



Washoe County School District
Administrative Review Report

March 6, 2023

National School Lunch Program
Food and Nutrition Division

Administrative Review Report
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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, SBP, After-School Snack Program, and Fresh Fruit and Vegetable Program administered by Washoe County School District (WCSD) from February 6-23, 2023.

An exit conference was held on Thursday, February 23, 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 Washoe County School District 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, February 6, 2023. The review was conducted at the Washoe County School District in Sparks, Nevada. The Administrative Review was conducted by Erica Jaramillo, Dan Pimm, Allen Whitenack, Megan Jensby, and Brittany Mally. WCSD staff included Shirley Kakousky, Mike Supple, Jeffery Tenenbaum, Brielle Zimmerman, Kristy McDonald, Scott Schelb, Bernadette Goodnight, Alicia Waintroob and Shannon Brenneman. This report is based on the results of the offsite assessment, the onsite review of files, and meal service observations of the breakfast, lunch, snack, and fresh fruit and vegetable programs. An exit conference was held on Thursday, February 23, 2023, which provided a summary of the work performed at WCSD and we discussed any additional documentation needed, preliminary findings, and observations.

III. Scope

The Procurement Review covered all documents, records, invoices, and procedures relating to the procurement for the SFA for the year of review, school year 2021-2022. Administrative Review covered documents, records, and procedures relating to the administration of the NSLP for the month of review, December 2022. Meal observations were conducted at the following sites as part of the on-site Administrative Review:

- Sun Valley ES
- Alice Smith ES
- North Valley HS
- Desert Skies MS
- Mt Rose K-8
- Peavine ES
- Kate Smith ES
- Hug HS
- McQueen HS
- Corbett ES
- Pine MS
- Swope MS

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 WCSD'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

- Kitchens: WCSD kitchens were very clean and organized at all sites observed, especially Pine MS, North Valley HS, Alice Smith ES, Desert Skies MS, and Hug HS.

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- Recordkeeping: WSCSD demonstrates organization by keeping records neatly separated and accessible.
- Staff: All WSCSD staff were very helpful and supportive of each other. It was nice to see everyone work as a team.

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
 - 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 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).

	Finding	Corrective Action	Due Date
#1	<p>Certification and Benefit Issuance Applications received by SFA must be certified for the correct meal benefit level (either free, reduced or paid) as detailed in the Eligibility Manual for School Meals, July 18, 2017 edition.</p> <p>During the review of applications, it was noted that the determining official was converting all incomes to annual. Of the reviewed applications this did not change the eligibility status. However, this could lead to miscategorized eligibility and is the incorrect method to calculate income.</p>	<p>Retrain all staff that participates in the determining, confirming, and verifying of applications.</p> <p>Submit proof of completed training (sign-off sheet, certificates, etc.) to NDA for review.</p> <p>Reference: Eligibility Manual for School Meals and NDA Webinar</p>	April 5, 2023
#2	<p>Verification Verification of student’s eligibility must be completed on a sample of household applications per 7 CFR 245.6a(c). If the household refuses to cooperate in verification, per 7 CFR 245.6a(f)(4), their benefit shall be terminated (updated to paid).</p> <p>Of the reviewed verified application, two were miscategorized based on the following:</p> <ul style="list-style-type: none"> App #20230000236- Net income was used instead of gross income. Should have been changed to Paid. App #2023001663- Based on proof submitted should have been changed to Paid. 	<p>Retrain staff, as mentioned in finding #1, on completing verification. Also send notification letters to two households and update Benefit Issuance Document (BID) with accurate status.</p> <p>Submit proof of training, BID, and letters to NDA for review.</p>	April 5, 2023

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#3	<p>Meal Counting and Claiming Per 7 CFR 210.8, the meal counts for the review period must yield an accurate result, must be comparable to the day of review meal counts, and must not exceed the number of eligible students. Monthly and daily claim reconciliation must yield accurate meals.</p> <p>During meal observations the following was noted:</p> <ul style="list-style-type: none"> • Breakfast in the classroom (BIC) at Sun Valley ES: Teachers did not know that all components had to be served to students to count meals. A few students were missing fruit components on the initial handout of meals. • Lunch for Pre-K and specials classes at Corbett ES: Meal counts were not recorded as they were given to students. They were recorded by the Kitchen Manager as the teacher picked up meals from the cafeteria. This is not a true count of served meals. 	<p>1. Create a process to incorporate tally sheets for Pre-K and specials classes at Corbett ES to record lunch meals served to students in the classroom.</p> <p>2. Retrain BIC teachers on meal patterns and meal counting process.</p> <p>Submit proof of teacher retraining (Sign-in sheets, agenda, etc.) and 1 week of rosters from Corbett for classroom lunch service.</p>	April 5, 2023
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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
#4	<p>Offer Versus Serve (OVS) Per FNS under OVS, every student is offered the option to select the full amount of all five food components.</p> <p>During observations the following was noted:</p> <ul style="list-style-type: none"> • Lunch at North Valley HS: In the last few minutes of lunch service, the last service line ran out of vegetable components, leaving a few of the students without the option to select a vegetable with all entrée choices. • Lunch at Hug HS: The entrée of popcorn chicken was initially offered 	<p>Retrain staff on OVS, ensuring staff understands that all food components must always be on the service line. As well as ensuring staff understand which items are considered vegetable and grains.</p> <p>Submit proof of training to NDA for review.</p>	April 5, 2023

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	with tater tots with no grain option on the line. Once the tater tots ran out, Cheez-It's were offered in the entrée.		
#5	<p>Menu Production Records Production and menu records must be maintained in accordance with FNS guidance. Production records for the review month of December 2023 were reviewed.</p> <p>Production records missing the essential component: identifying meal component food items count towards.</p>	Add the required component to current production records in use. Submit a week's worth of production records (one week for each age group served), using your updated template.	April 5, 2023

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
#6	<p>Professional Standards Tracker 7 CFR 210.30(g) requires all SFAs to track and maintain records regarding employees' annual training. UDSA'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, hiring date, employee position, required hours of training, training title/subject, training date, length of training, school year training is applied to, and completed training hours to date.</p> <p>Current tracker in place is missing the following essential component: Training dates.</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 an updated tracking system with the added required components.	April 5, 2023

Smart Snacks in School- Regulations governing all food and beverages sold in school must meet nutritional standards as well as federal and local regulations. References include Healthy Hunger-Free Kids Act 2010, 7 CFR 210.11 and Nevada's School Wellness Policy.

	Finding	Corrective Action	Due Date
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#7	<p>Competitive Foods At a minimum, all competitive food sold to students on the school campus during the school day must meet the nutrition standards specified in 7 CFR 210.11(c). Per 7 CFR 210.11(b)(4), no specially exempted fundraiser foods or beverages may be sold in competition with school meals in the food service area during the meal service.</p> <p>During observations the following was noted:</p> <ul style="list-style-type: none"> • Bake sale during lunch service at Hug HS. • The vending machine at Pine MS turned on during the second lunch service and had non-nutrition standard food items. • Pre-K classroom at Corbett ES has snack dispenser; items inside purchased by teacher and not monitored by SFA. 	<p>1.Create a business process that explains how items in vending machines will be checked for compliant foods before they are purchased to be sold. Include names and/or position titles of all staff involved as well as their signature to show acknowledgement. Or install timer to keep machine off from the midnight before to 30 minutes after the school day. Include in the process who is responsible for timer.</p> <p>2.Create a business process that details how foods and snacks given and sold to students on campus and during the school day are smart snack compliant. Also, include how competitive foods that are non-compliant, including exemption days, are not sold during meal service.</p> <p>Submit both processes and signatures to NDA for review.</p>	April 5, 2023
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VIII. Recommendations and Technical Assistance

Recommendations:

1. **Share Table:** During meal observations at a few of the schools, share tables were not in use and students threw away a lot of food items. Consider implementing share tables district wide to help reduce food waste.
2. **Fresh Fruit and Vegetable Program (FFVP):** During FFVP observation, the teacher did not have an education sheet. Ensure that teachers are aware of where and/or how they can obtain FFVP education sheets if not delivered with produce.

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3. **Applications:** Because WCSD processes a lot of applications, consider implementing confirmation of eligibility determination on all processed applications to ensure accuracy.
4. **A La Carte:** At Kate Smith ES and McQueen HS, the a la carte purchases interfered with the line flow. Consider selling a la carte in a separate line or after all students have gone through for meal service.

Technical Assistance:

1. Meal Counting:

- Technical assistance was provided at Mt. Rose K-8 and Sun Valley ES to stop students if the items on their tray are not visible. Stopping and asking to see their trays will ensure that a reimbursable meal is taken before and counted.
- Technical assistance was provided at Mt. Rose K-8 to move the point of service closer to the end of the service line to improve meal counts and stop students from walking off without their meal being evaluated and counted.
- Technical assistance was provided at Mt. Rose K-8 to consider, for breakfast, switching from rosters to typing in name on POS. This will be more accurate than shuffling through rosters to find classroom and student.

2. Offer Versus Serve (OVS):

- Technical assistance was provided to post OVS signage at: Mt. Rose K-8, Sun Valley ES, North Valley HS, Alice Smith ES during on-site observations. Ensure signage is posted at all other sites.
- Technical assistance was provided to follow OVS guidance and stop heavily encouraging students to take all meal components. Students taking more than wanted leads to food waste, which was seen during meal observations.

3. Civil Rights: Technical assistance was provided to keep on record an annual log for civil rights complaints. This means for every school year regardless of if there was a complaint or not. The past three years plus current year were in civil rights binder by end of review.

4. Meal Consumption Times: Technical assistance was provided at Sun Valley ES to release tables in the sequence of first in first out. During observation, the last table that entered was the first one released. This sequence causes unequal mealtimes for different tables.

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5. Food Safety:

- Technical assistance was provided at Peavine ES and Hug HS to place internal thermometers in fridges. This was completed on site.
- Technical assistance was provided at Hug HS to have dishwasher log present. This was completed on site.

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. Eligibility Manual for School Meals
- D. [USDA OVS Signage Material](#)

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