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May 15, 2017

Certified Letter #7006 2760 0000 0509 5737

Walt Hackford
Superintendent
Mineral County School District
PO Box 1540
Hawthorne, NV 89415

Dear Mr. Hackford,

The Nevada Department of Agriculture, Food and Nutrition Division conducted an Administrative Review of the Mineral County School District (MCSD) from April 11-12, 2017. The Administrative Review team consisted of Brittany Mally, Quality Assurance Specialist and Rose Wolterbeek, School Nutrition Services Specialist. The purpose of the Administrative Review is to ensure compliance with federal regulations and also provide technical assistance for program improvement. Our team greatly enjoyed working with all food service staff members. Thank you for accommodating our staff during the review and for providing all the needed documentation in a timely fashion. Staff was very helpful in providing documentation and answering questions throughout the review process.

We conducted an exit conference on April 12, 2017 to discuss the major findings of the review. Jaci Carr, Fiscal Manager and Walt Hackford, Superintendent were in attendance. The Administrative Review evaluates compliance with the regulatory provisions of the National School Lunch Program (NSLP) and School Breakfast Program. Administrative Reviews are required to be conducted on a three year review cycle. The MCSD received an onsite review its National School Lunch Program (NSLP) and School Breakfast Program (SBP). Lunch was observed at Hawthorne Elementary School (HES) and breakfast was observed at Schurz Elementary School (SES). The findings of the review are detailed below by the three main sections of the Administrative Review, Performance Standard I, Performance Standard II and Other Areas. The new procurement review is being coupled with the administrative review and the findings of the procurement review are included in this letter.

Performance Standard I – Meal Access and Reimbursement

The National School Lunch Program (NSLP) and the School Breakfast Program (SBP) have counting and claiming systems that are federally mandated for all School Food Authorities (SFAs) that are participating in these programs. All free, reduced price, and paid meals claimed for reimbursement must be served only to children eligible for free, reduced- price, or paid meals. The certification and benefits issuance process is the SFA's certification of a student's eligibility for free or reduced price meals and serves as the link to the SFA's

meal counting and claiming system. Validation of this system during the Administrative Review ensures that eligible children receive meals to which they are entitled and that claims for reimbursement are valid.

A review of applications at MCSD revealed the following errors:

- There was one application that had an incomplete case number and was marked as categorically eligible, student also could not be found on the direct certification list.
- There were four applications marked as categorically eligible that had invalid case numbers.
- There was one income application that had no adult signature.
- There was one application that was marked as denied but should have been free. It was determined that this family has not paid their meal balance all year therefore no money is owed to this family.

Corrective Action Required: The following corrective actions should be taken to correct the application errors listed above. A list of the changes should be kept. This list should include who was talked to, when they were talked to, and the outcome of the communication. Submit to NDA for review.

Income based applications that lack any one of these items are considered incomplete and cannot be processed for meal benefits.

1. Names of all Household Members
2. Amount, source, and frequency of current income for each household member
3. Signature of an adult household member
4. Last 4 digits of the social security number of the households primary wage earner or another adult household member, or an indication that the household member does not have one

Families who have income based applications that are considered incomplete should be notified as to why their application is considered incomplete and given the opportunity to submit/correct the missing information within 10 calendar days of the notification being sent to them. If the family fails to submit/correct the missing information in the required timeframe, they should immediately be placed on paid status.

To be considered complete, an assistance program application must have the following information;

1. Names of children for whom the application is made
2. SNAP, TANF, or FDPIR case number or identifier, for the children or any household member listed on the application, and
3. Signature of the Adult household member completing the application

Families whose have assistance program based applications that are considered incomplete should be notified as to why their application is considered incomplete and given the opportunity to submit/correct the missing information within 10 calendar days of the notification being sent to them. If the family fails to submit/correct the missing information in the required timeframe, they should immediately be placed on paid status.

Income should not be annualized when there is only one income frequency listed. It is only annualized when there are multiple income streams with differing pay frequencies.

Verification

The verification report submitted by MCSD stated that one application was pulled for verification. When NDA asked to see that one application it could not be found. In addition, the verification report submitted for school year 16/17 was not timely or accurate.

Corrective Action Required: Please create a policy/procedure for how verification will be conducted each school year. This policy should include who or which position will be responsible for completing the verification

process and report, a timeline for the process and the steps to complete for verification. Submit to NDA for review. In addition, try and locate the application that was verified this school year and submit a copy to NDA for review.

MCS D is doing a great job with meal counting and claiming and all claims from the month of review were verified and NDA found zero errors. Overall, MCS D is doing a good job in Performance Standard I and should continue these great practices. The following areas are in compliance and no corrective action is needed: meal counting and claiming, direct certification and the benefit issuance document.

Performance Standard II- Meal Pattern and Nutritional Quality

The National School Lunch Program meal pattern is the foundation of federal school nutrition programs, and sponsors of the program must ensure that they are offering reimbursable meals for breakfast and lunch according to regulations (7 CFR 210.10 and 220.80). Schools operating NSLP and/or the SBP must prepare, offer, and serve meals to students that meet the meal pattern requirements for the appropriate age/grade groups on all reimbursable meal service lines.

The meal pattern standards have specific requirements for minimum amounts of fruit, vegetables, meat/meat alternates, and grains that must be offered daily and weekly. In addition, there are standards for vegetable sub-groups which must be offered each week. The meal pattern also requires that all creditable grain items be whole grain rich. The meal pattern limits calories (minimum and maximum levels), restricts sodium levels, limits saturated fat, and eliminates trans fats.

Meal Pattern

The meal pattern at MCS D is not meeting the specific requirements set forth by USDA. Each school site in MCS D has their own menu that they are using. As a result of the last administrative review conducted in April of 2014, it was agreed upon by MCS D that one lunch menu would be used for both sites. One menu was approved for MCS D after the last review. It is not a requirement that each site use the same menu however for MCS D since there is no food service director overseeing both sites, it would be best if each site used the same menu. Following one menu for both sites could also cut costs by ordering larger bulk quantities, simply ordering, and will make it easier to know if the menu is in compliance. Currently for this school year 16/17 there has been two lunch menus being offered, one at HES and another at Schurz ES. Both menus are not fully meeting the meal pattern requirements. The breakfast menu is currently meeting the meal pattern requirements for breakfast at both sites.

The menu being used at HES is a four day menu. Prior to the review the USDA menu certification worksheet was partially completed for one week of the October lunch menu for K-8 and 9-12. The simplified nutrient assessment was not completed for the week, only the meal component portions of the spreadsheet. Based on the weekly report that week of the menu was not meeting the dark green vegetable sub-group or the other vegetable sub-group. By looking at the entire menu for October there are other weeks that may not be in compliance for meeting all the required meal components and sub groups. NDA had a discussion with the cook at HES and walked her through the weekly components worksheet and explained what was missing and how all the groups must be met for each week of the menu. At that time NDA directed the cook to complete the USDA menu certification worksheets for each week of the April lunch menu for HES and submit to NDA for review.

The menu being used at Schurz ES is a five day menu. Prior to the review the USDA menu certification worksheet was fully completed for one week of the October lunch menu for K-6 age grade group. This week

alone showed multiple problems and several areas of the meal pattern not in compliance. The following issues were found with this week:

- The daily minimum quantity of vegetables (3/4 cup) was not being met, which also means the weekly quantity was not being met
- Within the vegetable sub-groups the red/orange, starchy, and other were not being met for the week.
- The minimum amount of grains was not being met. The weekly total entered was 5.25 oz equivalents and the requirement is 8 oz equivalents.
- The simplified nutrient assessment was filled out and shows the calories are not within the required range. Daily average was 528 calories and the required range is 600-650 kcals per meal.

NDA had a discussion with the cook at Schurz ES and walked her through the weekly components worksheet and explained what was missing and how all the groups must be met for each week of the menu. At the time of the review NDA directed the cook to complete the USDA menu certification worksheets for each week of the October lunch menu for Schurz ES and submit to NDA for review.

As there were findings in this area during the last review, meeting the meal pattern requirements is a systemic problem for MCSD. The current school year is almost over and looking forward to next year, NDA strongly recommends that all school sites in MCSD follow one menu for breakfast and one menu for lunch. The menu for HES should be planned to meet all the meal pattern requirements based on a four day school week. The menu for Schurz ES should be planned to meet all the meal pattern requirements based on a five day school week. Even though Schurz is a 5 day school it can still use the menu planned for Hawthorne and add additional meals on Fridays that meet the meal pattern requirements. All menus will need to be approved by NDA. Once the cycle menus have been set and approved for one month any additions or alterations to the menu throughout the school year will need to be submitted to NDA for approval.

Corrective Action Required: The following corrective actions are required:

- For next school year plan a monthly cycle lunch menu for HES that meets the meal pattern requirements for a four day school week.
- For next school year plan a monthly cycle lunch menu for Schurz ES that meets the meal pattern requirements for a five day school week. NDA strongly recommends that each site use the same lunch menu.
- For each week of the menu/menus complete a USDA menu certification worksheet, including the simplified nutrient assessment tab. Each week of the menu must be in compliance for this corrective action to be complete. NDA is available for technical assistance as needed for planning the menu and completing the worksheets.
- Submit the menu/menus and the worksheets to NDA for review.

Production Records

Per 7 CFR 210.10 schools must follow a food based menu planning approach and produce enough food to offer each child the quantities specified in the meal pattern and must also keep production and menu records for the meals they produce/serve. Production and menu records must be maintained in accordance with Food and Nutrition Service (FNS) guidance. The menu production records must be filled out completely and daily for all NSLP programs.

The menu production records (MPRs) at HES were completed and had little to no errors. A week's worth were submitted to NDA prior to the onsite visit and were reviewed. The MPRs there were in compliance.

During the course of the administrative review it was discovered that the MPRs for Schurz ES had not been completed from October 2016 through March 2017. This problematic as it is a federal regulation that MPRs are completed daily for all NSLP programs. The MPRs serve as documentation to ensure that food listed on the menu was actually the food that was served and that enough food was prepared for the meals that are submitted for reimbursement. A week's worth of MPRs were submitted for breakfast and lunch from the month of October 2016, however they were not completed in October but were completed once notification was received that the administrative review had been scheduled. These MPRs contained mathematical errors for the amount of food that was prepared and were not in compliance.

The MPRs from the previous review did not contain the required information or the required format. For the MPRs submitted for the current review the format has improved and the MPRs submitted from both sites did have the required information. However, the fact that MPRs were not completed for five months is unacceptable and fiscal action will be taken.

Notice of Fiscal Action: Fiscal action is being taken for the month of review only for Schurz ES. The month of review stated in the notification letter was January 2017. As there are no MPRs on file for this month for both breakfast and lunch meals, the meals submitted for reimbursement for this month cannot be claimed. Since the claim for reimbursement for January 2017 has already been submitted and paid the amount owed will be recouped from future claims. The total amount owed to NDA will be \$4,752.

Meal	# of meals	Federal Reimbursement Rate (Free)	Totals
Breakfast	873	\$ 2.04	\$ 1,780.92
Lunch	917	\$ 3.24	\$ 2,971.08
			\$ 4,752.00

Corrective Action Required: Please complete the following corrective actions:

- Please submit to NDA one weeks' worth of completed production records for both breakfast and lunch meals from Schurz ES.
- In addition, the cook at Schurz ES must complete the Food Production Records course from the Institute of Child Nutrition. Which can be found here: <http://www.nfsmi.org/Templates/TemplateDefault.aspx?q=cELEPTIzOA>. Submit certificate of completion to NDA.

Standardized Recipes

Standardized recipes were onsite at both kitchens and available for all meals on the menu. When the employee at Schurz was asked if the recipes were followed and how the amounts were calculated and adjusted on each recipe for the number of meals needed each day they stated "we measure food items but to adjust the recipe for the number of meals needed I eyeball it sometimes." The mathematical errors on the production records submitted for Schurz ES indicate that the standardized recipes are being followed for the specific ingredients that are required in the recipe but not the specific amounts. They also show that if the recipe is written for 50 servings and the planned number of meals is 61 that the recipe is not being adjusted correctly to produce 61 meals. It is a federal regulation that standardized recipes must be used and followed correctly. It is important that standardized recipes be followed as it helps to accurately produce the number of planned meals and reduce food costs by decreasing food waste. It also helps to prevent under producing a food item.

Corrective Action Required: Submit a plan to NDA indicating how MCSD will ensure that standardized recipes are being followed. Alongside the productions records submitted from Schurz ES, please submit copies of the recipes used for those meals that appear on those production records.

Food Labels

Both sites had multiple binders full of food labels. It is great that the food labels are being kept and used. However, it should not be a cumulative collection of all foods ever used for the meals. If a product is no longer being used then archive the label. Only labels of current foods being used to produce the meals should be kept on file.

Corrective Action Required: Update the food label binders to only include labels of the foods that are currently being used to produce the food on the menus. Keep updated file available for NDA to check during next visit.

Whole Grain Rich

The following menu items were found at Schurz ES and were found to not be whole grain rich and will need to be discontinued from the menu. Serve the remaining that are in inventory but do not order more of these items.

- NY frozen garlic breadstick product # 4263943 (last ordered 3/7/17)
- Pennant wheat dinner roll #63256091

Corrective Action Required: Remove these items from the menu and discontinuing ordering them. This is a repeat finding and fiscal action may be assessed if this continues to be a problem.

At both sites Fruit Loops cereal was found. Kellogg's does make a Fruit Loops cereal product that is for schools specifically so it will meet the nutrition requirements. However, the Fruit Loops found at both sites is not that approved product for schools.

Corrective Action Required: Make sure that any future orders of Fruit Loops is for the following product specifically:

- Kellogg's® Froot Loops® for Schools Code No: 38000 11467

When the delivery is made, make sure that is the product that is delivered to you from the distributor. If it is not, do not accept it and send it back. If it is not that specific product then it cannot be served as a part of a reimbursable meal.

Reimbursable Meal Signage

At Schurz ES proper signage was not posted which would indicate what a child would have to take to have a reimbursable meal. The site had a menu board provided by NDA hung high on the wall where it could not be reached to edit. This board can be used daily for each meal to indication what a child has to take to have a reimbursable meal. This is a repeat finding and fiscal action may be taken if this is not addressed. The signage at HES was great and being used properly and should be used as an example for Schurz ES.

Corrective Action Required: Create a policy governing the use of the menu boards. This policy should direct staff to complete the menu board daily for each meal service. Submit one weeks' worth of photographs from Schurz ES and the corresponding menu showing that the menu boards are being used to inform children of what is being served and what constitutes a reimbursable meal. Submit the policy to NDA as well for review.

Comprehensive Resource Management

A comprehensive resource management review is required when certain risk based criteria are met by the school district. The MCSD triggered a comprehensive resource management review of two areas, the maintenance of the non-profit school food service account and the sale of non-program foods. The intent and scope of this part of the Administrative Review is to apply a systematic approach to ensuring the overall financial health of an SFA's nonprofit food service.

After an in depth review of both areas there were no findings and therefore no corrective action is necessary in this area.

General Program Compliance

Civil Rights

At the time of the onsite review the civil rights training had not been completed by the staff interacting with program participants. This is an annual requirement that must be met each year. Technical assistance was provided and since the exit conference the civil rights training has been provided to the staff and quizzes submitted to NDA as proof of completion. No further action is required.

Also MCSD did not have a civil rights complaint log on file. Even if there has not been any civil right complaints against the NSLP there still needs to be a log in place. Technical assistance was provided and a civil rights complaint log was submitted to NDA on May 11, 2017. No further action is required.

SFA Onsite Monitoring

No onsite monitoring was performed. This required when the district has more than one site serving meals. The onsite monitoring must be performed by February 1st each year. Lunch must be monitored yearly and breakfast must be monitored every other year.

Corrective Action Required: MCSD must perform an onsite review at each of its locations and submit these reviews to NDA for review. The onsite monitoring form is attached.

Professional Standards

The Professional Standards regulations in 7 CFR 210.30 establishes hiring standards for new school nutrition program directors at the School Food Authority (SFA) level (effective July 1, 2015). In addition, the regulations establish annual training standards for all school nutrition program directors, managers, and staff. The required annual training hours vary according to the employee's role in the management and operation of the school nutrition program.

Training must be job-specific and is intended to help employees perform their duties well. Training needs are best assessed by an employee in consultation with their manager, director, or the Nevada Department of Agriculture. Training may be obtained in many ways, such as in-person, online, through local meetings, webinars, conferences, etc. A variety of free and low-cost training resources and formats are available.

USDA Training Tracking Tool has been provided as a resource to assist SFAs to track and record the annual training hours completed by each school nutrition program employee. Supporting documentation for all completed trainings, i.e., *agendas, sign-in sheets, certificates of completion, etc.* must be maintained on file.

The required training hours are as follows:

- Food Service Director/Supervisor 12 hours
- Food Service Manager 8 hours
- All other full time staff 6 hours
- Part time staff 4 hours

At the time of the onsite review MCSD had not been keeping track of professional standard training hours. Technical assistance and the USDA Training Tracker Tool was provided to them. For the following positions the expected training hours are required by the end of the current school year:

- Diana Munger, Cook – 6 hours
- Norberta , Cook – 6 hours
- Part time staff – 4 hours
- Jaci Carr, Fiscal Manager – 4 hours

Meeting the annual requirements for professional standards is non-negotiable. All required hours for this school year must be met by June 30th, 2017.

Corrective Action Required: Record in the USDA Training Tracker or in an Excel sheet all food service employees, their work status (FT or PT), and the training hours they have completed for school year 16/17. If using an Excel sheet please include the title of the training, the professional standard code the training meets, the date it was completed, and the length of the training. If additional hours are needed also submit a plan on how the training hours will be met by June 30th, 2017. Submit both documents to NDA for review.

Food Safety

Overall food safety at both sites was very good and kitchens were clean and had good food safety practices. Food safety was much improved at Schurz ES from the last administrative review. The following areas of food safety will need to be addressed.

The HACCP manual at both sites did not contain a table of contents. Make sure that the table of contents matches the pages numbers for the corresponding procedures.

Corrective Action Required: Update the HACCP manual at each site to include a table of contents. Make sure that the table of contents matches the pages numbers for the corresponding procedures. Submit the table of contents to NDA for review.

Sanitizer strips were observed at HES and they stated they use sanitizer daily, however no log is kept to record the tested concentration of the sanitizer. At Schurz ES no sanitizer test strips were found near the dish washing areas. Sanitizer should be used daily in the kitchen to wash dishes, pots and pans, and also to wipe down the lunch tables. The sanitizer solution needs to be tested after it is added to water to ensure that it is at the correct concentration. A daily log must be kept to document the testing of the sanitizer solution.

Corrective Action Required: Create a policy governing the use of sanitizer in the kitchen and cafeteria and the maintenance of cleaning solution concentration logs and submit the policy along with 2 weeks' worth of sanitizer logs to NDA for review.

At Schurz ES there were no temperature logs posted on the refrigerators or freezers in the kitchen and no temperature logs were shown to the reviewers. The employee interviewed stated that the temperatures are checked daily and written down in the office. It is best practice to have a temperature log posted on the outside of each refrigerator and freezer unit and that the temperatures be checked twice daily at a minimum and recorded

right away. There were plastic sleeves taped to the outside of the units where the logs should be kept, however there were no logs present.

Corrective Action Required: Maintain daily temperature logs for each refrigerator and freezer piece of equipment used for food service at Schurz ES. Submit one month's worth of temperature logs to NDA for all required pieces of equipment for Schurz ES.

Meal charge policy

A meal charge policy must be in place by July 1, 2017.

Procurement Review

The procurement of goods and services is a significant responsibility of a school food authority (SFA). Obtaining the most economical purchase should be considered in all purchases when using the nonprofit food service account. Federal, state and local laws and regulations specify the methods SFAs must:

- Properly procure goods and services
- Award contracts only to responsible contractors
- Not restrict competition
- Follow procurement standards in program regulations (7 CFR 210.21 & 2 CFR 200.318-.326)
- Prohibit conflicts of interest
- Use required procurement methods
- Take affirmative steps to use small, minority, women's business and labor surplus enterprises, when possible
- Oversee contractors to ensure all contract provisions are fulfilled for the duration of the contract

With regards to a procurement plan for Child Nutrition program at Mineral County School District the reviewer examined the District's procurement procedures. A district purchasing policy was not in place as the two policies received titled *Vendor Relations* (DJG-June 24, 20016) and *Payment Procedures* (DK-June 24, 2006) were not adequate per Federal guidelines. Per USDA guidance, the procurement plan must outline the specific procedures per 2CFR Part 200 for program operators 2CFR 318 (a).

The procurement plan must include a provision to prohibit the acquisition of unnecessary or duplicative items per 2CFR 218(d). The plan must also ensure that all solicitations incorporate a clear and accurate description for the material, product or service to be procured. A sample is provided with some suggested language so the current policy may be updated per Federal guidelines.

The Nevada Department of Agriculture (NDA) is required to ensure that SFAs comply with the applicable regulations through audits, administrative reviews, technical assistance, training, guidance materials, and by other means. (7 CFR 210.19(a)(3)). Based on the responses received by Mineral County School District's procurement worksheet, it was determined that the district was using the following procurement method in its operation:

- Micro-purchase Method
- Small Purchase Method

As part of the **Micro Purchase**, the Nevada Department of Agriculture reviewed one vendor (2015/16 School year) for purchases below the micro-purchase threshold (\$0-\$3,500): Bonanza Produce. The reviewer examined the purchase orders and receipts/invoices to determine:

- If the transactions were below \$3,500

- If the prices for products were purchased reasonable
- If the SFA equitably distributed purchases among qualified sources

The method was in compliance in all three areas with the regulations on Federal purchasing. Due to the geographic limitation of the school district, the staff should continue to get price quotes from the other suppliers on produce as to equitably distribute the fresh produce purchases.

As part of the **Small Purchase**, the Nevada Department of Agriculture reviewed one vendor (2015/16) for a purchase made below the federal small purchase threshold (under \$150,000): US Food Service. The reviewer found the purchases were in compliance. Due to the geographic limitation of the school district, the staff should continue to get price quotes from the other suppliers on goods and services such as Sysco to see if they would deliver to Schurz Elementary in the upcoming school year.

A written code of standard of conduct was requested. It was determined that Mineral County School District did not have one in place. Per 2CFR Part 200.3189(c)(1) the non-Federal entity must maintain written standard of conduct covering conflicts of interest and to govern the actions of its employees engaged in the selection, award and administration of contracts. No employee, officer, or agent may participate in the selection, award, or administration of a contract supported by a Federal award if he or she has a real or apparent conflict of interest. The Mineral County School district must have a standard of conduct in place to meet this requirement for procurement. A sample is provided which the district may use or may develop their own code of conduct. The code of conduct must also provide for disciplinary action for violations by officers, employees or agents (2CFR 200.318 (c)1).

Keep all solicitation documents for all future procurement methods per the approved procurement plan.

Please find attached the following guidance documents: Numbered memo NSLP 2016-14 (issued on November 3, 2015): *Questions and Answers on the Transition to and Implementation of 2 CFR Part 200*, Procurement Methods Quick Reference Chart and a pilot Procurement Plan prototype. In addition, technical assistance will be provided if requested by staff on the procurement review findings.

Corrective Actions Required:

- Develop a purchasing plan for the child nutrition program to bring it into compliance with the Federal regulations per 2 CFR Part 200.320 with regards to procurement methods for program operators. A pilot plan is attached which the district may use to meet that requirement.
- Develop a policy governing the code of conduct for staff involved with district purchasing with regards to procurement in the Child Nutrition program. A sample is attached which the district may use to meet that requirement.

Summary

As noted above fiscal action is being taken for the missing production records at Schurz ES from October 2016-March 2017. The total amount of fiscal action is \$4, 752. This amount will be recouped from future claims for reimbursement. Instructions for recoupment will be sent before it begins. Please note that if repeat violations are found on subsequent reviews or follow-ups in any program area fiscal penalties may be assessed and the additional \$0.06 reimbursement may be turned off until the program is brought into compliance with federal regulations. **All corrective actions must be completed and submitted by June 15, 2017.** If 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 complete if not submitted by the required

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due date. Please see the attached document, NSLP-SBP-SMP Appeals sponsor handout for direction on how to appeal the denial of all or a part of the claim for reimbursement or withholding funds. An appeal must be filed within 15 days. If you have any questions about the required corrective action please contact Brittany Mally at (775) 353-3663 as soon as possible.

Best Regards,



Brittany Mally RD,
Quality Assurance Specialist,
NV Dept. of Agriculture, Food and Nutrition Division

Attachments: Appeal Procedures, Procurement Package, Onsite Monitoring Form

Cc: Jaci Carr, Fiscal Manager
Diana Munger, Cook Hawthorne ES
Norberta Sam-Whistler, Cook Schurz ES
Catrina Peters, School Nutrition Services Manager, NV Dept. of Agriculture, FND
Rose Wolterbeek, School Nutrition Services Specialist, NV Dept. Of Agriculture, FND

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