

April 1, 2022

Wilkinson County School District
Mr. Chavis Bradford, Superintendent
PO Box 785
Woodville, MS 39669-0000

Dear Mr. Bradford:

The State Agency (SA) completed an Administrative Review (AR) of the National School Lunch Program (NSLP), School Breakfast Program (SBP), and Fresh Fruit and Vegetable Program (FFVP) during the week of January 25, 2022. An exit conference was conducted on March 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, **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 210.7(c)(1)(iv) and 7 CFR 210.18 (g)(1)(ii), the process to record, consolidate, and report meal counts must yield accurate claims. While reviewing the meal count documentation, the SA determined that the SFA had an underclaim for the month of December 2021 of four-hundred and twenty-seven (427) lunch meals and three-hundred and eight (308) 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]. In order to demonstrate corrective action, the SFA must submit a plan to ensure the accuracy of future claims. This could include a second party check and/or a return to an electronic POS.

Rate desc.	Rate	Meals Claimed	Meals Verified	Paid Amount	Corrected Amount	Difference
Breakfast Reimbursement Rate	\$2.4625	8,921	9,229	\$21,967.9625	22,726.4125	\$758.4500
Lunch Reimbursement Rate	\$4.3175	11,069	11,496	\$47,790.4075	49,633.9800	\$1,843.5725
TOTAL UNDERCLAIMED						\$2,602.02

Performance Standard 2 (Meal Pattern and Nutritional Quality)

- In accordance with 7 CFR 220.8 (i), a nutrient analysis should be used to determine that 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 Reviewer noted that the William Winans site is serving extra items at breakfast (grits, pop-tarts, cereal) that are not included in the planned or analyzed menu. 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 corrective action, the SFA must provide training to staff to emphasize the importance of not deviating from or adding to the planned menu.
- The SFA must comply with the meal pattern as described in 7 CFR 210.10 (c). The Reviewer noted that the William Winans site did not offer a sufficient quantity of vegetables on 12/10/22. 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 corrective action, the SFA must provide training to staff on the meal pattern components and quantities.
- In accordance with 7 CFR 210.10 (e), students must select reimbursable meals under the rules of OVS. During the meal observation at William Winans, the Reviewer noted that staff had difficulty understanding and verbalizing some of the key concepts of OVS. It should be noted that the Reviewer did not observe any non-reimbursable meals being served, despite this confusion. In order to implement and demonstrate corrective action, the SFA must train staff on OVS and provide the SA a copy of the training agenda and sign in sheet.
- In accordance with 7 CFR 210.10 (i), a nutrient analysis should be used to determine that 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 Reviewer noted that the William Winans site is offering a chef salad at lunch daily, but this is not included in the nutrient analysis. 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 corrective action, the SFA must submit an updated nutrient analysis that includes all planned menu items.

General Program Compliance

- In accordance with 7 CFR 210.30 (b)(1), all school nutrition program directors must meet minimum educational requirements. The Interim Child Nutrition Director has not met these hiring requirements. In order to implement corrective action, the District must submit a corrective action plan to ensure any director over the Child Nutrition Programs meets the minimum requirements as prescribed by USDA and the SA.

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- In accordance with SP 24-2017, food marketing, including depictions of food products on vending machines and coolers and other equipment, cannot promote non-compliant products. While on site at William Winans, the Reviewer noted that the ice cream cooler in the cafeteria advertised non-compliant ice cream products. In order to implement corrective action, the SFA must either remove or obscure the advertisement.
- In accordance with 7 CFR 210.13 (d), SFAs should ensure that facilities for the storage, preparation, and service of food products are maintained to safeguard against spoilage. While on site at William Winans, the reviewer noted a build up of mold/mildew on the inside of the ice machine. In order to implement corrective action, the SFA must provide documentation that the ice machine has been cleaned, as well as a corrective action plan to ensure the machine is regularly cleaned and sanitized in the future.
- In accordance with USDA Memo SP 31-2008, FFVP participating schools are required to widely publicize the availability of free fresh fruits and vegetables. The Reviewer observed no evidence that the FFVP at William Winans has been advertised. In order to implement corrective action, the SFA must submit a corrective action plan to widely publicize the availability of fresh fruits and vegetables through the FFVP.

The School Food Authority (SFA) **must provide a corrective action response to all findings** of the Review by **May 2, 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 commitment to continuous quality improvement. It is apparent to the SA that the SFA has taken steps to improve the program despite the challenges of the pandemic and staff turnover within the CN department.

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

Sincerely,

A handwritten signature in black ink, appearing to read 'M. Chauvin', with a stylized, cursive script.

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

cc: File NSLP (AR) 2021/2022
Sierra Benjamin-Jackson, Child Nutrition Director

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May 13, 2022

Wilkinson County School District
Mr. Chavis Bradford, Superintendent
PO Box 785
Woodville, MS 39669-0000

Dear Mr. Bradford:

Your response to the findings of our Administrative Review of your 2021-2022 National School Lunch Program (NSLP), School Breakfast Program (SBP), and Fresh Fruit and Vegetable Program (FFVP) 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
Sierra Benjamin-Jackson, Interim Child Nutrition Director

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