



Douglas County School District
Administrative Review Report
(Amended)

February 28, 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 National School Lunch Program and School Breakfast Program administered by Douglas County School District from January 27th through 31st, 2020.

An exit conference was held on Thursday, January 31st, 2020 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 Douglas 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 27th, 2020. The review was conducted at the Douglas County School District in Minden, Nevada. The Administrative Review was conducted by Bobbie Beach, Chris Tate, and Bailey Taber. DCSD staff included Brittany Mally and Jordanna Foster. 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 31st, which provided a summary of the work performed at DCSD 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/SBP for the month of review, which was **November 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 2019-2020**.

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 DCSD'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

- **Recordkeeping:** DCSD demonstrates exceptional organization of documentation.
- **Application Processing and Verification:** All application documents, including verification, were well detailed. Reviewers could easily identify if and how many times the family was contacted. All applications were processed well before the 10-day deadline.
- **Meal Quality:** DCSD offers variety of fresh, quality, and appealing menu choices for its students daily. Many items were made scratch in the kitchens daily.

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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
 - Indirect Costs

- 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

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VII. Findings and Required Corrective Action

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
#1	<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>DCSD’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"> ○ Steps to assure that small, minority, and women’s businesses enterprises and labor surplus firms are used when possible. 	<p>Update DCSD’s current procurement regulations to encompass the required elements outlined in 7 CFR 200.321. Submit to NDA for review and approval.</p>	April 1, 2020

VIII. Recommendations and Technical Assistance

Recommendations:

1. Only current HACCP documents and manuals to be kept on site. Two HACCP manuals were kept on file at Jacks Valley Elementary School and an old version was shared for the AR. Only new versions of HACCP manuals should be kept, and the old HACCP manuals should be disposed of.
2. Annual administrative staff required training completed on-schedule and documentation log maintained appropriately. Internally-developed training log was missing training documentation for staff for current year.
3. All current health inspection reports to be kept on file for all food service sites. Current HI report missing for ZCES for current year, and second HI reports still needed for several other sites. Recommended on-hand record of ZCES HI and SFA to request second review of sites from local health department.

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4. Completion of on-site reviews in advance of February 1st. On-site monitoring is required to be completed by February 1st. At time of review, several on-site reviews still had yet to be completed, with only one business day remaining.
5. Incorporate School Garden/locally grown produce in NSLP programs. School Gardens and purchasing locally grown food 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 can be used to support local farmers and school garden programs. See **Appendix C** for more information.

Technical Assistance:

1. Technical assistance provided for benefit issuance and validation of free and reduced school meal applications. Nine (9) total applications identified as mis-categorized meal benefit status. Five (5) applications identified as missing required information. Student statuses corrected by SFA during on-site visit, and recommended additional steps and precautions to prevent similar errors moving forward.

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

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