

June 7, 2022

Region 1 Mental Health Center  
Ms. Odessa King, Director  
2950 HWY 49 South  
Tutwiler, MS 38963-5225

Dear Ms. King:

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 April 12, 2022. An exit conference was conducted on May 17, 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, **nine (9) 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. The Reviewer noted that the SFA had an overclaim for the month of March 2022 of nine (9) lunch meals and nine (9) breakfast meals as described in the chart below. In order to demonstrate corrective action, the SFA must submit a corrective action plan to ensure the accuracy of future claims, this could include a second party check. The SFA must also retrain staff on how to use the tally sheets correctly and provide the SA a copy of the training agenda and sign in sheet.

Due to a violation of 7 CFR 210.18 (g)(1)(ii), the SA has determined that the following reimbursed meals are unallowable for March 2022. Because the total amount of the overclaim falls within the allowable disregard threshold (\$600.00) established by federal regulation, the SA will not seek to recoup these funds.

Rate desc.	Rate	Meals Claimed	Meals Verified	Paid Amount	Corrected Amount	Difference
Breakfast Reimb. Rate	\$2.6050	364	355	\$948.22	\$924.78	(\$23.44)
Lunch Reimb. Rate	\$4.5625	364	355	\$1,660.75	\$1,619.69	(\$41.06)
NET OVERCLAIM (Disregarded)						\$64.50

### Performance Standard 2 (Meal Pattern and Nutritional Quality)

- Meals planned and served as part of the NSLP must align with the meal pattern as described in 7 CFR 210.10 (c). While reviewing the planned menu and production records, the Reviewer noted that staff did not offer the minimum of a full cup of fruit and a full cup of vegetable every day at lunch. 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 a revised planned menu and production record indicating that the meal pattern is being followed.
- 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 the site offered only a 1/2 cup of fruit for breakfast which is insufficient. 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 a revised planned menu and production record indicating that the meal pattern is being followed.
- In accordance with 7 CFR 210.10(h)(2)(i), a nutrient analysis must be performed to determine compliance with the prescribed levels of calories, saturated fat, and sodium in the meals offered to each age grade group over a school week. Over the course of the Review, the SFA was unable to provide sufficient documentation to the SA for a nutrient analysis to be conducted. In order to implement and demonstrate corrective action, the SFA must submit sufficient documentation (standardized recipes, nutrition facts labels, and CN labels if applicable) to conduct a nutrient analysis to the SA.

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- 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 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 as well as production records indicating that the production book is completed daily.

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

- In accordance with 7 CFR 210.13 (c), the SFA must develop a written food safety program that covers any facility where food is stored, prepared, or served. The Reviewer noted that the SFA did not have a food safety (HACCP) plan. In order to implement and demonstrate corrective action, the SFA must develop and implement a food safety plan and provide a copy to the SA.
- 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 site observation, the Reviewer noted ice build-up in the freezer, 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 retrain staff on proper storage practices (FIFO) and provide an agenda and sign in sheets. Additionally, the SFA must provide documentation that the freezer has been fixed.
- 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, the Reviewer noted that the SFA was not recording the daily temperature for all freezers, coolers, and dry storage. The SFA must record temperature for all freezers, coolers, and dry storage daily and must send 2 weeks' worth of temperature logs for the freezers, coolers, and dry storage. Furthermore, the SFA must retain staff on food safety and provide the SA with a copy of the agenda and sign in sheet.
- In accordance with 7 CFR 210.30 (g), the SFA must document compliance with the professional development standards for all school food service staff. Over the course of the review, it became apparent that the SFA does not have any system to document professional development hours accrued on the part of staff. In

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order to demonstrate corrective action, the SFA must submit a plan for tracking professional development.

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.

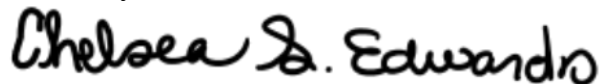
Pursuant to regulations, an organization has the right to appeal a monetary assessment imposed. Any appeal of a monetary assessment must be filed with the SA within fifteen (15) calendar days of receipt of this letter. Please refer to the enclosed copy of appeal procedures.

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 manager on the hard work she put in to providing the children with delicious 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 Marianna Chauvin or me at (601) 576-5000.

Sincerely,



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

cc: File NSLP (AR) 2021/2022  
Gale Moore  
Quentin Smith

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September 20, 2022

Region 1 Mental Health Center  
Mrs. Karen Corley , Executive Director  
2950 Hwy 49 South  
Tutwiler, MS 38963-5225

Dear Ms. Corley:

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, however, the SFA will continue to receive targeted technical assistance from the State Agency.

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  
Quinton Smith, Child Nutrition Director

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