



Carson City School District
Administrative Review Report

December 6, 2019

National School Lunch Program
Food and Nutrition Division

Administrative Review Report
Food and Nutrition Division



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I. Executive Summary

Administrative Review

The Richard B. Russell National School Lunch Act, as amended by the Healthy Hunger-Free Kids Act of 2010 (HHFKA), requires a unified accountability system designed to ensure participating school food authorities (SFAs) comply with National School Lunch Program (NSLP) and School Breakfast Program (SBP) requirements. The Act also requires an accountability system that conducts Administrative Reviews to evaluate requirements for NSLP and SBP during a three-year (triennial) cycle.

The Administrative Review provides a comprehensive evaluation of school meal programs of SFAs participating in the NSLP, SBP, and includes both Critical and General Areas of Review. This includes the implementation of HHFKA program requirements and other Federal Programs.

Procurement Review

The procurement of goods and services is a significant responsibility of a SFA. Obtaining the most economical purchase should be considered in all purchases when using the nonprofit food service account. SFAs must comply with the applicable regulations through audits, administrative reviews, technical assistance, training, guidance materials, and by other means (7 CFR 210.19(a)(3)). Federal, state and local laws and regulations specify the methods SFAs must ensure all competitive procurements must be in accordance with 2 CFR Part 200.318-.326 and all other applicable government-wide and FNS regulations and guidance.

Nevada Department of Agriculture (NDA) conducted the Procurement Review in tandem with the Administrative Review of the NSLP, SBP, After-School Snack Program (ASSP) and Fresh Fruit and Vegetable Program (FFVP) administered by Carson City School District (CCSD) from November 4-7, 2019.

An exit conference was held on Thursday November 7, 2019 to provide a summary of the work performed and to discuss any anticipated findings and required corrective actions.

We commend your agency's commitment to improving operations of this essential nutrition assistance program. We wish to thank the Carson City School District staff for the time and assistance extended to our State Agency staff during this process.

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II. Introduction

An entrance conference was conducted on Monday, November 4, 2019. The review was conducted at the Carson City School District in Carson City, Nevada. The Administrative Review was conducted by Bobbie Beach, School Nutrition Specialist; Jillian Smith, Program Officer; Chris Tate, Program Officer; and Mark Nguyen, USDA-WRO. CCSD staff included Elizabeth Snyder, CCSD Director of Nutrition; Mary Sawyers, CCSD Administration Office Specialist; Sandra Ramirez, Aramark Food Service Director; Andres Montoya, Aramark District Manager; and Brian Achilles, Aramark District Manager. This report is based on the results of the offsite assessment, the onsite review of files, and meal service observations of the breakfast, lunch, snack and FFVP programs. An exit conference was held on Thursday, November 7, 2019 which provided a summary of the work performed at CCSD and we discussed any additional documentation needed, preliminary findings, and observations.

III. Scope

The Administrative Review covered documents, records, and procedures relating the administration of the NSLP for the month of review, August 2019. The Procurement Review covered all documents, records, invoices, and procedures relating to the procurement for the SFA for the year of review, school year 2018-2019. Meal observations were conducted at the following site during the onsite review:

- Empire Elementary School
- Carson Middle School

IV. Methodology

The Administrative Review was conducted in accordance with procedures and requirements set forth in the Administrative Review Manual, 2018-2019 edition. It included evaluating CCSD's administration of the National School Lunch and School Breakfast programs through the assessment of agency procedures, sampled review files, documentation, claims, fiscal systems, contracts, and staff interviews.

The Procurement Review was conducted in accordance with procedure and requirements set forth in the 2 CFR 200 and 7 CFR 210. The procurement plan, code of conduct, and procurement documents, including invoices, were evaluated for compliance.

V. Noteworthy Achievements

- Overall Improvement- CCSD staff has made significant improvements in regards to correcting deficiencies identified in the previous Administrative Review especially, with Food Service Management Contract monitoring and menu production records.
- Marketing and Menu Appeal- CCSD site staff did an excellent job at developing sample meal trays to display in meal service lines to help advertise what was on the menu for the day.

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VI. Critical Areas of Review

- Performance Standard I- Meal Access and Reimbursement
 - Certification and Benefits Issuance
 - Meal Counting and Claiming
- Performance Standard II- Meal Pattern and Nutritional Quality
 - Meal Components and Quantities
 - Offer versus Serve
 - Dietary Specifications and Nutrient Analysis
 - Menu Production Records
- Comprehensive Resource Management
 - Revenue from non-program foods
- General Areas
 - Civil Rights
 - Professional Standards
 - SFA On Site Monitoring
 - Local School Wellness Policy
 - Water Availability
 - Food Safety
 - Reporting and Recordkeeping
- Other Federal Programs
 - Afterschool Snack Program
 - Fresh Fruit and Vegetable Program
- Special Provision Option
 - Provision II
 - Community Eligibility Provision
- Procurement
 - Procurement Plan
 - Code of Conduct
 - Procurement Documents and Records
- Food Service Management Contract
 - Contract Monitoring

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VII. Findings and Required Corrective Action

Performance Standard I – Meal Access and Reimbursement – Federally mandated counting and claiming systems for all SFAs that participate in NSLP and SBP. Free, reduced-price, and paid meals claimed for reimbursement must be served only to eligible children. Certification and benefits issuance process is the SFA’s certification of student eligibility for FRL meals and serves as a link to the SFA’s meal counting and claiming system. References include but are not limited to 7 CFR 245.2(1)(i); 7 CFR 245.6(b)(1); 7 CFR 210.7 (c)(1)(iii)(iv); 7 CFR 210.18 (g)(1)(ii)(A); CFR 210.19(c)(2)(i); and 210.19(c)(2)(ii).

	Finding	Corrective Action	Due Date
#1	<p>Certification and Benefit Issuance Applications and direct certification documents must be certified for the correct benefit level (either, free, reduced or paid) as detailed in the <i>Eligibility Manual for School Meals</i>, July 18, 2017 edition and the current income eligibility guidelines.</p> <p>Of the 560 students reviewed, 18 students listed on the direct certification list from Division of Welfare and Supportive Services as Medicaid-Reduced were categorized on the benefit issuance document as Medicaid-Free.</p>	<p>Correct all benefit issuance errors noted in Appendix D. Submit a signed copy of Appendix D with a date in which the errors were corrected to NDA for approval.</p>	<p>January 6, 2019</p>

General Program Compliance

Wellness Policy – To help foster a healthy school environment, Section 204 of the Healthy, Hunger Free-Kids Act added section 9A to the Richard B. Russell National School Lunch Act (NSLA) to expand the scope of wellness policies. References include but are not limited to 7 CFR 210.11; 7CFR part 210 Appendix B; and The Healthy Hunger Free Kids Act Section 9A (204)

	Finding	Corrective Action	Due Date
#2	<p>Triennial assessment The HHFKA final rule requires all local school wellness policies to be reviewed and/or updated once every three years.</p> <p>CCSD Policy 245-Wellness Policy has not been updated since July 14, 2015.</p>	<p>Submit a proposed timeline for the CCSD Policy 245 to be reviewed and/or updated for the 2019-20 school year, as well as, a business policy/process to establish regular triennial update of CCSD Policy 245.</p>	<p>January 6, 2020</p>

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Other Federal Programs

Afterschool Snack Program (ASSP) – Program is intended to ensure participating sites serve students nutritionally-balanced snacks, provide appropriate educational or enrichment activities, and count and claim snacks accurately. References include but are not limited to 7 CFR 210.10(o); 7 CFR 210.9(c)(7); 7 CFR 210.13(c); and 7 CFR 210.23(b).

	Finding	Corrective Action	Due Date
#3	<p>ASSP Counting and Claiming The <i>Administrative Review Manual</i>, 2017-2018 edition, requires SFAs to establish an accurate counting and claiming system that has safeguards in place to ensure that only one snack per child per day is counted for reimbursement at the point of service.</p> <p>During the onsite review at Empire Elementary School, the ASSP monitor was not following the approved counting and claiming system created by CCSD.</p>	<p>Documentation was provided on 11/21/2019 that additional training had been done with the ASSP monitor at Empire Elementary School on the counting and claiming process. In addition to the documentation provided on 11/21/2019, submit a week’s worth of snack count sheets along with the corresponding menu production records to NDA for review and approval.</p>	January 6, 2020

Procurement – Procuring goods and services is a significant responsibility of the SFA. Obtaining the most economical purchase should always be considered in all purchases made from federal funds out of the nonprofit school food service account. References include but are not limited to 7 CFR 210.19(a)(3); 2 CFR 200.218-.326.

	Finding	Corrective Action	Due Date
#4	<p>Small Purchase Threshold Solicitation 2 CFR200.320 (b) requires SFAs to obtain two or more price/rate quotations from qualified sources for any purchases that do not cost more than the Simplified Acquisition.</p> <p>CCSD’s did not receive two or more price quotations before purchases were made with Model Dairy.</p>	<p>Obtain price/rate quotes for 2-3 milk vendors (one quote can be from Model Dairy). Submit to NDA for review and approval.</p>	January 6, 2020

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VIII. Recommendations and Technical Assistance

Recommendations:

1. **Incorporate School Garden/locally grown produce in NSLP programs-** School Gardens and purchasing locally grown food provides a multitude of benefits for students including learning about healthy food, learning how to grow fruits and vegetables, and promoting better nutrition. USDA supports such efforts through its Farm to School Program. Nonprofit School Food Service Funds can be used to support local farmers and school garden programs. See Appendix C for more information.
2. **Enhance strategies for nutrition education at FFVP school sites.** The focus of FFVP is to bring fresh produce into the school for distribution to children. For many children, the produce they see in school might be their first exposure to fresh fruits and vegetables. That is why nutrition education is critical to the program's success. For more information and ideas of enhancing nutrition education with FFVP service visit [USDA's Fresh Fruit and Vegetable Handbook](#).

Technical Assistance:

1. Technical assistance provided to correct font size of the USDA non-discrimination statement on approval/verification notification letters. FNS 113-1 requires SFAs to post full USDA nondiscrimination statement on public notification materials in a print size no smaller than the text on the remainder of the document.
2. Technical assistance was provided to place offer versus serve signage in the meal service line at Empire Elementary School and Carson Middle School. The *Administrative Review Manual*, 2017-2018 edition, states SFAs must post signage in the service line to assist students in selecting a reimbursable meal.
3. Technical assistance was provided to ensure students at Empire Elementary and Carson Middle School had access to water during the meal services. USDA numbered memo SP28-2011 specifies that school sites must provide access to free potable water during lunch and breakfast services.

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IX. Corrective Action Response

A written response to the corrective actions detailed in this report must be submitted within thirty (30) calendar days of receipt of the report. The response must include a description of the corrective action plan for the findings, including implementation time frames and supporting documentation as necessary.

NDA will thereafter assess the SFA's corrective action response. If the corrective action is not completed, or if the need is identified to ensure all corrective items are in place, we may schedule a follow up review. Program Funds may be withheld until corrective action is completed if not submitted by the required due date.

The SFA may appeal the NDA's action by submitting a written appeal request within fifteen (15) calendar days after receipt of notice of this Administrative Review Report and should be sent by certified mail, or its equivalent, or sent electronically by email. NDA will acknowledge the receipt of an appeal request within 10 days after its receipt of the request. More information is available in Appendix A.

X. Appendix

- A. Appeal Procedure-attached
- B. Procurement Review Detail-attached
- C. Guidance on Farm to School and local purchasing
- D. Certification and Benefit issuance errors

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