

November 21, 2019

Clarksdale Municipal School District  
Dr. Joe Nelson, Superintendent  
Post Office Box 1088  
Clarksdale, MS 38614-0000

Dear Dr. Nelson:

The State Agency (SA) completed an Administrative Review (AR) of the National School Lunch Program (NSLP), School Breakfast Program (SBP), After School Care Program (ASCP), and Fresh Fruit and Vegetable Program (FFVP) during the week of November 4, 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, **five (5) total findings were identified, including two (2) 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(3) and 7 CFR 220.8, the School Food Authority (SFA) must maintain a Production Record of all meals to demonstrate compliance with the meal pattern. Production Records are critical, and failure to maintain Production Records can result in fiscal action through disallowed meals. The Reviewer noted that Production Records were not maintained consistently for breakfast and lunch at Clarksdale High during the 2019-2020 School Year. In order to document corrective action, the SFA must submit a complete Production Record for the period between August 2019 and November 2019. Furthermore, the SFA must submit a corrective action plan to ensure Production Records are completed and maintained in the future.
- In Accordance with 7 CFR 210.10 and 7 CFR 220.8, Production Records must demonstrate how meals offered contribute to the required food components and quantities for each age/grade group, each day. The Reviewer noted that menu items were attributed to incorrect meal component groups; for example, rice was recorded as a vegetable and yogurt was recorded as a fruit. In order to implement corrective action, the SFA must conduct training for all managers in the following areas: contribution of grains and meat/meat alternatives; contribution size

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- requirements; utilization of the USDA Exhibit A Grain Chart; the Food Buying Guide; and the Menu Planner Meal Preparation Documentation (Chapter 4) published by USDA. In order to document corrective action, the SFA must submit copies of the training agenda and sign in sheets to the SA by December 21, 2019.

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

- In accordance with 7 CFR 210.13, the SFA shall ensure that food storage, preparation, and service complies with applicable health and sanitation standards. Additionally, the 2017 Food Code 6-501.111 (Controlling Pests) requires regular pest control measures to prevent the harborage of insects and rodents. While on site at Clarksdale High, the Reviewer observed an uncontrolled pest infestation. In order to implement corrective action, the SFA must retain the services of a licensed pest control company and take steps to control the current infestation. The SFA must submit documentation of corrective action to the SA by December 21, 2019.
- In accordance with USDA Memo SP 13 -2014, arrangements in which the school food service labor is used to prepare goods for an outside entity (e.g., catering), are allowable to the extent that the SFA has taken steps to ensure that all costs incurred (including labor and food costs), are covered by the outside entity contracting with the school food service operation. The Reviewer noted that catering contracts were not currently taking staff labor into account in terms of pricing. In order to document corrective action, the SFA must submit a written plan to correct the issue in the future.
- In accordance with 7 CFR 210.9 (c) (7), the ASCP must be reviewed by the SFA twice during the school year, with the first review occurring within the first four (4) weeks of operation. The Reviewer noted that the first review was not conducted within the required time frame. In order to implement corrective action, the Child Nutrition Director (CND) must complete the initial review and make plans for the second. In order to document corrective action, the SFA must submit a copy of the monitoring form to the SFA and submit a written plan of action to ensure that monitoring will occur on schedule in the future.

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 **December 21, 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.

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The SA would like to commend the staff for their promptness in response to the SA's requests for documentation. Furthermore, the SA Reviewers noted that the manager at the High School was a delight to work with, and that her interactions with students were positive and respectful. The SA also commends the manager and staff at JW Stampley, who kept a very clean kitchen, and put extra thought into the presentation of their food. The SA would recommend these food presentation techniques for duplication in other cafeterias.

If you have any questions regarding this review, or if you would like to request additional assistance, please email me at [mburks@mdk12.org](mailto:mburks@mdk12.org), or call Ginger Gibson or me at (601) 576-5000.

Sincerely,

**Original Signed**

Mary Burks, Director  
Office of Child Nutrition, School Support Division

cc: File NSLP (AR) 2019/20

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January 7, 2020

Clarksdale Municipal School District  
Dr. Joe Nelson, Superintendent  
Post Office Box 1088  
Clarksdale, MS 38614-0000

Dear Dr. Nelson:

Your response to the findings of our Administrative Review of your 2019-2020 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 Ginger Gibson or me at (601) 576-5000. Thank you for your continued support of the Child Nutrition Programs.

Sincerely,

**Original Signed**

Mary Burks, Director  
Office of Child Nutrition, School Support Division

cc: File NSLP (AR) 2019/20

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