



**Nevada  
Department  
of Agriculture**

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**Storey County School District**  
*Administrative Review Report*

November 7<sup>th</sup>, 2023

National School Lunch Program  
***Division of Food and Nutrition***



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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 an 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 STOREY COUNTY SCHOOL DISTRICT from 10/10/2023 to 10/11/2023.

An exit conference was held on 10/20/2023 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 STOREY COUNTY SCHOOL DISTRICT staff for the time and assistance extended to our State Agency staff during this process.

## **II. Introduction**

An entrance conference was conducted on 10/09/2023. The review was conducted at the STOREY COUNTY SCHOOL DISTRICT in Virginia City, Nevada. The Administrative Review was conducted by Allen Whitenack. STOREY COUNTY SCHOOL DISTRICT staff included. This report is based on the results of the offsite assessment, the onsite review of files, and meal service observations of the SFA's participating programs. An exit conference was held on 10/20/2023 which provided a summary of the work performed at STOREY COUNTY SCHOOL DISTRICT 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 for the month of review, May 2023. The Procurement Review covered all documents, records, invoices, and procedures relating to the procurement for the SFA for the year of review, school year 2022-2023.

## 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 STOREY COUNTY SCHOOL DISTRICT'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 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

Storey County staff were highly receptive to technical assistance and willing to make changes quickly.

Hillside Elementary was well organized, clean, and had efficient meal service.

## 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
  - Paid Lunch Equity
  - Indirect Costs
- General Areas
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  - SFA On Site Monitoring
  - Local School Wellness Policy
  - Smart Snacks in School
  - Water Availability
  - Food Safety
  - Reporting and Recordkeeping
  - SBP and SSO Outreach
- Procurement
  - Procurement Plan
  - Code of Conduct
  - Procurement Documents and Records

**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); and 210.19(c)(2)(ii).

Site Name	Question Finding	Corrective Action	Due Date
	Q203 Sponsor Verification-In Sponsor Verification Report no applications were selected for verification. Per Sponsor Verification Report, 20 applications were received in School Year 22-23. The appropriate minimum number of applications reviewed should have been 3.	Submit a written business process to follow Sponsor Verification requirements. Submit to NDA for review. Please see appendix for Sponsor Verification instructions.	12/07/2023
	Q303 Meal Counting and Claiming-During Technical Assistance observation of lunch service at Virginia City Middle School it was noted that students were not offered or served all five of the required components for a reimbursable meal.	Technical Assistance was given on site instructing Nutrition Staff that students must take all five components of the meal for it to be counted as reimbursable as Virginia City Middle School is currently operating straight service.	12/07/2023
	Q130 Certification and Benefit Issuance-Denial of benefits was not communicated to households.	Create a written business process that can effectively communicate denial of benefits to applicants. Submit to NDA for review. Once approved, send denial of benefits letter to parent/guardian of denied students within 10 days of determination.	12/07/2023

**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.

Site Name	Question Finding	Corrective Action	Due Date
	Q601 Dietary Specifications and Nutrition Analysis-During review of existing Nutrient Analysis for Hugh Gallagher Elementary multiple issues were noticed. During the week of 5/1-5/5/23 tomato sauce was credited when ketchup was served with corn dogs, and there were no grains offered on 5/3/23. During the week of 5/8-5/12/23 tomato salsa was credited as 3/4 cup red/orange veg. During observation it was noted that the tomato salsa was a 2oz portion. White beans were credited on a day with no school. A 4-day analysis should have been used for this week instead of the 5 days as it was a short week. The week of 5/15-5/19, a 4-day analysis should have been used as it was a short week as well. During the week of	Provided updated Nutrient Analysis for the entire menu cycle that reflects any 3- or 4-day school weeks to NDA for review. Create a written business process for SFA to catalog and store all CN labels, recipes, and/or ingredient lists for all items served at Hugh Gallagher Elementary and Virginia City Middle School. Send to NDA for review. NDA will schedule follow-up visit to review updated menu, labels, and meal service at Hugh Gallagher and Virginia City Middle School.	12/07/2023

5/22-5/26/23 it was noted that celery was being credited at 1 cup when the production sheet listed 1/2 cup. There were no CN labels or recipes available for review.

Hugh Gallagher Elementary	Q401	Meal Components and Quantities- During lunch observation 8 meals did not contain all five of the required components for a reimbursable meal.	Technical assistance was given to substitute nutrition staff regarding the requirement that all items must be provided to each student for the meals to be considered reimbursable. Please note- due to the meals not containing the required elements this finding does require fiscal action in the amount of \$33.60 in the form of an open claim adjustment. Please see open claim adjustment form for more information.	12/07/2023
Hugh Gallagher Elementary	Q403a	Meal Components and Quantities (Fluid Milk)-The SFA must ensure that at least two choices of fluid milk from the following list are offered throughout the meal service: fat free and/or low fat (1%) flavored or unflavored milk. During both breakfast and lunch observation only one type of fluid milk was offered.	Technical assistance was given to food service staff that two types of fluid milk must be offered with both breakfast and lunch. Food service staff was able to provide two types of milk for the remainder of service.	12/07/2023
Hugh Gallagher Elementary	Q404a	Reimbursable Meal Signage-The U.S. Department of Agriculture (USDA) regulations for the National School Lunch Program (NSLP) and School Breakfast Program (SBP) require school food authorities (SFA) to post cafeteria signage that provides clear information about the daily planned reimbursable meals and all allowable choices. The purpose of this signage is to prevent unintentional purchases of a la carte items and help students choose a reimbursable meal. Signage for reimbursable meal was not available during observation.	Sponsor shall post signage as to what constitutes a reimbursable meal in a prominent location. Once posted, send photo proof of signage to NDA for review. Please see appendix for examples of approved signage options.	12/07/2023
Hugh Gallagher Elementary	Q408	Performance-Based Reimbursement- Observations during meal service, lack of CN labels, recipes, and production records will require the removal of Performance-Based Reimbursement.	NDA will review the updated menus, nutrient analysis, production records and conduct a follow up visit at which time Performance-Based Reimbursement can be reinstated if appropriate changes have been made.	12/07/2023
Hugh Gallagher Elementary	Q409	Meal Components and Qualities-SFAs are required to maintain documentation that demonstrates how meals offered to students meet meal pattern requirements.  Meal production records were not completed or provided during observation.	Provide NDA completed production records for the review period and submit to NDA for review. If production records are missing/unavailable documentation such as invoices and/or food inventory tracking records can be used to recreate missing documentation but should not be used in lieu of production records.	12/07/2023

\*Please note the review of the menu production records may result in additional corrective action and/or fiscal action.

### Comprehensive Resource Management

All revenues and expenses under the nonprofit school food service account must be allowable- used only for the operation and improvement of the food service and net cash resources may not exceed three months' average operating expenses. References include not are not limited to 7 CFR 210.14.

Site Name	Question Finding	Corrective Action	Due Date
	Q700 Resource Management-Reviewer was unable to track revenue accounts with documents provided and how it is separated from School District's General Fund.	Provide documentation of separate non-profit food service account or how funding is being tracked at the district level.	12/07/2023

### General Program Compliance

#### Civil Rights

Regulations require SFAs to comply with civil rights provisions to ensure that no child is denied benefits or otherwise discriminated against because of race, color, national origin, age, sex, or disability. References include but are not limited to 7 CFR 210.23(b), 7 CFR 210.18(h)(2)(ii), FNS Instruction 113-1, USDA memo SP59-2016.

Site Name	Question Finding	Corrective Action	Due Date
	Q801 Public Media Release-A public media release is required annually that must contain the free and reduced Income Eligibility Guidelines. The public release must also explain that when known to the school district, households will be notified of their children's eligibility for free meals if they are members of households receiving assistance from SNAP, TANF, FDPIR, and/or other categorically eligible sources.	Create a public media release that contains the required elements as stated or use the supplied media release. If using the supplied media release, the release must specify the responsibilities NDA will assume and the school(s) covered by the release. Submit to NDA for review. Once approved, post publicly.	12/07/2023
	Q806 Civil Rights Training-Annual civil rights training is required for staff who interact with program applicants or participants (i.e., cafeteria staff, determining official) and their supervisors.	Create an annual civil rights training for Storey County School District staff or use NDA provided training through CNP system. Documentation must indicate that the following subjects are covered: Collection and Use of Data, Effective Public Notification Systems, Complaint Procedures, Compliance Review Techniques, Resolution of Noncompliance, Requirements for Reasonable Accommodations of Persons with Disabilities, Requirements for Language Assistance, Conflict Resolution, and Customer Service. If not using NDA supplied training, submit training and training log of attendees to NDA for review.	12/07/2023
Hugh Gallagher Elementary	Q811 Civil Rights-FNS Instruction 113-1 requires that all participating schools prominently display the USDA nondiscrimination poster "And Justice for All" in service area.	Post And Justice for All Poster in prominent location. The poster must be placed in a location that enables program participants to read the text of the poster without obstruction. Once posted, send photo proof to NDA for review.	12/07/2023

And Justice for All Poster was not present in school.

**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

Site Name	Question Finding	Corrective Action	Due Date
	Q1216 Professional Standards Training Tracking-7 CFR 201.30(g) requires all SFAs to track and maintain records regarding employee's annual training. USDA's Professional Standards Training Tracker may be used, or an alternative tracking tool may be developed but must include at minimum these required fields: employee name, hire date, employee position, required hours of annual training, training title/subject, length of training, school year training is applied to, and completed training hours to date.	Repeat Finding: Develop a training tracker and submit to NDA for review or use the USDA's Training Tracking Tool available here: <a href="https://pstrainingtracker.fns.usda.gov/">https://pstrainingtracker.fns.usda.gov/</a> . Once approved, create a business plan to ensure all nutrition staff are scheduled for training by December 4, 2023.	12/07/2023

**Local School 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).

Site Name	Question Finding	Corrective Action	Due Date
	Q1002 School Wellness Policy-Nevada's School Wellness Policy states stakeholder/committee needs to meet at least twice a year. There were no committee meetings scheduled for 23-24 school year.	Create a business policy to have the school wellness committee meet at the minimum of two times per year. Please submit a timeline/date for when this committee will meet this school year and what topics will be covered at the meeting.	12/07/2023
	Q1003a School Wellness Committee-Parents and guardians, students, physical education teachers, school health professionals, school administrators, the school board, representatives of the school district, and the general public must be permitted to contribute to the development, implementation, periodic review, and update of the local school wellness policy.	Form a school wellness committee and provide the list of committee members or documentation of recruitment of specified committee members to NDA for review.	12/07/2023
	Q1005 Implementation of School Wellness Policy-The HHFKA final rule requires all local and school wellness policies to be reviewed and/or updated once every three years. During review it appears the Storey County School Wellness Policy had not been updated since SY 2016-2017.	Create a written business plan that includes information on a wellness policy assessment. The assessment must include the extent to which schools are in compliance with the local school wellness policy, the progress made toward attaining the goals of the local school wellness policy, and the extent to which the local school wellness policy compares to a model Local School	12/07/2023



Wellness Policy. Submit the business plan to NDA for review.

**Food Safety**

Regulations require SFAs to establish a food safety program and maintain facilities in accordance with Federal, State, and Local Health Code regulations to reduce risks of food borne illnesses. References include but are not limited to 7 CFR 210.13, USDA Guidance for School Food Authorities: Developing a School Food Safety Program, NRS 429.200, 444.335, and NRS chapter 446.

Site Name	Question Finding	Corrective Action	Due Date
Hugh Gallagher Elementary	Q1404 Hazard Analysis Critical Control Point (HACCP) Manual- 7 CFR 210.13 (c) requires SFA to establish a food safety program for any facility where food is stored, prepared, or served. There was no HACCP manual on site at Hugh Gallagher Elementary.	Create a site-specific HACCP manual. The HACCP manual should include Table of Contents, Standard Operating Procedures for all aspects of food handling from receiving to serving, be specific to the site's operation, and Date of last review/update. Submit to NDA for review and approval.	12/07/2023
Hugh Gallagher Elementary	Q1405a Food Safety Inspection Report-FNS requires the most recent food safety inspection report to be posted in a location visible to the public	Provide a copy of the most recent food safety inspections for NDA for review. Post in a conspicuous location. If 2 food safety inspections have not been performed, sponsor will need to contact State of Nevada Environmental Services to set up a bi-annual inspection schedule and send documentation of request to NDA for review.	12/07/2023
Hillside Elementary School	Q1405c Food Safety Reviews-Food Safety Inspections were not completed bi-annually.	Request a bi-annual Food Safety Inspection schedule from State of Nevada Environmental Services. If State of Nevada is unable to provide 2 health inspections per year, provide documentation of request to NDA for review.	12/07/2023
Hugh Gallagher Elementary	Q1408 Food and Refrigeration Temperature Logs-The SFA must monitor and record food temperatures. The SFA must also monitor and record refrigerator and freezer temperatures. Food temperatures must be recorded for all meals on a temperature log. During observation there were no temperature logs for hot or cold food, refrigerators, and freezers. A temperature log needs to be created for every refrigerator, freezer, and milk cooler. Each item should be monitored and recorded twice a day (morning and late afternoon). This log should be posted on every refrigerator, freezer and milk cooler. Temperatures should be taken using an internal thermometer (not the item's external gauge).	Provide NDA 2 weeks' worth of temperature logs for review. If none available, create temperature logs for all refrigerators, freezers, warmers and submit 2 weeks' worth of temperature logs for review.	12/07/2023
	Q1401 Food Safety and Storage-SFA is required to ensure that facilities for the handling, storage, and distribution of	Ensure all food items are stored at least 6" off ground, send photo proof to NDA for review once completed.	12/07/2023

purchased and donated foods are properly safeguarded against theft, spoilage, and other loss. During observation boxes of fruit juice were being stored on the floor of Virginia City Middle School.

### Reporting and Recordkeeping

Regulations require SFAs to submit reports to NDA to report to RNS compliance with program requirements as well as for SFAs to retain records for three years plus the current year. References includes but is not limited to 7 CFR 210.20 and 7 CFR210.23(c).

Site Name	Question Finding	Corrective Action	Due Date
	Q1501 Reporting and Recordkeeping-Sponsor was unable to provide the previous year's production records, temperature logs and food safety inspections for Hugh Gallagher Elementary.	Create a written business process for the storage and handling of all NSLP documents at a central location for a minimum of 3 years after the final claim for reimbursement. Submit to NDA for review. * Please note that without proper document storage and handling, meal claims may be withheld.	12/07/2023

## VII. Recommendations and Technical Assistance

### Recommendation:

-A nutrient analysis software program may alleviate some of the issues by using the USDA nutrition analysis spreadsheets. Approved USDA Nutrient Analysis Software: <https://www.fns.usda.gov/tn/usda-approved-nutrient-analysis-software>

-Using a K-12 catalog for ordering food products for Hugh Gallagher Elementary and Virginia City Middle School will also help to maintain the whole grain requirements of the NSLP Program.

### School Wellness Resources

<https://www.fns.usda.gov/tn/local-school-wellness-policy-implementation-tools-resources#2>

<https://www.healthiergeneration.org/take-action/schools/wellness-topics/policy>

The Institute of Child Nutrition -This site has a multitude of free School Nutrition training courses available to assist with your Professional Standards requirements: <https://theicn.org/>.

## 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:**

Sponsor Verification-

<https://www.fns.usda.gov/cn/verification-toolkit>

Reimbursable Meal Signage-

<https://www.fns.usda.gov/tn/sbp-materials>

<https://www.fns.usda.gov/tn/school-lunch-resources>

<https://www.fns.usda.gov/tn/todays-lunch>

Training Tracker-

<https://pstrainingtracker.fns.usda.gov/>