

March 22, 2019

Jefferson Davis County School District
Mr. Will Russell, Superintendent
1025 Third Street
Prentiss, MS 39474-0000

Dear Mr. Russell:

The State Agency (SA) completed an Administrative Review of the National School Lunch Program (NSLP), School Breakfast Program (SBP), and After School Care Program (ASCP) during the week of February 25, 2019. The regulations governing the Administrative Review (7 CFR 210.18) require the SA to review two Critical Areas of performance: Performance Standard 1 (Meal Access and Reimbursement) and Performance Standard 2 (Meal Pattern and Nutritional Quality). The Review additionally covers several General Areas of Review. Over the course of the SA review, **eleven (11) total findings were identified, including six (6) relating to Performance Standards 1 & 2. These findings have resulted in fiscal action in the amount of \$838.51.** The findings which were identified are described below.

Performance Standard 1 (Meal Access and Reimbursement)

- According to {7 CFR 210.18 (g) (1) (i)}, the State Agency (SA) must monitor compliance with benefit application, Direct Certification (DC), and applicant eligibility. Over the course of the review, the Reviewer identified the following errors:
 - The Reviewer identified three (3) students whose eligibility status was indicated as Categorically Eligible through SNAP. However, these students were not on the DC list. The Reviewer also noted that each of these students had an application on file, but no SNAP number was on the application. The following corrective action should be taken by April 22, 2019: The School Food Authority (SFA) should determine eligibility for these students based on the applications on file. Additionally, the eligibility status should be updated in the system and the families should be given 10 days notice of adverse action before the changes take effect.
 - The Reviewer identified one (1) student who was listed as having zero income in the system, however the application on file indicates that the family has income and would still be eligible for free meals with this income. The following corrective action should be taken by April 22, 2019: The eligibility status should be updated in the system.

- The Reviewer identified three (3) applications (affecting two (3) students) were incorrectly approved for Free meals when they should have been approved as eligible for Reduced meals. The following corrective action should be taken by April 22, 2019: The eligibility status should be updated in the system and the families should be given 10 days notice of adverse action before the changes take effect.
- The Reviewer identified three (3) applications that were missing required information. Two (2) of these applications (affecting two (2) students) were missing social security numbers; and one (1) application (affecting one (1) student) was missing an adult signature. The following corrective action should be taken by April 22, 2019: the SFA should contact the families to procure the missing information.
- The SFA was unable to produce documentation to validate the eligibility status of seven (7) applications affecting seven (7) students. There were no applications on file and the students were not on the DC list. The following corrective action should be taken by April 22, 2019: The SFA should obtain an application from the affected families or produce a DC list validating the eligibility status of these students. Additionally, the eligibility status should be updated in the system and the families should be given 10 days notice of adverse action before the changes take effect.
- **Findings related to Performance Standard 1 have resulted in a combined total of \$838.51 in fiscal action, which includes \$589.60 in the NSLP and \$248.191 in the SBP.**

Performance Standard 2 (Meal Pattern and Nutritional Quality)

- According to {7 CFR 210.18 (g) (2) (i)}, the meals offered must meet the components and quantities required by the meal pattern. While on site at JDCHS, the Reviewer observed that on the Grab & Go line for lunch, students who picked up sandwiches did not have the opportunity to pick up a vegetable which is a required component. This affected 24 student meals. Similarly, on the hot service line, students who picked up fish sticks did not have the opportunity to pick up a grain which is a required component. This affected three (3) student meals before the issue was corrected on site by the addition of a grill cheese sandwich. The following corrective action should be taken by April 22, 2019: the SFA must submit menus demonstrating that all components are available to all students regardless of entree choice.

General Program Compliance

- According to {7 CFR 210.18 (h) (2) (B)}, Verification activities must be consistent with Verification requirements and procedures established in regulation. The Reviewer noted that the SFA had not completed Verification through family notification and collection of income documentation. The following corrective

action should be taken by April 22, 2019: the SFA should notify families pulled for Verification and collect income documentation according to guidelines outlined in the Eligibility Manual.

- According to {7 CFR 210.18 (h) (1) (iv)}, SFAs must follow fair and consistent methodologies to allocate allowable indirect costs to the school food service account. The Reviewer noted that the SFA was charged an incorrect amount in Indirect Costs. There were costs listed in the expenditure list that were not attributed to the cost base. As a result, the SFA was charged too much in indirect costs. The following corrective action should be taken by April 22, 2019: the SFA should submit documentation that the District has transferred the appropriate funds back to the SFA.
- According to {7 CFR 210.10 (a) (i)} and {7 CFR 220.8}, schools must follow a food-based menu planning approach, and school meals must meet the dietary specifications outlined in regulation. While on Site at JDCHS, The Reviewer observed that the site is not following the planned menu. As a result, the nutrient analysis conducted by the SFA does not match the menu. Additional choices are offered, but not planned on the menus. Examples include breakfast items (cereals, biscuits, pancake on a stick, bagels) and lunch items (condiments, chef salads, hoagies). The following corrective action should be taken by April 22, 2019: The SFA should provide documentation of production records, planned menus, and corresponding nutritional analyses for the month of March 2019 to ensure that production closely aligns with planned menus and that menus fall within nutritional guidelines.
- According to {7 CFR 210.11}, competitive food items sold to students during the school day must meet general nutrition requirements (must be *“Smart Snack Compliant”*). While on site at JDCHS, the Reviewer noted that the Nature Valley Granola Bar product that is being vended to students is not Smart Snack compliant. The following corrective action should be taken by April 22, 2019: LEA/SFA should submit documentation or assurances that the item has been removed from the vending machines.
- According to {7 CFR 210.13 (c) (2) (d)}, the SFA should ensure that storage facilities and procedures safeguard against spoilage. Proper storage practices include but are not limited to: appropriate temperatures for applicable equipment (e.g., cooler); food is stored 6 inches off the floor; canned goods are free from dents, and the FIFO method of inventory is implemented. The reviewer observed the following storage violations while on site at JDCHS:
 - Milk was stored on the floor of the walk-in cooler due to an inoperable milk cooler. This issue was corrected on site by raising the milk off the floor. No further action is necessary, however the SFA may want to consider repairing or replacing the milk cooler.

- Dented Cans were not separated in the storage area. This issue was corrected on site and no further action is necessary.
- The Walk-in Cooler did not have an interior thermometer. This issue was corrected on site and no further action is necessary.
- Boxes stored in the walk-in freezer were not dated properly. The following corrective action should be taken by April 22, 2019: The SFA should provide training regarding FIFO and properly dating items in the walk-in freezer. The SFA submit documentation, including training agendas and sign-in sheets, indicating that training was conducted.

The SFA's response to all areas requiring corrective action must be entered into the Mississippi Application and Reimbursement System (MARS) by the Child Nutrition Director (CND) by **April 22, 2019**.

In accordance with the criteria established in the regulations, a total of **\$838.51** is being assessed. Pursuant to regulations, an organization has the right to appeal any monetary assessment imposed. Any appeal of a monetary assessment must be filed with the SA within 15 calendar days of receipt of this letter.

In addition to conducting the AR, one of the functions of the SA is to provide Technical Assistance (TA). During the course of the review, the SA Reviewer provided TA in several areas to the CND. TA is documented in MARS, specifically in the comment section of the On-Site Assessment Tool. TA is provided for the improvement of the program operations and is not considered a finding.

The SA would like to commend the district for its implementation of a Grab & Go line at the high school. It was also noted that the cashiers had a clear understanding of Offer Versus Serve (OVS). The SA would also like to commend the district for the progress it has made in regard to maintenance of the production book since the prior AR. If you have any questions, please email me at mchauvin@mdek12.org or call Mary Burks or me at (601) 576-4955.

Sincerely,

Original Signed

Marianna Chauvin, Assistant Director of School Support
Office of Child Nutrition, School Support Division

cc: File NSLP (AR) 2019

May 15, 2019

Jefferson Davis County School District
Will Russell, Superintendent
1025 Third Street
Prentiss, MS 39474

Dear Mr. Russell:

Your response to the findings of our Administrative Review (AR) of your 2018-2019 National School Lunch Program (NSLP), School Breakfast Program (SBP), and After School Care Snack Program (ASCP) has been received in the Mississippi Application and Reimbursement System (MARS). We have accepted your response; however, the dietary specifications and nutrient analysis section of the Corrective Action Documentation (CAD) reveals the need for further Technical Assistance (TA), which the District will receive from the State Agency (SA). We are closing the file on this Administrative Review for the current cycle.

If you have any questions concerning this review or need assistance, please call Mary Burks or me at (601) 576-4955. Thank you for your continued support of the Child Nutrition Programs.

Sincerely,

Original Signed

Marianna Chauvin, Division Director II, Administrative Reviews
Office of Child Nutrition, School Support Division

cc: File NSLP (AR) 2019

This institution is an equal opportunity provider.

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