



Churchill County School District
Administrative Review Report

February 14, 2020

National School Lunch Program
Food and Nutrition Division

Administrative Review Report

Food and Nutrition Division



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I. Executive Summary

Administrative Review

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

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

Procurement Review

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

Nevada Department of Agriculture (NDA) conducted the Procurement Review in tandem with the Administrative Review of the NSLP, SBP, and the Fresh Fruit and Vegetable Program (FFVP) administered by Churchill County School District (CCSD) from January 13-16, 2019.

An exit conference was held on Thursday, January 16, 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 Churchill County School District staff for the time and assistance extended to our State Agency staff during this process.

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II. Introduction

An entrance conference was conducted on Monday, January 13, 2019. The review was conducted at the Churchill County School District in Fallon, Nevada. The Administrative Review was conducted by Reece Winfield, School Nutrition Coordinator II; Bobbie Beach, School Nutrition Specialist; and Chris Tate, Program Officer. CCSD staff included Phyllis Dowd, Director of Business Services; Debbie Lund, Account Technician; and Summer Stephens, Superintendent. Chartwells staff included Jo Lamun, Director of Dining Services. This report is based on the results of the offsite assessment, the onsite review of files, and meal service observations of the breakfast and lunch programs. An exit conference was held on Thursday, January 16, 2019 which provided a summary of the work performed at CCSD and we discussed any additional documentation needed, preliminary findings, and observations.

III. Scope

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

- Churchill County High School
- Numa Elementary School

IV. Methodology

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

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

V. Noteworthy Achievements

- **Meal Quality-** CCSD offers variety of fresh, quality, and appealing menu choices for its students daily. Many items were made scratch in the kitchens daily.
- **Certification and Benefit Issuance-** Of the 490 student eligibility determinations reviewed, not a single error was found. This is a significant improvement from the 17 errors noted in the previous administrative review.

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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

- General Areas
 - Civil Rights
 - Professional Standards
 - SFA On Site Monitoring
 - Local School Wellness Policy
 - Water Availability
 - Food Safety
 - Reporting and Recordkeeping

- Procurement
 - Procurement Plan
 - Code of Conduct
 - Procurement Documents and Records

- Other Federal Programs
 - Fresh Fruit and Vegetable Program

- Food Service Management Company
 - Contract Monitoring

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VII. Findings and Required Corrective Action

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.			
	Finding	Corrective Action	Due Date
#1	<p>Dietary Specifications and Nutrient Analysis 7 CFR 210.10 (f) and 7 CFR 220.8 (f) requires SFAs to offer school meal programs consistent with the federal standards for calories, saturated fat, sodium, and trans-fat.</p> <p>For month of review, CCSD was not meeting the calorie minimum over the week for the 6-12 SBP meal pattern (450-550). See Appendix D for specific information on deficiencies.</p>	Submit a nutrient analysis by week for March 2020’s SBP menu detailing how calories will be raised to meet the minimum calorie level (450) for the 6-12 SBP meal pattern.	March 16, 2020
#2	<p>Menu Production Records (MPRs) 7 CFR 210.10 (3) requires schools or SFAs to maintain daily Menu Production Records to show how the meals offered contribute to the required food components and food quantities for each age grade group.</p> <p><i>Repeat Finding-</i> For the month of review the following deficiencies were noted:</p> <ul style="list-style-type: none"> ○ Only one type of milk served at some of the sites ○ Not enough fruit and or vegetable servings to claim the total number of meals ○ Incomplete MPRs <p>See Appendix E for details on specific deficiencies.</p> <p><i>**Please note due to the discrepancies in the number of fruit servings served versus the number of meals claimed. This finding does require fiscal action in the amount of \$297.86 The total fiscal</i></p>	<p>(1) Complete NDA’s Menu Production Workbook Training (found in Appendix E). Submit to NDA the dates, times, and signatures from all staff that completed the workbook.</p> <p>(2) Submit a weeks’ worth of complete Menu Production Records from all sites for NDA to review and approve.</p>	<p>(1) March 16, 2020</p> <p>(2) March 16, 2020</p>

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<i>action does fall below the USDA \$600 disregard and therefore will not be assessed.</i>	
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Other Federal Programs

Fresh Fruit and Vegetable Program (FFVP) – The Fresh Fruit and Vegetable Program (FFVP) aims to increase children’s exposure to and consumption of a variety of fruits and vegetables. The SFA must ensure FFVP is available to all enrolled children, is provided free of charges, is offered within the school day outside of meal service times and provides an accompanying educational component. References include but are not limited to Farm Bill Section 19; FNS numbered memo SP31-2008; *USDA Fresh Fruit and Vegetable Program-Handbook for Schools*; and the *NDA FFVP Policy and Procedure Manual*.

	Finding	Corrective Action	Due Date
#3	<p>Meal Service Times The USDA Fresh Fruit and Vegetable Program-Handbook for Schools states FFVP cannot be served during the NSLP and SBP reimbursable meal service periods.</p> <p>During the onsite review, Numa Elementary School served it’s FFVP in conjunction with its SBP service.</p>	<p>Create a meal service implementation plan for Numa Elementary School to change the FFVP meal service to occur separate from the SBP service. Submit to NDA for review and approval.</p>	<p>March 16, 2020</p>

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 Part 200.318-326; 7CFR 210.21; 2CFR Part 200; 2CFR 318 (a-d); 2 CFR Part 200.320.

	Finding	Corrective Action	Due Date
#4	<p>Procurement Plan 7 CFR 200.318 requires SFAS to establish and document their procurement procedures which reflect applicable State, local and federal laws and regulations.</p> <p><i>Repeat Finding-</i> CCSD’s Purchasing (Regulation 3300.1) and/or Food Service Funds (Regulation 3500.0) was missing the following required components:</p> <ul style="list-style-type: none"> ○ Prohibit the acquisition of unnecessary or duplicative items ○ Require written procedures for procure transactions that ensure all 	<p>Update CCSD’s current procurement regulations to encompass all the required elements as outlined in 7 CFR.318. Submit to NDA for review and approval.</p>	<p>March 16, 2020</p>

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	<p>solicitations incorporate a clear and accurate description of the technical requirements for the material, product, or service to be procured</p> <ul style="list-style-type: none"> ○ Steps to assure that small, minority and women’s businesses enterprises and labor surplus firms are used when possible. 		
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VIII. Recommendations and Technical Assistance

Recommendations:

1. **Incorporate School Garden/locally grown produce in NSLP programs-** School Gardens and purchasing locally grown food provides a multitude of benefits for students including learning about healthy food, learning how to grow fruits and vegetables, and promoting better nutrition. USDA supports such efforts through its Farm to School Program. Nonprofit School Food Service Funds can be used to support local farmers and school garden programs. See Appendix C for more information.

Technical Assistance:

1. Technical assistance was provided on Meal Counting and Claiming. CCSD was submitting claims 10 days after month end which allowed claim discrepancies for applications approved and eligibility backdated within a claim month. 7 CFR §210.8 (b)(1) states school food authorities must submit a final claim for reimbursement to the state agency no later than 60 days following the last day of the full month covered by the claim. CCSD has edited all claims with discrepancies and created an internal procedure to submit claims 30 days after month end.
2. Technical assistance was provided at Numa Elementary school to place signage regarding what constitutes a reimbursable meal under offer versus serve. 7 CFR §210.18(g)(2)(i)(B)(1) requires signage or other methods to be used to assist students to identify what constitutes a reimbursable meal. Numa Elementary fixed this issue onsite.
3. Technical assistance was provided to create a Professional Standards Tracking log. 7 CFR §210.30(g) requires all SFAs to track and maintain records regarding employees annual training. CCSD fixed this issue onsite.
4. Technical assistance was provided to create a Civil Rights Complaint Procedure and Log. *USDA’s Administrative Review Manual*, 2018-2019 edition, requires SFAs to have a written procedure for receiving and processing Civil Rights complaints as well

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- as, a physical log to document any Civil Rights complaints received by the SFA. CCSD fixed this issue onsite.
5. Technical assistance was provided to update CCSD's Local School Wellness Policy. CCSD's current policy has not been reviewed or updated since 2016. 7 CFR 210.31 (e)(d) and the Healthy Hunger Free Kids Act (2010) requires the Local School Wellness Policy to be reviewed and/or update once every three year. CCSD brought their Local school Wellness Policy to be reviewed/updated to their board's January 27, 2020 meeting.

IX. Corrective Action Response

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

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

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

X. Appendix

- A. Appeal Procedure-attached
- B. Procurement Review Detail-attached
- C. Guidance on Farm to School and Local Purchasing
- D. Dietary Specifications and Nutrient Analysis Deficiencies
- E. Menu Production Records Deficiencies and Training

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