

June 7, 2022

Harrison County School District  
Mr. Mitchell King, Superintendent  
11072 Hwy. 49  
Gulfport, MS 39503-0000

Dear Mr. King:

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 April 25, 2022. An exit conference was conducted on May 31, 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, **four (4) 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.

#### **LEA/District Level Finding**

- 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 Harrison Central High, the Reviewer noted that the vending machine contained popcorn that was not smart snack compliant. The LEA also did not have the nutritional facts for all items in the vending machine. The SA recommends that the LEA utilize the smart snack calculator to ensure that all items in the vending machine meet smart snack guidelines. In order to demonstrate corrective action, the LEA must submit a corrective action plan to ensure all products in the vending machine are smart snack compliant.
- 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 West Harrison Middle School, the Reviewer noted that the vending machine (in the gym) contained a non-compliant beverage. The principal has submitted documentation showing that the vendor was contacted weeks before to have the items removed, as such no further action is necessary.

#### **SFA Level Findings - Performance Standard 2 (Meal Pattern and Nutritional Quality)**

- Breakfast meals served must follow the meal pattern as outlined in 7 CFR 220.8(c). Based on the production book and menu, the SFA was not offering enough fruit at breakfast (only serving 1/2 cup). The SA will not seek fiscal action in this matter to align with USDA guidance (COVID-19 Child Nutrition Response #100). In order to

demonstrate and implement corrective action, the SFA must provide training to staff on proper meal pattern requirements at breakfast.

- In accordance with 7 CFR 210.10(e) and 7 CFR 220.8(e), students must select reimbursable meals under the rules of Offer Versus Serve (OVS). During the meal observation at West Harrison Middle, the Reviewer noted that OVS was not being implemented correctly. Children were not allowed to decline milk at breakfast or lunch. In order to demonstrate and implement corrective action the SFA must properly train staff on the correct OVS procedure.

The School Food Authority (SFA) **must provide a corrective action response to all findings** of the Review by **July 7, 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 SFA on a job well done! The Staff was very friendly and work very well together. They have an excellent rapport with the children and have appetizing food that encourages participation. I would like to commend the Director for the creative and innovative things that are happening with child nutrition in the district. Keep up the great work!

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

Sincerely,



Jimmy May, Program Specialist  
Office of Child Nutrition, School Support Division

cc: File NSLP (AR) 2021/2022  
Bradley Barlow, Child Nutrition Director

*This institution is an equal opportunity provider.*

July 8, 2022

Harrison County School District  
Mr. Mitchell King, Superintendent  
11072 Hwy. 49  
Gulfport, MS 39503-0000

Dear Mr. King:

Your response to the findings of our Administrative Review of your 2021-2022 National School Lunch Program (NSLP), School Breakfast Program (SBP), Fresh Fruit and Vegetable (FFVP), and After School Snack 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,



Jimmy May, Program Specialist  
Office of Child Nutrition, School Support Division

cc: File NSLP (AR) 2021/2022  
Bradley Barlow, Child Nutrition Director

*This institution is an equal opportunity provider.*