

March 29, 2019

West Bolivar Consolidated School District
Mr. Larry Walker, Superintendent
Highway 1 & 8
Rosedale, MS 38769

Dear Mr. Walker:

The State Agency (SA) completed an Administrative Review of the National School Lunch Program (NSLP) and School Breakfast Program (SBP) during the week of March 18, 2019. The regulations governing the Administrative Review (7 CFR 210.18) reference two Critical Areas of performance: Performance Standard 1 and Performance Standard 2, as well as several General Areas of Review. Over the course of the review, **five (5) findings were identified**, including one (1) finding related to Performance Standard 2. However, the SA is pleased to report that **none of the findings have resulted in fiscal action**. All findings identified over the course of the review are described below.

Performance Standard 2 (Meal Pattern and Nutritional Quality)

- While on site at Ray Brooks, the Reviewer noted that Offer Versus Serve (OVS) was not implemented correctly in accordance with 7 CFR 210.10(e). A student is allowed to decline two (2) of the (5) offered components as long as the student has at least a ½ cup of fruit or vegetable. The Reviewer observed the manager instructing students to go back and pick up a green vegetable, even if they had the correct components on their tray. In order to implement and document corrective action, the School Food Authority (SFA) should retrain all staff and provide training agendas and sign-in sheets to the SA by April 29, 2019.

General Program Compliance (General Areas of Review)

- 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 SFA has submitted a spend down plan to the SA demonstrating how it will expend funds while improving the child nutrition program. No further action is necessary.
- According to FNS 113-1, program materials should utilize the correct non-discrimination statement. The Reviewer noted that the incorrect non-discrimination statement was used on several materials such as Community Eligibility Program (CEP) notices, summer feeding notices, and menus. The SFA corrected all templates while the Reviewer was on site. No further action is necessary.

This institution is an equal opportunity provider.

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- According to 7 CFR 210.13, SFAs must develop and implement a food safety plan. The Reviewer noted that the SFA's written Food Safety plan is not implemented. Proper HACCP principles include storage practices and prevention of food contamination. Furthermore, SFAs should ensure that facilities for the storage of food products safeguard against spoilage and other loss {7 CFR 210.13 (c) (2) (d)}.
 - While on site at West Bolivar High School, the Reviewer noted that Broccoli on the salad was molded. The Reviewer requested that all potentially contaminated salad be thrown away, which staff did immediately.
 - Storage violations were observed at both Ray Brooks and the West Bolivar HS. Ray Brooks School had cheese opened in the cooler. Cabbage had what looked like mold left in the cooler, which potentially can contaminate other food in the cooler.
 - Raw chicken was being served. Students brought this to the attention of the Review the raw chicken. Staff immediately discarded the raw chicken and started new chicken.

In light of these food safety violations, the SFA should implement corrective action by re-training all staff on food safety and storage. In order to document corrective action, the SFA should provide training agendas and sign-in sheets to the SA by April 29, 2019.

- 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*”). The Reviewer noted that certain items sold to students are not Smart Snack compliant. Sports drinks in the hall are not Smart Snack compliant because the caloric beverages are in a 20 oz. container, when High Schools are only allowed 12 Oz. The SFA also had Austin Peanut Butter and cheese crackers on the rack to sell. These items are not Smart Snack Compliant. The manager took them off the rack and placed them in the storage room. In order to document on-going corrective action, the SFA must provide documentation that the drinks and crackers have been taken out and replaced with an appropriate Smart Snack Compliant item(s) by April 29, 2019.

A corrective action response to the findings of this review is required by **April 29, 2019**. The Child Nutrition Director (CND) must provide this corrective action response through the Mississippi Application and Reimbursement System (MARS).

In addition to the Review, the SA provided technical assistance (TA) in several areas to the CND. These comments are located in MARS, specifically in the comments section of the On-site Assessment Tool. These comments are provided for the improvement of the program operations.

The SA would like to commend the CND and SFA Staff for their efficiency and timeliness in producing required documentation, which was well kept and in excellent order, enabling the Reviewer to complete the review in a timely fashion. The Reviewer also noted that the sites were very clean and that staff exhibited politeness and generosity which made time spent in the district enjoyable.

If you have any questions about this review or would like to request additional assistance, please email me at ccrawford@mdek12.org, or call Mary Burks or me at (601) 576-4955.

Sincerely,

Original Signed

Charles Crawford, Program Specialist
Office of Child Nutrition, School Support Division

cc: File NSLP (AR) 2019

May 10, 2019

West Bolivar Consolidated School District
Mr. Larry Walker, Superintendent
Highway 1 & 8
Rosedale, MS 38769

Dear Mr. Walker:

Your response to the findings of our Administrative Review of your 2018-2019 National School Lunch Program (NSLP), School Breakfast Program (SBP), After School Care Snack Program (ASCP), and Fresh Fruit & Vegetable Program (FFVP) 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

Charles Crawford, Program Specialist
Office of Child Nutrition, School Support Division

cc: File NSLP (AR) 2019

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