

November 1, 2021

Starkville Oktibbeha Consolidate School  
Dr. Eddie Peasant, Superintendent  
401 Greensboro Street  
Starkville, MS 39759-4151

Dear Dr. Peasant:

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 October 18, 2021. An exit conference was conducted on October 27, 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, **four (4) total findings were identified, including one (1) 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)**

- In accordance with 7 CFR 210.10 (k)(2), full quantities of each required component must be available on every serving line throughout the service. During the meal observations at both West Elementary and Sudduth Elementary, the Reviewer noted that the sites ran out of certain food items prior to the end of service which resulted in an insufficient quantity of that component being available. At Sudduth, only a half cup of vegetable was left on the line, this affected 12 students. At West Elementary, several of the breakfast carts ran out of certain fruit or grain offerings prior to the end of service. The SA did note that even though they ran out of certain offerings, all students were able to select a fully reimbursable meal. For this reason, as well as USDA guidance allowing flexibility in this area, the SA will not seek fiscal action in this area. The SFA must submit a corrective action plan to ensure all components are available on all serving lines throughout the duration of the meal service.

## General Program Compliance (General Areas of Review)

- In Accordance with SP 24-2017, all food advertisements on the campus must advertise only smart snack compliant products. During the observation of West Elementary, the Reviewer noted that the ice cream cooler in the cafeteria is advertising non-compliant ice cream products. In order to demonstrate corrective action, the SFA must submit proof that the advertisement has been removed or obscured.
- 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 observations at both West Elementary and Sudduth Elementary, the Reviewer noted that staff had difficulty understanding and verbalizing some of the key components of OVS. At West Elementary, the cashier thought that the meat component was required. At Sudduth elementary, because they were operating 5 breakfast carts, they needed five trained cashiers, and several of those cashiers did not seem to have an understanding of OVS or the number of items required. 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 a training schedule indicating how additional training on OVS will be provided to all relevant staff.
- If pre-k students are not co-mingled with other age groups, SFAs are required to follow the meal pattern as outlined in 7 CFR 220.8 (o). During the meal observation at Sudduth Elementary, the Reviewer noted that two of the breakfast carts were servicing the Pre-K students exclusively (not co-mingled) and they were not following the Pre-K Meal pattern. In order to demonstrate corrective action, the SFA must create a plan to co-mingle the students or to serve the pre-K menus on the pre-K hall and provide training to staff on the pre-K meal pattern to relevant staff.

The School Food Authority (SFA) **must provide a corrective action response to all findings** of the Review by **December 1, 2021**. 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.

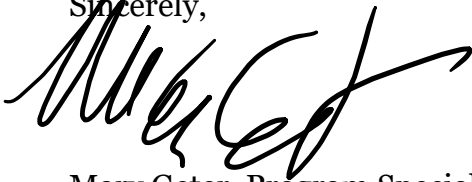
In addition to conducting the AR, one of the functions of the SA is to provide Technical Assistance (TA). During the course of the review, the SA Reviewer provided TA in several areas to the CND. TA is documented in MARS, specifically in the “Technical Assistance” section of the “Compliance” Module. TA is provided for the improvement of the program operations and is not considered a finding.

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The SA would like to commend the SFA for being so well-prepared for the review. Staff were very responsive to requests for information. During the on-site review, the SA noted that both kitchens were very clean and that they had well-managed storage and inventory.

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

Sincerely,

A handwritten signature in black ink, appearing to read 'Mary Geter', written in a cursive style.

Mary Geter, Program Specialist  
Office of Child Nutrition, School Support Division

cc: File NSLP (AR) 2021/2022  
Ginny Hill, Child Nutrition Director

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November 29, 2021

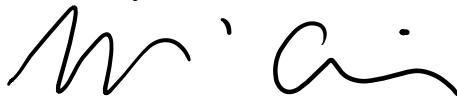
Starkville Oktibbeha Consolidated School District  
Dr. Eddie Peasant, Superintendent  
401 Greensboro Street  
Starkville MS 39759-4151

Dear Dr. Peasant:

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 Mary Burks or me at (601) 576-5000. Thank you for your continued support of the Child Nutrition Programs.

Sincerely,



Marianna Chauvin, Division Director II  
Office of Child Nutrition, School Support Division

cc: File NSLP (AR) 2021/2022  
Ginny Hill, CND

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