



Saddling Up for Success: Taming the Most Common CRCF Citations

South Carolina Assisted Living Association (SCALA)

Spring Conference

April 29, 2026

Out of the Gate: Your Run Down for Today



- **Meet the Jockeys:** *Residential Facilities Section Overview*
- **In the Winner's Kitchen- Food Rules that Lead to Success:** *Food and Sanitation Audits*
- **Hurdles on the Track:** *Top Violations in CRCFs*



MEET THE JOCKEYS



Residential Facilities Section Management



Justin McCary
Field Manager
(803) 545-4049 (o)
(803) 977-3836 (c)
mccaryjc@dph.sc.gov



Norrisie Summers
Field Manager
(803) 545-4866 (o)
(803) 397-7666 (c)
summernm@dph.sc.gov



Everette Williams
Support Manager
(803) 545-4371 (o)
(803) 920-7527 (c)
williael@dph.sc.gov

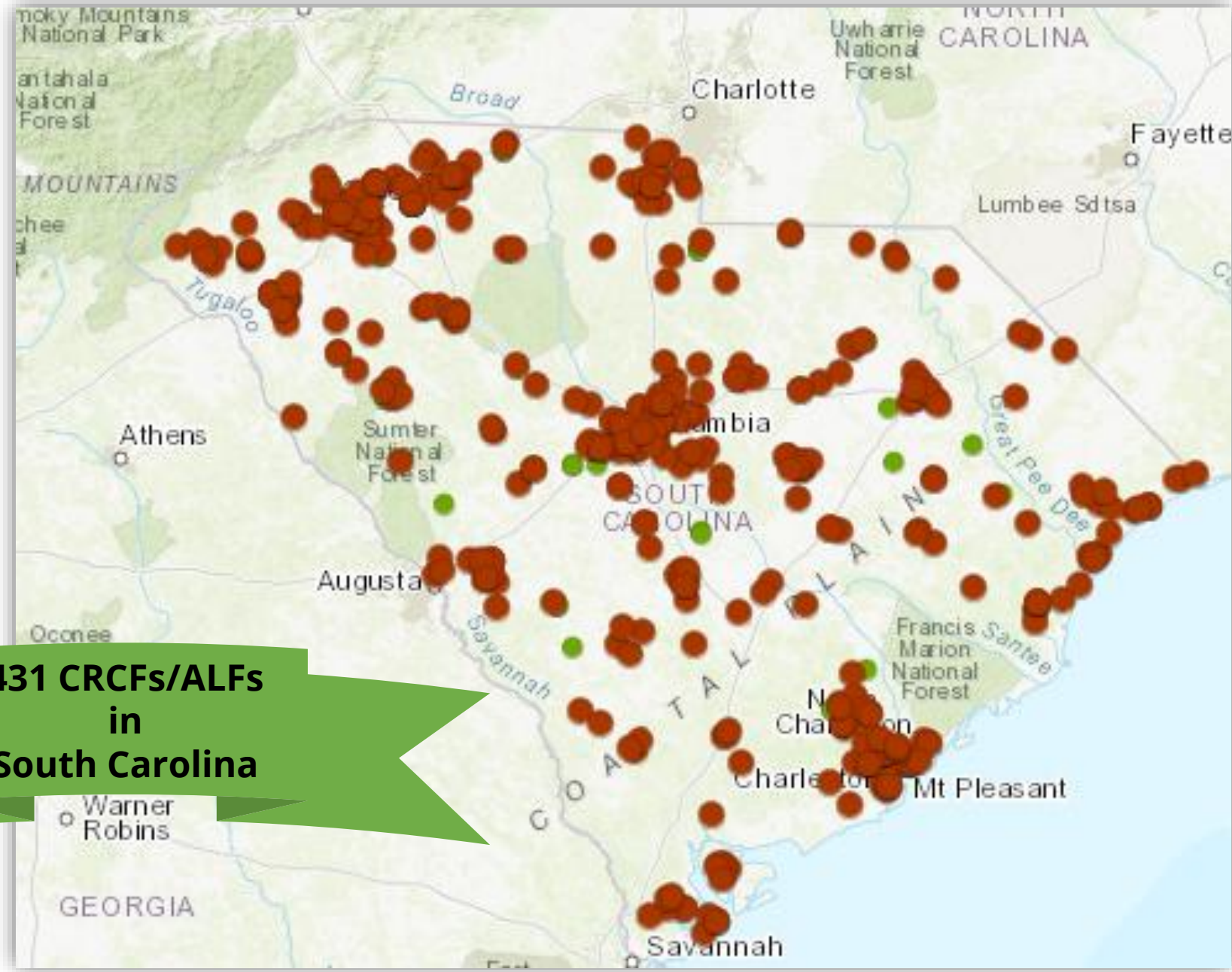


Dustin Ransdell
Support Manager
(803) 898-0100 (o)
(803) 348-1057 (c)
ransdedt@dph.sc.gov



Residential Facilities Section

- Enforce regulatory standards, inspect and license the following:
 - Community Residential Care Facilities/Assisted Livings
 - Crisis Stabilization Units
 - Adult Day Cares
 - Facilities for Chemically Dependent or Addicted Persons



**431 CRCFs/ALFs
in
South Carolina**

Warner
Robins
GEORGIA

IN THE WINNER'S KITCHEN: FOOD RULES THAT LEAD TO SUCCESS



Food Grade Ratings

- Food Grade A “Meet requirements”
Score: 88-100
- Food Grade B “Needs Improvement” Score: 78-87
- Food Grade C “Needs Significant Improvement” Score: 77 and below



PRIORITY AND PRIORITY FOUNDATION VIOLATIONS



“**Priority violation**” includes violations with a quantifiable measure to show control of hazards such as cooking, reheating, cooling, handwashing.

“**Priority foundation violation**” includes a violation that requires the purposeful incorporation of specific actions, equipment or procedures by industry management to attain control of risk factors that contribute to foodborne illness or injury such as personnel training, infrastructure or necessary equipment, documentation or record keeping, and labeling.

- Three (3) or more priority and/priority violations results in a follow-up
- Cited priority and/or priority foundation violations must be compliance at the time of the follow-up inspection.
- **Failure to correct priority and/or priority foundation violations from previous inspection shall result in a downgrade and/or a further downgrade.**

Certified Food Protection Manager (2-102.12)



- Food Protection Manager
 - Supervisory and management responsibility
 - Authority to direct and control food preparation and service
 - Ability to enforce employee health policies
 - Frequent presence in the facility
 - Passed a test through an accredited program

RETAIL FOOD ESTABLISHMENTS CERTIFIED FOOD PROTECTION MANAGER

REGULATION 61-25: RETAIL FOOD ESTABLISHMENTS



South Carolina
DEPARTMENT OF
AGRICULTURE

FIVE KEY RISK FACTORS
repeatedly identified in foodborne illness outbreaks:

1. Improper Holding Temps
2. Inadequate Cooking
3. Contaminated Equipment
4. Food from Unsafe Sources
5. Poor Personal Hygiene

All 5 of these risk factors can be reduced by having a certified food protection manager.

REGULATION 61-25
Citations 2-102.12 & 2-102.20
At least one employee with the authority to direct and control food preparation and service shall be a food protection manager who has been certified by an accredited program. Only Conference of Food Protection ANSI certified Food Protection Manager Courses meet the requirements of 2-102.20.

PUBLIC HEALTH REASONS
Food protection managers have an important role in formulating policies, verifying food employees carry out these policies, and communicating with employees about the recommended practices to reduce the risk of foodborne illness.

Below are organizations with Certified Food Protection Manager (CFPM) programs accredited by the American National Standards Institute (ANSI). The [ANSI/CFP](#) link provides information on authorized programs.



National Restaurant Association
ServSafe® Food Protection Manager
Certification Program
servsafe.com



State Food Safety
Food Protection Manager Training
statefoodsafety.com



South Carolina Restaurant &
Lodging Association
servsafecertified.com



Always Food Safe
Food Protection Manager
Certification Program*
alwaysfoodsafes.com



Clemson Cooperative Extension
clemson.edu/servsafe



AAA Food Handler
Certified Food Protection Manager
aafoodhandler.com/
food-manager-certification



Learn2Serv® Food Protection
Manager Certification Program*
360training.com/learn2serve



National Registry of
Food Safety Professionals
Food Protection Manager
Certification Program*
nrfsp.com



Responsible Training
Food Protection Manager
Certification Program
responsibletraining.com

*These trainings may be offered in multiple languages.



Person In Charge (2-102.12)

- Individual present at a retail food establishment who is responsible for the operation at the time of the inspection
- Must be a certified food handler or a certified food protection manager
- Must be present at all times during operation
- Must be able to demonstrate to the Department requirements of the regulation

Food Handler Certificate

RETAIL FOOD ESTABLISHMENTS FOOD HANDLER CERTIFICATE

REGULATION 61-25: RETAIL FOOD ESTABLISHMENTS



South Carolina
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All 5 of these risk factors can be reduced by the person in charge.

REGULATION 61-25

Citations 2-102.12 (B)

At all times during operation, the person in charge shall have a food handler certificate or be a certified food protection manager.

ASTM International's ANSI Certificate Accredited Program Food Handlers courses meet the requirements of 2-102.12.

PUBLIC HEALTH REASONS

The Person in Charge has an important role in monitoring employee activities and ensuring that everyone follows established policies to reduce the risk of foodborne illness.



Every facility must have a person in charge (PIC) that is responsible for food safety during all hours of operation. The PIC must either have a Food Handler Certificate or be a Certified Food Protection Manager (CFPM). Listed on this fact sheet are programs that offer the Food Handler certificate.

123 PREMIER FOOD SAFETY
123premierfoodsafety.com

360TRAINING.COM
360training.com/food-beverage-programs

A PLUS FOOD TRAINING, LLC
aplusfoodtraining.com

AAA FOOD HANDLER
aafoodhandler.com

ABOVE TRAINING / STATE FOOD SAFETY
statefoodsafety.com

ACE HANDLER
acefoodhandler.com

CLEMSON EXTENSION SERVICE (SERVSAFE)
clemsun.edu/extension/food

COGNETI, LLC
cogneti.com

DIVERSYS LEARNING, INC.
diversys-foodsafety.com

EFOODHANDLERS, INC.
efoodhandlers.com

EFOODTRAINER, INC.
efoodtrainer.com

FOOD HANDLER SOLUTIONS, LLC
foodhandlersolutions.com

FOOD MARKETING INSTITUTE
fmi.org

FOOD SAFETY EDUCATORS
foodsafetyeducators.com

HEALTH TECHNOLOGIES, INC.
diningrd.com/pages/food-handler-program

INSTITUTE OF FOOD SAFETY, HEALTH, & HYGIENE, INC.
institute4foodsafety.com

MENUTRINFO, LLC
allertrain.com

MYCERTIFY
mycertify.com

NATIONAL ENVIRONMENTAL HEALTH ASSOCIATION (SERVSAFE)
neha.org

NATIONAL REGISTRY OF FOOD SAFETY PROFESSIONALS
nrfsp.com/exam-center/food-handler

NATIONAL RESTAURANT ASSOCIATION (SERVSAFE)
servsafe.com

PROMETRIC, INC.
prometric.com/en-us/clients/foodsafety

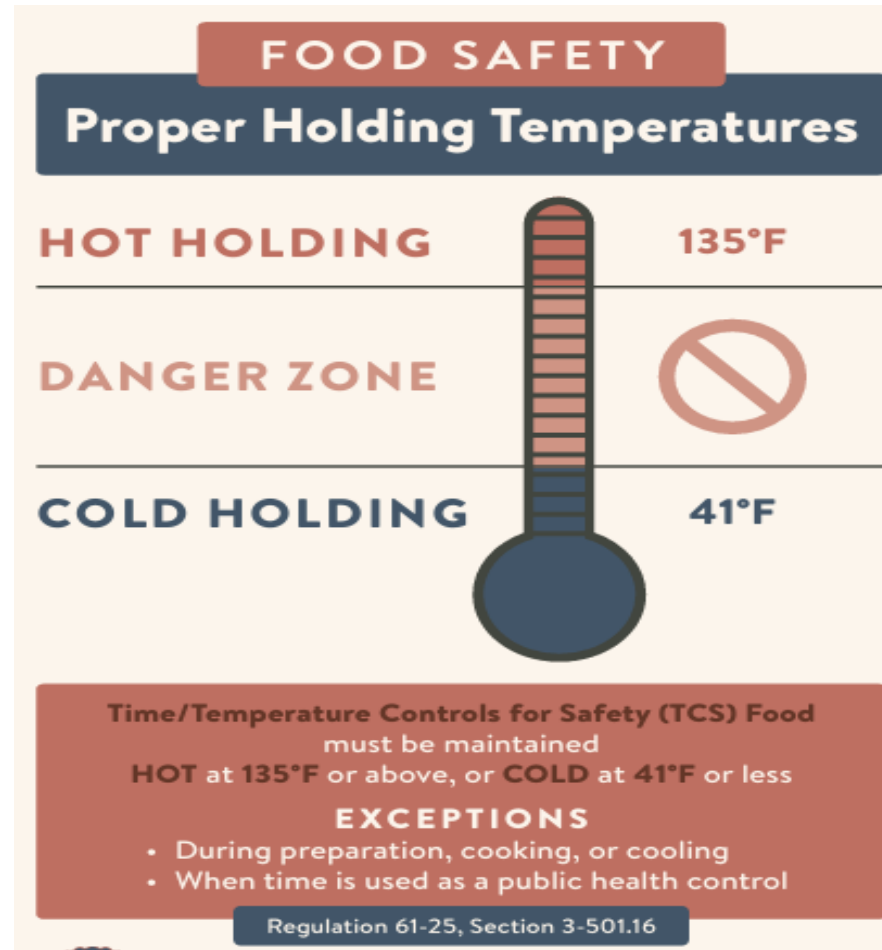
RESPONSIBLE TRAINING/SAFEWAY CERTIFICATIONS, LLC
responsibletraining.com

RESERVING
rservering.com

SOUTH CAROLINA RESTAURANT & LODGING ASSOCIATION (SERVSAFE)
servsafecertified.com

TAP SERIES
tapseries.com

Proper Holding Temperatures (3-501.16)



Proper Cooking Temperatures (3-401)



COOKING



- Fruits, vegetables, and grains (rice, pasta) for hot holding

135°F



- Cuts of raw beef, pork, and lamb
- Eggs for immediate service
- Fish, including shellfish and crustacean

145°F FOR 15 SECONDS



- Ground or tenderized meats
- Ground, chopped or minced fish
- Eggs for hot holding

155°F FOR 17 SECONDS



- Raw poultry
- Stuffed meats, fish, poultry or pasta
- Stuffing that includes meat, fish or poultry

165°F

REHEATING



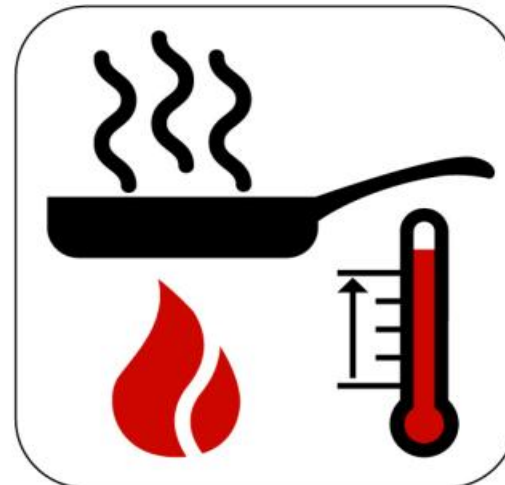
- TCS food that is cooked, cooled, and reheated for hot holding

165°F WITHIN 2 HOURS



- TCS food that is cooked, cooled, and reheated for immediate service

ANY TEMPERATURE



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Cleaning of Equipment and Utensils (4-601)



- Equipment food contact surfaces and utensils cleaned to sight and touch
- Food contact surfaces of cooking equipment/pans free of encrusted grease deposits and other soil accumulations
- Non-food contact surfaces cleaned and free of accumulation of dust, dirt, food residue and other debris



Date Marking (3-501.17)

- Controlling the growth of listeria which continues to grow even at refrigerated temperatures
- Ensures the food is discarded before harmful bacteria can cause a foodborne illness



What Must Be Date Marked?

- Time/Temperature Control for Safety Foods
- Ready to eat food that does not require any additional preparation to make the food safe
- Prepared food that may be reheated
- Food stored under refrigeration for more than 24 hours

How to Date Mark?

- Food must be served, sold or discarded within seven (7) days of preparation/opening
- The day the food is prepared is day 1. The discard date is day 1 plus 6.



Labels (3-302.12 & 7-102.11)

- Working containers holding food, food ingredients or chemicals that are removed from its original packaging must be labeled with the common name:
 - Cooking oils
 - Flour
 - Salt
 - Spices
 - Sugar
 - Chemicals/sanitizers



Controlling Pests (6-501.111)



- Premises must be maintained free of insects, rodents and other pests
- Routinely inspect incoming shipments of food/supplies
- Routinely inspect premises for evidence of pests & treat
- Eliminate harborage conditions

Maintenance and Operation (4-501)



- Equipment must be maintained in good repair and operating condition:
 - Warewashing machine
 - Stove/oven
 - Refrigerator
 - Other appliances
- Contact the Department if there is a loss of service that affects the continuity of essential services

Personal Hygiene (2-301 & 2-401)



- Good Hand washing; hands washed with soap in hand sink & properly dried
- Hair Restraints (*i.e., hair net, hat, hair covering, etc.*) worn by food service staff in kitchen area;
 - Beard guards for staff with beards
- Employees clothing clean; jewelry & fingernails appropriate

Food Employees Dos & Don'ts



- **Don't touch the food with bare hands**
 - Suitable means to handle RTE foods: single-use gloves, tongs, deli tissues, spoons/forks, spatulas
- **Don't smoke, eat, or drink in the kitchen**
- **Do store employee personal items in a designated area away from food**
- **Do Create an Employee Health Policy**

Glove Use

- **ALWAYS** wash your hands before putting on gloves & changing to a new pair
- Change gloves when:
 - Soiled/torn
 - Before starting a new task
 - After handling raw meat, fish, or poultry
 - Before handling ready to eat (RTE) foods



Handwashing Sink (5-202.12)

- Temperatures at the handwashing sink must reach at least 100 degrees F

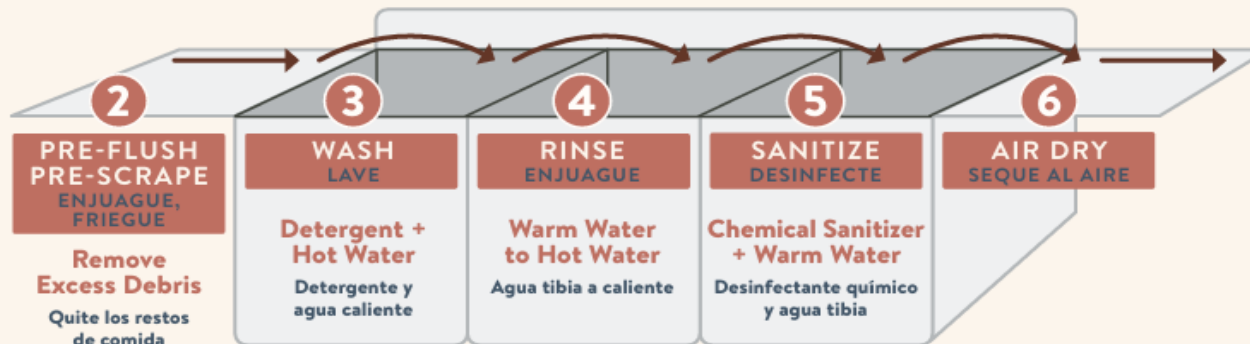


Manual Warewashing: Chemical (4-501)



Manual Warewashing (Chemical Sanitizing) Pasos para lavar la vajilla a mano (limpiar con químicos)

1 CLEAN AND SANITIZE SINKS AND DRAINBOARDS LIMPIE Y DESINFECTE LOS FREGADEROS Y LOS ESCURREPLATOS



South Carolina
DEPARTMENT OF AGRICULTURE

agriculture.sc.gov/retail-food-safety

5 SANITIZE DESINFECTE

Water temperature equal
to at least 75°F

La temperatura debe estar
a o al menos a 75 grados F

ppm = parts per million
ppm = partes por millón

Chemical Sanitizer + Warm Water Desinfectante químico y agua tibia

Chemical Type
Tipo de químico

Chlorine Cloro	50 to 200 ppm
Quaternary Ammonia (QUAT) Amoniaco	200 to 400 ppm
Iodine Yodo	12.5 to 25 ppm

Follow chemical manufacturer's instructions.
Siga las instrucciones en el paquete.

Approved Concentration
Concentraciones aprobadas

Manual Warewashing: Hot Sanitizing (4-501)

Manual Warewashing (Hot Sanitizing) Lavado de vajilla manual (desinfección en caliente)

1 CLEAN AND SANITIZE SINKS AND DRAINBOARDS LIMPIE Y DESINFECTE LOS FREGADEROS Y LOS ESCURREPLATOS



Proper Food Storage

- Clean and dry location
- Not exposed to splash, dust, other contamination
- At least 6 inches above the floor
- Separate dented/damaged goods
- Separate ready to eat and prepared foods from raw meats

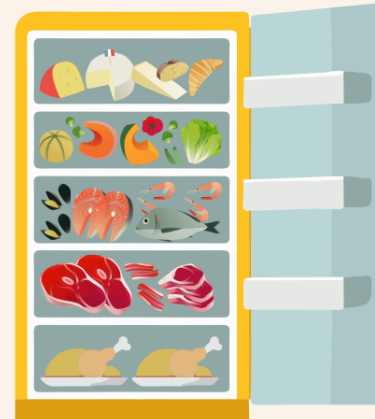
RULE 1 Separate ready-to-eat and prepared foods from raw meats.

REGLA 1 Separe los alimentos preparados y listos para comer de las carnes crudas.



RULE 2 Provide proper order of refrigerated storage top to bottom.

REGLA 2 Organice de manera adecuada el almacenamiento de alimentos refrigerados de arriba a abajo.



↓ Ready-to-eat and prepared foods
Alimentos preparados y listos para comer

↓ Fruits and vegetables
Frutas y verduras

↓ Raw fish, seafood, shellfish
Pescado crudo/mariscos crudos

↓ Raw beef, ground beef, pork
Carne de res cruda, carne molida cruda,
carne de puerco cruda

↓ Raw poultry
Carne de ave cruda

RULE 3 Maintain refrigeration temperatures of 41°F or below.
(The ideal temperature for storage is 35°F to 38°F.)

REGLA 3 Mantenga el refrigerador a una temperatura de 41°F o inferior.
(La temperatura ideal para el almacenamiento es de 35°F a 38°F.)





Tips to Remember

- Proper Certifications
- Practice good hygiene
- Maintain good refrigeration
- Store food properly
- Clean & maintain the kitchen
- Pest control
- Proper sanitization
- Food safety knowledge
- Know your population
- Immediate corrective action
- Conduct self inspections
- **Ask SC DPH**

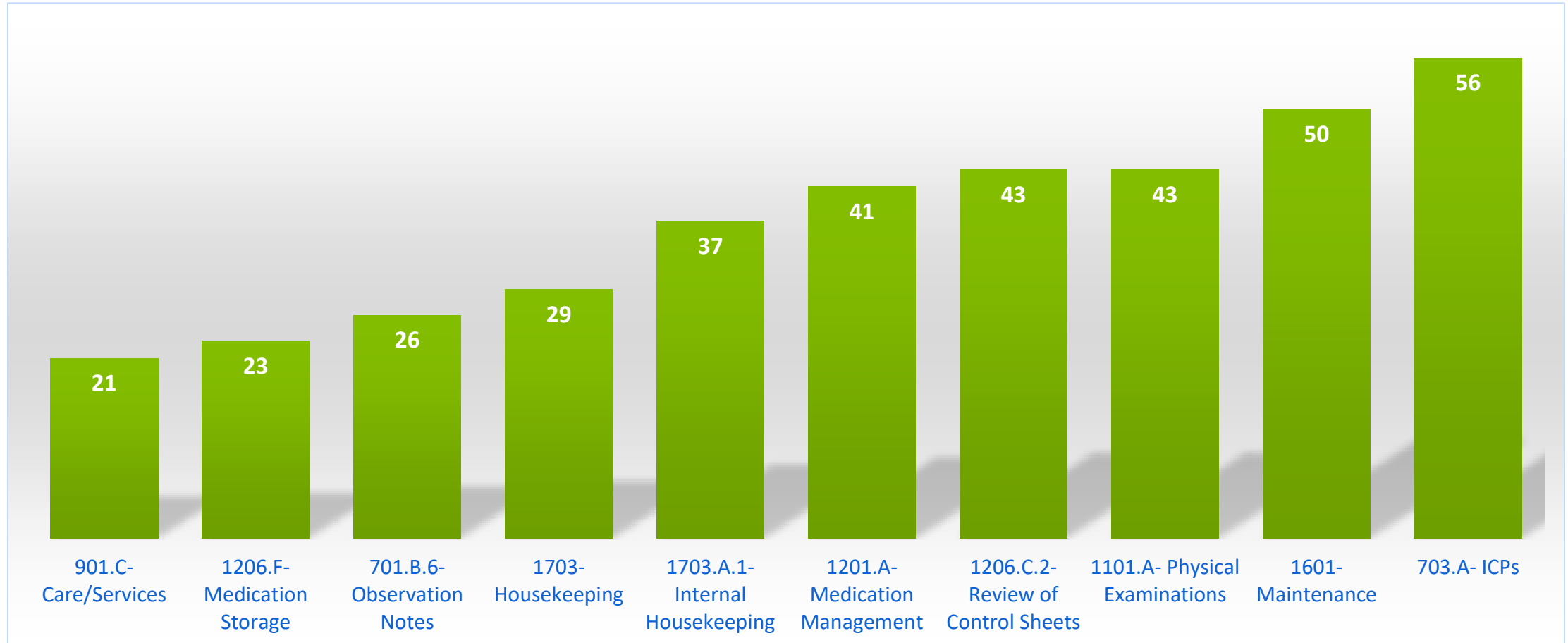
HURDLES ON THE TRACK



Top 10 Citations in CRCFs

Data is from January 1- March 31, 2026

Frequency of Citations for Q1





901.C Care & Services

The facility shall **render care and services in accordance with orders from physicians or other authorized healthcare providers and take precautions for residents with special conditions**, e.g., pacemakers, wheelchairs, dementia, etc. The facility shall assist in activities of daily living as needed and appropriate. **Each facility is required to provide only those activities of daily living** and only to the levels specifically designated in the written agreement between the resident, and/or his/her responsible party/guardian, and the facility.



Examples of Noncompliance

- Blanks on the MAR for not administering medications and/or treatments as ordered
- Elopements
- Staff not assisting residents with their ADLs



1206.F Medication Storage

No medication shall be left in a resident's room unless the facility provides an individual cabinet/compartment which is kept locked in the room of each resident who has been authorized in writing to self-administer by a physician or other authorized healthcare provider. In lieu of a locked cabinet/ compartment, storage of medications shall be permitted in a resident room which can be locked, provided the room is licensed for one bed; medications are not accessible by unauthorized persons; the room is kept locked when the resident is not in the room; the medications are **not controlled substances and all other requirements of this section are met.**



Examples of Noncompliance

- Controlled substances in resident's rooms
- Medications in shared rooms but not properly stored if only one resident is authorized to self-administer
 - Includes couples
- Medications, including OTCs, found in resident's rooms without an order from a physician or authorized healthcare providers
 - Families taking their loved ones on outings and returning with OTCs



1703 & 1703.A.1 Housekeeping

The facility and its grounds shall be **clean**, and **free of vermin and offensive odors**.

- A. Interior housekeeping shall **at a minimum** include:
 1. **Cleaning each specific area of the facility;**



Examples of Noncompliance

- Live bed bugs and roaches throughout the facility
 - No treatment performed or attempts to eradicate the issue
- Vermin (*i.e., ants/bugs*) crawling on the walls, mattresses and in the kitchen
 - Flying insects throughout the facility
- Offensive odors such as urine, feces, mildew and sewage



Examples of Noncompliance

- Stains of various colors and possible mold in the showers, on the floors, toilets, walls and sinks
- Overflowing trash
- Floors not properly cleaned
 - Staff using dirty mop water or no chemicals in the water
- Accumulation of dust on the ceiling, vents, fans, walls, etc.
- Lack of cleaning by housekeeping staff



701.B.6 Notes of Observation

B. Specific entries/documentation shall include at a minimum:

6. Notes of observation. In instances that involve significant changes in a resident's medical condition and/or the occurrence of a serious incident, **notes of observation shall be documented at least daily until the condition is stabilized and/or the incident is resolved. In all other instances, notes of observation for residents shall be documented at least monthly**



Examples of Noncompliance

- Notes not available for review at the time of the inspection
- Not completed at least monthly or until the condition is stabilized or incident resolve
- Recommend being detailed when documenting instead of stating "*Resident is ok*".



1201.A Medication Management

Medications, including controlled substances, medical supplies, and those items necessary for the rendering of first aid shall be available and properly managed in accordance with local, State, and Federal laws and regulations. Such management shall address the securing, storing, and administering of medications, medical supplies, first aid supplies, and biologicals, their disposal when discontinued or outdated, and their disposition at discharge, death, or transfer of a resident.



Examples of Noncompliance

- Current order at the facility but the medication is not available for administration
 - No evidence if a refill has been requested or medication has changed
- Current order and medication available in the facility but the medication is not listed on the MAR
- No first aid kit available

1206.C.2 Control Sheet Review



At each shift change, there shall be a documented review of the control sheets by outgoing staff members with incoming staff members that shall include verification by outgoing staff members that they have **properly administered medications** in accordance with orders by a physician or other authorized healthcare provider and have documented the administrations. Errors/omissions indicated on the MAR's shall be addressed and corrective action taken at that time.



Examples of Noncompliance

- Administrators not aware of this regulatory requirement
- Staff not completing the documented review at the end of their shift
 - Blanks on the document
- Staff pre-signing the document prior to the end of their shift



1101.A Physical Exams

A physical examination shall be **completed for residents within thirty (30) days prior to admission and at least annually thereafter.**

Physical examinations conducted within thirty (30) days prior to admission by physicians licensed in states other than South Carolina are permitted for new admissions under the condition that residents obtain an attending physician licensed in South Carolina within thirty (30) days of admission to the facility and undergo a second (2nd) physical examination by that physician within thirty (30) days of admission to the facility. The physical examination shall be updated to include new medical information if the resident's condition has changed since the last physical examination was completed.



1101.A Physical Exams (cont.)

The physical examination shall address:

1. The appropriateness of placement in a CRCF;
2. Medications/treatments ordered;
3. Self-administration status;
4. Identification of special conditions/care required;
5. The need of (or lack thereof) for the continuous daily attention of a licensed nurse.



Examples of Noncompliance

- Not completed within the specified timeframe
- Documentation does not address the required criteria
- Documentation not available at the time of the inspection
- Not signed and/or dated by a physician
- Physical indicates the resident requires a higher level of care



1601 Maintenance

The facility shall keep **all equipment and building components (e.g., doors, windows, lighting fixtures, plumbing fixtures) in good repair and operating condition.** The facility shall **document preventive maintenance.**

The facility shall comply with the provisions of the codes officially adopted by the South Carolina Building Codes Council and the South Carolina State Fire Marshal applicable to community residential care facilities.



Examples of Noncompliance

- Common maintenance issues:
 - Equipment not working (*e.g., HVAC, water heater, lights, doors*)
 - Holes of various sizes and shapes in the ceiling, walls, floors and doors
 - Damage to the walls (*e.g., paint peeling, scuff marks, baseboards, exposed insulation*)
 - Clogged drains, toilets, leaking faucets
 - Cracked and inoperable windows



703.A Individual Care Plans

Using the written assessment, **the facility shall develop within seven (7) days of admission an ICP with participation of the resident, administrator (or designee), and/or the sponsor or responsible party when appropriate, as evidenced by their signatures and date.**

The ICP shall be **reviewed and/or revised as changes in resident needs occur, but not less than semi-annually** with the resident, administrator (or designee), and/or the sponsor or responsible party as evidenced by their signatures and date.



703.A

Individual Care Plans (cont.)

The ICP shall describe:

1. The needs of the resident, including the activities of daily living for which the resident requires assistance, i.e., what assistance, how much, who will provide the assistance, how often, and when;
2. Requirements and arrangements for visits by or to physicians or other authorized healthcare providers;
3. Advance directives/healthcare power of attorney, as applicable;
4. Recreational and social activities which are suitable, desirable, and important to the well-being of the resident;
5. Nutritional needs.



Examples of Noncompliance

- ICPs not completed for new admissions
- ICPs not completed and reviewed within designated timeframes
- ICPs not revised when needed
 - *Changes in ADLs, type of care, behavior, diets, etc.*
- Blanks on the ICPs.
- Not signed or dated by appropriate person(s)



Helpful Tips: File Audits

- Audit Frequency
 - Conduct audits at a frequency determined by the administrator
- Documentation & Corrective Action
 - Document audit findings and any corrective actions taken
- File Completeness & Timeliness
 - Ensure all files are complete and available (monthly, semi annually, annually)
 - Verify all required signatures are present and completed by appropriate
 - Physician
 - Authorized healthcare provider
 - Administrator or designee
- Tracking & Access
 - Maintain a tickler or monitoring system for due items
 - Ensure designated staff can access files in the administrator's absence
 - Confirm that all files are kept onsite

Helpful Tips: Facility Walkthrough



- Frequency
 - Walkthroughs should be conducted at a frequency determined by the administrator
 - Suggest a daily walkthrough
 - Conduct random pop-up visits
- Documentation & Corrective Action
 - Document audit findings and any corrective actions taken
- Staff Accountability
 - Creating a checklist for staff to complete and submit at the end of each shift, verifying completion of outlined tasks
 - Complete additional tasks during night shift (deep cleaning)

Helpful Tips: Facility Walkthrough



- Medications and chemicals:
 - Ensure none present in rooms without written authorization. Verify documented on ICPs.
- Environmental Conditions
 - Checking facility & water temperatures; maintaining logs
- Maintenance & housekeeping
 - Cleanliness, vermin, odors
 - Operating conditions and good repair
- Safety & signage
 - Required signs posted (no smoking)
 - Secured oxygen cylinders
- Kitchen
 - Cleanliness
 - Ample supply of food
 - Quality food
 - Proper certifications
- Adequate staffing

Helpful Tips: : Medication Audits



- Frequency
 - Conduct audits at a frequency determined by the administrator
 - Conduct random, unannounced and on all shifts
- Documentation & Corrective Action
 - Document audit findings and any corrective actions taken
- Policy & Procedure
 - Update facility policies and procedures to reflect current practices and regulations

Helpful Tips: : Medication Audits



- Medication availability
 - Active and current orders, present and ready for scheduled administration
- Medication safety
 - No expired or discontinued medications
 - Proper storage and security
- Record accuracy
 - Check for blanks or errors on MARs, control sheets and shift change logs
- Staff Competency
 - Ensure all staff have received proper training
 - Conduct competency tests and refresher training throughout the year
 - Review the top quarterly citations sent to all CRCFs with staff
- Back Up Systems
 - Maintain a backup pharmacy in case medications cannot be filled or delivered on time
- Policy & Procedure
 - Update facility policies and procedures to reflect current practices and regulations

CONTACT ME



JoMonica Taylor 

(803) 545-4257 

taylorjj@dph.sc.gov 

<https://dph.sc.gov/professionals/healthcare-quality/healthcare-facility-licensing/community-residential-care>



CROSSING THE FINISH LINE: QUESTIONS

