

March 4, 2022

Holland School District  
Dr. Mario Willis, Superintendent  
101 West Washington Street  
Hollandale, MS 38748

Dear Dr. Willis:

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 October 4 2021. An exit conference was conducted on February 18, 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, **eight (8) total findings were identified, including seven (7) 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. The Reviewer noted that the SFA had an underclaim for the month of October of four hundred and seventy-two (472) lunch meals and three hundred and forty five (345) breakfast meals. As it is past the sixty (60) day deadline for a claim adjustment, in order to claim those funds, the SFA would have to submit a request for a one-time exception [which can only be used once every thirty-six (36) months]. The SFA must submit a corrective action plan to ensure the accuracy of future claims, this could include a second party check. Additionally, the SFA should return to using their POS software system which is more accurate than a tally sheet system.

Rate desc.	Rate	Meals Claimed	Meals Verified	Paid Amount	Corrected Amount	Difference
Breakfast Reimbursement Rate	\$2.4625	6038	6383	\$14868.5750	\$15718.1375	-\$849.5625
Lunch Reimbursement Rate	\$4.3175	8898	9374	\$38417.1150	\$40472.2450	-\$2055.1300
TOTAL UNDERCLAIMED						-\$2904.6925

- 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. Furthermore, it is the intent and purpose of the program to provide nutritious meals to eligible students (7 CFR 210.1 (a)), and does not include service to adults. During the meal observation, the reviewer noted that teacher meals were counted and recorded on the daily tally sheet used to file the monthly claim. The Reviewer learned that the October claim for reimbursement also included teacher meals. The SFA immediately acted to correct the claim in MARS to remove the teacher meals (adjustment dated 12/13/21). In order to demonstrate on-going corrective action, the SFA must retrain staff on how to separate student meals from adult meals in the counting and recording system. The SFA must submit proof of training to the SA.

### **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). During the meal observation, the Reviewer noted that staff planned to offer only a 1/2 cup of fruit for breakfast. The meal pattern requires the student to receive a full cup. Staff corrected this immediately on the day of review by offering additional fruit and it did not result in any non-reimbursable meals. Although prior breakfast meals served did not align with the meal pattern, 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 corrective action, the SFA must retrain staff on the meal pattern requirements. The SFA must submit proof of training to the SA as well as production records indicating that the meal pattern is being followed.
- Meals planned and served as part of the NSLP must align with the meal pattern as described in 7 CFR 210.10(c), this includes appropriate quantities for different age groups. The Reviewer noted that the site is serving multiple age groups, pre-plating the meals, and not making any accommodations for the varying age groups. The SA will not seek fiscal action in this matter to align with USDA guidance (COVID-19 Child Nutrition Response #100). In order to implement and demonstrate corrective action, the SFA must submit a menu appropriate for each age group as well as a nutrient analysis of each grade group menu to ensure compliance with the meal pattern. Furthermore, the SFA must retain staff on the correct meal pattern requirement and providing the appropriate meals for each grade group. The SFA must submit proof of training to the SA.
- Meals planned and served as part of the NSLP must align with the meal pattern as described in 7 CFR 210.10 (c). During the meal observation, the Reviewer noted that staff planned to offer only a half cup of vegetable for all age groups. the

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meal pattern requires 3/4 cup of vegetable for K-8 and a full cup of vegetable for 9-12. Staff corrected this immediately on the day of review by offering additional vegetables and it did not result in any non-reimbursable meals. Although prior lunch meals served did not align with the meal pattern, 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 corrective action, the SFA must retrain staff on the meal pattern requirements. The SFA must submit proof of training to the SA as well as production records indicating that the meal pattern is being followed.

- 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 not submit sufficient documentation to the SA to ensure compliance with calories, saturated fat, or sodium. Furthermore, the weekly certification reports do not indicate compliance with fruit, vegetable subgroups, milk, or grains. 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 corrective action, the SFA must submit weekly certification reports and base menu spreadsheets for each age group, indicating compliance with all meal pattern requirements.
- In accordance with 7 CFR 210.10 (c), the SFA must serve meals that meet meal pattern requirements. The Reviewer noted that vegetable substitutions are not made within the correct subgroup. Furthermore, the planned menu did not offer sufficient quantities of the beans and peas subgroup. In order to implement and demonstrate corrective action, the SFA must train staff on the vegetable subgroups and how to make appropriate substitutions if necessary. The SFA must provide the SA with a copy of the agenda and sign-in sheet for the training. Furthermore, the SFA must revise the menu and submit documentation (menu and nutrient analysis) indicating that sufficient quantities of each subgroup are included.

## **General Program Compliance**

- 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. During the observation, the Reviewer noted significant ice build-up in both freezers, posing both a food safety hazard as well as a physical safety or trip hazard. Additionally, the site staff is not implementing First in First Out (FIFO) correctly, as all boxes are not dated. In order to demonstrate corrective action, the SFA must provide documentation showing that the ice build-up has been fixed and is no longer a hazard. Furthermore, the SFA must retain staff on FIFO and submit proof of training to the SA.

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The School Food Authority (SFA) **must provide a corrective action response to all findings** of the Review by **April 4, 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](mailto: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  
Joann Martin, Child Nutrition Director

June 7, 2022

Hollandale School District  
Dr. Mario Willis, Executive Officer  
101 West Washington Street  
Hollandale, MS 38748-0000

Dear Dr. Willis:

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 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  
Joann Martin, Child Nutrition Director

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