



Washoe County School District
Administrative Review Report

June 11, 2019

National School Lunch Program
Food and Nutrition Division

Administrative Review Report
Food and Nutrition Division



Table of Contents

I.	Executive Summary	2
II.	Introduction	3
III.	Scope	3
IV.	Methodology	3
V.	Noteworthy Achievements	3
VI.	Critical Areas of Review	4
VII.	Findings and Required Corrective Actions	5
VIII.	Recommendations and Technical Assistance	5
IX.	Corrective Action Response	7
X.	Appendix	7
	a. Appeal Procedure	
	b. Guidance on Utilizing School Garden Produce in Child Nutrition Programs	

This institution is an equal opportunity provider

Administrative Review Report

Food and Nutrition Division



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.

Nevada Department of Agriculture (NDA) conducted the Administrative Review of the NSLP, SBP, the After-School Snack Program (ASSP) and the Fresh Fruit and Vegetable Program (FFVP) administered by Washoe County School District from April 8-26, 2019.

An exit conference was held on Friday, April 26, 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 WCSD staff for the time and assistance extended to our State Agency staff during this process.

This institution is an equal opportunity provider

II. Introduction

An entrance conference was conducted on Monday, April 8, 2019. The review was conducted at the WCSD in Reno, Nevada. The Administrative Review was conducted by Bobbie Davidson, School Nutrition Coordinator; Rose Wolterbeek, School Nutrition Specialist; and Joe Dibble, School Nutrition Supervisor. WCSD staff included Peter Etchart, Chief Operating Officer; Lianka Soliz, Food Service Director; Kyle Rodriguez, Senior Accountant; Cindy Cohen, General Manager; Kathy Royal, Meal Applications Program; Scott Schelb, Field Supervisor; and Bernadette Goodnight, Field Supervisor. 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 Friday, April 26, 2019, which provided a summary of the work performed at WCSD 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, January 2019. Meal Observations were conducted at the following sites as a part of the on-site Administrative Review:

- Damonte HS
- Loder ES
- Veterans Memorial ES
- Mitchell ES
- Sierra NV Academy
- Wooster HS
- Depoli MS
- Natchez ES
- Clayton MS
- Risley ES

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 WCSD'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.

V. Noteworthy Achievements

- School Wellness: WCSD had made significant improvements regarding Wellness Policy Implementation at the site level and had a 35% increase in annual Wellness Policy Implementation Assessment reporting from 2016-17 to 2017-2018.
- Recordkeeping: WCSD demonstrates exceptional organization and thoroughness in all the supporting documentation requested.
- Meal application processing: 590 applications were reviewed during the onsite visit and not a single error was identified.

This institution is an equal opportunity provider

VI. Critical Areas of Review

- Performance Standard I- Meal Access and Reimbursement
 - Certification and Benefits Issuance
 - Meal Counting and Claiming
 - Verification
- 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
 - Indirect Costs
- General Areas
 - Civil Rights
 - Professional Standards
 - SFA On Site Monitoring
 - Local School Wellness Policy
 - Water Availability
 - Food Safety
 - Reporting and Recordkeeping
- Special Provision Option
 - Verification of established claiming percentages for Provision II and Community Eligibility Provision (CEP)
 - Certification of Special Provision Claims
- Other Federal Programs
 - Fresh Fruit and Vegetable Program
 - Afterschool Snack Program
- Food Service Management Contract

This institution is an equal opportunity provider

VII. Findings and Required Corrective Action

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; WCSD Internal Regulation 5600; and The Healthy Hunger Free Kids Act Section 9A (204), N			
	Finding	Corrective Action	Due Date
#1	<p>Triennial assessment The HHFKA final rule and WCSD Internal regulation 5600 require all local school wellness policies to be reviewed and/or updated once every three years.</p> <p>WCSD Regulation 5600 has not been reviewed 4/18/2016.</p>	<p>Submit a proposed timeline for WCSD Regulation 5600 to be reviewed and/or updated for the 2019-20 school year, as well as, a business policy/process to establish regularly update Regulation 5600 triennially.</p>	July 11, 2019

VIII. Recommendations and Technical Assistance

Recommendations:

- 1. Storing personal food items separately.** Damonte Ranch High School stores personal food items in the same storage facilities as its food products for its child nutrition programs. NDA recommends labeling these products or designating an employee food shelf to ensure these food products do not get co-mingled with its child nutrition products.
- 2. Utilizing gloves with student workers.** Echo Loder utilizes student workers to help serve kindergarten classes by passing out milk. Students were passing out milks ungloved. NDA recommends students utilizing gloves to ensure milks cartons are uncontaminated during service.
- 3. Storing hot food in hot holding bags during service.** Sierra Nevada Academy prepares addition meals for students who have not ordered a lunch and keeps these lunches at the front office daily. Although, the meals are being kept in accordance with ServSafe standards, NDA recommends keeping hot meals in a hot holding container to ensure the meals are hot and appealing to students.
- 4. Incorporate School Garden produce in NSLP, ASSP, or FFVP programs-** School Gardens provide 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 and Fresh Fruit and Vegetable Grant funds

This institution is an equal opportunity provider

can be used to purchase school produce from school gardens to incorporate into your child nutrition programs and support the continued success of the current school gardens at WCSD. Guidance on this process can be found in Appendix B.

Technical Assistance:

1. Technical assistance was provided to correct the appeal procedure language on the denial letter template to ensure it matched the appeal procedure language on all other benefit/adverse action notification letters. The Eligibility Manual for School Meals (July 18, 2017 edition) requires a written notification of denial that includes the right to appeal and instructions how to appeal.
2. Technical assistance given to add the following to the professional standards training tracker: hire date of each employee, required number of training hours, training dates, and the school year in which the training hours are applied. The 2018-2019 Administrative Review Manual outlines that a Professional Standards tracking system must include employee name, hiring date, employee position, required hours of training, training title/learning topic code, training date, length of training, school year training is applied to and completed training hours year to date.

This institution is an equal opportunity provider

Administrative Review Report

Food and Nutrition Division



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. Guidance on Utilizing School Garden Produce in Child Nutrition Programs

This institution is an equal opportunity provider