

March 16, 2020

MS Natl Guard Youth Challenge  
Lt. Colonel Stringer  
Building 80, Holloran Avenue  
Camp Shelby, MS 39407-5500

Dear Lt. Colonel Stringer:

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 2, 2020. 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**. All findings were issued under Performance Standards 1 and 2 and are described below.

**Performance Standard 1 (Meal Access and Reimbursement)**

- In accordance with 7 CFR 210.18 (g)(ii), the process used by the School Food Authority (SFA) to count, record, consolidate, and report the number of reimbursable meals served to eligible children must yield correct claims. The Reviewer noted that meal counts for the NSLP, SBP, and the ASCP for the month of January 2020 were not consolidated and claimed correctly and resulted in an over claim of \$461.78. The errors are explained in the chart below. The SFA corrected the incorrect meal counts through a claim adjustment while the Reviewer was on site. However, in order to implement and document on-going corrective action, the SFA must submit a plan, such as the implementation of a second party check, to ensure the accuracy of meal counts in the future.

<b>January 2020</b>					
Meal Type	Claimed	SA Verified	Difference	Rate	Adjustment
NSLP	3631	3503	128 meals	\$3.43	(\$448.00)
SBP	3369	3370	1 meal	\$2.20	\$2.20
ASCP	3643	3626	17 meals	\$0.94	(\$15.98)
<b>Total Net Adjustment</b>					<b>(\$461.78)</b>

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- In accordance with 7 CFR 210.9 (b) (9), the SFA must count the number of reimbursable meals served to eligible children at the point of service or through another counting system if approved by the SA. The Reviewer noted that the SFA had implemented an Alternative POS system, which had not been approved by the SA. Cadre leaders were asked to record the number of students in their unit at the beginning of the service line, and no system was in place to count the actual number of reimbursable meals served. The Issue with physical layout was corrected on site. The desk (POS) was moved to the end of the line and the cashier was given a clicker and inspected eat tray to ensure each meal was reimbursable. As such, no further action regarding the physical layout is necessary. However, in order to document on-going corrective action, the SFA must submit documentation indicating that the daily meal count sheets are correctly recording the number of reimbursable sack lunches served, non-reimbursable cadre leaders served, and reimbursable student meals served on the hot line.

### **Performance Standard 2 (Meal Pattern and Nutritional Quality)**

- In accordance with 7 CFR 210.10 (i), a nutrient analysis should be used to determine the weighted average of calories, saturated fat, and sodium in the meals offered to each grade group over a school week meet federal requirements. The Reviewer conducted a nutrient analysis of the lunch and breakfast menu for the review period. The reviewer noted that the weighted average of daily calories and sodium are too high in accordance with the meal pattern for breakfast and lunch. Additionally, the lunch menu does not contain enough grain on certain days, and not all vegetable subgroups are offered over the course of the week. In order to implement corrective action, the SFA must work with SA staff to develop a cycle menu that is fully compliant with the meal pattern.
- The Reviewer noted that the SFA does not always follow the planned menu or standardized recipes. For example, macaroni and cheese was substituted for potatoes, the chicken pot pie on the menu was actually chicken and dumplings recipe, and there appears to be no standardized recipe for the meatball and egg noodle stroganoff. Furthermore, dessert items are not included on the planned menu. All of these issues make it difficult to validate the nutrient analysis in accordance with 7 CFR 210.10 (i). In order to implement corrective action, the SFA must submit a revised menu with all menu items included and with standardized recipe numbers for each menu item offered.
- The Reviewer noted that Sack lunches which are claimed for reimbursement are not recorded in the red book. Furthermore, the sack lunches served do not appear to comply with the meal pattern requirements regarding milk and vegetables. In *This institution is an equal opportunity provider.*

order to document corrective action, the SFA must submit a week's worth of red book pages to ensure they are completed correctly. Furthermore, the SFA should submit a menu for sack lunches to ensure compliance with the meal pattern.

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 16, 2020**.

Pursuant to regulations, an organization has the right to appeal a monetary assessment imposed. Any appeal of a monetary assessment must be filed with the SA within fifteen (15) calendar days of receipt of this letter. Please refer to the enclosed copy of appeal procedures.

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 their efforts to quickly correct areas of non-compliance while the reviewer was on site.

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) 576-5000.

Sincerely,

**Original Signed**

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

cc: File NSLP (AR) 2019/20  
Kirri Martin, Business Manager

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VIA ELECTRONIC DELIVERY

April 9, 2020

MS Natl Guard Youth Challenge  
Lt. Colonel Stringer  
Building 80, Holloran Avenue  
Camp Shelby, MS 39407-5500  
[jstringer@msyouthchallenge.org](mailto:jstringer@msyouthchallenge.org)

Dear Lt. Colonel Stringer:

Your response to the findings of our Administrative Review of your 2019-2020 National School Lunch Program (NSLP), School Breakfast Program (SBP), and After School Care Program (ASCP) has been received and accepted in the Mississippi Application and Reimbursement System (MARS). We are closing the file on this review.

Please note that the SA will continue to provide targeted Technical Assistance (TA) to your organization to improve your cycle menu and sack lunch menu.

If you have any questions concerning this review or need assistance, please call Mary Burks or me at (601) 576-5000. 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) 2019/20  
Eldridge DeDeaux  
Kirri Martin

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