

March 29, 2022

Canton Separate School District
Mr. Gary Hannah, Superintendent
403 East Lincoln Street
Canton, MS 39046-0000

Dear Mr. Hannah:

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 February 14, 2022. An exit conference was conducted on March 29, 2022. The regulations governing the Administrative Review (7 CFR 210.18) require the SA to review two Critical Areas: 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, **six (6) total findings were identified, including five (5) relating to Performance Standard 1 and 2.** The findings which were identified are described below.

Performance Standard 1 (Meal Access and Reimbursement)

- In accordance with 7 CFR 210.18 (g)(1)(ii), the process used by the SFA to count, record, consolidate, and report the number of reimbursable meals served to eligible children must yield correct claims. Upon review of the meal counts, the Reviewer determined that the SFA over claimed the ASCP for Canton elementary by two hundred and forty six (246) snacks for the month of February 2022. This was a claim consolidation error that was corrected during the course of the review (as noted by the SFA's claim adjustment). However, in order to demonstrate on-going corrective Action, the SFA must submit a plan to ensure the accuracy of future claims; this could include a second party check.

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 SFA did submit sufficient documentation to the SA to ensure compliance with the meal pattern, however the Reviewer noted that the nutrient analysis did not match the published menu. The SA recognizes that supply chain disruptions

caused by the pandemic may cause the SFA to deviate from the published menu. However, the nutrient analysis must match the published menu. In order to demonstrate corrective action, the SFA must revise the published menu and/or the nutrient analysis and provide training to site managers to note in the red book if any menu changes are necessary due to supply chain.

- In accordance with 7 CFR 210.18 (g)(2)(i)(B)(1), the site must provide signage identifying what constitutes a reimbursable meal at or near the beginning of the serving line. The Reviewer noted that neither site observed during the Review had any OVS signage displayed. In order to demonstrate corrective action, The SFA must submit proof that the appropriate signage has been posted.
- In accordance with 7 CFR 210.10 (a)(3), SFAs must keep production records for the meals they produce. These records must show how the meals offered contribute to the required food components and food quantities for each age/grade group. Production records must be maintained daily in accordance with FNS guidance. A review of the production records at Huey L. Porter Middle School revealed missing or incomplete production records. The SA will not seek fiscal action in this matter to align with USDA guidance (COVID-19 Child Nutrition Response #100). The SFA must retrain staff on how to complete the production book and the importance of completing it daily. The SFA must submit the training agenda and sign in sheets and production records showing that the production book is completed daily.
- Meals planned and served as part of the NSLP must align with the meal pattern as described in 7 CFR 210.10(c). Upon review of the nutrient analysis, the reviewer noted that the menu is not in compliance with the whole grain requirements as outlined in the SFA's current waiver approved by the SA on 8/9/2021, which requires at least 50% of the planned menu to be Whole Grain Rich (WGR). In order to demonstrate corrective action, the SFA must revise the planned menu to meet or exceed 50% WGR grain products.

General Program Compliance (General Areas of Review)

- In accordance with 7 CFR 210.13 (d), SFAs should ensure that facilities for the storage of food products safeguard against theft, spoilage, and other loss. During the observation at Huey L. Porter Middle School, the Reviewer noted the site staff are not implementing First in First Out (FIFO) correctly, as all boxes are not dated. In order to demonstrate corrective action, the SFA must train staff on FIFO and provided an agenda and sign in sheets to the SA. The SFA must also provide proof that the boxes and food items are being dated properly.

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The School Food Authority (SFA) **must provide a corrective action response to all findings** of the Review by **April 29, 2022**. This response must be entered into the Mississippi Application and Reimbursement System (MARS) by an authorized signatory for the Child Nutrition Programs. If an authorized signatory is unable to access the Compliance module in MARS, the district must submit a corrective action plan on District letterhead that is signed by an authorized signatory.

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 the staff's dedication to providing students with delicious and nutritious meals.

If you have any questions regarding this review, or if you would like to request additional assistance, please email me at chedwards@mdek12.org or call Mary Burks or me at (601) 576-5000.

Sincerely,



Chelsea Edwards, Program Specialist
Office of Child Nutrition, School Support Division

cc: File NSLP (AR) 2021/2022
Margaret Beatty, Child Nutrition Director

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June 7, 2022

Canton Separate School District
Mr. Gary Hannah, Superintendent
403 East Lincoln Street
Canton, MS 39046

Dear Mr. Hannah:

Your response to the findings of our Administrative Review of your 2021-2022 National School Lunch Program (NSLP), School Breakfast Program (SBP), After School Care Program (ASCP), and Fresh Fruit and 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 Marianna Chauvin or me at (601) 576-5000. Thank you for your continued support of the Child Nutrition Programs.

Sincerely,



Chelsea Edwards, Program Specialist
Office of Child Nutrition, School Support Division

cc: File NSLP (AR) 2021/2022
Margaret Beatty, Child Nutrition Director

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