

December 22, 2021

Coffeeville School District
Mr. Dexter Green, Executive Officer
96 Mississippi Str.
Coffeeville, MS 38922-2776

Dear Mr. Green:

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 November 17, 2021. An exit conference was conducted on December 14, 2021. 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, **five (5) total findings were identified, including three (3) relating to Performance Standard 1 and 2.** The findings which were identified are described below.

DISTRICT/LEA Level Findings

- In accordance with 7 CFR 210.11 (c), competitive food items sold to students during the school day must meet general nutrition requirements (must be “*Smart Snack Compliant*”). While on site at Coffeeville HS, The reviewer noted that the vending machine was stocked with non-compliant products. In order to demonstrate corrective action, the SFA must provide proof that non-compliant products have been removed and/or all items in the vending machine are smart snack compliant.

SFA Level Findings

Performance Standard I

- In accordance with 7 CFR 210.7(c)(1)(iv) and 7 CFR 210.18 (g)(1)(ii), the process to record, consolidate, and report meal counts must yield accurate claims. While reviewing the meal count documentation, the SA determined that the SFA had an underclaim for the month of October of (815) lunch meals and (245) breakfast meals. The SFA has already submitted a claim adjustment in MARS to recoup the underclaim, which is described in the table below. In order to demonstrate corrective action, the SFA must submit a plan to ensure the accuracy of future claims.

Rate desc.	Rate	Meals Claimed	Meals Verified	Paid Amount	Corrected Amount	Difference
Lunch Reimbursement Rate	\$4.3175	5127	5942	\$22,135.8225	\$25,654.5850	\$3518.7625
Breakfast Reimbursement Rate	\$2.4625	3491	3736	\$8,596.5875	\$9,199.9000	\$603.3125
TOTAL UNDERCLAIMED						\$4,122.0750

Performance Standard II

- 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 and planned menu, the SA determined that the SFA did not offer enough grains to meet the daily minimums for three (3) days during the review week. Furthermore, the SFA did not offer enough “other” vegetable over the course of the review week. The SA will not seek fiscal action in these matters to align with USDA guidance (COVID-19 Child Nutrition Response #100). In order to demonstrate corrective action, the SFA must redo the menu to be compliant with both grain and vegetable subgroup requirements.
- In accordance with 7 CFR 210.10(e) and 7 CFR 220.8(e), students must select reimbursable meals under the rules of OVS. During the meal observation at Coffeetown HS, the Reviewer noted that staff had difficulty understanding and verbalizing some of the key components of OVS. It should be noted that the Reviewer did not observe any non-reimbursable meals being served, despite this confusion. In order to demonstrate corrective action, the SFA must provide additional training on OVS to all relevant staff.

General Program Compliance

- In accordance with SP 24-2017, food marketing, including depictions of food products on vending machines and coolers and other equipment, cannot promote non-compliant products. While on site at Coffeetown HS, the Reviewer noted that the ice cream cooler in the cafeteria advertised non-compliant ice cream products. The ice cream bin was removed immediately while the SA was present. Because this was corrected on site, no further action is necessary.

The School Food Authority (SFA) **must provide a corrective action response to all findings** of the Review by **January 25, 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

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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 Child Nutrition staff for their ability to respond quickly and effectively to challenges. The SA commends both the Child Nutrition Director and the HS Cafeteria manager for their efforts to remain compliant despite the fact that both are new to their positions with the district. The SA recognizes the challenges they face implementing the SSO program for the very first time, but it is obvious to the SA that both the CND and the manager are quick to make necessary corrections and 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 yfulton@mdek12.org or call Mary Burks or me at (601) 576-5000.

Sincerely,

A handwritten signature in black ink, appearing to read 'Y. Fulton', with a stylized, cursive script.

Yumetrice Fulton, Program Specialist
Office of Child Nutrition, School Support Division

cc: File NSLP (AR) 2021/2022
Mary Burnett, Child Nutrition Director

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March 4, 2022

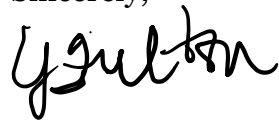
Coffeeville School District
Mr. Dexter Green, Executive Officer
96 Mississippi Street
Coffeeville, MS 38922-2776

Dear Mr. Green:

Your response to the findings of our Administrative Review of your 2021-2022 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) 576-5000. Thank you for your continued support of the Child Nutrition Programs.

Sincerely,



Yumetrice Fulton, Program Specialist
Office of Child Nutrition, School Support Division

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