



Storey County School District
Administrative Review Report

December 24, 2019

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 administered by Storey County School District (SCSD) from December 3, 2019.

An exit conference was held on Tuesday, December 3, 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 Northeastern Nevada Juvenile Detention Center 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, December 3, 2019. The review was conducted at the Storey County School District in Lockwood, Nevada. The Administrative Review was conducted by Bobbie Beach, School Nutrition Specialist. SCSD staff included Anne Simons, Food Service Manager; Esmie Hess, Student Information Systems Coordinator; and Kristen Chandler, Business Manager. This report is based on the results of the offsite assessment, the onsite review of files, and meal service observations of the lunch program. An exit conference was held on Tuesday, December 3, 2019 which provided a summary of the work performed at SCSD 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.

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 SCSD'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

- Overall Program Improvements- SCSD has reduced the number of Administrative Review findings from 11 findings to 4 findings.

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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
 - Dietary Specifications and Nutrient Analysis
 - Menu Production Records

- 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

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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.			
	Finding	Corrective Action	Due Date
#1	<p>Meal Components and Quantities SFAs operating NSLP must follow meal pattern requirements for each age grade group within all reimbursable meal service lines including offering minimum quantities of all food components and vegetable subgroups over the week</p> <p>For the month of review, SCSD fell short of meeting the minimum vegetable subgroups over the week for the K-5 NSLP meal pattern.</p> <ul style="list-style-type: none"> • Week 1 (Aug 19-23) missing ½ cup of legumes • Week 2 (Aug 26-30) missing ½ cup starchy and ½ cup dark green vegetable 	Submit a menu for January 2020 indicating how the vegetable subgroups detailed in Appendix E will be met over the week to NDA for review and approval.	January 24, 2020
#2	<p>Dietary Specifications and Nutrient Analysis 7 CFR 210.10 (f) and 7 CFR 220.8 (f) require SFAs to offer school meal programs consistent with the federal standards for calories, saturated fat, sodium, and trans-fat.</p> <p>For the month of review, SCSD was not meeting the calorie minimum over the week for the K-5 NSLP meal pattern (550-650 calories). The weighted average calories were 433.</p>	Submit a nutrient analysis by week for January 2020’s menu detailing how calories will be raised to meet the minimum calorie level (550) for the K-5 NSLP meal pattern.	January 24, 2020

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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

	Finding	Corrective Action	Due Date
#3	<p>Professional Standards Tracking 7 CFR 210. 30 (g) requires all SFAs to track and maintain records regarding employees annual training. USDA’s Professional 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</p> <p><i>Repeat Finding-</i> At the time of review, SCSD was not tracking professional standards hours on an annual basis.</p>	<p>Update the current Professional Standards tracking system to include the missing required components or use <u>USDA’s Professional Standards Training Tracker 2.0</u>. Please send updated tracking system with the added required components.</p> <p>See Appendix D for Professional Standards Tracking Templates and learning codes</p>	January 24, 2019

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; 7CFR part 210 Appendix B; and The Healthy Hunger Free Kids Act Section 9A (204).

#4	<p>Triennial assessment The HHFKA final rule require all local school wellness policies to be reviewed and/or updated once every three years.</p> <p>SCSD School Wellness Policy has not been reviewed/updated since 07/13/2015.</p>	<p>Submit a proposed timeline for SCSD School 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.</p>	January 24, 2020
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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.

Technical Assistance:

1. Technical assistance provided to SCSD staff to utilize entitlement with their meal vendor to purchase USDA foods or DOD Fresh produce. Schools participating in NSLP are entitled to a value of USDA foods based on the number of lunches served in the previous year multiplied by a per meal rate set by USDA. Entitlement dollars used to purchase USDA foods or DOD Fresh products frees up money that would be otherwise be spent on commercial food purchases.
2. Technical assistance provided to correct missing a social security number. USDA's Eligibility Manual for School Meals requires income applications to be complete before processing including the last four digits of the primary wage earner's social security number or an indication that the adult household member does not have a social security number.
3. Technical assistance provided to identify an eligible case number on categorical applications. A valid case number must in Nevada must be nine digits in order to process an application for categorical eligibility.

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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 Resources

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