



**Mineral County School District**  
*Administrative Review Report*

December 3, 2019

National School Lunch Program  
*Food and Nutrition Division*

# Administrative Review Report

## Food and Nutrition Division

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### Table of Contents

I.	Executive Summary	2
II.	Introduction	3
III.	Scope	3
IV.	Methodology	3
V.	Noteworthy Initiatives	3
VI.	Critical Areas of Review	4
VII.	Findings and Required Corrective Actions	5
VIII.	Recommendations and Technical Assistance	7
IX.	Corrective Action Response	8
X.	Appendix	8
	a. Appeal Procedure	
	b. Procurement Review	
	c. Guidance on Farm to School and local purchasing	
	d. Professional Standards learning codes and training requirements	

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# 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 and SBP administered by Mineral County School District (MCSD) from October 29-30, 2019.

An exit conference was held on Wednesday, October 30, 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 Mineral County School District staff for the time and assistance extended to our State Agency staff during this process.

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# Administrative Review Report

## Food and Nutrition Division

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### II. Introduction

An entrance conference was conducted on Tuesday, October 29, 2019. The review was conducted at the Mineral County School District in Hawthorne, Nevada. The Administrative Review was conducted by Bobbie Beach, School Nutrition Coordinator II; and Doreece Winfield, School Nutrition Coordinator II. MCSD staff included Spring Blazewick, Fiscal Reporting/Data Management; and Diane Rodriguez, Financial Manager. 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 Wednesday, October 30, 2019 which provided a summary of the work performed at MCSD 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, August 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 site(s) as a part of the on-site Administrative Review:

- Hawthorne Junior/Senior High 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 MCSD'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

- Breakfast in the Classroom: MCSD went beyond the requirements of SB503 and has offered breakfast in the classroom at all its school sites. Breakfast participation has increased significantly.
- Staff enthusiasm: Staff at MCSD are dedicated to doing what is best for its students. MCSD staff had many discussions with NDA during the onsite review asking advice and suggestions on innovative ideas to serve their students the best meal.

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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
  - Paid Lunch Equity
  
- 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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**Administrative Review Report**  
Food and Nutrition Division



**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.

<b>Finding</b>		<b>Corrective Action</b>	<b>Due Date</b>
#1	<p><b>Offer Versus Serve (OVS) Signage</b> The Administrative Review Manual, 2017-2018 edition, states schools operating the OVS meal service option must have signage posted on the service line to assist students in selecting a reimbursable meal.</p> <p><i>Repeat Finding-</i> At the time of the review, Hawthorne Jr./Sr. HS did not have signage indicating what constitutes a reimbursable meal under OVS.</p>	Develop OVS signage that clearly defines what is a reimbursable meal under OVS for students. Submit to NDA for approval.	<b>January 3, 2019</b>
#2	<p><b>Menu Production Records (MPRs)</b> 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>MPRs are still needed for:</p> <ul style="list-style-type: none"> <li>• Hawthorne Junior/Senior HS for 10/29/2019 and 10/30/2019</li> <li>• Schurz Elementary School for one week from August 2019</li> </ul>	<p>Submit MPRS for NDA for review and approval.</p> <p><i>** Additional corrective action may result after reviewing submitted MPRs.</i></p>	<b>January 3, 2019</b>

**General Program Compliance**

**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

<b>Finding</b>		<b>Corrective Action</b>	<b>Due Date</b>
#3	<p><b>Professional Standards Tracking</b> 7 CFR 210.30 (g) requires all SFAs to track and maintain records regarding employees annual training. USDA’s Professional</p>	Update the current Professional Standards tracking system to include the missing required components or use <u>USDA’s</u>	<b>January 3, 2019</b>

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**Administrative Review Report**  
Food and Nutrition Division



	Standards Training Tracker may be used, or an alternate tracking tool may be developed but must include at minimum these required fields: Employee Name, hiring date, employee position, required hours of training, training title/subject, length of training, school year training is applied to, and completed training hours to date.  <i>Repeat Finding-</i> At time of review, no tracking log for professional standards was in place	<u>Professional Standards Training Tracker 2.0</u> . Send a copy to NDA for approval  See Appendix D for Professional Standards Learning Topic Codes	
#4	<b>Professional Standards Training</b> 7 CFR2 10.30(2) outlines minimum annual training requirements for all staff with duties related to school meal programs.  <i>Repeat Finding-</i> At time of review, MCSD staff did not meet the minimum Professional Standards Training requirements for the 2018-2019 school year.	(1) Develop a training plan to ensure professional standards training hours will be met annually. Include signatures from all applicable staff. Submit to NDA for approval.  See Appendix D for professional standards learning codes and professional standards training requirements.	<b>January 3, 2019</b>
<b>Wellness Policy</b> – 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; and The Healthy Hunger Free Kids Act Section 9A (204),			
#5	<b>Triennial assessment</b> 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.  MCSD School Nutrition-Food Service Wellness Policy has not been reviewed/updated since 11/17/2015.	Submit a proposed timeline for MCSD School-Nutrition-Food Service Wellness Policy to be reviewed and/or updated for the 2019-2020 school year, as well as, a business policy/process to establish a regular update of the Local School Wellness Policy triennially.	<b>January 3, 2019</b>

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**Administrative Review Report**  
 Food and Nutrition Division



**Water Availability-** Schools participating in NSLP must make potable water available to children at no charge in the place where lunch meals are served. References include but are not limited to Health, Hunger-Free Kids Act of 2010 Section 203 and USDA Numbered memo SP28-2011.

#6	<b>Water Availability</b> Free potable water must be made available during meal service to all NSLP participants. At the time of the review, Hawthorne Jr/Sr HS did not have an operational water fountain.	Submit a work order or documentation that the water fountain at Hawthorne Jr/Sr HS has been fixed or an alternate water station has been created.	<b>January 3, 2019</b>
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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.
- 2. Maintain a log of sanitizer concentration levels-** Keeping a log of sanitizer concentration levels provides a multitude of benefits including: keeping staff accountable for testing sanitizer concentration, ensuring the sanitizer concentration level is appropriate to be effective, and can be essential in the event of a food borne illness outbreak to demonstrate the school site’s compliance with sanitizing practices.
- 3. Add more details to onsite monitoring forms-** Onsite monitoring gives the SFA the opportunity to conduct a self-assessment of its school sites. NDA encourages to be thorough and keep detailed notes. Onsite monitoring can identify deficiencies to correct before an Administrative Review and help identify any topic areas your staff may need additional training on.

**Technical Assistance:**

- 1. Technical assistance provided for to create a civil rights complaint log.** FNS 113-1 and the *Administrative Review Manual*, 2017-2018 edition, requires SFAs to document complaints alleging discrimination within its school meal programs to include the date the complaint was made, whether the allegation was made verbally or in person, the staff member receiving the complaint, and the date the complaint was forwarded to NDA.

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## Administrative Review Report

### Food and Nutrition Division

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#### 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. Professional Standards Learning Codes and Training requirements

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