



**White Pine County School District**  
*Administrative Review Report*

June 24, 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 Achievements	3
VI.	Critical Areas of Review	4
VII.	Findings and Required Corrective Actions	5
VIII.	Recommendations and Technical Assistance	8
IX.	Corrective Action Response	9
X.	Appendix	9
	a. Appeal Procedure	
	b. Procurement Review	
	c. Meal Benefit Application Certification Errors Detailed	
	d. NDA Procurement Plan Template	

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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 White Pine County School District from May 20-21, 2019.

An exit conference was held on Tuesday, May 21, 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 White Pine County School District (WPCSD) 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, May 20, 2019. The review was conducted at the WPCSD in Ely, Nevada. The Administrative Review was conducted by Bobbie Beach, School Nutrition Coordinator II; and Rose Wolterbeek, School Nutrition Specialist. WPCSD staff included Kathryn Brunson, Nutrition Secretary; and Paul Johnson, Chief Financial Officer. Chartwells staff included Jake Culbert, Director of Dining Service; John Chiu, West Region District Manager; and Betsy Myers, West Region Dietitian. 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 Tuesday, May 21, 2019 which provided a summary of the work performed at WPCSD 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, February 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 2017-2018. Meal observations were conducted at the following sites as a part of the on-site Administrative Review:

- David E. Norman 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 WPCSD 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**

- Menu Production Records: All menu production records were complete, thorough, and accurate.
- Meal Benefit Application Processing: WPCSD significantly reduced the number of errors identities with the processing of meal benefit applications reducing its benefit issuance error percentage from 9.70% in school year 2015-16 to 3.8%.

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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
  - Revenue from non-program foods
  
- 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
  
- Food Service Management Company Contract

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**Administrative Review Report**  
Food and Nutrition Division



**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).

	<b>Finding</b>	<b>Corrective Action</b>	<b>Due Date</b>
#1	<p><b>Certification and Benefits</b> Applications received by SFA must be certified for the correct meal benefit level (either free, reduced or paid) as detailed in the <i>Eligibility Manual for School Meals</i>, July 18, 2017 edition.</p> <p>Of the 131 applications reviewed the following errors were noted:</p> <p>a. <u>Repeat Finding-Incorrect Benefit Certification</u>: Five (5) applications were missing information and/or certified for the incorrect benefit level. See Appendix C for details.</p> <p>b. <u>Repeat Finding-Application processing</u>: Thirty (30) applications were processed outside of the 10-day timeframe; seven (7) applications were missing the household number or listed the incorrect household number.</p> <p><i>** Incorrect meal benefit certification did result in overpayment totaling \$263.60. Due to USDA’s \$600 overpayment disregard, fiscal action will not be assessed.</i></p>	<p>a. Correct all applications listed in Appendix C. Submit a signed copy of Appendix C with the date in which the applications were corrected.</p> <p>b. (1) Create a business process to ensure all applications are processed accurately and in a timely manner. Process should include:</p> <ul style="list-style-type: none"> <li>• Names and or titles of staff involved in meal benefit application processing</li> <li>• Details on application processing timeline</li> <li>• Measures to accurately track when an application was received (ex: Date Stamp)</li> <li>• The information required to process an income application</li> </ul>	<p><b>a. July 24, 2019</b></p> <p><b>b. (1) July 24, 2019</b></p>

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**Administrative Review Report**  
Food and Nutrition Division



		<ul style="list-style-type: none"> <li>• When to contact a family regarding missing information. Have all applicable staff sign business process. Submit to NDA for approval.</li> </ul> <p>b. (2) Complete the <a href="#">Meal Benefit Application Training Module</a> July 2016 version from our NDA You Tube Channel (#13). Submit date and list of staff members who completed training to NDA.</p>	<p><b>b. (2) July 24, 2019</b></p>
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<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>
#2	<p><b>Professional Standards Training Tracking</b> 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>Tracking system currently in place is missing the following essential components: employee position, required hours of training, school year training is applied to and completed training hours to date.</p>	<p>Update the current Professional Standards tracking system to include the missing required components or use <a href="#">USDA’s Professional Standards Training Tracker 2.0</a>. Please send updated tracking system with the added required components.</p>	<p><b>July 24, 2019</b></p>

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**Administrative Review Report**  
 Food and Nutrition Division



**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 439.200, 444.335, and NRS chapter 446.

#3	<p><b>Hazard Analysis Critical Control Point (HAACP) Manual</b>          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>The HAACP plan at David E. Norman ES was outdated, unused, and was not site specific.</p>	<p>Update current HAACP manual to meet all federal, state, and local regulations. HAACP manual should include:</p> <ul style="list-style-type: none"> <li>• Standard Operating Procedures (SOP) that are site specific to the facilities and methods used to prepare foods.</li> <li>• Table of contents for users to easily identify needed food safety SOPs</li> </ul> <p>Submit to NDA for approval.</p>	<b>July 24, 2019</b>
#4	<p><b>Food Handling</b>          During the on-site review, multiple food handling issues were observed, including:</p> <ul style="list-style-type: none"> <li>• Hand washing not performed when switching tasks</li> <li>• Employee personal items such as food and drink kept in food service area.</li> </ul>	<p>Conduct a Food Handling/ Food Safety training for all WPCSD employees who have duties related to the School Nutrition Program. Submit documentation (training material, sign in sheet, etc.) to NDA for approval.</p>	<b>July 24, 2019</b>

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**Administrative Review Report**  
Food and Nutrition Division



<p><b>Procurement</b> – 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.</p>			
Finding		Corrective Action	Due Date
#5	<p><b>Procurement Plan</b> SFAs are required to have a procurement plan that includes all elements outlined in 2 CFR Part 200.320 with regards to procurement methods for program operators.</p> <p>WPCSD Policy Manual Section 4000 was missing the following required elements:</p> <ul style="list-style-type: none"> <li>• Prohibiting acquisition of unnecessary or duplicative items</li> <li>• Requiring solicitations to incorporate clear and accurate descriptions of technical requirements</li> <li>• Include preferences for minority and women’s business when possible.</li> </ul>	<p>Update WPCSD Policy Manual Section 4000 to include all required elements to suffice Federal Regulation CFR 200.320 or create separate procurement procedures specifically for WPCSD school nutrition program.</p> <p>See Appendix D for NDA’s Procurement Plan template.</p>	<b>July 24, 2019</b>

**VIII. Recommendations and Technical Assistance**

**Recommendations:**

- 1. Best Practice: All Site Managers attend an 8-hour food safety training.** An 8-hour food safety course for all Site Managers would be extremely beneficial to WPCSD staff and students to ensure food is handled properly and food borne illness risks are minimized.

**Technical Assistance:**

1. Technical assistance provided to add additional Offer versus Serve (OVS) signage to the breakfast line to assist students in selecting a reimbursable meal. 7 CFR 210.10(1)(2) requires that schools identify, near or at the beginning of serving lines, what foods constitute unit priced reimbursable meals. Schools using OVS must also identify what a student must select in order to have a reimbursable meal under OVS.
2. Technical assistance provided to David E. Norman Elementary School to establish a water station inside the cafeteria, the feeding locations. According to Healthy, Hunger-Free Kids Act of 2010 Section 203 and USDA numbered memo SP28-2011,

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# Administrative Review Report

## Food and Nutrition Division



schools participating in NSLP must make potable water available to children at no charge in a placed where lunch meals are served.

3. Technical assistance was provided to WPCSD to establish a Civil Rights Complaint Log. FNS Instruction 113-1 requires SFAs to maintain an annual record/log to document civil rights complaints. Log must note date complaint was received, description of complaint (verbal or written), and the date civil rights complaint was forwarded to State Agency

### 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. Meal Benefit Application Certification Errors Detailed
- D. NDA Procurement Plan Template

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