



STATE OF SOUTH CAROLINA
DEPARTMENT OF EDUCATION

MOLLY M. SPEARMAN
STATE SUPERINTENDENT OF EDUCATION

February 25, 2019

Mr. Donald Andrews, Superintendent
Cherokee County School District
141 Twin Lakes Rd.
Gaffney, SC 29341

Dear Mr. Andrews:

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 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. Andrews
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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: Sandra Littlejohn, 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: Cherokee County School District

On Site Review Dates: February 12-15, 2019

<u>Director:</u> Sandra Littlejohn	<u>Telephone:</u> 864-206-6424 <u>Email:</u> sandra.littlejohn@cherokee1.org
<u>Lead Reviewer:</u> Shamere Young	<u>Telephone:</u> 803-734-0325 <u>Email:</u> syoung@ed.sc.gov
<u>Review Month:</u> December 2018	<u>Review Week:</u> December 17-21, 2018
<u>Pre Conference Date:</u> December 18, 2018 <u>Attendance:</u> Sandra Littlejohn	<u>Exit Conference Date:</u> February 15, 2019 <u>Attendance:</u> Mr. Andrews –Superintendent Shamere Young- Education Associate, Sandra Littlejohn – Food Service Director, Chris Strong – Education Associate , Diane Cole – Field Supervisor (SFA)

Site Visited	Day of Review	Reviewer	Site Manager
Blacksburg Middle	02.12.19	Shamere Young & Chris Strong	Rita Patterson
Alma Elementary	02.13.19	Chris Strong	Debra McAfee
Blacksburg High	02.13.19	Shamere Young	Donna Smith



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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, 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, 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 Alma Elementary & Blacksburg High 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

The next step of the AR Process is for you to execute and return the attached Corrective Action Plan by March 22, 2019.

Upon completion of the Corrective Action Plan by the target date of March 22, 2019, please forward the required documentation to Shamere Young. 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: Cherokee

Date of On-Site AR: February 12-15, 2019

Date CAP due: March 22, 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)
SFA	USDA Performance Standard 1 School Food Authority: Certification and Benefit Issuance	<p>Households filled out applications on a back to school night (prior to school start), but the SFA did not process free/reduced applications within 10 days of receipt. Note: Applications should be reviewed and an eligibility determination made IMMEDIATELY, but no later than 10 days from receipt.</p> <p>Ensure that applications are processed within the required 10 days.</p> <p>§7 CFR 245.6 (a). <i>Application, eligibility and certification of children for free and reduced price meals and free milk.</i> (6) Notice of approval—(i) Income applications. The local educational agency must notify the household of the children's eligibility and provide the eligible children the benefits to which they are entitled within 10 operating days of receiving the application from the household.</p>	<p>SFA is to create a written SOP on how applications will be processed in the future and submit to SA.</p> <p>SFA will ensure that benefit issuance employee(s) attend a USDA or SA Eligibility/Benefit Issuance training before SY19-20</p>	n/a	
	USDA Performance Standard 1 General Compliance: RMCR – Paid Lunch Equity	<p>SFA must correct errors on PLE Tool. After corrections are made follow recommendation of PLE Tool regarding increase.</p> <p>7 CFR 210.14 (e) <i>Pricing paid lunches.</i> For each school year beginning July 1, 2011, school food authorities shall establish prices for paid lunches in accordance with this paragraph.</p> <p>(1) Calculation procedures. Each school food authority shall:</p> <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.</p> <p>(ii) Calculate the difference between the per meal Federal reimbursement for paid and free lunches received by the school</p>	<p>SFA worked on PLE tool onsite and corrected errors.</p> <p>Lunch prices will be raised in SY 19-20 by SFA. SFA is required to have updated lunch prices submitted as part of the new SY 19-20 NSLP application packet.</p>	n/a	

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.

(2) Average paid lunch price is equal to/greater than the reimbursement difference. 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.

(3) Average lunch price is lower than the reimbursement difference. When the average price from the prior school year is lower than the difference in reimbursement rates as determined in paragraph (e)(1)(iii) of this section, the school food authority shall establish an average price for the current school year that is not less than the average price charged in the previous school year as adjusted by a percentage equal to the sum obtained by adding:

(i) 2 percent; and

(ii) The percentage change in the Consumers Price Index for All Urban Consumers used to increase the Federal reimbursement rate under section 11 of the Act for the most recent school year for which data are available. The percentage to be used is found in the annual notice published in the Federal Register announcing the national average payment rates, from the prior year.

(4) Price Adjustments. (i) Maximum required price increase. The maximum annual average price increase required under this paragraph shall not exceed ten cents.

		(ii) Rounding of paid lunch prices. Any school food authority may round the adjusted price of the paid lunches down to the nearest five cents.				
		(iii) Optional price increases. A school food authority may increase the average price by more than ten cents.				
Signature of SFA Representative:				Date:		
Signature of School Foodservice Representative:				Date:		
Signature of Administrative Reviewer:				Date:		

Technical Assistance (TA) for Administrative Review (AR)

SFA: Cherokee

Date of On-Site AR: February 12-15, 2019

Location SFA Office or Site (1)	Areas Requiring TA (2)	TA Received Supporting Documentation (3)	TA Provided by: Person Receiving TA: (4)
SFA	<p>General Area:</p> <p>Section 800: Civil Rights</p>	<p>Direct Certification letter has the incorrect non-discrimination statement on it.</p> <p>Benefit issuance supervisor made corrections to the statement at the bottom of the letters for future use.</p> <p>The nondiscrimination statement must accompany any new printed materials and any web-based materials referencing FNS programs</p>	<p>Provided by: <u>Shamere Young</u></p> <p>Received by: <u>Diane Cole, Field Supervisor</u></p>
Alma Elementary	<p>Performance Standard 2</p> <p>Section 400: Meal Components and Quantities</p>	<p>Signage or other methods used to assist students in identifying the reimbursable meals was not available for breakfast. Must have OVS signage to assist students in selecting meal choices.</p> <p>Breakfast OVS signage was placed in cafeteria.</p> <p>210.18(g)(2) (1) Observe a significant number of program meals, as described in the FNS Administrative Review Manual, at each serving line and review the corresponding documentation to determine whether all reimbursable meal service lines offer all of the required food components/items and quantities for the age/grade groups being served, as required under §210.10, as applicable, and §220.8 of this chapter, as applicable. Observe meals at the beginning, middle and end of the meal service line, and confirm that signage or other methods are used to assist students in identifying the reimbursable meal. If the State agency identifies missing components or inadequate quantities prior to the beginning of the meal service, it must inform the school food authority and provide an opportunity to make corrections. Additionally, if visual observation suggests that quantities offered are insufficient or excessive, the State agency must require the reviewed schools to provide documentation demonstrating that the required amounts of each component were available for service for each day of the review period.</p>	<p>Provided by: Chris Strong</p> <p>Received by: Sandra Littlejohn, Director & Cafeteria Manager</p>

Blacksburg Middle	<p>Performance Standard 2</p> <p>Section 400: Meal Components and Quantities</p>	<p>Only one OVS sign was posted inside the cafeteria. Spoke to Manager & director about having additional signage in café (especially since it is large), to encourage/explain OVS.</p> <p>Manager hung up new OVS posters before lunch service started.</p> <p>210.18(g)(2) (1) Observe a significant number of program meals, as described in the FNS Administrative Review Manual, at each serving line and review the corresponding documentation to determine whether all reimbursable meal service lines offer all of the required food components/items and quantities for the age/grade groups being served, as required under §210.10, as applicable, and §220.8 of this chapter, as applicable. Observe meals at the beginning, middle and end of the meal service line, and confirm that signage or other methods are used to assist students in identifying the reimbursable meal. If the State agency identifies missing components or inadequate quantities prior to the beginning of the meal service, it must inform the school food authority and provide an opportunity to make corrections. Additionally, if visual observation suggests that quantities offered are insufficient or excessive, the State agency must require the reviewed schools to provide documentation demonstrating that the required amounts of each component were available for service for each day of the review period.</p>	<p>Provided by: Shamere Young</p> <p>Received by: Diane Cole, Field Supervisor & Cafeteria Manager</p>