



**Nevada  
Department  
of Agriculture**

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**MINERAL COUNTY SCHOOL  
DISTRICT**  
*Administrative Review Report*

National School Lunch Program  
***Division of Food and Nutrition***

# MINERAL COUNTY SCHOOL DISTRICT

## Administrative Review Report

Division of Food and Nutrition



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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, and ASSP administered by MINERAL COUNTY SCHOOL DISTRICT from 05/07/2024 to 05/08/2024.

An exit conference was held on 05/15/2024 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 MINERAL COUNTY SCHOOL DISTRICT staff for the time and assistance extended to our State Agency staff during this process.

## II. Introduction

An entrance conference was conducted on 05/06/2024. The review was conducted at the MINERAL COUNTY SCHOOL DISTRICT in Hawthorne, Nevada. The Administrative Review was conducted by Allen Whitenack. MINERAL COUNTY SCHOOL DISTRICT staff included Stephanie Keuhey, and Susan Fisher. This report is based on the results of the offsite assessment, the onsite review of files, and meal service observations of the SFA's participating programs. An exit conference was held on 05/15/2024 which provided a summary of the work performed at MINERAL COUNTY SCHOOL DISTRICT and we discussed any additional documentation needed, preliminary findings, and observations.

## III. Scope

The Administrative Review covered documents, records, and procedures relating to the administration of the NSLP for the month of review, January 2024. The Procurement Review covered all documents, records, invoices, and procedures relating to the procurement for the SFA for the year of review, school year 2022-2023.

## 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 MINERAL COUNTY SCHOOL DISTRICT'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

Site/Questions	Achievements
Hawthorne Elementary School/Q1407	Food Service Staff at Hawthorne Elementary were engaging with students which created a positive atmosphere during meal service. Serving 3 to 5 students at a time in the service line kept students moving through the meal choices effectively.
Schurz Elementary School/Q1407	Both the kitchen and meal service areas at Schurz Elementary were clean and orderly. Staff were highly receptive to Technical Assistance and asked many pertinent questions to improve their processes.

## 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
- Comprehensive Resource Management
  - Maintenance of the Non-Profit School Food Services Account
  - Revenue from non-program foods
  - Paid Lunch Equity
  - Indirect Costs
- General Areas
  - Civil Rights
  - Professional Standards
  - SFA On Site Monitoring
  - Local School Wellness Policy
  - Smart Snacks in School
  - Water Availability
  - Food Safety
  - Reporting and Recordkeeping
  - SBP and SSO Outreach
- Procurement
  - Procurement Plan
  - Code of Conduct
  - Procurement Documents and Records

## 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).

Site/Questions	Finding	Corrective Action	Due Date
Hawthorne Elementary School/Q325b	Meal Counting and Claiming (After School Snack Program)-During on-site observation on 5/6/2024 reviewer counted 11 snacks served in the three after school programs. In reviewing the meal counts it was noted that 27 snacks were claimed for 5/6/2024. During the exit conference MCSD staff explained that the staff person responsible for meal counts would take the snack count and compare with daily attendance roster as an edit check to ensure the correct amounts of snacks being claimed daily. This is not an acceptable process as students may be present during the school day, but may not attend the after-school snack program even if they are registered.	Create a roster for the After School Program that can accurately capture snacks served and retrain staff on correct counting and claiming procedure. Send updated ASSP Roster and copies of staff training materials to the NDA for review.	07/04/2024

**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; the meal pattern limits calories, restricts sodium levels, limits saturated fat, and eliminates trans fats. References include but are not limited to 7 CFR 210.10 and 220.80.

Site/Questions	Finding	Corrective Action	Due Date
Hawthorne Elementary School/Q409	Meal Components and Quantities- Per 7 CFR 210.10(b)(1)(i), daily, school lunches offered to each age/grade group must include the food components and food quantities specified in the appropriate meal pattern. Menu and Production Records for 5/8/2024 show no fruit being offered at any of the three Hawthorne Schools (Hawthorne Elementary, Hawthorne Middle School, Mineral County High School). As a result, the meals from these three schools on 5/8/2024 will not be counted as reimbursable meals. *NSLP Fiscal action is calculated at \$1,148.40. See Open Claim Adjustment Letter for further detail.	Develop a procedure to monitor the menu and production records to ensure meals served meet the minimum daily requirements for each applicable age/grade group. Train staff to ensure they can follow the procedure and understand the meal pattern requirements. Submit procedure and proof of training to the NDA for review. Submit training documentation given to staff (PPTs, policy, recipe instructions, etc.).	07/04/2024
Schurz Elementary School/Q409	Meal Components and Quantities (Repeat Finding)- Per 7 CFR 220.8(b)(1)(i), daily, school meals offered to each age/grade group must include the food components and food quantities specified in the appropriate meal pattern. During review of production records it was noted on 1/11,1/16,1/ 23,1/29, and 1/31/2024 that only 1/2 cup of fruit was offered during breakfast. As such these meals would not be counted as reimbursable. Total meals disallowed: 218. *SBP fiscal action is calculated at \$595.14 qualifying for the disregard as this does not exceed \$600.00 per program.	Develop a procedure to monitor the menu and production records to ensure meals served meet the minimum daily requirements for each applicable age group. Train staff to ensure they can follow the procedure and understand the meal pattern requirements. Submit procedure and proof of training to the NDA for review. Submit training documentation given to staff (PPTs, policy, recipe instructions, etc.).	07/04/2024

Hawthorne Elementary School/ Q410a	Meal Components and Quantities- Per FNS Memorandum SP 30-2012, 80% of weekly grains offered must meet the Whole Grain Rich (WGR) Criteria. During review of off-site documents and on-site observations many non-WGR items were observed in dry storage and as menu items.	Deplete all non-WGR items from inventory and replace with WGR alternatives. Work closely with food vendor(s) to ensure new menu items and products meet the WGR requirements. Additionally, have all food service staff attend a training session on WRG requirements and create a corrective action plan regarding the procurement of Whole Grain Rich Items. Submit proof of training and corrective action plan to the NDA for review.	07/04/20 24
Hawthorne Elementary School/Q412	Due to the findings in the Meal Components and Quantities module, Performance Based Reimbursement will be turned off until all corrective actions have been addressed and an updated menu has been provided for review.	Address all corrective actions and submit a copy of the updated NSLP menu to NDA for review and reinstatement of PBR.	07/04/20 24



## General Program Compliance

### Civil Rights

Regulations require SFAs to comply with civil rights provisions to ensure that no child is denied benefits or otherwise discriminated against because of race, color, national origin, age, sex, or disability. References include but are not limited to 7 CFR 210.23(b), 7 CFR 210.18(h)(2)(ii), FNS Instruction 113-1, USDA memo SP59-2016.

Questions	Finding	Corrective Action	Due Date
Q803	Civil Rights-Civil Rights Policy is not complete. There is no Civil Rights Complaint Log on file for MCSD.	<p>MCSD must create a policy that governs the reporting and step by step process that will be used to handle civil rights complaints in the food and nutrition services programs in this school district. This policy must list step by step the entire process by which a student/guardian would report a civil rights complaint and then list each step in the chain that the civil rights complaint will go through until the USDA has notified of complaint resolution. It must also detail a process for the child to bypass this system completely and report their civil rights complaint directly to the USDA.</p> <p>Create a Civil Rights Complaint log for the current school year that contains all civil rights complaints in the food and nutrition services programs filed for that school year. A new Civil Rights Log should be kept for each school year going forward. These logs must be kept for three years after the submission of the final claim for reimbursement for the fiscal year. If audit findings have not been resolved, the three-year period is extended as long as required for resolution of audit issues.</p>	07/04/2024

**Professional Standards**

Regulations establish hiring standards for new school nutrition program directors at the School Food Authority (SFA) level and annual training standards for all school nutrition program directors, managers, and staff. References include but are not limited to 7 CFR 210.30

Questions	Finding	Corrective Action	Due Date
Q1203a	Professional Standards-Food Safety Training is required for new program directors that were hired on or after July 1, 2015 (training must have occurred either within 5 years prior to the starting date or must occur within 30 calendar days of the start date). During the on-site review it was noted that the current Food Service Director (School District Superintendent) has not had Food Safety Training.	During discussions with the NDA and MCSD staff, it was noted that Susan Fisher has met the hiring requirements for a LEA of 2,499 or less. Susan will take over as Food Service Director for the 2024-2025 school year. Susan will need to complete a Food Safety Training class within 30 days. Once training has been completed submit to the NDA for review.	07/04/2024
Q1208	Professional Standards-Training Tracking (Repeat Finding)-All SFAs are required to track and maintain records regarding employees' annual training. USDA's Professional Standards Training Tracker may be used, or an alternative tracking tool may be developed but must include at minimum these required fields: employee position, required hours of training, training title/subject, length or training, school year training is applied to, and completed training hours to date. Currently no training tracker is in place for Mineral County School District.	Create a training tracker with required elements or create a profile for Mineral County School District (MCSD) through the USDA's Professional Standards Training Tracker that includes all MCSD staff who have responsibilities in School Food Service. Add all trainings for SY 23-24 and submit to the NDA for review.	07/04/2024

## Food Safety

Regulations require SFAs to establish a food safety program and maintain facilities in accordance with Federal, State, and Local Health Code regulations to reduce risks of food borne illnesses. References include but are not limited to 7 CFR 210.13, USDA Guidance for School Food Authorities: Developing a School Food Safety Program, NRS 429.200, 444.335, and NRS chapter 446.

Site/Questions	Finding	Corrective Action	Due Date
Hawthorne Elementary School/Q1406	Food Safety Inspection-Per FNS, each school must have the most recent food safety inspection report posted in a publicly visible location for all participants of the school meals program to view. Currently the health inspection for Hawthorne Elementary School is posted in the kitchen office where it is not readily available for participants.	Post a copy of the most recent food safety inspection in a publicly visible location. Send photo to the NDA as proof.	07/04/2024
Hawthorne Elementary School/Q1408	Sanitation/Temperature Logs-The SFA must monitor for correct temperatures and sanitation levels (using a thermometer and test strips) and record their chemical levels when using sanitation liquids. These test results trackers should be visible near the sink(s) or dishwashers where the sanitation process is done. Hawthorne Elementary School currently has not been recording temperature or sanitation levels on the commercial dishwasher or 3 compartment sinks.	Create a temperature and sanitation log for dishwashing station and submit 2 weeks' worth of logs to the NDA for review.	07/04/2024
Schurz Elementary School/Q1408	Temperature and Sanitation Level Logs-FNS requires each school in the SFA to maintain temperature and sanitation logs for a period of six months. During on-site observation there were temperature logs available but had not been filled out.	Provide the NDA with 2 weeks' worth of temperature and sanitation logs.	07/04/2024
Schurz Elementary School/Q1409	Food Safety and Storage-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 losses per 7 CFR 210.13 D. During on-site observation, the reviewer found bottled waters stored directly on floor.	Move all food items at least 6 inches off the floor. Send photo to the NDA for proof.	07/04/2024

## VII. Recommendations and Technical Assistance

### Recommendation:

In order to ensure the accuracy and compliance of MCSD's meal program's nutrition information, the NDA strongly recommends using a USDA-approved Nutrient Analysis software program. These software programs have been reviewed and approved by the USDA's Food and Nutrition Service and are designed to provide accurate and reliable nutrition information for school meals. Using a USDA-approved Nutrient Analysis software program will allow MCSD to accurately calculate the nutrient content of meals, progress towards meeting nutrition standards, and ensure that meal program(s) are in compliance with federal regulations.

During on-site review of Hawthorne Elementary School Breakfast, late arriving students were slowed in line, due to other students coming into cafeteria to get "to-go" boxes for the remainder of their breakfast. The NDA would recommend food service staff stock "to-go" boxes outside of the service area to expedite the meal service for late arriving students.

On MCSD website the menus do not show daily fruit offerings. The NDA recommends including all menu offerings on MCSD website to aid parents and students in meal choices.

The NDA recommends reviewing HACCP manuals for all schools to ensure they are up to date with most recent policies and that all items in kitchen(s) have correct safety plans.

### Technical Assistance

Site/Questions	Achievements
Q1004	Local School Wellness- A committee has not been able to be formed, and meetings have not been held on School Wellness due to lack of participation from School Staff and the Public. Please attempt to form a School Wellness Committee again this upcoming school year and schedule 2 meetings at minimum to review and update Local School Wellness Policies.
Hawthorne Elementary School/Q324a	Meal Counting and Claiming- During the second service at Hawthorne Elementary School reviewer observed cafeteria staff counting students as they entered the service line before they received their meal. Technical Assistance was given explaining that meal counts must be taken at the end of the service line after the student has selected a fully reimbursable meal. The reviewer also recommended a meal counting and claiming training for cafeteria staff.

Hawthorne Elementary School/Q402	<p>Meal Components and Quantities- During lunch prep it was observed that kitchen staff was portioning french fries and romaine lettuce by hand. When it comes to portioning meal items, it's essential to use proper utensils to ensure accuracy and prevent contamination. Rather than using your hands to portion out food, it's best to use a combination of measuring cups, spoons, and scales to accurately measure the correct serving sizes. For example, when serving dry goods like grains or cereals, use a measuring cup to scoop out the correct amount. When serving liquids or sauces, use a measuring cup or a spoon to pour the correct amount. For heavier or more irregularly shaped items like meat or vegetables, use a digital scale to ensure accurate weighing. By following these best practices for portioning with proper utensils, you can ensure that your meals are not only accurately portioned but also safely and hygienically prepared.</p>
Schurz Elementary School/Q811	<p>Civil Rights- Currently displayed And Justice for All poster is out of date. The NDA will supply updated And Justice for All posters to Mineral County School District. Please submit a picture of updated posters once hung up.</p>
Schurz Elementary School/Q1405a	<p>Food Safety Inspections -During on-site observations it was noted that no schools had received a health inspection this school year. It was also noted that the health permits for all schools had expired on 4/30/2024. Per discussion with MCSD staff, requests have been made to the local health department for inspections, but the county has recently been moved to a new jurisdiction. Health inspections have been requested and scheduled with Central Nevada Health District.</p>

Hawthorne Elementary School/Q1410a	Food Safety and Storage-Technical assistance was given on non-low sodium canned items in storage. Consider the following guidelines when purchasing low-sodium items for NSLP programs. Look for products with sodium levels that meet or exceed USDA's low-sodium guidelines (200-300 mg per serving for main courses, sides, and entrees; 100-150 mg per serving for snacks and condiments). Include low-sodium specifications in contracts with food vendors, conduct thorough product evaluations, and develop partnerships with suppliers who can provide low-sodium options. Analyze meal patterns to identify opportunities for low-sodium options, plan menus that incorporate low-sodium options, and develop recipes that use herbs, spices, and other seasonings to enhance flavor without adding salt. Provide training and education to food service staff on low-sodium options and meal planning strategies and conduct regular nutrition analysis to ensure compliance with NSLP guidelines.
Hawthorne Elementary School	Infant and Pre-K Meal Pattern-During review of cereals offered, it was noted that the Frosted Flakes contained more than 6 grams of sugar per dry ounce. Technical Assistance was given to MCSD that the Frosted Flakes are not complaint for Pre-K meals.
Hawthorne Elementary School	Infant and Pre-K Meal Pattern-Many items on all menus are not WGR. Technical Assistance was given on WGR item requirements. A WGR training for kitchen staff will be part of Corrective Action Plan.

**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 Process
- b. Procurement Review
- c. Open Claim Adjustment Letter
- d. Civil Rights Complaint Log Template
- e. Professional Training Tracker Template
- f. Website Training Links:

Production Records Training-

<https://theicn.docebosaas.com/learn/courses/154/production-records>

Whole Grain Rich Training P1-<https://theicn.docebosaas.com/learn/courses/155/whole-grain-rich-foods-part-1>

Whole Grain Rich Training P2-<https://theicn.docebosaas.com/learn/courses/234/whole-grain-rich-food-part-2>

Food Buying Guide-<https://theicn.docebosaas.com/learn/external-ecommerce;view=none;redirectURL=?ctldoc-catalog-o=se-%22food%20buying%20guide%22>

g. g. USDA Professional Standards Training Tracker-  
<https://pstrainingtracker.fns.usda.gov/>

h. h. Multi Wheel Cutter-<https://www.webstaurantstore.com/ateco-13957-7-wheel-stainless-steel-pastry-cutter/14413957.html>