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# **Humboldt County School District**

## *Administrative Review Report*

Dec 22, 2022

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 Administrative Review of the NSLP administered by Humboldt County School District from November 15<sup>th</sup> – 17<sup>th</sup>, 2022. The Procurement Review was done in tandem at the Nevada Department of Agriculture in Sparks Nevada.

An exit conference was held on Thursday, November 17, 2022 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 Humboldt County School District and Chartwells staff for the time and assistance extended to our State Agency staff during this process.

## **II. Introduction**

An entrance conference was conducted on Tuesday, November 15, 2022. The Administrative Review was conducted by Tom Doughty, School Nutrition Coordinator II and Erica Jaramillo, School Nutrition Coordinator II. The Procurement Review was conducted by Dan Pimm, School

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Nutrition Specialist. Humboldt County School District staff included Laura Jensen, Food Service Coordinator, while Chartwells staff included Adrian Carcas and Nathan Hardin. This report is based on the results of the onsite assessment, the onsite review of files, and meal service observation of the breakfast, lunch, and Fresh Fruit and Vegetable programs. An exit conference was held on Thursday, November 17, 2022 which provided a summary of the work 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, September 2022. The Procurement Review covered all documents, records, invoices, and procedures relating to the procurement for the SFA for the year of review, school year 2020-2021.

### 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 Humboldt County School District’s administration of the National School Lunch, School Breakfast, and Fresh Fruit and Vegetable 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

- Record Keeping: Administration, Accounting, and food service all kept excellent records on student eligibility, claims, food service accounts, and nutritional/serving records.
- Kitchen Organization: Kitchens are clean and well organized while containing all the necessary components.

### 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

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- Offer versus Serve
- Dietary Specifications and Nutrient Analysis
- Comprehensive Resource Management Review
  - Maintenance of the Non-Profit Food Service Account
- General Areas
  - Civil Rights
  - Professional Standards
  - Local School Wellness Policy
  - Water Availability
  - Food Safety
  - Reporting and Recordkeeping
- Procurement
  - Procurement Plan
  - Code of Conduct
  - Procurement Documents and Records

## VII. Findings and Required Corrective Action

<b>Performance Standard I – Meal Access and Reimbursement</b>			
<b>Meal Counting and Claiming:</b> All free, reduced price, and paid meals claimed for reimbursement are served only to children eligible for free, reduced price, and paid meals, respectively, and are counted, recorded, consolidated, and reported through a system that consistently yields correct claims.			
	<b>Finding</b>	<b>Corrective Action</b>	<b>Due Date</b>
#1	<p><b>Meal counting and claiming</b> Per 7 CFR 210.8, the school food authority establishes internal controls which ensure the accuracy of meal counts prior to the submission of the monthly claim for reimbursement.</p> <p>Meal counting was observed on the day of review with the following observations:</p> <ul style="list-style-type: none"> <li>● At Sonoma Heights Elementary School, the tracking and reporting wasn't accurate. Currently the school</li> </ul>	<p>Create a procedure for either having students enter their pin numbers as they come through the line, or take meal counts with a clicker and enter all meals served into IC as a bulk entry at the end of service.</p> <p>Submit new procedure to NDA for review.</p>	<b>January 23, 2023</b>

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	<p>tracks the students via rosters at the start of the line, then once all students have been served, the students are scanned into Infinite Campus by matching up the roster names to the student IDs on a sheet of barcodes. After the meal service, the scanned student identifier didn't match the rosters (by count and in some cases, names), and it was also different than NDA's clicker count.</p> <ul style="list-style-type: none"> <li>• Rosters showed 281 students marked as served, Infinite Campus showed only 268 students scanned/claimed a meal, and NDA clicker-counted 276 students.</li> <li>• After reconciling the counts, it was found that 27 mistakes occurred in the counting and claiming process at Sonoma Heights Elementary School.</li> </ul>		
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**Performance Standard II - Meal Pattern and Nutritional Quality**  
Meals claimed for reimbursement must contain food components in specific quantities and requirements as required by regulations.

	<b>Finding</b>	<b>Corrective Action</b>	<b>Due Date</b>
#2	<p><b>Nutrient Analysis</b> Nutrient analysis must provide calorie, saturated fat, and sodium information for all items being offered during meals, including condiments.</p> <p>The nutrient analysis for lunch for the K-8 grade group had condiments listed but it did not include the required information for calories, saturated fat, and sodium. It was zeros for those sections.</p>	<p>Please correct and add the nutrient information for the condiments used during lunch and breakfast meals. Resubmit the nutrient analysis for 2 weeks' worth of menus for the lunch K-8 grade group.</p>	<p><b>January 23, 2023</b></p>

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<p>#2</p>	<p><b>Menu Production Records (MPRs)</b> Production and menu records must be maintained in accordance with FNS guidance.</p> <p>In reviewing the MPRs for HCSD there were several things noted that need correcting:</p> <ul style="list-style-type: none"> <li>• Make sure that OVS is marked either yes or no on all MPRs. On the lunch MPRs from GVE nothing was marked.</li> <li>• Make sure that the total in the served reimbursable meal column is the total number of reimbursable meals served only, not second meals, a la carte of adult meals.</li> <li>• There needs to be a separate column added to the MPRs to record second meals, a la carte, and adult meals served.</li> <li>• The numbers recorded in the served reimbursable column should add up to the total number of reimbursable meals at the top of the PR. This was not the case on the lunch PRs for Lowery HS. The totals never matched and were always higher than the total number of meals served at the top. The total entrees served should add up to the number of reimbursable meals served and being claimed.</li> <li>• The bulk quantity column needs to be filled out with the amount of product that was pulled to make the food. In some instances, the word case was written down, and in others it just said see recipe. Units of measurement need to be included, so if you pulled a case, how much did that case weigh, or what was the case count? You can't just write see recipe, as the</li> </ul>	<p>Please make the noted corrections going forward on all MPRs at all sites. Add a separate column to record second meals, a la carte, and adult meals served. Train staff completing MPRs on how to complete the bulk quantity/amount pulled column.</p> <p>Attached is a MPR training workbook you can use with the staff.</p> <p>Submit to NDA for review one weeks worth of breakfast and lunch MPRs for each site that was reviewed during the AR.</p>	
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	<p>recipes are not scaled for the same amount of food that was produced according to the production record. Example is from the Lowery HS production record for lunch from 9/20/2022. For the beef nachos the bulk quantity said, “see recipe”. The cook wrote down they prepared 30 servings, but the attached recipe was for 25 servings, 50 servings, or 100 servings.</p> <ul style="list-style-type: none"> <li>The MPRs provided from McDermitt ES were a different format than the other schools, did not have the meal components column filled out, and had no amount pull column.</li> </ul> <p><b>**Repeat Finding**</b></p>		
#3	<p><b>Reimbursable Meal compliance:</b> At Lowry High School the staff member counting the meals at the POS didn’t know fruit (or 100% fruit juice) is a required component for breakfast.</p>	<p>Have the Food Service Management company hold a meeting with the kitchen leads (or the whole food service staff) and review reimbursable meal components. Send NDA a copy of the training/meeting agenda and a signed roster list of who attended.</p>	<p><b>January 23, 2023</b></p>

**General Program Compliance** – General Program Compliance include observations and compliance of Civil Rights, District or School’s On-Site Monitoring, Local School Wellness Policy and School Meal Environment, Smart Snacks in School, Professional Standards, Water Availability, Food Safety, Reporting and Recordkeeping, and School Breakfast and Summer Food Service Programs Outreach.

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**Civil Rights** – SFAs are required to administer program services and benefits in accordance with all laws, regulations, instructions, policies, and guidance related to nondiscrimination in program delivery

	<b>Finding</b>	<b>Corrective Action</b>	<b>Due Date</b>
#4	<p><b>Separation of Students</b> The USDA states, “Schools and School Districts must avoid any policy or practice leading to the overt identification of children receiving free or reduced-price meal benefits.” Separating students by meal types can identify these students and is a Civil Rights violation.</p> <p>At Sonoma Heights Elementary School, students were separated (by different tables) if they brought their lunch from home or were served school lunch.</p>	<p>Write and submit to NDA for approval a policy about how students will be seated during mealtimes. The policy needs to include that there should be no segregation between students who have brought meals from home and students eating school meals.</p>	<p><b>January 23, 2023</b></p>

**Temperature & Sanitation Logs** – Each SFA is required to ensure that facilities for the handling, storage, and distribution of purchased and donated foods are properly safeguarded against theft, spoilage, and other loss (7 CFR 210.13(d)). Temperature is appropriate for the applicable equipment (e.g. freezer, refrigerator, milk cooler). Chemicals are clearly labeled and stored away from food and food-related supplies.

#5	<p><b>Sanitation Logs</b> The SFA must monitor (using test strips) and record their chemical levels when using sanitation liquids. These test result trackers should be visible near the sink where the sanitation process is done as well as near the dish washing station. All schools observed in the Humboldt County School District currently have no Sanitation Logs</p>	<p>Provide NDA with 2 weeks’ worth of test strip sanitation logs for each site observed during the review</p>	<p><b>January 23, 2023</b></p>
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**Food Safety, Storage, and Buy American** – It is the State Authorities responsibility to ensure that all selected schools meet the food safety and storage requirements. This includes any facility where food is stored, prepared, or served for the purposes of the NSLP, SBP, or other FNS programs.

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#6	<p><b>Food is stored 6” above ground on clean shelving:</b> At Grass Valley Elementary School it was observed that canned goods and dressings were on the bottom shelf, only 3” above the ground.</p>	Restock the shelves moving any food items to the 2 <sup>nd</sup> or 3 <sup>rd</sup> shelf and store non-food items on the bottom shelf. Send NDA a picture once completed.	<b>January 23, 2023</b>
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**Local School 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; 7 CFR part 210 Appendix B; and The Healthy Hunger Free Kids Act Section 9A (204).

	<b>Finding</b>	<b>Corrective Action</b>	<b>Due Date</b>
#7	<p><b>Allotted Meal Consumption Time:</b> Per the State of Nevada School Wellness Policy “It is the intent of this policy to allow each student adequate time to eat their meals, therefore, time spent acquiring the meal is not included in the time to consume the meal. Each school district shall: Provide at least 20 minutes for each student to consume the lunch meal.” Per the Humboldt CSD Wellness Policy “Students participating in the breakfast/lunch Program (hot or cold lunch) are offered a minimum of 15 minutes for breakfast and 20 minutes for lunch. Dismissal from the lunch program may begin after 20 minutes from when the student sits down with their meal.” At Sonoma Heights Elementary School it was observed and timed that each table was released with an <i>average</i> of only 14 minutes to consume their lunch.</p>	Write and submit to NDA for approval a policy on how the school staff will ensure all students have 20 minutes of seat time for lunch and 15 minutes for breakfast.	<b>January 23, 2023</b>
#8	<p><b>Triennial Assessment:</b> The HHFKA final rule requires all local school wellness policies to be reviewed and/or updated once every three years.  Humboldt County School District’s School Wellness Policy has not been reviewed/updated since 9/6/19</p>	Submit a proposed timeline (meeting date and agenda) for Humboldt County School District’s School Wellness Policy to be reviewed and/or	<b>January 23, 2023</b>

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		updated for the 2022-2023 school year.	
#9	<b>School Wellness Committee Meeting</b> <b>2x/year:</b> A Local School Wellness committee needs to meet at least twice a year.	Form a school wellness committee and report who is on the committee. Also, create a business policy to replace members and keep a committee in place, submit to NDA for review Please submit a timeline/dates for when this committee will meet this school year and what topics will be covered at the meetings.	<b>January 23, 2023</b>
#10	<b>Competitive Food &amp; Beverages:</b> Competitive food means all food and beverages other than meals reimbursed under the NSLP and SBP made available for sale to students on the school campus during the School Day. At two of the sites we observed, Lowery HS and Winnemucca JHS, there was a Pepsi machine in or just outside of the cafeteria. Even if they are currently not operational, these machines should be turned off during the School Day (until at least 30 minutes after school ends). If they want to sell Smart Snack approved drinks during the school day please see the school wellness policy for those guidelines.	Write and submit a policy to NDA for approval about vending machine use on HCSO campuses. Include how it will be insured that machines will be off during meal service times and stocked with Smart Snack approved items if on during the school day.	<b>January 23, 2023</b>
<b>Fresh Fruit and Vegetable Program (FFVP) – The Fresh Fruit and Vegetable Program (FFVP) aims to increase Elementary School Children’s exposure to and consumption of a variety of fruits and vegetables.</b>			
#11	<b>Fresh Fruit or Vegetable Education:</b> Currently the FFVP provider sends an information sheet about each fruit or vegetable the students are about to consume. This info sheet is for the teachers to read and help them model/educate the benefits of the FFVP. These info sheets did not arrive prior to service on the FFVP observation day.	Put a back-up plan in place to educate the students if the info sheets don’t arrive prior to service. Please provide to NDA the back-up plan, who will direct it, and how it will be delivered to the school(s).	<b>January 23, 2023</b>

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**Procurement** – SFAs must comply with the applicable regulations for procurement of goods and services, including using the specified methods in federal, state, and local laws and regulations; with all contracts, purchasing services involving the child nutrition program regulations for procurement must be in place. References include but are not limited to 7 CFR 210.19(a)(3); 2 CFR 200.318-326; 7 CFR 210.21; 2 CFR 200; 2 CFR 318(a-d); 2 CFR 200.320

	<b>Finding</b>	<b>Corrective Action</b>	<b>Due Date</b>
#12	<p><b>USDA Commodity Foods Credit</b> Regardless of the type of contract, the FSMC is required to credit back to the SFA the value, processing fees and shipping and handling fees of any USDA Foods used on the school meal programs.</p> <p>Please refer to page 11 section 9(D) for the exact wording outlining this in the contract between the FSMC and HCSD.</p> <p>The monthly client invoices from the FSMC to HCSD for school year 2022-2023 were reviewed and did not show a USDA foods usage credit. However, to date \$54,128.40 and \$6,777 in bonus commodities has been used this school year.</p> <p><b>**Repeat Finding**</b></p>	<p>The FSMC needs to document the value of all USDA Foods used in this current school year so far. The amount needs to be recorded on the next monthly invoice to HCSD and deducted from the next monthly invoice submitted to HCSD.</p> <p>A copy of the invoice showing the USDA Foods credit needs to be submitted to NDA as proof. Moving forward this credit needs to show up monthly on client invoices.</p>	<b>January 23, 2023</b>

**VIII. Recommendations and Technical Assistance**

**Recommendations:**

1. At Sonoma Heights Elementary School, there is a large gap between the fruits/vegetables and the entrée line, which slowed down service several times. It was observed that staff members had to leave their stations (entrée service) 12 times to redirect students back to collect items from the fruits/vegetables tables to make it a reimbursable meal. It is recommended that the students leave the serving window with a reimbursable meal and can hit the salad bar for additional fruit and vegetable options.
2. During the “Breakfast in the Classroom” BIC service at Grass Valley Elementary School, straight serve meals meal bags were delivered to the classroom. One classroom opened each of the delivered meals to provide a more Offer vs. Serve meal

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- for their students. The teacher (and students) call this table “The Breakfast Bar.” Having a choice of food was very well received by the students. It is recommended that if feasible HCSD consider implementing a BIC model that would allow for OvS.
3. During the “Breakfast in the Classroom” service at Grass Valley Elementary School, 2 classes observed had their students highlight on a board which meal they received. Relying on the students to mark if they received a meal can cause errors in the claim. It is recommended that these two classrooms follow the lead of the other teachers, and have the teachers mark/count the number of students that picked up a breakfast.

**Technical Assistance:**

1. Technical assistance provided for updating HACCP Manual. Currently, all HACCP Manuals reviewed did not include a table of contents for easy and quick reference. Chartwells created a table of contents for every school’s HACCP Manual.
2. Technical assistance provided for display of “And Justice for All” posters. The “And Justice for All” posters must be visible and readable to the students. Most locations had the posters too high or behind the service lines making them unable to be read. Chartwells management moved the signs to appropriate locations.
3. Technical assistance provided for display of most recent food safety inspection. The most recent food safety inspections were posted in the kitchen. Chartwells management moved them to a visible location for program participants.
4. Technical assistance provided for internal temperature thermometers. At McDermitt Combined School, the refrigerators needed an internal thermometer. Chartwells management provided thermometers the next day and provided pictures of their installation.
5. Technical assistance provided for Verification Application Signatures. In reviewing the verification applications, it was noticed that a Verifying Official’s Signature wasn’t completed. This is to be signed even if it is the same person signing the Determining Official or Confirming Official part of the application. The Verifying Official showed me the verification process and signed the 3 applications. This was completed within minutes of this observation.

**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

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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. Menu Production Workbook-attached

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