

May 24, 2022

Covington County School District  
Ms. Babette Duty, Superintendent  
PO Box 1269  
Collins, MS 39428-000

Dear Ms. Duty:

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 February 22, 2022. An exit conference was conducted on May 11, 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, **eleven (11) total findings were identified, including six (6) 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)**

- Meals planned and served as part of the SBP must align with the meal pattern as described in 7 CFR 220.8 (c). A review of production records indicated that the Carver Middle site has been serving an insufficient serving of fruit at Breakfast (.5 cup). In order to demonstrate corrective action, the SFA has submitted a fully compliant planned breakfast menu. As such, no further action necessary.
- In accordance with 7 CFR 210.10 (a)(3), SFAs must keep production records that indicate how the meals offered contribute to the meal pattern. A review of the production records indicates that managers are not recording contribution sizes correctly in the production book. Despite these recording errors, the SA is confident that the sites are producing meals that comply with the meal pattern (with the exception of the fruit deficiency previously mentioned). In order to implement corrective action, the SFA must providing training to managers regarding contribution sizes in the production book.
- In accordance with 220.8(a)(1), schools must follow a food-based menu planning approach. The Reviewer noted that no planned breakfast menu was available on Day of Review at Carver Middle. In order to demonstrate corrective action, the SFA has submitted a fully compliant breakfast menu. As such, no further action is necessary.

- In accordance with 210.10 (a)(1)(i), schools must follow a food-based menu planning approach. At Mt. Olive Attendance, The Reviewers observed a great deal of deviation from the planned menu which seems to indicate that managers do not have a planned menu in advance. In order to demonstrate corrective action, the SFA must providing training to managers regarding the importance of not deviating from the planned menu.
- In accordance with 7 CFR 210.10 (d), fluid milk must be available in at least two varieties. On the day of review, Carver Middle briefly ran out of chocolate milk during the lunch service (white milk was still available). This was not the fault of the site; the Reviewer observed that the driver was delayed, and the site had documentation that sufficient milk had been ordered. As such, no further action is necessary.
- In accordance with 7 CFR 210.10 (o) (2), after school snacks must contain two (2) different components. The Reviewer noted that the ASCP coordinator did not have an understanding of required components and indicated that if the situation arose, she would allow students to decline a component. The SA did not observe any non-reimbursable snacks served on the day of review and see no evidence that this has occurred during the review period. In order demonstrate corrective action, the SFA must provide training regarding meal pattern to the ASCP coordinator.

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

- In accordance with FNS 113-1, program materials should utilize the correct non-discrimination statement. The Reviewer noted that the SFA has an incorrect version of the Non Discrimination statement on website. In order to demonstrate corrective action, the SFA should work with the district webmaster to correct the statement.
- 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. The Reviewer noted that at Carver Middle, the ice cream cooler and drink cooker have advertisements for non-compliant products. In order to demonstrate corrective action, the site must remove or obscure the advertisement.
- In accordance with 7 CFR 210.13 (d), the SFA shall ensure that storage facilities safeguard against theft, spoilage and other loss. The Reviewer noted that the Carver Middle site is not dating boxes to allow for FIFO. In order to demonstrate corrective action, the SFA must train staff on FIFO and provide the SA a copy of the agenda and sign in sheet.

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- 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*”). The Reviewer noted that french fries sold during lunch are not smart snack compliant. SA suggests that the SFA submit a plan to either stop selling french fries or find a smart snack compliant product.
- In accordance with 7 CFR 210.13 (d), SFAs should ensure that facilities for the storage of food products should safeguard against theft, spoilage, and other loss. While on site at Mt. Olive Attendance, the Reviewer noted significant ice build-up in the freezer, posing both a food safety hazard as well as a physical safety or trip hazard. In order to demonstrate corrective action, the SFA must submit documentation that the issue has been fixed.

The School Food Authority (SFA) **must provide a corrective action response to all findings** of the Review by **June 24, 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.

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 staff for all their hard work throughout the pandemic. All staff on site were extremely accommodating and easy to work with.

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

Sincerely,



Natalie Smith, Program Specialist  
Office of Child Nutrition, School Support Division

cc: File NSLP (AR) 2021/2022  
Patty Graham, Child Nutrition Director

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July 22, 2022

Covington County School District  
Babette Duty, Superintendent  
P.O. Box 1269  
Collins, MS 39428-0000

Dear Ms. Duty:

Your response to the findings of our Administrative Review of your 2021-2022 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.

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,



Natalie Smith, Program Specialist  
Office of Child Nutrition, School Support Division

cc: File NSLP (AR) 2021/2022  
Patty Graham, Child Nutrition Director

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