STATE OF SOUTH CAROLINA
DEPARTMENT OF EDUCATION

MOLLY M. SPEARMAN
STATE SUPERINTENDENT OF EDUCATION

March 3, 2017

Mrs. Zonia Jefferson, Superintendent
Florence County School District Four
304 Kemper Street
Timmonsville, SC 29161

Dear Mrs. Jefferson:

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 Donna Davis on February 22-24, 2017. The findings of the review (to include a Corrective Action Plan, if applicable) were discussed with you, Casandra Garner and Gardenia Williams 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.*

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In addition to an evaluation of key SFA administrative processes and records for the review month of December 2016, Timmonsville Education Center was selected to receive an 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 Donna Davis at (803) 734-0080 or ddavis@ed.sc.gov.

Sincerely,

Ronald F. Jones
Director, Office of Health and Nutrition

RFJ/dd

Attachment

cc: Casandra Garner, Child Nutrition Program Director
Donna Davis, District Services Interim Team Leader, SCDE, Office of Health and Nutrition

STATE OF SOUTH CAROLINA
DEPARTMENT OF EDUCATION

Administrative Review of Florence County School District Four Child Nutrition Programs

Conducted by
Donna Davis
Office of Health and Nutrition

February 22-24, 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 (1) exception.

There are no written procedures for ensuring how catering service bills are paid. Invoice from a catered event dated October 25, 2016 in the amount of $126.14 has not been paid to the nonprofit school food service account as of February 24, 2017.

Corrective Action: Submit written procedure for ensuring how catering service bills will be paid. Submit documentation of the date the catered meals/food items billed for October 25, 2016 were transferred into the nonprofit school food service account.

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 with one (1) exception.

The SFA did not request two Food Safety Inspections from DHEC for the school year.

Corrective Action: Submit verification that two Food Safety Inspections have been requested.

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 Timmonsville Education Center 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.

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, and food safety.

Actual Performance: Based on evaluation of documentation and observations made during the onsite visitation, all success criteria were met with one (1) exception.

The SFA operates a school store that sells non-compliant food items immediately after school. This has resulted in the school being over its allotted fundraiser days for the school year (the limit is 30 days per year with two consecutive days counting as one day.).

Corrective Action: Submit verification that the SFA has stopped the sales of non-compliant food items until thirty minutes after the end of the school day.

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.

Afterschool Snack Program (ASP)

Actual Performance: Based on evaluation of documentation and observations made during the onsite visitation, all success criteria were met with one (1) exception.

The attendance record is being used as the meal count record. The ASP Coordinator submits an attendance list daily and states that each child in attendance received a snack.

Corrective Action: SFA must submit verification that a meal count record has been developed in addition to the attendance record.

Fresh Fruits and Vegetables Program

Actual Performance: Based on evaluation of documentation at the district office and observations of the FFVP made during the onsite visitation at Brockington Elementary School, all success criteria were met.

Commendations: All supporting documentation for the FFVP was organized, readily accessible, and validated the operation of the program at the district and school levels.

Closure

The next step of the AR Process is to obtain a signature from you and Casandra Garner acknowledging that you have received the Corrective Action Plan document and agree to its terms and conditions. The original copy of the signed document should be returned to Donna Davis by April 3, 2017.

Upon completion of the Corrective Action Plan by the target date of April 3, 2017, please forward the required documentation to Donna Davis. 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 for Administrative Review (AR)

SFA: Florence Four | Site: Timmonsville Education Center | Date of On-Site AR: 2/22-24, 2017

Areas needing Corrective Action (1)	Planned Corrective Action Activities (2)	Person(s) Responsible (3)	Timeframe (4)	Verification (5)
1400 - Food Safety The SFA did not request two Food Safety Inspections from DHEC for the school year.	Submit verification that two Food Safety Inspections have been requested.	SFA Director	April 3, 2017	
Revenue from Nonprogram Foods Testing Chart Invoice from a catered event dated October 25, 2016 has not been paid to the nonprofit school food service account as of February 24, 2017 and there are no written procedures for ensuring how catering service bills are paid.	Submit written procedure for ensuring how catering service bills will be paid. Submit documentation of the date the catered meals/food items billed for October 25, 2016 were transferred into the nonprofit school food service account.	Superintendent and Finance Director	April 3, 2017	
1100 - Smart Snacks The SFA operates a school store that sells non-compliant items immediately after school. This has resulted in the school being over its allotted fundraiser days for the school year (the limit is 30 days per year with two consecutive days counting as one day.).	Submit verification that the SFA has stopped the sales of non-compliant food items until thirty minutes after the end of the school day.	Superintendent and Principal	April 3, 2017	
1700 - Afterschool Snack The attendance record is being used as the meal count record. The ASP Coordinator submits an attendance list daily and states that each child in attendance received a snack.	SFA must submit verification that a meal count record has been developed in addition to the attendance record.	SFA Director	April 3, 2017	

Signature of SFA Representative:	Date:
Signature of School Foodservice Representative: N/A	Date:
Signature of Administrative Reviewer:	Date: