

May 02, 2019

Noxubee County School District  
Dr. Rodriquez Broadnax, State Transformation Interim Superintendent  
37 Gandy Tindal Road  
Macon, MS 39341

Dear Dr. Broadnax:

The State Agency (SA) completed an Administrative Review (AR) of the National School Lunch Program (NSLP) and School Breakfast Program (SBP) during the week of April 29, 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 three (3) 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 and Nutritional Quality)**

- In accordance with 7 CFR 210.10 (c), schools must offer meal components and quantities as specified in the Meal Pattern. While on-site at Noxubee County High School, the Reviewer noted that during the review week, the grain requirement was not met in accordance with the Meal Pattern. In order to implement and document corrective action, the School Food Authority (SFA) must adjust the cycle menu and nutrient analysis to ensure that a full grain component is offered every day and submit documentation to the SA by June 3, 2019.
- In accordance with 7 CFR 210.10(i), a nutrient analysis should be used to determine that the weighted average of calories, saturated fat, and sodium in the meals offered to each grade group over a school week meets federal requirements. The Reviewer noted that the weighted average of sodium for the review week was too high (11 mg overage) based on the nutrient analysis. In order to implement and document corrective action, the SFA must update the cycle menu and submit a nutrient analysis indicating that the sodium target 1 is being met by June 3, 2019.

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- Regulations regarding Offer Versus Serve (OVS) are outlined at 7 CFR 210.10(e) and 7 CFR 220.8(e). While on-site at Noxubee County High School, the Reviewer observed that staff were pre-plating breakfast items for students. This was corrected immediately. Additionally, during the breakfast service, the Reviewer observed one (1) student go past the cashier without a reimbursable meal (no fruit component). This was pointed out and corrected immediately for the duration of the breakfast service. During the Lunch service, the Reviewer observed four (4) trays that were non-reimbursable and students were stopped from progressing by the Reviewer which kept the error from resulting in any non-reimbursable meals; however, the cashier did not catch the error. In order to implement and document corrective action, the SFA must retrain all staff on OVS requirements and submit training agendas and sign in sheets to the SA by June 3, 2019.

### **General Program Compliance (General Areas of Review)**

- In accordance with 7 CFR 210.30 (g), the SFA must document compliance with professional development standards for all school food service staff. The Reviewer noted that the SFA training tracking tool does not contain all USDA required elements. Additionally, the Reviewer noted that non-managerial Child Nutrition staff have not attained the required six (6) hours of training, and the Child Nutrition Director (CND) has not attained the required twelve (12) hours of training for the 2018-2019 SY in accordance with 7 CFR 210.30. In order to implement and document corrective action, the SFA must complete the professional development tracking document with all required elements; the SFA must provide documentation that all non-managerial staff have received six (6) hours of training; and the SFA must provide documentation that the CND has received twelve (12) hours of training. All documentation is due to the SA by June 3, 2019.
- In accordance with 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. In order to implement and document corrective action, the SFA must submit a plan to reduce the excess balance while improving Child Nutrition Program operations. This plan is due to the SA by June 3, 2019.
- In accordance with FNS Instruction 791-1, FNS prohibits the denial of meals to students as disciplinary action. While on-site at Noxubee County High School, the Reviewer noted that students who are in the alternative school were only offered cereal and juice, while students who came to the cafeteria were offered the full, hot menu and the cereal. This practice constitutes the use of food as a punishment. In order to implement and document corrective action, the SFA must submit a plan to the SA detailing how it intends to offer the same breakfast to students in the alternative school as it does to students who come into the cafeteria by June 3, 2019.

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- In accordance with 7 CFR 210.13 (c) (2) (d), SFAs should ensure that facilities for the storage of food products should safeguard against theft, spoilage, and other loss. While on-site at Noxubee County High School, the Reviewer noted that the Freezer has significant ice build-up. In order to implement and document corrective action, the SFA must fix the ice-build up and submit an invoice or work order indicating that the issue has been resolved by June 3, 2019.

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 **June 3, 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 "Technical Assistance" section of the "Compliance" Module. TA is provided for the improvement of the program operations and is not considered a finding.

The SA would like to commend the SFA for being so responsive and prompt to all requests for information. The SFA was well prepared for the AR, which was greatly appreciated by the Reviewer. Site staff at Noxubee County High School were also extremely swift in responding to areas of non-compliance. It is evident that all members of the CN staff are dedicated to continuous quality improvement.

If you have any questions regarding this review, or if you would like to request additional assistance, please email me at [mchauvin@mdek12.org](mailto:mchauvin@mdek12.org) or call Mary Burks or me at (601) 576-4955.

Sincerely,

**Original Signed**

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

cc: File NSLP (AR) 2019

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June 3, 2019

Noxubee County School District  
Dr. Rodriquez Broadnax, State Transformation Interim Superintendent  
37 Gandy Tindal Road  
Macon, MS 39341

Dear Dr. Broadnax:

Your response to the findings of our Administrative Review of your 2018-2019 National School Lunch Program (NSLP) and School Breakfast Program (SBP) has been received and accepted in the Mississippi Application and Reimbursement System (MARS). We are closing the file on this review.

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  
Office of Child Nutrition, School Support Division

cc: File NSLP (AR) 2019

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