STATE OF SOUTH CAROLINA

DEPARTMENT OF EDUCATION

MOLLY M. SPEARMAN
STATE SUPERINTENDENT OF EDUCATION

January 11, 2019

Mr. Martin Wright, Superintendent
Hampton School District 2
635 4th Street
Estill, SC 29918

Dear Mr. Wright:

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.

In addition to an evaluation of key SFA administrative processes and records, onsite visitation(s) 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/hz

Attachment

cc: Cheryl Grant, Child Nutrition Program Director
Donna Davis, District Services Team Leader, SCDE Office of Health and Nutrition
Heather Zwiker, Education Associate, SCDE Office of Health and Nutrition

Hampton School District 2

On Site Review Dates: December 12-14, 2018

Director: Cheryl Grant	Telephone: (803) 625-5029 Email: granche@hampton2.k12.sc.us
Lead Reviewer: Heather Zwiker	Telephone: (803) 734-6049 Email: hzwiker@ed.sc.gov
Review Month: November	Review Week: November 12-16, 2018
Pre Conference Date: Attendance: Cheryl Grant, Director Debbie Burison, SFS Assistant Heather Zwiker, Reviewer	Exit Conference Date: December 14, 2018 Attendance: Cheryl Grant, Director Debbie Burison, SFS Assistant Corine Miller, CFO Heather Zwiker, Reviewer

Site Visited	Day of Review	Reviewer	Site Manager
Estill High School	12/13/2018	Heather Zwiker	Jackie Miller

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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, 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 Estill High School 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: The Fresh Fruit and Vegetable Program will be reviewed at a later date.

Closure
The next step of the AR Process is for you to execute and return the attached Corrective Action Plan by February 11, 2019.

Upon completion of the Corrective Action Plan by the target date of February 11, 2019, please forward the required documentation to Heather Zwiker. 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: Hampton 2 **Date of On-Site AR:** **Date CAP due: February 11, 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: General Program Compliance** On-Site Monitoring	No breakfast monitoring was done, and lunch monitoring was done late (2/27/2017). *According to 7 CFR 210.18(E)(iii), The State agency must ensure that the school food authority conducts on-site reviews of each school under its jurisdiction, as required by §§ 210.8(a)(1) and 220.11(d) of this chapter, and monitors claims and readily observable general areas of review in accordance with §§210.8(a)(2) and (a)(3), and 220.11(d) of this chapter.*	The SFA must draft, and provide, a plan to ensure compliance for future school years. Monitoring visits must be completed by February 1, annually.		
SFA	**USDA Performance Standard 1: General Program Compliance** Wellness Policy	The SFA must ensure that the Local Wellness policy meets the Healthy, Hunger-Free Kids Act of 2010 (HHFKA) regulations as wells as USDA meal pattern requirements. No assessment was done on the Wellness Policy by the SFA. Dr. Juanita Bowens reviewed the wellness policy and found the findings below. She emailed the School Board Association Model Local Wellness Policy, and the USDAs Local Wellness Policy Summary Guidelines, as well as the current wellness policy with needed corrections in red. "I have reviewed your wellness policy and made notes on sections that have not been fully developed and thus does not meet USDA or SC School Board Association's Local Model Wellness Policy Guidelines. For your convenience, I have attached a copy of the School Board Association's Model Local Wellness Policy for your use. You will also find attached a copy of USDA's Local Wellness Policy Summary Guidelines. You should have received an invitation to attend a training on 12/5/2018 to assist districts who were having an AR during the 2018-2019 school year; however, I have not received a	Submit the Local School Wellness Policy to include revision date. Submit an assessment on the Wellness Policy. Submit supporting documentation that Local School Wellness Policy was made available to the public via web address, distribution packet, or email.		

		registration form from your district. Please let me know if I can be of further assistance." Juanita Bowens, PhD, RD, LD, SNS 1429 Senate Street, 701-D Columbia, SC 29201 (803)734-8194 (o) *CFR 210.18(x) Local school wellness. The State agency shall ensure the local educational agency complies with the local school wellness requirements set forth in §210.30.* *CFR 210.12(e) Local school wellness policies. 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.*			
SFA	**USDA Performance Standard 1: Resource Management** Revenue from non-program foods	Upon request of the non-program food revenue tool, it was found that the SFA had not completed one. The SFA must complete the non-program foods revenue tool annually, to effective evaluate the profitability of non-program foods sold to participants. *CFR 210.14 (f) (1-3) (1) Definition of non-program foods. For the purposes of this paragraph, non-program foods are those foods and beverages:(i) Sold in a participating school other than reimbursable meals and meal supplements; and (ii) Purchased using funds from the nonprofit school food service account.(2) Revenue from non-program foods. The proportion of total revenue from the sale of non-program foods to total revenue of the school food service account shall be equal to or greater than: (i) The proportion of total food costs associated with obtaining non-program foods to (ii) The total costs associated with obtaining program and non-program foods from the account. (3) All revenue from the sale of non-program foods shall accrue to the nonprofit school food service account of a participating school food authority.*	The SFA must complete and submit the Non-Program Foods Revenue Tool for 2016-17 and 2017-18 school years.		
SFA **Estill High School**	**Performance Standard 1 and 2** Meal Counting and Claiming Procedures	Students are not scanning IDs when going thru the line like they are supposed to. They sign their names on a piece of paper which makes the line take longer and makes it more difficult to ensure students are only getting one meal, or if they need to be charged for seconds. There was one student that came through the line twice and did not pay for the second meal.	Provide documentation, showing that the SFA has an acceptable and accurate procedure for counting and claiming. Provide written documentation that students are charged for second meals.		

		Production Records did not match the POS count. I spoke with the Director and she corrected the meal count before putting the claim in. 210.18(g)(1) *Performance Standard 1 (All free, reduced price and paid school meals claimed for reimbursement are served only to children eligible for free, reduced price and paid school meals, respectively; and are counted, recorded, consolidated and reported through a system which consistently yields correct claims.)* The State agency must follow review procedures stated in this section and as specified in the FNS *Administrative Review Manual* to ensure that the school food authority's certification and benefit issuance processes for school meals offered under the National School Lunch Program, and School Breakfast Program are conducted as required in part 245 of this chapter, as applicable.			
SFA **Estill High School**	**Performance Standard 1 and 2** Food Safety	Sample trays were not prepared or retained. This is a repeat violation. Boxes need to be 6" off the floor. This is a repeat violation. Foods in storage are not properly labeled. This is a repeat violation. *HACCP 2-5 (T1) A sample of each menu item that was prepared in-house must be saved for seven days in the freezer. See Handout 4: Procedures for Preparing a Sample Tray.* *HACCP 2-5 (DS4) All food is stored on clean shelving that is at least 6 inches off the floor and away from the wall.* *HACCP 2-6 (pg. 20) Complete this checklist as part of your monthly food safety inspection cycle. If you answer "no" to any of the items, you must take corrective action. Record the corrective actions taken in the space at the bottom of this form. NOTE: This is one of a series of four forms. It is recommended that one form be completed each week. Packaged food is properly labeled with date received (month/day/year).* *CFR 210.18 (k) Withholding payment. At a minimum, the State agency must withhold all program payments to a school food authority as follows: (1) Cause for withholding. (i) The State agency must withhold all Program payments to a school food authority if documented corrective action for critical area violations is not provided with the deadlines specified in paragraph (j)(2) of this section;(ii) The State agency must withhold all Program payments to a school food authority if the State agency finds that corrective action for critical area*	Provide refresher HACCP training on procedures for the preparation and retention of sample trays. Provide refresher HACCP training on proper storage. Provide refresher HACCP training on procedures for labeling and dating food items Submit the roster and agenda for each of the above listed trainings.		

		violation was not completed;(iii) The State agency may withhold Program payments to a school food authority at its discretion, if the State agency found a critical area violation on a previous review and the school food authority continues to have the same error for the same cause; and(iv) For general area violations, the State agency may withhold Program payments to a school food authority at its discretion, if the State agency finds that documented corrective action is not provided within the deadlines specified in paragraph (j)(2) of this section, corrective action is not complete, or corrective action was not taken as specified in the documented corrective action.			
Estill High School	**Performance Standard 2: Nutritional Quality and Meal Pattern**	Juice accounts for more than 50% of the weekly fruit allowance. Juice is not accounted for on the 6 Cent Worksheet. *CFR 210.18 (iii) For repeated violations involving food quantities and whole grain-rich foods cited under paragraph (g)(2) of this section, the State agency has discretion to apply fiscal action as follows:(A) If the meals contain insufficient quantities of the required food components, the affected meals may be disallowed/reclaimed;(B) If no whole grain-rich foods are offered during the week of review, meals for the entire week of review may be disallowed and/or reclaimed;(C) If insufficient whole grain-rich foods are offered during the week of review, meals for one or more days during the week of review may be disallowed/reclaimed.(D) If a weekly vegetable subgroup is offered in insufficient quantity to meet the weekly vegetable subgroup requirement, meals for one day of the week of review may be disallowed/reclaimed; and(E) If the amount of juice offered exceeds the weekly limitation, meals for the entire week of review may be disallowed/reclaimed.* *CFR 210.10 (F)(ii) Fruits component. Schools must offer fruits daily as part of the lunch menu. Fruits that are fresh; frozen without added sugar; canned in light syrup, water or fruit juice; or dried may be offered to meet the requirements of this paragraph. All fruits are credited based on their volume as served, except that ¼ cup of dried fruit counts as ½ cup of fruit. Only pasteurized, full-strength fruit juice may be used, and may be credited to meet no more than one-half of the fruits component.* *Memo SP 10-2012 (v.9) Fruits and Vegetables (1) Schools may offer fruits that are fresh; frozen; canned in light syrup, water or fruit juice; or dried. Pasteurized full-strength (100%) fruit juice may also be offered in either liquid or frozen form (it is credited to meet no more than one-half of the fruits component offered over the week). Required quantities are established in the meal patterns for lunch and breakfast.*	The Director must complete the inTeam Blackboard training on Nutritional Quality and Meal Pattern for Menu Planners part 3 and submit the certificate of completion. Submit updated 6 Cent Worksheets that account for the juice on the menu.		

Estill High School	**Performance Standard 2: Nutritional Quality and Meal Pattern**	No recipe was available or used for "jello with fruit." The weeks of November 5-9, and November 19-21 are missing a bean/legume. *CFR 210.18 (l) Fiscal action. The State agency must take fiscal action for all Performance Standard 1 violations and specific Performance Standard 2 violations identified during an administrative review as specified in this section. Fiscal action must be taken in accordance with the principles in § 210.19(c) and the procedures established in the FNS Administrative Review Manual. The State agency must follow the fiscal action formula prescribed by FNS to calculate the correct entitlement for a school food authority or a school. While there is no fiscal action required for general area violations, the State agency has the ability to withhold funds for repeat or egregious violations occurring in the majority of the general areas as described in paragraph (k)(1)(iv).(1) Performance Standard 1 violations. A State agency is required to take fiscal action for Performance Standard 1 violations, in accordance with this paragraph and paragraph (l)(3).(i) For certification and benefit issuance errors cited under paragraph (g)(1)(i) of this section, the total number of free and reduced price meals claimed must be adjusted to according to procedures established by FNS.(ii) For meal counting and claiming errors cited under paragraph (g)(1)(ii) of this section, the State agency must apply fiscal action to the incorrect meal counts at the school food authority level, or only to the reviewed schools where violations were identified, as applicable.(2) Performance Standard 2 violations. Except as noted in paragraphs (l)(2)(iii) and (l)(2)(iv) of this section, a State agency is required to apply fiscal action for Performance Standard 2 violations as follows:(i) For missing food components or missing production records cited under paragraph (g)(2) of this section, the State agency must apply fiscal action.(ii) For repeated violations involving milk type and vegetable subgroups cited under paragraph (g)(2) of this section, the State agency must apply fiscal action as follows:(A) If an unallowable milk type is offered or there is no milk variety, any meals selected with the unallowable milk type or when there is no milk variety must also be disallowed/reclaimed; and(B) If one vegetable subgroup is not offered over the course of the week reviewed, the reviewer should evaluate the cause(s) of the error to*	Submit a standardized recipe for the jello with fruit. Submit an updated menu and 6 Cent Worksheet for this cycle menu. The Director must complete the inTeam Blackboard training on Nutritional Quality and Meal Pattern for Menu Planners part 1 and 2 and submit the certificates of completion.		

determine the appropriate fiscal action. All meals served in the deficient week may be disallowed/reclaimed.

§ 210.10 (5) Standardized recipes. All schools must develop and follow standardized recipes. A standardized recipe is a recipe that was tested to provide an established yield and quantity using the same ingredients for both measurement and preparation methods.

§ 210.10 (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***
	Amount of food[a] per week (minimum per day)		
Fruits (cups)[b]	*2½ (½)*	*2½ (½)*	*5 (1)*
Vegetables (cups)[b]	*3¾ (¾)*	*3¾ (¾)*	*5 (1)*
Dark green[c]	*½*	*½*	*½*
Red/Orange[c]	*¾*	*¾*	*1¼*
Beans and peas (legumes)[c]	*½*	*½*	*½*
Starchy[c]	*½*	*½*	*½*
Other[c,d]	*½*	*½*	*¾*
Additional Vegetables to Reach Total[e]	*[e]1*	*[e]1*	*[e]1½*

		Grains (oz eq)[f]	*8-9 (1)*	*8-10 (1)*	*10-12 (2)*		
		Meats/Meat Alternates (oz eq)	*8-10 (1)*	*9-10 (1)*	*10-12 (2)*		
		Fluid milk (cups)[g]	*5 (1)*	*5 (1)*	*5 (1)*		
		Other Specifications: Daily Amount Based on the Average for a 5-Day Week					
		Min-max calories (kcal)[h]	*550-650*	*600-700*	*750-850*		
		Saturated fat (% of total calories)[h]	*<10*	*<10*	*<10*		
		Sodium Target 1 (mg)[e]	*≤1,230*	*≤1,360*	*≤1,420*		
		Trans fat[hij]	*Nutrition label or manufacturer specifications must indicate zero grams of transfat per serving.*				
Estill High School	**Performance Standard 2: General Program Compliance**	Water requirements are not met. The water dispenser in the cafeteria was removed for cleaning and no other water option was available. Auditor requested they move the water dispenser from inside the kitchen and move it out to the cafeteria. Custodians moved it immediately. However, towards the end of service students complained that debris was in the water. After checking it the auditor found that debris was in the water and advised other methods such as bottled water or a portable igloo type container with a spout so students could fill cups. Director states they don't have either of those options available at this time. The water dispenser was removed on Monday, 12/10/2018. This is a repeat violation.				Submit written documentation and pictures that water is available in all school cafeterias during breakfast and lunch.	

		Memo SP 28-2011 While potable water is required to be made available to students, it is not considered part of the reimbursable meal and students are not required to take water. There is no separate funding available for this provision and reimbursement may not be claimed. However, reasonable costs associated with providing potable water would be an allowable cost to the non-profit food service account. *CFR 210.18 (k) Withholding payment. At a minimum, the State agency must withhold all program payments to a school food authority as follows: (1) Cause for withholding. (i) The State agency must withhold all Program payments to a school food authority if documented corrective action for critical area violations is not provided with the deadlines specified in paragraph (j)(2) of this section;(ii) The State agency must withhold all Program payments to a school food authority if the State agency finds that corrective action for critical area violation was not completed;(iii) The State agency may withhold Program payments to a school food authority at its discretion, if the State agency found a critical area violation on a previous review and the school food authority continues to have the same error for the same cause; and(iv) For general area violations, the State agency may withhold Program payments to a school food authority at its discretion, if the State agency finds that documented corrective action is not provided within the deadlines specified in paragraph (j)(2) of this section, corrective action is not complete, or corrective action was not taken as specified in the documented corrective action.*			

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