

Elko County School District
Administrative Review Report

June 10, 2022

National School Lunch Program
Food and Nutrition Division

Table of Contents

I.	Executive Summary	2
II.	Introduction	2
III.	Scope	3
IV.	Methodology	3
V.	Noteworthy Initiatives	3
VI.	Critical Areas of Review	3
VII.	Findings and Required Corrective Actions	4
VIII.	Technical Assistance	5
IX.	Corrective Action Response	5
X.	Appendix	5
	a. Appeal Procedure	
	b. Procurement Review	

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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 administered by Elko County School District from May 3rd – 6th, 2022.

An exit conference was held on Friday, May 6, 2022 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 Elko County School District and Chartwells staff for the time and assistance extended to our State Agency staff during this process.

II. Introduction

An entrance conference was conducted on Tuesday, May 3, 2022. The Administrative Review was conducted by Allen Whitenack, Program Officer I and Dan Pimm, School Nutrition Specialist. The Procurement Review was conducted by Dan Pimm. Elko County School District staff included Veronica Cervantes, Nutrition Services Secretary, while Chartwells staff included Steve Armstrong and Tobias Gibbs. This report is based on the results of the onsite assessment,

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Administrative Review Report

Food and Nutrition Division



the onsite review of files, and meal service observation of the breakfast and lunch programs. An exit conference was held on Friday, May 6, 2022 which provided a summary of the work 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 2022. The Procurement Review covered all documents, records, invoices, and procedures relating to the procurement for the SFA for the year of review, school year 2020-2021.

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 Elko County School District's administration of the National School Lunch, School Breakfast, After School Snack, and Fresh Fruit and Vegetable 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

- Reimbursable Meals: All employees asked, knew what a reimbursable meal was comprised of for both straight serve and offer vs. serve.
- Kitchen Organization: All kitchens (especially West Wendover Elementary School) are clean and well organized while containing all the necessary components.

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

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Administrative Review Report
 Food and Nutrition Division



- Comprehensive Resource Management Review
 - Maintenance of the Non-Profit Food Service Account

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

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

VII. Findings and Required Corrective Action

General Program Compliance			
Temperature & Sanitation Logs – 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 loss (7 CFR 210.13(d)). Temperature is appropriate for the applicable equipment (e.g. freezer, refrigerator, milk cooler). Chemicals are clearly labeled and stored away from food and food-related supplies.			
#1	Sanitation Logs The SFA must monitor (using test strips) and record their chemical levels when using sanitation liquids. These test result trackers should be visible near the sink where the sanitation process is done. Elko County School District Schools currently has no Sanitation Logs.	Provide NDA with 2 week’s worth of test strip sanitation logs.	September 10 th , 2022

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VIII. Recommendations and Technical Assistance

Technical Assistance:

1. Technical assistance provided for updating HACCP Manual. Currently, all HACCP Manuals reviewed list Ecolab as the cleaning and dishwashing chemical company to be used in the kitchens. Diversey is currently being used. Please update the tab and title page referencing this in your HACCP manuals.
2. Technical assistance recommendation for West Wendover High School Water Availability. Considering the expenditures to purchase bottled water, it was recommended that Elko County School District have the water turned on to the two water fountains in the gym/lunchroom at West Wendover High School. Doing so will make water available to students and eliminate the need and cost of purchasing bottled water.

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

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