

November 16, 2021

Sunflower County Consolidated
Dr. Miskia Davis, Superintendent
196 Martin Luther King Drive
P. O. Box 70
Indianola, MS 38751-0000

Dear Dr. Davis:

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 25-27, 2021. An exit conference was conducted on November 12, 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, **three (3) 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.

LEA/District Level Finding

- It is the intent and purpose of the NSLP to provide nutritious meals to eligible students (7 CFR 210.1 (a)), but the program is not designed to include service to adults. Further, 796-1 Rev 2 Exhibit d (M) states that costs associated with sales or services to adults are considered unallowable. While on-site at Thomas Edwards High School, the SA Reviewer observed that a child gave their meal to a security guard on duty. While it may appear that the student willingly shared their tray, this arrangement gives the appearance of impropriety because adults, especially figures of authority, exert a great deal of influence on children who may experience undue pressure to continue to provide meals, even if the child changes their mind about whether or not they want to consume the meal. For these reasons, the District should not allow students to forfeit their meals to adults, whether it is of the child's own volition or if it is as some form of punishment (which is expressly forbidden by FNS instruction 796-1 Rev. 1). The following Corrective Action must be taken by December 16, 2021: the District must provide documentation of training provided to staff regarding maintaining professionalism and preventing meal forfeiture from occurring in the future.

SFA Level Findings

Performance Standard 2 (Meal Pattern and Nutritional Quality)

- In accordance with 7 CFR 210.10 (a)(3), 7 CFR 210.15 (b)(2), and 7 CFR 220.8(a)(3), School Food Authorities (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 at both Thomas Edwards High School and Carver Elementary revealed missing or incomplete production records for more than a month prior to the review. The SA will not seek fiscal action in this matter to align with USDA guidance (COVID-19 Child Nutrition Response #100). The following corrective action must be taken by December 16, 2021: the SFA must submit proof that production records are being maintained.

General Program Compliance (General Areas of Review)

- In accordance with 7 CFR 210.13 (d), the SFA shall ensure that the necessary facilities for storage, preparation, and service of food are maintained to safeguard against theft, spoilage and other loss. The Reviewer noted that there was ice build-up in both freezers at Thomas Edwards High. This could cause issues and become a hazard if not fixed. The following corrective action must be taken by December 16, 2021: the SFA must submit documentation to the SA indicating that the ice build-up is fixed and is no longer a hazard.

The School Food Authority (SFA) **must provide a corrective action response to all findings** of the Review by **December 16, 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.

The SA would like to commend the SFA for the cleanliness of all three sites visited. The Reviewer also noted that particular care was given on each serving line to display the food in an appealing manner.

This institution is an equal opportunity provider.

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

Sincerely,

A handwritten signature in black ink that reads "Chelsea Edwards". The signature is written in a cursive, flowing style.

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

cc: File NSLP (AR) 2021/2022
Scherrie Payne, Child Nutrition Director

This institution is an equal opportunity provider.

December 21, 2021

Sunflower County Consolidated School District
Dr. Miskia Davis, Superintendent
196 Martin Luther King Drive
P. O. Box 70
Indianola, Ms 38751-0000

Dear Dr. Davis:

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 Mary Burks 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
Scherrie Payne, Child Nutrition Director

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