



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

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

May 15, 2019

Ms. Marie Milam, Executive Director  
Midlands STEM Institute  
633 Mobley Highway  
Winnsboro, SC 29180

Dear Ms. Milam:

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:

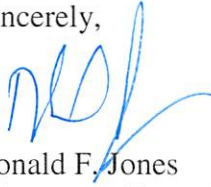
- Free and Reduced Price Meal Benefits Certification;
- Meal Access and Reimbursement;
- Resource Management;
- Nutritional Integrity of Meals and All Other Foods Sold in Schools; and
- Other Related Federal Programs.

Ms. Milam  
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In addition to an evaluation of key SFA administrative processes and records, onsite visitation 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/cg

Attachment

cc: Sharon Irby, Child Nutrition Program Director  
Lillie Mozie, Child Nutrition Manager  
Donna Davis, District Services Team Leader, SCDE Office of Health and Nutrition  
Carla Garland, Education Associate, SCDE Office of Health and Nutrition

Midlands STEM Institute

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On Site Review Dates: April 24-26, 2019

<u>Director:</u> Marie Milam	<u>Telephone:</u> (803) 815-1524  <u>Email:</u> mmilam@midlandsstem.org
<u>Lead Reviewer:</u> Carla Garland	<u>Telephone:</u> (803) 734-0518  <u>Email:</u> cgarland@ed.sc.gov
<u>Review Month:</u> March 2019	<u>Review Week:</u> March 18-22, 2019
<u>Pre Conference Date:</u> March 5, 2019  <u>Attendance:</u> Sharon Irby Lillie Mozie	<u>Exit Conference Date:</u> March 26, 2019  <u>Attendance:</u> Marie Milam Sharon Irby Lillie Mozie

Site Visited	Day of Review	Reviewer	Site Manager
Midlands STEM Institute	March 24-26, 2019	Carla Garland	Lillie Mozie



**STATE OF SOUTH CAROLINA**  
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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, all success criteria were met.

Commendations: Records were kept in an orderly fashion and easy to reference.

**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.

## **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 Midlands STEM Institute 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, 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 June 14, 2019.

Upon completion of the Corrective Action Plan by the target date of June 14, 2019, please forward the required documentation to Carla Garland at cgarland@ed.sc.gov. Once your Corrective Action Plan has been approved, a final closure letter will then be mailed to you.

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

SFA: Midlands STEM Institute

Date of On-Site AR: April 24-26, 2019

Date CAP due: June 14, 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)
	<b>USDA Performance Standard 1 General Compliance:</b>  Local Wellness Policy	The SFA must ensure that the Local Wellness policy meets the Healthy, Hunger-Free Kids Act of 2010 (HHFKA) regulations as well as USDA meal pattern requirements  210.18(x) <i>Local school wellness</i> . The State agency shall ensure the local educational agency complies with the local school wellness requirements set forth in §210.30.  210.12(e) <i>Local school wellness policies</i> . Local educational agencies must comply with the provisions of §210.30(d) regarding student, parent, and community involvement in the development, implementation, and periodic review and update of the local school wellness policy.	Submit the Local School Wellness Policy to include revision date to Dr. Juanita Bowens and a copy to Carla Garland.  Submit supporting documentation that Local School Wellness Policy was made available to the public via web address, distribution packet, or email.		
	<b>USDA Performance Standard 1 General Compliance:</b>  Reporting and Record Keeping	Nutritional Quality and Meal Pattern – School Level (Dietary Specifications)  Breakfast – 6 Cent Compliance A. All items served were not listed on the posted menu on the day of review and some items were not listed but notated on the SFAs production records for the month of review.  <i>CFR 210.18 (A). Review menu and production records for the reviewed schools for a minimum of one school week (i.e., a minimum number of three consecutive school days and a maximum of seven consecutive school days) from the review period. Documentation, including food crediting documentation, such as food labels, product formulation statements, CN labels and bid documentation, must be reviewed to ensure compliance with the lunch and breakfast meal patterns. If the documentation review reveals problems with food components or quantities, the State agency must expand the review to, at a minimum, the entire review period.</i>	The SFA must provide the 6 Cent Worksheets to ensure compliance for the remainder of this school year, and future school years.  <b>Additionally, the Reviewer is requesting both the Director and Manager to attend the upcoming 6 Cent Workshop (June 11-12, 2019) in Camden, SC.</b>		

	<b>USDA Performance Standard 2 Nutritional Quality and Meal Pattern – School Level</b>  Reporting and Record Keeping	Nutritional Quality and Meal Pattern – School Level (Dietary Specifications)  Lunch – 6 Cent Compliance A. All items served were not listed on the posted menu on the day of review and some items were not listed but notated on the SFAs production records for the month of review.  <i>CFR 210.18 (A). Review menu and production records for the reviewed schools for a minimum of one school week (i.e., a minimum number of three consecutive school days and a maximum of seven consecutive school days) from the review period. Documentation, including food crediting documentation, such as food labels, product formulation statements, CN labels and bid documentation, must be reviewed to ensure compliance with the lunch and breakfast meal patterns. If the documentation review reveals problems with food components or quantities, the State agency must expand the review to, at a minimum, the entire review period.</i>	The SFA must provide the 6 Cent Worksheets to ensure compliance for the remainder of this school year, and future school years.  Provide 6 Cent Compliance Worksheet for lunch meals that match the March 2019 menu.		
	<b>USDA Performance Standard 1 General Compliance:</b>  Civil Rights	The one page notification letter indicating if a student has been approved for free or reduced meals did not include the nondiscrimination clause. Additionally, any document over one page in length must contain the full USDA Nondiscrimination statement.  FNS Instruction 113-1  (IX) (A) (3) Nondiscrimination Statement. All information materials and sources, including Web sites, used by FNS, State agencies, local agencies, or other sub recipient to inform the public about FNS programs must contain a nondiscrimination statement. It is not required that the nondiscrimination state be included on every page of the program information Web site. At a minimum, the nondiscrimination statement, or a link to it, must be included on the home page of the program information.	Letters pertaining to meal services must contain the nondiscrimination clause.  SFA must submit a copy of the updated notification letter to include the nondiscrimination statement to the State agency.		
	<b>USDA Performance Standard 2 Nutritional Quality and Meal Pattern – School Level</b>  Food Safety	Weekly sample trays not being kept.  The South Carolina Program Reference Manual, page 85, states that SFA's are to: <ol style="list-style-type: none"> <li>1. Store samples for seven days in a freezer that is operating between 0 and 10 °F.</li> <li>2. Throw out samples that are more than seven days old. Hold from Monday to Monday, Tuesday to Tuesday, etc. Throw away at end of day, when you check the freezer for the last time.</li> </ol>	SFA must begin keeping weekly sample trays		



	<b>USDA Performance Standard 2 Nutritional Quality and Meal Pattern – School Level</b>  Food Safety	Large white unmarked container located in the storage room.	SFA must submit documentation indicating the container content and date.		
Signature of SFA Representative:			Date:		
Signature of School Foodservice Representative:			Date:		
Signature of Administrative Reviewer:			Date:		

### Technical Assistance (TA) for Administrative Review

**SFA: Midlands STEM Institute**

**Date of On-Site AR: April 24-26, 2019**

SFA Office or Site (1)	Areas Requiring TA (2)	TA Received  Supporting Documentation (3)	TA Provided by:  Person Receiving TA: (4)
Midlands STEM Institute	<b>USDA Performance Standard 1 General Compliance:</b>  Civil Rights	Civil Rights Poster was located behind the serving line. Corrected on-site, no further action is required.  FNS 113-1, page 15, states, Prominently display the USDA nondiscrimination poster "And Justice for All," or an FNS approved substitute, except in family day care homes. If a State agency elects to produce its own posters, either due to unavailability from USDA/FNS or State agency preference, the reproduction must be approximately the same size as the applicable "And Justice for All" poster (11" width and 17" height).	Provided by: <b>Carla Garland</b>  Received by: <b>Sharon Irby and Lillie Mozie</b>
	<b>USDA Performance Standard 2 General Compliance:</b>  <b>Food Safety</b>	Hand sink log not posted. Corrected on-site, no further action required.  South Carolina Program Reference Manual, page 29, indicates handwashing is done in an approved handwashing sink that has running water at 100°F or hotter, hand soap, and single-use towel dispenser.	Lillie Mozie
	<b>USDA Performance Standard 2 General Compliance School Level</b>  <b>Food Safety</b>	HACCP Binder was updated by SFA, however, Section IV: Large Equipment was incomplete. The manager indicated that she would update immediately.  Large equipment includes items that are <u>not</u> easily moveable. Examples include freezer, refrigerator, slicer, oven, fryers, hot-holding cabinets, and mixers. Equipment does not include items such as knives, dishes, cutting boards, and glassware (South Carolina Program Reference Manual, page 8).	Lillie Mozie
	<b>USDA Performance Standard 2 General Compliance School Level</b>  <b>Meal Components and Quantities - Lunch</b>	Non-fat salad dressings are available for both students and teachers.  The reviewer is recommending that the SFA place non-fat dressing on the line and have teachers ask for the regular dressing or place regular salad dressing in area for teachers ONLY. This will ensure that students will pick up low fat dressing.  210.10 f.1. Calories. {b} Discretionary sources of calories (solid fats and added sugars) may be added to the meal pattern if within the specifications for calories, saturated fat, trans fat, and sodium.	Lillie Mozie