



Pershing County School District
Administrative Review Report

April 23, 2020

National School Lunch Program
Food and Nutrition Division

Administrative Review Report

Food and Nutrition Division



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I. Executive Summary

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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 Veggies Program administered by Pershing County School District (PCSD) from March 2-4, 2020.

An exit conference was held on Thursday, March 4, 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 Pershing County School District (PCSD) 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, March 2, 2020. The review was conducted at the Pershing County School District in Lovelock, Nevada. The Administrative Review was conducted by Reece Winfield, School Nutrition Coordinator II; and Bailey Taber, School Nutrition Coordinator II. PCSD staff included Julie Myers, Food Service Manager; Lisa Clark, Finance Officer; and Russel Fecht, Superintendent. This report is based on the results on 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, March 4, 2020 which provided a summary of the work performed at PCSD 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, December 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:

- Lovelock 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 PCSD'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 Organization and Food Quality: the kitchen staff at PCSD do a nice job of maintaining the cleanliness of the facilities and providing quality food and service to the students. They have also done very well in utilizing equipment grants to upgrade many of their facilities and equipment.

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- School Wellness: PCSD has met its School Wellness goals for the 2018-2019 school year. Pershing has an involved wellness committee that creates a positive environment for student wellness in Pershing County.
- Document Records: PCSD kept adequate physical files and records to allow for manual tracking and review of all areas of the administrative review.

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
- 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

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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); 210.19(c)(2)(ii); and the *Eligibility Manual For School Meals* (July 18, 2017 edition).

Finding		Corrective Action	Due Date
#1	<p>Meal Counting and Claiming 7 CFR 210.8 requires that SFAs implement internal controls to ensure accuracy of meal counting and claiming procedures.</p> <p><i>Repeat Finding-</i> The on-site meal counts for PCSD did not match what was claimed for the month of review, December 2019. See Appendix C for a list of discrepancies.</p>	<p>(1) Resubmit claimed meals in CNP for month of December to reflect actual served and counted meals.</p> <p>(2) Create a business process to ensure meal counts are counted and consolidated correctly. Business process should include:</p> <ul style="list-style-type: none"> Names and/or titles of person(s) responsible for completing Signatures from all applicable staff 	<p>(1) May 8, 2020</p> <p>(2) May 23, 2020</p>

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
#2	<p>Menu Production Records (MPRs) 7 CFR 210.10 (3) requires schools or SFAs to maintain daily Menu Production Records to</p>	<p>(1) Submit menu production records for the following:</p>	<p>(1) May 8, 2020</p>

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	<p>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> The MPR for the month of review, December 2019, the following deficiencies were noted:</p> <ul style="list-style-type: none"> • Fruit is not being served with every meal for middle and high school breakfast 	<p>a. December 2019-all sites</p> <p>(2) Complete NDA’s Menu Production Workbook Training (found in Appendix D) Submit to NDA the dates, times, and signatures from all staff that completed the workbook.</p> <p><i>**The review of the menu production records may result in additional corrective action and/or fiscal action.</i></p>	<p>(2) May 8, 2020</p>
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Food Safety, Storage, and Buy American– SFAs must ensure that all school sites meet the food safety and storage requirements. This includes any facility where food is stored, prepared, or served for the purposes of the NSLP, SBP and other FNS programs. References include but are not limited to 7 CFR 210.13(c) (1-3); NRS 439.200, 444.335; NRS chapter 446; and *Guidance for School Food Authorities: Developing a School Food Safety Program Based on the Process Approach to HACCP Principles*.

	Finding	Corrective Action	Due Date
#3	<p>Hazard Analysis Critical Control Point (HACCP) Manual</p> <p>7 CFR 210.13 (c) requires SFA to establish a food safety program for any facility where food is stored, prepared or served.</p> <p>HACCP manual reviewed onsite was out of date (expired 2015).</p>	<p>Update the HACCP manual for PCSD. The HACCP manual should include:</p> <ul style="list-style-type: none"> • Table of Contents • Standard Operating Procedures for all aspects of food handling from receiving to serving • Be specific to the site’s operation • Date of last review/update <p>Submit to NDA for review and approval.</p> <p>Resources for creating a HACCP plan can be found at the Institute of Child Nutrition: https://theicn.org/icn-resources-a-z/food-safety</p>	May 8, 2020

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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> PCSD’s procurement plan was missing the following required components:</p> <ul style="list-style-type: none"> • Prohibit the acquisition of unnecessary or duplicative items • Written procedures for procurement transactions that ensure that all solicitations incorporate a clear and accurate description of the technical requirements for the material, product, or service to be procured • Assure that small, minority and women's businesses enterprises and labor surplus firms are used when possible 	Update PCSD’s current procurement plan to encompass all the required elements as outlined in 7 CFR.318. Submit to NDA for review and approval.	May 23, 2020

VIII. Recommendations and Technical Assistance

Recommendations:

1. **Incorporate School Gardens/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

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- 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 E for more information.
2. **Implement automatic system for student identification in meal lines-** technology use such as student ID scanners or number keypads which enable students to enter their own IDs may help significantly, both to free up the food service manager to fulfill other administrative responsibilities, and to allow other trained personnel to fill in during staffing substitutions.
 3. **Utilize janitorial services during meal services or re-delegate kitchen help-** kitchen staff are stretched thin with their required daily duties and during meal service over a four-day service week. Upper level kitchen staff were witnessed hurriedly emptying trashes and wiping down tables in the middle of a busy service line, yet no janitorial staff were witnessed at the schools at any time over the course of the Administrative Review. Janitorial assistance, if available, may be instrumental in enabling a more cohesive and smooth-flowing meal service and nutrition program.

Technical Assistance:

1. Record notes regarding communication with families, including dates of contact attempts and extenuating circumstances. Several applications for FRL needed correction or more information. One application was verified later than ten days following receipt, and one application had no SSN and the box, “No SSN,” was unchecked. Other applications appeared to be miscategorized or missing information, but clarification was provided by PCSD staff.
2. Only allowable fruit alternatives should be served at breakfast. 100% juice, or a vegetable are the only two allowable alternatives to serving fruit at breakfast. On 12/4 it was noted that at the MS/HS strawberry yogurt was served and listed as the fruit component under the juice category. This is not an allowable substitution and could result in fiscal action in the future.
3. Add all missing required information on the Professional Standards Training tracking log. Training and tracking log was missing individual titles and hire dates. With only two and a half months left in the school year, Julie had completed only half of the required training hours. USDA training tracker template was supplied along with recommendation for keeping up with training hours spaced throughout the school year.
4. Post most recent Health Inspection report in a visible place in cafeteria. Certificate of completion and passing score was posted, but report must be made available for public view as well.
5. Opened food items and ingredients must be properly labeled. Multiple items in refrigerators at both LES and the MS/HS kitchens were kept in unlabeled containers or packaging other than the original. All opened food must have proper labeling, as

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- per regular health and safety standards, that identifies the food and the date after which it must be thrown out (seven days or less—follow standards).
6. Follow First-In-First-Out guidelines and throw out expired food products. Several ingredients in both kitchens were found in the dry storage areas that were past their expiration date. Guidance was provided to follow proper food storage procedures.
 7. Post weekly/daily menu in or directly outside of cafeteria for students and staff to view. Discussed multiple options, including printed version, erasable marker-board, or other.

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
- B. Procurement Review Detail
- C. Meal Counting and Claiming Discrepancies List
- D. Menu Production Workbook Training
- E. Guidance on Farm to School and Local Purchasing

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