

**Pyramid Lake Jr/Sr High School**  
*Administrative Review Report*

February 8, 2022

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 and SBP, administered by Pyramid Lake Jr/Sr High School from January 11-12, 2022.

An exit conference was held on Wednesday, January 12, 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 Pyramid Lake Jr/Sr High School 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 Tuesday, January 11, 2022. The review was conducted at the Pyramid Lake Jr/Sr High School in Nixon, Nevada. The Administrative Review was conducted by Brittany Mally, Dan Pimm, and Tom Doughty. Pyramid Lake Jr/Sr High school staff included Genevieve John and Tina Moore. 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, January 12, 2022, which provided a summary of the work performed at Pyramid Lake Jr/Sr High School 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, November 2021. 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 Pyramid Lake Jr/Sr High School'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**

- Kitchen Organization: Thorough temperature logs and daily cleaning, the kitchen is well organized and clean.
- Scratch cooking: Scratch cooking is provided quite often for the students at Pyramid Lake Jr/Sr High School. This is noteworthy as it is the preferred prep method by students and faculty alike.

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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**

**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>Production Records</b> Menu Production Records (MPR) must be maintained in accordance with Food &amp; Nutrition Services (FNS) guidance. Production records for the review month of November 2021 were reviewed.</p> <p>Repeat Finding- Amount Needed/Pulled Column The regulatory requirement is to show how much food was used to produce the meals in terms of amount pulled, and not filled in by numbers. This detail is expected to be listed for each bulk amount of food used for each of the menu items.</p> <p>Leftover Column: Indicate if the leftover food items are saved or discarded. Currently there is a total amount listed as leftover, but it cannot be determined what is done with the leftover food.</p>	<p>Send completed MPRs for one week’s worth of meals for both breakfast and lunch.</p>	<p><b>March 10, 2022</b></p>
#2	<p><b>Menu Certification Worksheets</b> School operating NSLP and/or the SBP must prepare, offer, and serve meals to students that meet the meal pattern requirements for the appropriate age/grade groups on all reimbursable meal service lines. Menus for the review month of November 2021 were reviewed.</p> <p>USDA worksheets were not updated and submitted for breakfast. We have the</p>	<p>Please review the breakfast worksheets (attached) for menu updates and complete the</p>	<p><b>March 10, 2022</b></p>

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	worksheets submitted from the SSO review in SY 20/21.  The meal pattern requirements are not met for the following weeks: <ul style="list-style-type: none"> <li>• Week 2 – short ¼ cup Other Vegetables (over entire week)</li> <li>• Week 3 – short ½ cup Red/Orange Vegetables (over entire week). Short on Whole Grain Rich – only 25% over the entire week, should be 100%</li> <li>• Week 4 – short ½ cup Red/Orange vegetables (over entire week).</li> </ul>	Simplified Nutrient analysis correctly.  Alter the menu or serving sizes for these weeks so that the meal pattern requirements are being met. Update and resubmit the lunch worksheets for weeks 2-4.	
#3	<b>Nutrient Analysis</b> All areas must be compliant for age/grade groups for total calories, saturated fat, and sodium requirements as set forth with HHFKA of 2010 for each age/grade group.  Repeat Finding- Pyramid Lake Jr/Sr High School does not use a nutrient software program, so they must complete the USDA worksheets including the Simplified Nutrient analysis tab to determine if the school is meeting the dietary specifications. This was submitted but it is not filled out completely so the nutrient analysis is incomplete and therefore not in compliance. All sides (meaning all fruit and veggies offered) and condiments need to be included with their calorie, saturated fat, and sodium amounts.	Please completely fill out the Simplified Nutrient Analysis tab (on the USDA worksheet) for each week of the lunch cycle menu. Make sure all fruits, veggies, and condiments are included in this analysis.	<b>March 10, 2022</b>
<b>General Program Compliance</b>			
<b>Professional Standards</b> – 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>
#4	<b>Professional Standards Tracking</b> The Excel tracking spreadsheet used by Pyramid Lake Jr/Sr HS to track staff member training does not show the length of training	Completely fill out and submit the Professional Standards Training tracking Sheet. File a	<b>March 10, 2022</b>

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	<p>per session attended. No time of training entered makes it difficult to assure all staff has met the required number of Performance Standard hours.</p> <p>Repeat Finding- Pyramid Lake is using the same tracking sheets as last review. This must be updated with the length of training time to assure the staff meets the required number of Performance Standard Training hours.</p>	<p>copy of the tracker for every food service employee.</p>	
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**Wellness Policy** – 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; 7 CFR part 210 Appendix B; and The Healthy Hunger Free Kids Act Section 9A (204).

	<b>Finding</b>	<b>Corrective Action</b>	<b>Due Date</b>
#5	<p><b>Triennial Assessment</b> The HHFKA final rule requires all local school wellness policies to be reviewed and/or updated once every three years.</p> <p>Pyramid Lake School Nutrition-Food Service Wellness Policy has not been reviewed/updated since 10/04/2017.</p>	<p>Submit a proposed timeline for Pyramid Lake School-Nutrition-Food Service Wellness Policy to be reviewed and/or updated for the 2021-2022 school year and a business policy/process to establish a regular update of the Local School Wellness Policy triennially.</p>	<b>March 10, 2022</b>
#6	<p><b>Availability to the public</b> LSWP needs to be made available to the public. There is no wellness policy on the school website.</p>	<p>Post the wellness policy to the school website.</p>	<b>March 10, 2022</b>
#7	<p><b>SW Committee Meeting 2x/year</b> A Local School Wellness stakeholder/committee needs to meet at least twice a year. There is no committee at Pyramid Lake Jr/Sr High School.</p>	<p>Form a school wellness committee and report who is on the committee. Also, create a business policy/process to replace members and keep a committee in place. Please submit a timeline/dates for when this committee will meet</p>	<b>March 10, 2022</b>

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		this school year and what topics will be covered at the meetings.	
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**VIII. Recommendations and Technical Assistance**

**Technical Assistance:**

1. Technical assistance provided for including Offer versus Serve (O vs. S) to Jr High students. Currently Pyramid Lake is only providing O vs. S to their Sr High School Students. The school is also providing the same serving portion sizes to both grade types. If Pyramid Lake switches their Jr High School to O vs. S it will improve their efficiency at set up and clean up between serving grade levels, plus make them more efficient with their meal production sheets (only needing 1 vs 2) and meal counts. Plus, the Jr High students should like the variety more and it might lower the waste of unwanted types of food thrown out by students.
2. Technical assistance provided for HACCP manual. Pyramid Lake Jr/Sr High School’s HACCP manual is outdated. The Nevada Department of Agriculture sent a link for a more up to date HACCP preparation manual. It is recommended that Pyramid Lake Jr/Sr High School print and replace their current binder.
3. Technical assistance recommending Pyramid Lake go to bid Milk, Bread, and use DoD Fresh. Considering the high prices Pyramid Lake is paying for commercial staples such as milk, bread, and produce, it is recommended that they send out a request for bid to current and new distributors and vendors in their area. This should lower their negative balance in their non-profit food service account. Please see Attachment B: Procurement Review for further details.
4. Technical assistance provided using low or non-fat dressing and margarine. Making food from scratch is preferred by students. However, if Pyramid Lake has any difficulties meeting the fat content requirements, it may be necessary to use low-fat or fat-free salad dressings and consider using margarine or butter instead of lard.

**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.

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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. Breakfast Worksheets
- D. Professional Standards Training Tracking Sheet

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