



MISSISSIPPI  
DEPARTMENT OF  
EDUCATION

Office of Child Nutrition  
**Scott Clements, Director of Child Nutrition**

December 17, 2025

**ELECTRONIC DELIVERY**

Mr. Marcus Bourdreaux  
Biloxi Public School District  
160 St. Peter Ave.  
Biloxi, MS 39533

Dear Mr. Bourdreaux:

Your response to the findings of our Administrative Review of your 2024-2025 National School Lunch Program (NSLP) 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 regarding this review, or if you need further assistance, please contact me at (601) 576-5000.

Sincerely,

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

cc: Vanessa Ladnier, Child Nutrition Director  
File: NSLP (AR) 2024-2025

*This institution is an equal opportunity provider.*

500 Greymont Avenue, Suite F  
P.O. Box 771  
Jackson, MS 39205-0771

Phone (601) 576-5000  
Fax (601) 354-7595

**[mdek12.org](http://mdek12.org)**



MISSISSIPPI  
DEPARTMENT OF  
EDUCATION

Office of Child Nutrition  
**Scott Clements, Director of Child Nutrition**

November 5, 2025

## **ELECTRONIC DELIVERY**

Mr. Marcus Bourdreaux, Superintendent  
Biloxi Public School District  
P.O. Box 168  
160 St. Peter Avenue  
Biloxi, MS 39533

Dear Mr. Bourdreaux:

The State Agency (SA) completed an Administrative Review (AR) of the National School Lunch Program (NSLP) and School Breakfast Program (SBP) from April 1 – April 3, 2025. An exit conference was conducted on April 16, 2025. 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, five (5) total findings were identified, including two (2) relating to Performance Standard 1. The findings which were identified are described below.

### **Performance Standard 1 (Meal Access and Reimbursement)**

During the review of Certification and Benefit Issuance, one student and their sibling were misclassified as free and should have been classified as reduced. This error was a result of data entry or software malfunction. In accordance with 7 CFR 245.3, each participating Local Educational Agency (LEA) must adhere to the eligibility criteria for free and reduced-price meals by following the family size income standards as outlined in the Income Eligibility Guidelines. The School Food Authority (SFA) corrected the students' statuses in the software and notified the household regarding the change in benefits. The SFA is required to provide a corrective action plan outlining how incorrect eligibility will be prevented in the future, along with clearly defined responsibilities for the determining official and the confirming official. Incorrectly classifying students can lead to non-compliance with federal regulations and significant financial penalties. The SA waived fiscal action, as the amount fell below the \$600.00 threshold (see exhibit A).

The Reviewer noted inaccuracies in breakfast and lunch meals count at Biloxi High during the month of review. For lunch, 13 meals were entered incorrectly on the claim; meals were underclaimed in the free category and overclaimed in the paid category. Breakfast also showed claiming errors, with 12 meals underclaimed in the free category and 12 meals overclaimed in the paid category. In accordance with 7 CFR 210.7(c)(1)(iv) and 7 CFR 220.11(d)(2), the SFA shall establish internal controls which ensure the accuracy of meal counts prior to the submission of the monthly claim for reimbursement. The SFA must establish and submit a second-party check system to the SA for reviewing meal counts before monthly claims are submitted. Overclaiming and underclaiming meals can lead to program non-compliance, financial repercussions, and

*This institution is an equal opportunity provider.*

500 Greymont Avenue, Suite F  
P.O. Box 771  
Jackson, MS 39205-0771

Phone (601) 576-5000  
Fax (601) 354-7595

**mdek12.org**





an increased administrative burden as significant staff time and resources are needed to identify, correct, and report these errors. The total amount falls within the allowable disregard threshold (\$600.00) established by federal regulation; the SA will not seek to recoup these funds. (See Exhibit A)

### **Competitive Foods and Smart Snacks**

Vending machines were operable during meal service times. This constitutes a competitive sales violation, also noted in the SY 2021-2022 Administrative Review. This is a violation of the State Board of Education (SBE) Rule 17.2 Competitive Food that may result in an accreditation violation. Rule 17.2 is in place to ensure children are not in a position of having to decide between non-nutritious foods immediately before or during the meal service period. Vending machines must be turned off at least one hour prior to and during meal service.

Vending machines had non-compliant inventory that violates nutritional and smart snack standards. In accordance with SBE Rule 17.10, Smart Snacks Standards ensure schools will provide students with healthier choices by offering more whole grain options, fruits, vegetables, leaner protein and lower-fat dairy. Smart Snacks applies to all foods and beverages sold to students. In accordance with 7 CFR 210.11(b), State agencies and/or local educational agencies must establish such policies and procedures as are necessary to ensure compliance with this section. State agencies and/or local educational agencies may impose additional restrictions on competitive foods, provided that they are not inconsistent with the requirements of this part.

The SA observed the sale of World's Finest Chocolate, Famous Amos cookies, Takis, and Kona shaved ice at Biloxi High School, Biloxi Upper Elementary School, and Nichols Elementary School. In accordance with 7 CFR 210.11(c)(1), all competitive foods sold to students on the school campus during the school day must meet minimum nutritional standards, the sale of these items were non-compliant.

Food items sold for purposes other than student consumption during the school day are allowable. These items can be distributed after the school day has ended. The School day is defined as the hours between 12:00 a.m. the midnight before until 30 minutes after the end of the instructional day. The Local Education Agency (LEA) must immediately discontinue all non-compliant fundraisers during the school day. The LEA must provide a corrective action plan outlining the procedure that will be taken to ensure future competitive food compliance. The Office of Child Nutrition (OCN) will conduct an unannounced review to verify compliance.

### **General Areas of Review**

The SFA did not have a civil rights complaint procedure in place. The absence of a civil rights complaint procedure places the school at risk of potentially impacting its financial resources. In accordance with FNS 113-1 (XV), the SFA should implement procedures for receiving and processing complaints alleging civil rights discrimination within School Nutrition Programs. To implement corrective action, the SFA must establish and



submit civil rights complaint procedures to the SA. The absence of a civil rights complaint procedure jeopardizes the SFA ethical responsibilities, legal compliance, and public trust, ultimately undermining its ability to fairly and effectively serve its students.

The SFA remitted a payment to J & B Flooring to have floors installed in Biloxi High School's cafeteria for \$63,627.70. However, the SFA did not seek permission from the SA. In accordance with 2 CFR 200.439(b)(1), capital expenditures for general purposes of equipment, buildings, and land are allowable as direct costs with prior written approval. Failure to follow proper procurement procedures when making purchases for NSLP and SBP can lead to significant negative consequences such as financial penalties and administrative burdens such as suspension or termination from the programs. To implement corrective action, the SFA must develop and submit a corrective action plan to the SA outlining how it will adhere to its procurement procedures. Future violations may be considered an unallowable cost and require repayment to the child nutrition account from district funds.

### **Corrective Action Plan Requirements**

The SFA must submit a complete corrective action response for each finding by **December 7, 2025**. The response must be submitted in the MARS Compliance Module 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 SA would like to commend the SFA for taking pride in providing meals to students each day by offering an array of choices and investing in innovative dining spaces where students can relax during meal periods.

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

Sincerely,

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

cc: File NSLP (AR) 2024/2025  
Vanessa Ladnier, Child Nutrition Director





Exhibit A

Rate desc.	Rate	Meals Claimed	Meals Verified	Paid Amount	Corrected Amount	Difference
Biloxi High School Breakfast Reimbursement Rate (Free)	\$2.84	5512	5524	\$15,654.08	\$15,688.16	\$34.08
Biloxi High School Breakfast Reimbursement Rate (Paid)	\$0.39	1712	1700	\$667.68	\$663.00	(\$4.68)
Biloxi High School Lunch Reimbursement Rate (Free)	\$4.45	8482	8495	\$37,744.90	\$37,802.75	\$57.85
Biloxi High School Lunch Reimbursement Rate (Paid)	\$0.44	5976	5963	\$2,629.44	\$26,23.72	(\$5.72)
Incorrect eligibility status (Lunch Free)	\$4.45	29 (F)	29 (R)	\$129.05	\$117.45	(\$11.60)
Incorrect eligibility status (Breakfast Free)	\$2.84	14 (F)	14 (R)	\$39.76	\$35.56	(\$4.20)
TOTAL OVERCLAIMED						\$65.73