

April 1, 2019

Kemper County School District
Ms. Jackie Pollock, Superintendent
Main Street
DeKalb, MS 39328

Dear Ms. Pollock:

The State Agency (SA) completed an Administrative Review (AR) of the National School Lunch Program (NSLP), School Breakfast Program (SBP), and After School Care Program (ASCP) during the week of March 19, 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, **seven (7) total findings were identified, including two (2) findings relating to Performance Standard 2.** The SA is pleased to report that **none of the findings have resulted in fiscal action.** The findings which were identified are described below.

Performance Standard 2 (Meal Pattern & Nutritional Quality)

- According to 7 CFR 220.8(e), students are allowed to decline one of four food items provided that the students select at least $\frac{1}{2}$ cup of the fruit requirement at breakfast. Additionally, 7 CFR 220.8(c)d states that School Food Authorities (SFAs) may substitute 1 oz. eq. of meat/meat alternative for 1 oz. eq of grains after the minimum daily grain requirement is met at breakfast. While on site at Kemper County HS/MS, the Reviewer noted that despite the fact that the School participates in Offer Versus Serve (OVS) for breakfast, staff were pre-plating all items. Also, the cashier and serving staff could not communicate a clear understanding of OVS or the meal pattern (specifically the difference between items and components at breakfast, and how meats credit during breakfast). The following corrective action should be taken by April 22, 2019: staff should be re-trained on OVS and meal pattern crediting regulations. Documentation of corrective action should include training logs.
- According to 7 CFR 210.10 (i), a nutrient analysis should be used to determine whether or not the weighted averages of calories, saturated fat, and sodium in the meals offered to each grade group over a school week meet federal requirements. A review of weighted averages for lunch for the review week indicates that calories were too low (45 calorie shortfall) and the sodium Target 1 was not met (78 mg Overage). A review of weighted averages for breakfast for the review week

This institution is an equal opportunity provider.

500 Greymont Avenue, Suite F
P.O. Box 771
Jackson, MS 39205-0771

Phone (601) 576-5000
Fax (601) 354-7595
www.mde.k12.ms.us

indicates that calories were too low (185 calorie shortfall). The following corrective action should be taken by April 22, 2019: the SFA must submit menus and nutrient analysis documents for upcoming menus indicating that the areas of non-compliance have been corrected.

General Program Compliance

- According to 7 CFR 210.14 (b), SFAs should limit net cash resources to an amount that does not exceed three months average expenditures. The Reviewer noted that the SFA has an excess balance. The following corrective action should be taken by April 22, 2019: the SFA must submit a spend down plan detailing how it will reduce the excess balance by improving the school food service operation.
- According to FNS 113-1, program materials should utilize the correct non-discrimination statement. The Reviewer noted that the SFA is using an incorrect version of the (long version) non-discrimination statement. Additionally, the Reviewer noted that in some cases, the short statement is used inappropriately (incorrect verbiage on public release) or is completely absent (menus). These issues were corrected on site. No further action is necessary.
- According to 7 CFR 210.30 (g), the Child Nutrition Director (CND) must document compliance with the professional development standards for all school food service staff. The Reviewer noted that the SFA does not utilize a unified tracking tool to track the required annual training hours. The following corrective action should be taken by April 22, 2019: The SFA must implement some system of tracking training hours that includes all USDA required elements (Name / Hire Date / Title / Core Duties / Employment Status / Professional Standard Employee Category).
- According to 7 CFR 210.13 (c)(2)(d), SFAs must ensure that facilities for the storage of food products should safeguard against spoilage and other loss. While on site at Kemper County HS/MS, the Reviewer observed storage violations including lack of dates on inventory which preclude proper implementation of First In First Out (FIFO), as well as a build-up of ice on the ceiling of the walk-in freezer which could potentially contaminate food. The following corrective action should be taken by April 22, 2019: The SFA must re-train staff on proper dating procedures for stored food products. The SFA must also fix the ice build-up in the freezer. Documentation of corrective action should include FIFO training logs or photographs indicating that food products are properly dated, as well as maintenance work orders for the freezer which should be submitted to the SA.
- According to FNS 113-1, The SFA must prominently display the USDA “And Justice for All Poster” at the point of service delivery. While on site at West Kemper Elementary, the Reviewer noted that the "And Justice For All" Poster is not displayed at the point of service delivery for the Snack Program, specifically

This institution is an equal opportunity provider.

on or near the Grab & Go Cart which is wheeled into the classroom. The following corrective action should be taken by April 22, 2019: SFA must post the "and Justice for All" Poster at the point of service delivery for the After School Snack Program.

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

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 being extremely well-organized and prepared for the review, despite the fact that the district is currently operating under an Interim CND. Additionally, the Reviewer observed flexibility and teamwork among the child nutrition program staff.

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) 2018

This institution is an equal opportunity provider.