

November 21, 2025

ELECTRONIC DELIVERY

Itawamba School District
Mr. Austin Alexander
605 S. Cummings St.
Fulton, MS 38843-1811

Dear Mr. Alexander:

Your response to the findings of our Administrative Review of your 2024-2025 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 Gerardo Padilla or me at (601) 576-5000. Thank you for your continued support of the Child Nutrition Programs.

Sincerely,



Taquasia Hicks, Director of Monitoring
Office of Child Nutrition, School Support Division

cc: File NSLP (AR) 2024-2025
Turner Sanderson. Food Service Administrator

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Office of Child Nutrition
Scott Clements, Director of Child Nutrition

September 30, 2025

ELECTRONIC DELIVERY

Itawamba County School District
Mr. Austin Alexander, Superintendent
605 S. Cummings St.
Fulton, MS 38843-1811

Dear Mr. Alexander:

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 December 2, 2024. An exit conference was conducted on December 19, 2024. In accordance with 7 CFR 210.18, the AR covers Performance Standard 1 (Meal Access and Reimbursement), Performance Standard 2 (Meal Pattern and Nutritional Quality), and several General Areas of Review. A total of five (5) findings were identified. Each finding is described below, along with the corrective action measures required to resolve them.

Meal Access and Reimbursement

During the Certification and Benefit Issuance review, seven (7) meal applications were found to be misclassified, leading to students receiving incorrect eligibility statuses. Some students were incorrectly approved for free benefits when they should have been approved for reduced or denied benefits. Others were incorrectly classified as paid when they were eligible for free or reduced-price benefits. These discrepancies violate 7 CFR 245.3, which requires accurate determination based on household size and income or categorical eligibility. As a result of these findings, fiscal action of \$883.70 could have been assessed. (See Exhibit A) However, USDA allows the SA to have discretion of issuing fiscal action when the errors are under 3% district wide. The SA recommends that the School Food Authority (SFA) ensures that all meal applications undergo a second-party check. For corrective action, the SFA must submit a plan to the SA detailing how it will prevent future errors on meal applications.

Discrepancies were identified between edit check documents and the SFA's November's claims for reimbursement at both Itawamba Agricultural High School and Itawamba Attendance Center. Underclaims and overclaims were noted across free, reduced-price, and paid categories for both breakfast and lunch. (See Exhibit B) These issues violate 7 CFR 220.11(d), which require accurate consolidation and reporting of reimbursable meals. The SFA must implement a second-party review process for meal counts and submit it to the SA before submitting claims. Persistent inaccuracies can lead to a reduction in future federal or state funding, or even a temporary suspension or permanent termination from participating in the programs. The SA has chosen to waive fiscal action as the amount fell below the \$600.00 threshold. The SA recommends that the SFA completes a second party check prior to submission of their monthly claim. The

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SFA must provide documentation detailing the corrective actions and preventative measures that will be implemented to ensure this is not a repeated offense.

Meal Pattern and Nutritional Quality

During the administrative review conducted on November 11, 2024, it was observed that the lunch menu for K-8 students failed to meet the minimum vegetable requirements for the meal pattern. While the menu offered a total of $\frac{3}{4}$ cup of vegetables— $\frac{1}{2}$ cup as a tossed salad and $\frac{1}{4}$ cup credited within the chicken pot pie entree—12 students who selected the tuna sandwich as their entree did not have access to the full $\frac{3}{4}$ cup of vegetables. This issue violates 7 CFR 210.7(c), which mandates that school lunches for grades K-8 offer a minimum of $\frac{3}{4}$ cup of vegetables daily. The SFA must submit a plan to the SA that outlines how they will ensure compliance with the meal pattern going forward. Not offering enough vegetables in school meals can significantly impact a child's overall nutrition and well-being.

MS State Board Policy 17.2

A vending machine located outside in the courtyard at Mantachie High School was operational within one hour before meal service. Mississippi State Board Policy Rule 17.2 prohibits food sales on campus within one hour prior to any meal service. This state-level restriction is consistent with USDA authority. The SFA must disable or restrict access to the vending machine during the one-hour period before and during meal services. Having competitive foods easily accessible right before and during a meal service can undermine the healthy eating messages promoted by the school nutrition program. Students may opt for less nutritious snacks instead of participating in the school meal. The SFSA must provide evidence showing how the policy will be enforced going forward. The plan should include specific steps, such as setting a timer on the machine, installing a lock, or covering it during restricted times.

General Areas of Review

At Fairview Attendance Center, several chip products (Doritos, Lays, Fritos) were observed for sale that do not meet USDA Smart Snacks standards. The site manager removed them before service, but documentation revealed that Child Nutrition funds were used to purchase these noncompliant items. This violates 7 CFR 210.11(c), which requires that all competitive foods sold during the school day meet USDA nutrition standards and prohibits the use of program funds for unallowable purchases. The SA recommends the SFA utilize the USDA Smart Snacks Calculator to assess product compliance prior to purchase or sale. The SFA must submit a plan to the SA detailing how all future food purchases will comply with USDA Smart Snacks standards.

Corrective Action Plan Requirements

The SFA must submit a complete corrective action response for each finding by **October 30, 2025**. The response must be submitted in the MARS Compliance Module



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by an authorized signatory. If MARS access is unavailable, the corrective action plan must be submitted on district letterhead and signed by an authorized official.

Technical Assistance Provided

Throughout the review, the SA provided technical assistance (TA) to support program compliance and improvement. TA is documented in the "Technical Assistance" section of the MARS Compliance Module and is not considered a formal finding.

The State Agency commends the Itawamba County School District for its commitment to providing students with consistent access to nutritious, well-balanced meals through the National School Lunch and School Breakfast Programs. During the course of the review, it was noted that the food service team demonstrated professionalism, responsiveness, and a willingness to implement best practices that support program goals. The district offers students a variety of appealing meal options, which encourages participation and supports student well-being and academic readiness. Your efforts contribute meaningfully to the health and educational success of the students you serve. The SA appreciates your dedication to program integrity and your investment in strengthening child nutrition operations across your schools.

If you have any questions about this review or need further assistance, please contact me at thicks@mdek12.org or (601) 576-5000.

Sincerely,

Taquasia Hicks, Director of Monitoring
Office of Child Nutrition, School Support Division

cc: File NSLP (AR) 2024/2025

Exhibit A

Rate desc.	Rate	Meals Claimed	Meals Verified	Paid Amount	Corrected Amount	Difference
Eligibility Issuance Lunch (Free)	\$4.54	7492	7375	\$34,013.68	\$33,482.50	(\$531.18)
Eligibility Issuance Lunch (Reduced)	\$4.14	1352	1308	\$5,597.28	\$5,415.12	(\$182.16)
Eligibility Issuance Lunch (Paid)	\$0.53	2621	2658	\$1,389.13	\$1,408.74	\$19.61
Eligibility Issuance Breakfast (Free)	\$2.84	4185	4117	\$11,885.40	\$11,692.28	(\$193.12)
Eligibility Issuance Breakfast (Reduced)	\$2.54	669	666	\$1,699.26	\$1,691.64	(\$7.62)
Eligibility Issuance Breakfast (Paid)	\$0.39	898	897	\$350.22	\$349.83	(\$0.39)
TOTAL OVERCLAIMED						(\$883.70)

Exhibit B

Rate desc.	Rate	Meals Claimed	Meals Verified	Paid Amount	Corrected Amount	Difference
Lunch Free Reimbursement Rate	\$4.45	21,938	21,850	\$97,624.10	\$97,232.50	(\$391.60)
Lunch Reduced Reimbursement Rate	\$4.05	4,429	4,483	\$17,937.45	\$18,156.15	\$218.70
Lunch Paid Reimbursement Rate	\$.44	6,441	6,490	\$2,834.04	\$2,855.60	\$21.56
Breakfast Reduced Reimbursement Rate	\$2.54	2,374	2,418	\$6,029.96	\$6,141.72	\$111.76
Breakfast Reduced Reimbursement Rate	\$2.54	669	666	\$1,699.26	\$1,691.64	(\$7.62)
Breakfast Paid Reimbursement Rate	\$0.39	2,541	2,553	\$990.99	\$995.67	\$4.68
TOTAL OVERCLAIMED						(\$237.06)

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