
<u>Lead Reviewer</u> : Ellen Mason	<u>Telephone</u> : 803-734-8199 <u>Email</u> : emason@ed.sc.gov
<u>Review Month</u> : January 2019	<u>Review Week</u> : March 5-8, 2019
<u>Pre Conference Date</u> : December 17, 2018 <u>Attendance</u> : Walter Campbell, Frank Manigault	<u>Exit Conference Date</u> : March 8, 2019 <u>Attendance</u> : Walter Campbell, Frank Manigault, Jeffrey Borowy, Ellen Mason, Donna Davis, Rebecca Kenner, Shamere Young

Site Visited	Day of Review	Reviewer	Site Manager
Burke High	March 6, 2019	Ellen Mason	James Smalls
Meeting Street Elementary at Brentwood	March 6, 2019	Donna Davis	Ann Hoch Jeff Dyson
West Ashley High	March 6, 2019	Rebecca Kenner	Gwen Whitley Emmasteen Witten
Head Start - West Ashley	March 6, 2019	Shamere Young	Pam Brown
Ashley River Elementary	March 6, 2019	Carla Garland	Brandy Moore
Ladson Elementary	March 7, 2019	Carla Garland	Margaret Grubb

James Island High	March 7, 2019	Rebecca Kenner	Andrea Balmer
Buist Academy Elem	March 7, 2019	Donna Davis	Michelle Viviel
Baptist Hill High	March 7, 2019	Ellen Mason	Susan Harrison- Smith
Charleston Development Academy	March 7, 2019	Shamere Young	Elizabeth Brinson



STATE OF SOUTH CAROLINA
DEPARTMENT OF EDUCATION

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

Commendations: The district office staff was easy to work with and always quick to respond to every request made by the review team.

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 Burke High, Meeting Street at Brentwood, West Ashley High, West Ashley Head Start, and Ladson 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, 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.

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 April 26, 2019.

Upon completion of the Corrective Action Plan by the target date of April 26, 2019, please forward the required documentation to Ellen Mason. Once your Corrective Action Plan has been approved, a final closure letter will then be mailed to you.

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

SFA: Charleston County School District

Date of On-Site AR: March 5-8, 2019

Date CAP due:

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: Verification	The SFA's verification notification letter did not include all required information. <u>NS Instruction 113 for Civil Rights (IX) (A) (3) Nondiscrimination Statement.</u> All information materials and sources, including Web sites, used by FNS, State agencies, local agencies, or other subrecipients 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 statement, or a link to it, must be included on the home page of the program information.	The SFA must submit updated verification notification/response letter templates with the correct non-discrimination statement. The template has been updated and submitted to state agency. No further action is needed.		
SFA Office	USDA Performance Standard 1 School Food Authority: Civil Right	The notification letters and free and reduced meal applications did not contain the correct nondiscrimination statement. Any document over one page in length must contain the full USDA Nondiscrimination statement. NS Instruction 113 for Civil Rights (IX) (A) (3) Nondiscrimination Statement. All information materials and sources, including Web sites, used by FNS, State agencies, local agencies, or other subrecipients 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 statement, or a link to it, must be included on the home page of the program information.	All letter templates and the free and reduced application template were update during the AR and submitted to the state agency. No further action is needed.		
Baptist Hill High	USDA Performance Standard 2	The food and beverage items in the vending machine and school store are not Smart Snack complaint. Since the vending machines and school store are available to the middle school,	Submit photographic evidence to the state agency that all food items in vending machines and all items sold in school store are		

**General Program
Compliance-School
level**

Smart Snacks

students all items sold much meet the middle school Smart Snack requirements.

7 CFR 210.11(b) Competitive food service and standards. General requirements for competitive food. (1) State and local educational agency policies. State agencies and/or local educational agencies must establish such policies and procedures as are necessary to ensure compliance with this section. State agencies and/or local educational agencies may impose additional restrictions on competitive foods, provided that they are not inconsistent with the requirements of this part.

(2) Recordkeeping. The local educational agency is responsible for the maintenance of records that document compliance with the nutrition standards for all competitive food available for sale to students in areas under its jurisdiction that are outside of the control of the school food authority responsible for the service of reimbursable school meals. In addition, the local educational agency is responsible for ensuring that organizations designated as responsible for food service at the various venues in the schools maintain records in order to ensure and document compliance with the nutrition requirements for the foods and beverages sold to students at these venues during the school day as required by this section. The school food authority is responsible for maintaining records documenting compliance with these for foods sold under the auspices of the nonprofit school food service. At a minimum, records must include receipts, nutrition labels and/or product specifications for the competitive food available for sale to students.

(3) Applicability. The nutrition standards for the sale of competitive food outlined in this section apply to competitive food for all programs authorized by the Richard B. Russell National School Lunch Act and the Child Nutrition Act of 1966 operating on the school campus during the school day.

(4) Fundraiser restrictions. Competitive food and beverage items sold during the school day must meet the nutrition standards for competitive food as required in this section. A special exemption is allowed for the sale of food and/or beverages that do not meet the competitive food standards as required in this section for the purpose of conducting an infrequent school-sponsored fundraiser. Such specially exempted fundraisers must not take place more than the frequency specified by the State agency during such periods that schools are in session. No specially exempted fundraiser foods or beverages may be sold in competition with school meals in the food service area during the meal service.

Smart Snack complaint. Along with photographs, send receipts for items purchased for school store to the state agency.

(c) General nutrition standards for competitive food. (1) General requirement. At a minimum, all competitive food sold to students on the school campus during the school day must meet the nutrition standards specified in this section. These standards apply to items as packaged and served to students.

(2) General nutrition standards. To be allowable, a competitive food item must:

(i) Meet all of the competitive food nutrient standards as outlined in this section; and

(ii) Be a grain product that contains 50 percent or more whole grains by weight or have as the first ingredient a whole grain; or

(iii) Have as the first ingredient one of the non-grain major food groups: fruits, vegetables, dairy or protein foods (meat, beans, poultry, seafood, eggs, nuts, seeds, etc.); or

(iv) Be a combination food that contains 1/4 cup of fruit and/or vegetable; or

(v) If water is the first ingredient, the second ingredient must be one of the food items in paragraphs (c)(2)(ii), (iii) or (iv) of this section.

(h)(i) Calorie and sodium content for snack items and side dishes sold as competitive foods. Snack items and side dishes sold as competitive foods must have not more than 200 calories and 200 mg of sodium per item as packaged or served, including the calories and sodium contained in any added accompaniments such as butter, cream cheese, salad dressing, etc., and must meet all of the other nutrient standards in this section. Effective July 1, 2016, these snack items and side dishes must have not more than 200 calories and 200 mg of sodium per item as packaged or served.

(2) Middle schools. Allowable beverages for middle school-aged students are limited to:

(i) Plain water or plain carbonated water (no size limit);

(ii) Low fat milk, unflavored or flavored (no more than 12 fluid ounces) from July 1, 2018 through June 30, 2019, school year 2018-2019;

(iii) Non fat milk, flavored or unflavored (no more than 12 fluid ounces);

(iv) Nutritionally equivalent milk alternatives as permitted in § 210.10 and § 220.8 of this chapter (no more than 12 fluid ounces); and

(v) 100 percent fruit/vegetable juice, and 100 percent fruit and/or vegetable juice diluted with water (with or without carbonation and with no added sweeteners) (no more than 12 fluid ounces).

Baptist Hill High	USDA Performance Standard 2 Nutritional Quality and Meal Pattern-School Level: Production Records and recipes	<p>The production records and recipe do not match for the General Tso chicken and brown rice. The quantity reflected on the production record do not reflect the proper quantity to meet the meal pattern requirements for meat/meat alternate or grain.</p> <p>7 CFR 210.10 (3) Production and menu records. 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>Submit updated recipe and production record template to state agency. The recipe has been updated.</p> <p>No further action required.</p>		
Baptist Hill High	USDA Performance Standard 2 General Program Compliance-School level Buy American Provision	<p>Romaine lettuce bought using DOD funds was from Mexico. The lettuce was shipped from Limehouse.</p> <p>7 CFR § 210.21 (d)Buy American -</p> <p>(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; and</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.</p> <p>(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>Submit documentation from vendor describing process to ensure this will not happen again and when produce will be picked up.</p> <p>This documentation has been provided and no further action is required.</p>		
Burke High	USDA Performance Standard 2 General Program Compliance-School level Smart Snacks	<p>Food items in vending machine and food and beverage at the school store are not Smart Snack complaint.</p> <p>See 7 CFR 210.11(b) cited for Baptist Hill High</p> <p>(3) High schools. Allowable beverages for high school-aged students are limited to:</p> <p>(i) Plain water or plain carbonated water (no size limit);</p>	<p>Submit photographic evidence to the state agency that all food items in vending machines and all items sold in school store are Smart Snack complaint. Along with photographs, send receipts for items purchased for school store to the state agency.</p>		

(ii) Low fat milk, unflavored or flavored (no more than 12 fluid ounces) from July 1, 2018 through June 30, 2019, school year 2018-2019;

(iii) Non fat milk, flavored or unflavored (no more than 12 fluid ounces);

(iv) Nutritionally equivalent milk alternatives as permitted in §210.10 and §220.8 of this chapter (no more than 12 fluid ounces);

(v) 100 percent fruit/vegetable juice, and 100 percent fruit and/or vegetable juice diluted with water (with or without carbonation and with no added sweeteners) (no more than 12 fluid ounces);

(vi) Calorie-free, flavored water, with or without carbonation (no more than 20 fluid ounces);

(vii) Other beverages that are labeled to contain less than 5 calories per 8 fluid ounces, or less than or equal to 10 calories per 20 fluid ounces (no more than 20 fluid ounces); and

(viii) Other beverages that are labeled to contain no more than 40 calories per 8 fluid ounces or 60 calories per 12 fluid ounces (no more than 12 fluid ounces).

West Ashley High

USDA Performance Standard 2 Nutritional Quality and Meal Pattern-School Level:

Grain Requirement

West Ashley High served a PBJ meal on the menu daily during the week of review. This item was not on the planned menu. Additionally, this entree item did not meet the 2 grain requirement per 9-12 grades.

210.18(c) *Meal pattern for school lunches.* Schools must offer the food components and quantities required in the lunch meal pattern established in the following table:

Food components	Lunch meal pattern		
	Grades K-5	Grades 6-8	Grades 9-12
Grains (oz eq) ¹	8-9 (1)	8-10 (1)	10-12 (2)

(B) *Daily and weekly servings.* The grains component is based on minimum daily servings plus total servings over a 5-day school week.

Submit the revised PBJ recipe and production record to reflect the additional required grain offering when served again.

West Ashley High

USDA Performance Standard 2 General Program Compliance-School level

Vending machines located in the cafeteria contained items that were not Smart Snack compliant (chocolate bars, sour gummies, and other snacks). West Ashley High School is not tracking exempt fundraisers per state and federal requirements.

Items must be removed or place on timer for students to only access after the school day.

Submit photograph of vending machines in the cafeteria with

	Smart Snacks	<p>See 7 CFR 210.11 cited for Baptist Hill High (4)Fundraiser restrictions. Competitive food and beverage items sold during the school day must meet the nutrition standards for competitive food as required in this section. A special exemption is allowed for the sale of food and/or beverages that do not meet the competitive food standards as required in this section for the purpose of conducting an infrequent school-sponsored fundraiser. Such specially exempted fundraisers must not take place more than the frequency specified by the State agency during such periods that schools are in session. No specially exempted fundraiser foods or beverages may be sold in competition with school meals in the food service area during the meal service.</p> <p>SC Memo March 6, 2015-These exemptions cannot apply to canteens, vending machines, or school stores that regularly sell food throughout the school year. For the 2017–18 school year and thereafter, schools may have up to 30 exempt fundraisers, not to exceed 1 day in length.</p>	<p>only compliant snack items or set timer.</p> <p>Submit exempt fundraiser tracking sheet to state agency.</p>		
Ladson Elementary	<p>USDA Performance Standard 2 Meal Counting and Claiming School Level:</p> <p>Point of Service</p>	<p>It was determined that prior to 3/7/2019, Head Start Children (around 51 children total) received breakfast and lunch meals on a daily basis. However, breakfast and lunch meal rosters for head start children had not been completed on a daily basis. The school was receiving verbal confirmation of which students received meals, however, for it to be a proper point of service a roster must be used. This issue was discussed with the district representative and the kitchen manager. Rosters were created on-site the day of review.</p> <p>7 CFR§210.9 (9) Count the number of free, reduced price and paid reimbursable meals served to eligible children at the point of service, or through another counting system if approved by the State agency;</p>	SFA must ensure that the Ladson Head Start Program record point of service meal counts on a daily basis for accountability. Submit March rosters for Head Start classes for breakfast and lunch to the state agency.		
Meeting Street at Brentwood	<p>USDA Performance Standard 2 Nutritional Quality and Meal Pattern-School Level:</p> <p>Food Safety</p>	<p>The site did not have thermometers in the milk coolers.</p> <p>7 CFR 210.13 Facilities management- (a) Health standards. The school food authority shall ensure that food storage, preparation and service is in accordance with the sanitation and health standards established under State and local law and regulations.</p>	It was corrected on site and no other action is needed.		

Meeting Street at Brentwood	USDA Performance Standard 2 Nutritional Quality and Meal Pattern-School Level: Food Safety	The site failed to complete the monthly HACCP food safety paperwork for February 2019. Only weeks one and two were completed, weeks three and four were not. 7 CFR 210.13 Facilities management- (a) Health standards. The school food authority shall ensure that food storage, preparation and service is in accordance with the sanitation and health standards established under State and local law and regulations.	Submit March 2019 weekly food safety forms. The forms have been submitted to the state agency and no further action is needed.		
Signature of SFA Representative:				Date:	
Signature of School Foodservice Representative:				Date:	
Signature of Administrative Reviewer:				Date:	

Technical Assistance (TA) for Administrative Review (AR)

SFA: Charleston

Date of On-Site AR: March 5-8, 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 - Certification and Benefit Issuance	<p>Technical Assistance provided to make sure that when applications are entered into Meals Plus that the names of all family members are entered into the system. The system is serving as the determining official and therefor all family members must be entered to make sure the determination is correct.</p> <p>7 CFR § 245.6 (6) Household members and social security numbers. The application must require applicants to provide the names of all household members.</p>	Provided by: <u>Ellen Mason</u> Received by: <u>Frank Manigault</u>
SFA Office	USDA Performance Standard 1 School Food Authority: 900 - SFA On Site Monitoring	<p>On-site monitoring forms were combined for some schools. While all the appropriate information was completed, each site needs its own on-site monitoring form going forward.</p> <p>7 CFR 210.8(a)(1) On-site reviews. Every school year, each school food authority with more than one school shall perform no less than one on-site review of the counting and claiming system and the readily observable general areas of review cited under</p> <p>7 CFR § 210.18(h), as prescribed by FNS for each school under its jurisdiction. The on-site review shall take place prior to February 1 of each school year. Further, if the review discloses problems with a school's meal counting or claiming procedures or general review areas, the school food authority shall: ensure that the school implements corrective action; and, within 45 days of the review, conducts a follow-up on-site review to determine that the corrective action resolved the problems.</p>	Provided by: <u>Shamere Young</u> Received by: <u>Walter Campbell</u>
Ashley River Elementary	USDA Performance Standard 2 General Program Compliance School Level	<p>The site's HACCP Book had been updated. However, Section 2-1: Food Safety Team, Section IV, was incomplete. The site manager indicated that she would complete the section immediately.</p> <p>7 CFR 210.13 Facilities management- (a) Health standards. The school food authority shall ensure that food storage, preparation and service is in accordance with the sanitation and health standards established under State and local law and regulations.</p>	Provided by: <u>Carla Garland</u> Received by: <u>Brandy M. Taylor</u>

	1500 - Reporting and Recordkeeping		
Buist Academy Elem	USDA Performance Standard 2 General Program Compliance School Level 1400 - Food Safety	<p>The temperature log for May 2019 was missing one day. Education Associate brought it to the attention of the Site Supervisor to ensure that the manager is checking it daily.</p> <p>7 CFR 210.13 Facilities management- (a) Health standards. The school food authority shall ensure that food storage, preparation and service is in accordance with the sanitation and health standards established under State and local law and regulations.</p>	<p>Provided by: <u>Donna Davis</u></p> <p>Received by: <u>Michelle Viviel</u></p>
Head Start - West Ashley	USDA Performance Standard 2 General Program Compliance School Level 1400- Food Safety	<p>Most recent food safety inspection is posted on the kitchen door (as DHEC requested), however; this is not visible to the public. Had the Field Officer make a copy to be placed on the parent board so that it is publicly visible and in compliance with USDA standards.</p> <p>7 CFR 210.13 Facilities management- (a) Health standards. The school food authority shall ensure that food storage, preparation and service is in accordance with the sanitation and health standards established under State and local law and regulations.</p>	<p>Provided by: <u>Shamere Young</u></p> <p>Received by: <u>Pam Brown</u></p>
James Island High	USDA Performance Standard 2 General Program Compliance School Level 400 - Meal Components and Quantities - Lunch	<p>The staff were using a #6 / 2/3rd cup scoop portion for rice. It should have been 1 cup. Technical assistance was given and item was corrected.</p> <p>7 CFR 210.10 (B) Daily and weekly servings. The grains component is based on minimum daily servings plus total servings over a 5-day school week. Schools serving lunch 6 or 7 days per week must increase the weekly grains quantity by approximately 20 percent (1/5) for each additional day. When schools operate less than 5 days per week, they may decrease the weekly quantity by approximately 20 percent (1/5) for each day less than 5. The servings for biscuits, rolls, muffins, and other grain/bread varieties are specified in FNS guidance. At least half of the grains offered weekly must meet the whole grain-rich criteria specified in FNS guidance, and the remaining grain items offered must be enriched.</p>	<p>Provided by: <u>Rebecca Kenner</u></p> <p>Received by: <u>Gwen Whitley</u></p>
James Island High	USDA Performance Standard 2 General Program Compliance School Level 400 - Meal Components and Quantities - Lunch	<p>The Nardone's Pizza red/orange vegetable credit based on the CN label was incorrect. The recipe and production record stated 1 cup R/O V contribution. However, the CN label stated 1/8 cup R/O V entered in the recipe.</p> <p>7 CFR § 210.10 Meal requirements for lunches and requirements for afterschool snacks (iii)Vegetables component. Schools must offer vegetables daily as part of the lunch menu. Fresh, frozen, or canned vegetables and dry beans and peas (legumes) may be offered to meet this requirement. All vegetables are credited based on their volume as served, except that 1 cup of leafy greens counts as 1/2 cup of vegetables and tomato paste and puree are credited based on calculated volume of the whole food equivalency. Pasteurized, full-strength vegetable juice may be used to meet no more than one-half of the vegetables component. Cooked dry beans or peas (legumes) may be counted as either a vegetable or as a meat alternate but</p>	<p>Provided by: <u>Rebecca Kenner</u></p> <p>Received by: <u>Gwen Whitley</u></p>

		<p>not as both in the same meal. Vegetable offerings at lunch over the course of the week must include the following vegetable subgroups, as defined in this section in the quantities specified in the meal pattern in paragraph (c) of this section:</p> <p>(B)Red-orange vegetables. This subgroup includes vegetables such as acorn squash, butternut squash, carrots, pumpkin, tomatoes, tomato juice, and sweet potatoes;</p>	
Ladson Elementary	<p>USDA Performance Standard 2 General Program Compliance School Level</p> <p>Infant and Pre-K Meal Pattern Checklist - Breakfast</p>	<p>Observed the breakfast meal in two classrooms and the family style method was not correctly implemented. The students were served by the teachers and the fruit with edible peels (apples) were not wrapped. This was discussed with the district representative and kitchen manager. The Education Associate provided the district representative handouts downloaded from the USDA website and the SNA Website regarding Family Style Meals.</p> <p>7 CFR § 226.20 - Requirements for meals.</p> <p>(n)Family style meal service. Family style is a type of meal service which allows children and adults to serve themselves from common platters of food with the assistance of supervising adults. Institutions and facilities choosing to exercise this option must be in compliance with the following practices:</p> <p>(2)Children and adults must be allowed to serve the food components themselves, with the exception of fluids (such as milk). During the course of the meal, it is the responsibility of the supervising adults to actively encourage each child and adult to serve themselves the full required portion of each food component of the meal pattern. Supervising adults who choose to serve the fluids directly to the children or adults must serve the required minimum quantity to each child or adult.</p>	<p>Provided by: <u>Carla Garland</u></p> <p>Received by: <u>Sarah Bates and Margaret Grubb</u></p>
Ladson Elementary	<p>USDA Performance Standard 2 General Program Compliance School Level</p> <p>400 - Meal Components and Quantities - Breakfast</p>	<p>Observed BIC, however, could not determine in one of the classrooms, if all students received a reimbursable meal. The teacher was preoccupied during the entire meal service. The student's that the Education Associate and the District Representative observed were served a meal but could not determine if they received a reimbursable meal. Walter Campbell stopped in the same day and this information was shared with him as well.</p> <p>7 CFR § 220.8 - Meal requirements for breakfasts</p> <p>(e)Offer versus serve for grades K through 12.School breakfast must offer daily at least the three food components required in the meal pattern in paragraph (c) of this section. To exercise the offer versus serve option at breakfast, a school food authority or school must offer a minimum of four food items daily as part of the required components. Under offer versus serve, students are allowed to decline one of the four food items, provided that students select at least 1/2 cup of the fruit component for a reimbursable meal. If only three food items are offered at breakfast, school food authorities or schools may not exercise the offer versus serve option.</p>	<p>Provided by: <u>Carla Garland</u></p> <p>Received by: <u>Sarah Bates and Margaret Grubb</u></p>
Ladson Elementary	USDA Performance Standard 2	<p>Some items in the kitchen's storeroom were marked incorrectly (mm/dd) and others were not marked at all. Some of the food products not containing a date are mustard packets, catsup, canned tomatoes, canned</p>	<p>Provided by: <u>Carla Garland</u></p>

	General Program Compliance School Level 1400 - Food Safety	applesauce, Uncle Ben's Rice, WG pop tarts, raisins, hummus, and Ritz crackers. Chicken nuggets located in one of the freezer's did not contain a receive date. This is to be corrected immediately. 7 CFR 210.13 Facilities management- (a) Health standards. The school food authority shall ensure that food storage, preparation and service is in accordance with the sanitation and health standards established under State and local law and regulations.	Received by: <u>Sarah Bates and Margaret Grubb</u>
Meeting Street at Brentwood	USDA Performance Standard 2 General Program Compliance School Level 1400 - Food Safety	Two components were being preplated and placed on the counters prior to food service beginning. The Education Associate explained to the Site Supervisor that preplating negates offer versus serve and the food is not held at a safe temperature in that environment. 7 CFR 210.13 Facilities management- (a) Health standards. The school food authority shall ensure that food storage, preparation and service is in accordance with the sanitation and health standards established under State and local law and regulations.	Provided by: <u>Donna Davis</u> Received by: <u>Ann Hoch</u>
Meeting Street at Brentwood	USDA Performance Standard 2 General Program Compliance School Level Infant and Pre-K Meal Pattern Checklist - Breakfast	When the breakfast menu for pre-K was reviewed, it was determined that the Apple Cinnamon Cheerios contain 10 grams of sugar per dry ounce and the Cinnamon Toast Crunch contained 8 grams of sugar per dry ounce. Informed site supervisor that cereals served to pre-K students cannot contain more than 6 grams of sugar per dry ounce. She removed those items from the menus. 7 CFR § 226.20 - Requirements for meals (5) Infant meal pattern table. The minimum amounts of food components to serve to infants, as described in paragraph (b)(4) of this section, are: ³ Breakfast cereals must contain no more than 6 grams of sugar per dry ounce (no more than 21.2 grams sucrose and other sugars per 100 grams of dry cereal).	Provided by: <u>Donna Davis</u> Received by: <u>Ann Hoch</u>
Meeting Street at Brentwood	USDA Performance Standard 2 General Program Compliance School Level Infant and Pre-K Meal Pattern Checklist - Breakfast	Pre-K students only had a muffin and banana at their desk and the milk was on a separate table. None of the students had a milk. The teacher was informed by the site supervisor and education associate that the meal components were not optional for the students and they had to receive all components. The teacher gave out the milk and said she would give them all components in the future. 7 CFR § 226.20 - Requirements for meals (c) Meal patterns for children age 1 through 18 and adult participants. Institutions and facilities must serve the food components and quantities specified in the following meal patterns for children and adult participants in order to qualify for reimbursement. (1) Breakfast. Fluid milk, vegetables or fruit, or portions of both, and grains are required components of the breakfast meal. Meat and meat alternates may be used to meet the entire grains requirement a maximum of three times per week. The minimum amounts of food components to be served at breakfast are as follows	Provided by: <u>Donna Davis</u> Received by: <u>Ann Hoch</u>

Meeting Street at Brentwood	USDA Performance Standard 2 General Program Compliance School Level 1400 - Food Safety	Monthly HACCP forms were difficult to locate. Education Associate suggested to the manager to place the monthly forms with her monthly records file. 7 CFR 210.13 Facilities management- (a) Health standards. The school food authority shall ensure that food storage, preparation and service is in accordance with the sanitation and health standards established under State and local law and regulations.	Provided by: <u>Donna Davis</u> Received by: <u>Ann Hoch</u>
West Ashley High	USDA Performance Standard 2 General Program Compliance School Level 400 - Meal Components and Quantities	The pizza entree was not available to all students. They ran out during the last lunch period. They were anticipating the weekly truck delivery in the morning, but it did not come until 12:30 pm. Technical assistance was given regarding adequate inventory cushion between deliveries. 7 CFR §210.10 Meal requirements for lunches and requirements for afterschool snacks (i) Requirements for lunch. School lunches offered to children age 5 or older must meet, at a minimum, the meal requirements in paragraph (b) of this section. Schools must follow a food-based menu planning approach and produce enough food to offer each child the quantities specified in the meal pattern established in paragraph (c) of this section for each age/grade group served in the school. In addition, school lunches must meet the dietary specifications in paragraph (f) of this section. Schools offering lunches to children ages 1 through 4 and infants must meet the meal pattern requirements in paragraphs (p) and (q), as applicable, of this section. Schools must make potable water available and accessible without restriction to children at no charge in the place(s) where lunches are served during the meal service.	Provided by: <u>Rebecca Kenner</u> Received by: <u>Pam Brown</u>
West Ashley High	USDA Performance Standard 2 General Program Compliance School Level 1400- Food Safety	Fruit with edible peel was not wrapped or under sneeze guard. Drinking cup did not have a straw. Technical assistance was given and corrected on-site. 7 CFR 210.13 Facilities management- (a) Health standards. The school food authority shall ensure that food storage, preparation and service is in accordance with the sanitation and health standards established under State and local law and regulations.	Provided by: <u>Rebecca Kenner</u> Received by: <u>Pam Brown</u>