

**National School Lunch Program (NSLP)  
Administrative Review Findings - Revised**

**Date: January 8 – February 8, 2018**

**Sponsor: Clark County School District**

Page 1 of 14

**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><b>Certification &amp; Benefits</b> a. Applications received by SFA must be certified for the correct meal benefit level (either free, reduced or paid); multiple errors were noted during the review of a randomized, representative sample of applications (360). Multiple income applications were considered incomplete because they were missing information, such as the names of all household members or clear income amounts and frequencies.</p>	<p>a. The benefits issuance document, or roster, must contain the following information as noted in the Administrative Review Manual page 30: “Contain the name and benefit status for all students certified as free or reduced price in the SFA.” To ensure applications are complete, create a business process for the individuals that manage the roster for CCSD and include the following:</p> <ul style="list-style-type: none"> <li>• Indicate who will be responsible for ensuring that the roster contains accurate information (name or title). Also include name or title of backup for this individual.</li> <li>• Describe the system that will be used to review the roster including at least quarterly reviews for accuracy.</li> <li>• Indicate how going forward, eligibility statuses such as “zero income” and “no applications” will no longer be used on the roster or indicate what steps will be taken to ensure that descriptions like these will also convey the student’s eligibility status of free, reduced-price, or paid.</li> <li>• Submit a copy of the business process to NDA for review.</li> </ul>	<p><b>September 17, 2018</b></p>
#2	<p><b>Verification Process</b> SFAs must complete to validate the certification and benefits issuance process; multiple errors were noted during the review of a randomized, representative sample of applications (30).</p>	<p>Create a business process that outlines when and how the verification process should end, including the following minimum information:</p> <ul style="list-style-type: none"> <li>• The number and types of communications that can be made to a household</li> <li>• Date verification officially ends</li> <li>• Actions that can be taken on November 15, when verification ends, for households that have not responded to information requests as part of verification</li> <li>• Indicate who is responsible for overseeing and ensuring that the</li> </ul>	<p><b>September 17, 2018</b></p>

**National School Lunch Program (NSLP)  
Administrative Review Findings - Revised  
Sponsor: Clark County School District**

**Date: January 8 – February 8, 2018**

**Page 2 of 14**

		<p>verification process is completed in the required time frames and the name or title of the individual who is the direct supervisor of the individual(s) who will be responsible for overseeing the verification process</p> <ul style="list-style-type: none"> <li>• The individual(s) responsible for completing the verification process and their direct supervisor should sign this business process indicating that they understand when and how to bring verification to a close and will comply with the Federal regulations governing the verification process.</li> <li>• CCSD should also submit a statement clarifying the status of their Verification process as well and submit a signed copy of this business process to NDA for review.</li> </ul>	
<b>#4</b>	<p><b>Household Notification Documents</b> NDA reviewed the Provision II notification letter, the approval letter, the denial letter, the notice of adverse action, and the direct certification letter. In these documents, the USDA nondiscrimination and use of information statement was not the same size as the font for the rest of the document.</p>	<p>Please update the listed documents and submit copies of them to NDA for review. The USDA nondiscrimination and use of information statement must be the same font size as all other text in the document it is a part of.</p>	<b>September 17, 2018</b>
<b>#5</b>	<p><b>Meal Counting and Claiming</b> SFAs must have a meal counting and claiming system that accurately counts, records, consolidates and reports the number of reimbursable meals by eligibility category; base claims for reimbursement on lunch counts are taken daily at the Point of Service (POS) which correctly identifies the number of free, reduced and paid lunches.</p> <ul style="list-style-type: none"> <li>• On-site review of the system used was conducted at a representative sample of school sites and multiple issues noted. (See Appendix C for a listing of issues by site.)</li> <li>• Breakfast after the Bell (SB503): on-site review of the system used during BAB had multiple issues</li> </ul>	<p>Create a policy or business process that governs counting and claiming within CCSD. This policy or business process should have the following:</p> <ul style="list-style-type: none"> <li>• It should direct staff to perform their counts only when meals are served to the students at the point of service.</li> <li>• Please describe how CCSD will enforce the counting and claiming policy in the future.</li> </ul> <p>Submit this policy or process to NDA for review. All meals that were counted improperly and were otherwise not compliant with program regulations will be recouped for the day of review. Please reference the fiscal action letter for these totals.</p>	<b>September 17, 2018</b>

**National School Lunch Program (NSLP)  
Administrative Review Findings - Revised  
Sponsor: Clark County School District**

**Date: January 8 – February 8, 2018**

**Page 3 of 14**

	<p>noted. (See Appendix C for a listing of issues by site.)</p> <p>According to Federal regulations governing counting and claiming, the following are ineligible: Pre-counts; pull counts; counts based on what is left over after a meal service; counts that do not occur at the point of service; and counts where a proper reimbursable meal is not verified by a staff member. A reimbursable meal may only be counted when it is served to the student at the point of service.</p>		
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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.

	<b>Finding</b>	<b>Corrective Action</b>	<b>Due Date</b>
<b>#7</b>	<p>Production and menu records must be maintained in accordance with FNS guidance. Production records for the review month of November 2017 were reviewed.</p> <ul style="list-style-type: none"> <li>Salad bar production records: of reviewed sites, these records do not clearly indicate what was prepared, served and left over; categories on the production record were measured differently. (E.g., serving size set as self-serve; served and leftovers in servings; pulled column in bags/packs/pounds)</li> <li>Insufficient meal components: reviewed sites did not serve enough meal components to match the amount of reimbursable meals claimed. (See Appendix E Menu Production Records for a list of sites and issues.)</li> </ul>	<p>Please submit correct salad bar production records as applicable for each site reviewed.</p>	<p><b>September 17, 2018</b></p>
<b>#8</b>	<p><b>Offer vs. Serve (OvS)</b> OvS meals services were observed at all sites reviewed</p>	<p>Submit a copy of the district-wide policy on OvS that employees are expected to comply with as well. Please describe how the district wil</p>	<p><b>September 17, 2018</b></p>

**National School Lunch Program (NSLP)  
Administrative Review Findings - Revised**

**Date: January 8 – February 8, 2018**

**Sponsor: Clark County School District**

**Page 4 of 14**

	<p>and is not being carried as defined by regulation. (See Appendix F Offer vs Serve for a list of sites and issues.)</p>	<p>meet the OvS requirements and ensure employees serving meals are trained and understand the requirements. Include a brief description of the training plan if applicable.</p> <p>Breakfast:</p> <ul style="list-style-type: none"> <li>• The student must be offered at least four food items.</li> <li>• The student must choose at least three food items.</li> <li>• One of the chosen food items must be half a cup of fruit/vegetable equivalent.</li> </ul> <p>Lunch:</p> <ul style="list-style-type: none"> <li>• The student must be offered 5 components.</li> <li>• The student must choose at least 3 components.</li> <li>• One of the chosen components must be half a cup of fruit/vegetable equivalent.</li> </ul>	
<p><b>#9</b></p>	<p><b>USDA Guidance for Pre-K Children</b> Preschoolers 2 - 4 years (Ferron Elementary observation on 1/23/18). Under the updated preschool meal patterns, milk served to children 2 through 4 years old must be unflavored low-fat (1 percent) or unflavored fat-free (skim) milk. Unflavored milk contains all the major nutrients also found in flavored milk. However, flavored milk (commercially prepared and plain milk that is flavored with syrup, powder, or straws) also contains added sugars. To better align with the Dietary Guidelines' recommendation to reduce the consumption of added sugar and to help children develop healthy eating practices, flavored milk is no longer allowed in reimbursable meals for preschoolers.</p>	<p>Please describe how the district will meet the USDA Pre-K meal pattern (flavored milk service). Please include a brief description of the training plan if applicable.</p> <p>Allowable milks for preschoolers 2 - 4 years old include low-fat or fat-free milk, low-fat or fat-free lactose reduced milk, low-fat or fat-free lactose free milk, low-fat or fat-free buttermilk, low-fat or fat-free cultured milk, or low-fat or fat-free acidified milk.</p>	<p><b>September 17, 2018</b></p>
<p><b>#10</b></p>	<p><b>Food Quantities and Components</b> During on-site reviews, it was noted that there were multiple options available to students that allowed them to meet their meal pattern requirements, including quantity, offered daily at each meal service at CCSD.</p>	<p>Please describe how the district will meet the condiment monitoring. Please include a brief description of a training plan if applicable.</p>	<p><b>September 17, 2018</b></p>

**National School Lunch Program (NSLP)  
Administrative Review Findings - Revised**

**Date: January 8 – February 8, 2018**

**Sponsor: Clark County School District**

Page 5 of 14

	There were some issues observed. (See Appendix G Food Quantities and Components to see the issues noted by site.)		
<b>#11</b>	<p><b>Signage</b> According to Federal regulations, there must be adequate signage indicating what constitutes a reimbursable meal and be visible at each meal service.</p> <p>Manch ES did not meet this signage requirement: The signage for the student meals was not displayed in a location that the students could readily see.</p>	Indicate how you will meet the signage requirements and submit photographs showing the corrected signage at Manch Elementary.	<b>September 17, 2018</b>

**Comprehensive Resource Management** – CCSD triggered a comprehensive resource management review based on answers given on the resource management risk indicator tool. The intent of this review is to apply a systematic approach to ensure overall financial health of an SFA’s nonprofit food service. References include but are not limited to 7 CFR 210.14; 2 CFR 225; 7 CFR 210.14 (f)(3). 210.11 (c)(2) (i-v) and CFR 210.19(a)(1).

	<b>Finding</b>	<b>Corrective Action</b>	<b>Due Date</b>
<b>#12</b>	<p><b>Nonprofit school food services account</b> a. Maintenance: NDA reviewed CCSD’s regulations governing the use of this account, finding the following issues:</p> <ul style="list-style-type: none"> <li>• In section II Enterprise Fund Part B it states, “or at secondary schools, share the income from the sale of food and beverages with school-approved student body organizations.”</li> <li>• In Section III Competitive Foods Part A section (2) it states, “Sharing with approved student body organizations of profits realized by the Food Service Department from the sale of food and beverages in secondary school lunch rooms.”</li> <li>• In Section III Competitive Foods Part A section (3) it states, “Sale and distribution of food by student</li> </ul>	<p>a. Based on regulation*, add the following clarifications to the language in Section II Enterprise Fund Part B and Section III Competitive Foods Part A (2): “All revenue from the sale of nonprogram foods shall accrue to the nonprofit school food services account of a participating school food authority.”</p> <p><i>*This applies to any food items that were purchased with funds from the nonprofit school food services account and to food items that were prepared by staff that were paid with funds from the nonprofit school food services account.</i></p> <p>Based on regulation, add the following clarifications to the Language in Section III Competitive Foods Part A section (3): “To be allowable, a competitive food item must: (i) Meet all of the competitive food nutrient standards as outlined in this section; and (ii) Be a grain product that contains 50 percent or more whole grains by weight or have as the first ingredient a whole grain; or</p>	<b>September 17, 2018</b>

**National School Lunch Program (NSLP)  
Administrative Review Findings - Revised**

**Date: January 8 – February 8, 2018**

**Sponsor: Clark County School District**

**Page 6 of 14**

	<p>body or parent organizations during school hours at places other than administration-designated food service program areas.”</p> <p>b. Subsidized student reduced-price breakfasts and lunches: though allowable use of the nonprofit school food services account funds when there is a surplus, CCSD does not appear to be tracking this expense in all fiscal documents related to this account. As it is a legitimate expense incurred to this account it should appear as such so the State Agency can assess the viability of this account.</p>	<p>(iii) Have as the first ingredient one of the non-grain major food groups: fruits, vegetables, dairy or protein foods (meat, beans, poultry, seafood, eggs, nuts, seeds, etc.); or (iv) Be a combination food that contains 1/4 cup of fruit and/or vegetable; or (v) If water is the first ingredient, the second ingredient must be one of the food items in paragraphs (c)(2)(ii), (iii) or (iv) of this section.”</p> <p>Note: the only exception to this regulation regarding competitive foods during normal school hours, which is from 12 am of the school day until 30 minutes after the end of normal school instruction, is for those items that are not to be consumed during school hours such as cookie dough, frozen pizzas, etc. Again, if these items are purchased with funds from the nonprofit school food services account or prepared by workers that are paid from the nonprofit school food services account, then all revenue shall flow to the nonprofit school food services account.</p> <p>Update your policies that govern the use of the nonprofit school food services account to include the items noted above and submit an updated policy to NDA for review.</p> <p>b. Create a policy or business process that will direct staff responsible for managing the nonprofit school food services account to include the expenses for subsidizing the reduced-price breakfast and lunches served by CCSD to its students. The policy or process should include the following:</p> <ul style="list-style-type: none"> <li>• In all the standard fiscal documents for the nonprofit school food services account at least an annual or year-to-date valuation of the total number of reduced-price meals that have been subsidized.</li> <li>• Indicate who will be responsible for monitoring this policy or process, by name(s) or title(s) and include their direct supervisor and anyone else who would act as backup to the primary individual(s) responsible for managing and reporting the funds in the nonprofit school food services account.</li> </ul>	
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**National School Lunch Program (NSLP)  
Administrative Review Findings - Revised**

**Date: January 8 – February 8, 2018**

**Sponsor: Clark County School District**

Page 7 of 14

	<p>d. Purchases of equipment are an allowable expense if the item bought is for the improvement of the NSLP/SBP program, and it is either on the state approved list of equipment or the SFA has asked NDA for prior approval to buy the item. It is noted that CCSD bought a forklift and this item is not on the state approved list of equipment nor can state approval be located.</p>	<ul style="list-style-type: none"> <li>• Submit a signed copy of the policy or process to NDA for review.</li> </ul> <p>d. Create and submit a policy or business process regarding buying equipment that is not on the state’s approved list of equipment that includes the following:</p> <ul style="list-style-type: none"> <li>• Prior to making purchases of equipment that are not on the state’s approved list of equipment, CCSD will contact the state to see if such a purchase is allowable. (See the PDF “Capital Expense Pre-Approval” in the Procurement Documents folder. This form should be used to obtain permission from the state for capital expenditures that are not on the state approved list and are over \$5000.)</li> <li>• Indicate who will be responsible for monitoring this policy, by name(s) or title(s) and include their direct supervisor and anyone else who would act as backups to the primary individual(s) responsible for making purchases for the school food program.</li> </ul>	
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**General Program Compliance**

**Civil Rights** – SFAs must follow civil rights requirements and guidance related to nondiscrimination. References include but are not limited to 7 CFR 15b.26 (d) and FNS Instruction 113-4.

	<b>Finding</b>	<b>Corrective Action</b>	<b>Due Date</b>
<b>#13</b>	<p>Based on site observations, CCSD is not treating participants the same regarding race, color, national origin, sex, age, and disability; this is a violation of Civil Rights and is also in violation of CCSD’s civil rights policy. (See Appendix H Civil Rights Compliance for issues by site.) All program participants must have equal access and not be discriminated against based on any of the above.</p>	<p>All staff who interact with program participants should receive training on CCSD’s internal civil rights policy. Provide documentation to NDA that all CCSD food service employees and volunteers who interact with program participants have received training on CCSD’s internal civil rights policy. This documentation can be a signed annual training document that indicates that the individuals that will be interacting with program participants are made aware of and will uphold the civil rights of program participants.</p>	<b>September 17, 2018</b>

**SFA On-site Monitoring** – Each SFA with more than one school operating NSLP must perform at least one on-site review; this review must evaluate the lunch counting and claiming system used by the school and observe the general areas of review that are readily observable in each school under its jurisdiction. References include but are not limited to 7 CFR 226.15 (e); 7 CFR 210.8(a)(1) and SP 14- 2011.

**National School Lunch Program (NSLP)  
Administrative Review Findings - Revised  
Sponsor: Clark County School District**

**Date: January 8 – February 8, 2018**

**Page 8 of 14**

Finding	Corrective Action	Due Date
<p><b>#14 SFA on-site monitoring conducted prior to February 1 of SY:</b></p> <ul style="list-style-type: none"> <li>• Each SFA with more than one school operating NSLP must perform at least one on-site review.</li> <li>• A minimum of 50% of schools operating SBP must be monitored at least once every two years. Issues that were noted during the review are in the following areas:               <ul style="list-style-type: none"> <li>○ General areas including completing the review and proper documentation lacking</li> <li>○ Incomplete and inaccurate forms</li> <li>○ On-site monitoring corrective action</li> <li>○ Inconsistent/noncompliant meal counts</li> </ul> </li> </ul> <p>(See Appendix I SFA On-Site Monitoring for issues noted by specific area.)</p>	<p>For the section labeled “General Areas Noted”, create a business process that outlines proper procedures for documenting and carrying out the on-site monitoring requirements, including:</p> <ul style="list-style-type: none"> <li>• All on-site monitoring forms are to have the date on which the on-site monitoring occurred placed in the “Date” section.</li> <li>• All on-site monitoring forms should be checked to indicate whether breakfast, lunch, or both programs are being monitored.</li> <li>• On-site monitoring should be performed annually on all sites that serve lunch and once every two years on all sites that serve breakfast.</li> <li>• When there is an area that requires corrective action, a corrective action plan should be created and documented on the on-site monitoring form section that is meant to address corrective actions.</li> <li>• The corrective action plan must be completed and followed up on within 45 days and this must be indicated on the on-site monitoring form by completing the sections for follow up.</li> <li>• Indicate who, by name and/or title, is responsible for ensuring that on-site monitoring is conducted in accordance with the regulations governing this process.</li> </ul> <p>Submit the signed business process to NDA for review.</p> <p>For the section labeled “Incomplete or Inaccurate Forms,” CCSD should complete the areas that were not completed. Submit the updated and completed on-site monitoring forms to NDA for review. (See Appendix I SFA On-Site Monitoring for issues noted by specific area.)</p> <p>For the section labeled “On-site Monitoring Corrective Action,” implement corrective action for the areas that were noted as being deficient and follow up on this within the 45-day timeframe allowed for following up on corrective action from on-site monitoring. A list of the</p>	<p><b>September 17, 2018</b></p>

**National School Lunch Program (NSLP)  
Administrative Review Findings - Revised**

**Date: January 8 – February 8, 2018**

**Sponsor: Clark County School District**

Page 9 of 14

		deficient sites will be provided separately.	
<p><b>Local School Wellness Policy</b> – 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; CCSD Internal Regulation R-3311; Purchasing Authority; and The Healthy Hunger Free Kids Act Section 9A (204), NSLP 2016-30.</p>			
Finding		Corrective Action	Due Date
#15	<p><b>Wellness Policy</b> During on-site reviews it was observed that several sites were not following CCSD’s approved Wellness Policy regarding Nutrition/Beverage Standards (Smart Snack Guidelines), Incentives and Rewards, Contracts, Marketing, Fundraising, and Monitoring and Accountability. (See Appendix J Local School Wellness Policy – Smart Snack Issues and Contract Incentives.)</p> <p>a. and b. Smart snacks: during on-site reviews it was observed multiple sites were in violation of federal guidelines for permitting the sale of competitive foods of minimal nutritional value in the food service area during meal periods.</p>	<p><b>**Note: The noncompliance in this area is not under the purview of the Clark County Food Services Department. The CCSD Administrative Department is responsible for this noncompliance and as such they will have to provide the following corrective actions</b></p> <p>a. Create a business process that will outline the steps that will be taken to bring CCSD into compliance with smart snack regulations. This business process should include the following:</p> <ul style="list-style-type: none"> <li>• Branding, etc. is not allowed and should be covered up on existing machines or the machines should be moved into locations to which the students do not have access.</li> <li>• Items such as sodas and other noncompliant smart snack items may not be sold on campus during the school day, midnight of the day of until 30 minutes after the end of the normal school day. Vending machines that contain these items must be turned off during the school day.</li> <li>• Vending machines that sell entirely smart snack compliant items are allowable.</li> <li>• Indicate who by name/title will be responsible for implementing this policy district wide.</li> <li>• Submit supporting documentation indicating that the policy is being complied with, such as: <ul style="list-style-type: none"> <li>○ Communication with vending machine providers where the timer for the machines is asked to be set on all machines in the district to only operate after the end of the school day for machines that sell items that are not smart snack compliant,</li> </ul> </li> </ul>	<p><b>September 17, 2018</b></p>

**National School Lunch Program (NSLP)  
Administrative Review Findings - Revised  
Sponsor: Clark County School District**

**Date: January 8 – February 8, 2018**

**Page 10 of 14**

	<p>c. NDA reviewed all contracts for vending machines and CCSD does not appear to be following its internal policy for approving these contracts, including lacking signatures and/or required review by Office of General Counsel. Several sites reviewed had outside companies (e.g., Firehouse Subs) serving food to students during lunch and no contracts for these services were provided.</p> <ul style="list-style-type: none"> <li>• Most contracts reviewed included sale of non-smart snack compliant items;</li> <li>• 39 of the reviewed contracts were not signed by a principal/authorized school representative nor a vendor rep</li> <li>• 43 of the reviewed contracts had no date the contract was signed</li> </ul>	<ul style="list-style-type: none"> <li>○ Communication with vending machine providers to replace current products with items that are compliant with smart snack standards.</li> </ul> <p>b. Competition with the Food Service Program</p> <ul style="list-style-type: none"> <li>• The CCSD Administrative Department must institute a district-wide policy that would ban direct competition with the food service programs by outside entities unless the items they are selling are compliant with smart snack regulations. This policy must bring CCSD into compliance with its own internal policies concerning the sale of foods of minimal nutritional value as well as the Federal regulations noted in 7 CFR 210.11.</li> </ul> <p>c. Contracts with outside entities and vendor contracts</p> <ul style="list-style-type: none"> <li>• The CCSD Administrative Department should also submit a written statement indicating how they are going to remain compliant with their own internal process for acquiring contracts that allow the sale of food by outside entities at the site level, as well as remaining compliant with the Federal regulations related to smart snacks. This statement should include who, by name or title, will be responsible for providing this oversight as well as the steps they will take to ensure compliance at the site levels.</li> <li>• The CCSD Administrative Department must develop a reasonable timeline and policy for winding down their current vending machine contracts and put into place a system that will oversee the operation of these machines during school hours.</li> <li>• USDA has issued guidance on the use of vending machines. Please see the PDF NSLP 2016-30 Food and Drug Administration Requirements for Vending Machines in the “Additional Documents” folder and indicate how CCSD will become compliant with the vending machine requirements.</li> <li>• If these vending machines continue to be in operation and sell items that are noncompliant with smart snack regulations while the current</li> </ul>	
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**National School Lunch Program (NSLP)  
Administrative Review Findings - Revised  
Sponsor: Clark County School District**

**Date: January 8 – February 8, 2018**

**Page 11 of 14**

	<p>d. Monitoring and accountability of Wellness Policy Compliance: the LEA is responsible for maintenance of records and document compliance with nutrition standards for all competitive food available for sale to students in areas under its jurisdiction that are outside of the control of the school food authority. According to the state system of reporting and monitoring of the wellness policy during the 2016/2017 SY, 262 out of 345 CCSD schools completed a monitoring report. Of the sites reviewed, the following deficiencies were noted:</p> <ul style="list-style-type: none"> <li>• 6 of the 24 sites did not submit a Wellness Policy monitoring report</li> <li>• 5 of the 24 sites did not complete the report</li> <li>• 5 of the 24 sites reported the school was not giving away or selling foods that did not meet Smart Snack Nutrition Standards, which contradicts what was observed on site</li> </ul>	<p>contract is winding down, they may not be turned on during the school day. The school day is defined as midnight of the day in question until 30 minutes after the end of regular teaching at the location.</p> <ul style="list-style-type: none"> <li>• Submit this plan for winding down these contracts to NDA for review.</li> </ul> <p>d. Monitoring of Wellness Policy Compliance Create a business process detailing how monitoring of Wellness Policy compliance will take place. This business process should include:</p> <ul style="list-style-type: none"> <li>• Name and/or title of person responsible for monitoring wellness policy compliance</li> <li>• Details of how sites will be monitored for Wellness Policy compliance</li> <li>• Include any internal edit checks or steps that will be used to assist in the monitoring process</li> <li>• Include signatures from all members of administration that oversee monitoring of the wellness policy, all staff from food service administration, and any other individuals responsible for monitoring and reporting wellness policy progress on this business process.</li> </ul>	
<p><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.</p>			
	<b>Finding</b>	<b>Corrective Action</b>	<b>Due Date</b>
<b>#16</b>	<p>Of the randomized sample of 393 employees, 105 are no longer employees of CCSD.</p> <ul style="list-style-type: none"> <li>• Of the remaining 288 individuals, a total of 153 employees are deficient in the number of required</li> </ul>	<p>Develop a training schedule and tracking document for all food service workers to meet Professional Standards so all employees meet the required number of training hours.</p>	<b>September 17, 2018</b>

**National School Lunch Program (NSLP)  
Administrative Review Findings - Revised**

**Date: January 8 – February 8, 2018**

**Sponsor: Clark County School District**

Page 12 of 14

	<p>training hours.</p> <ul style="list-style-type: none"> <li>30 employees have some training completed but fall below the training hour requirement.</li> </ul>	<p>Please describe how you will meet the requirement for the employees who have not yet met the minimum requirement for this school year. (See Appendix K Missing Training Hours for a list of employees.)</p>		
<p><b>Food Safety</b> – the SFA’s systems in place to manage food safety and reduce the risks of food borne illnesses must comply with regulations. References include but are not limited to Subpart C section 210.13 of Facilities Management.</p>				
Finding		Corrective Action		Due Date
<b>#17</b>	<p>During the on-site review, multiple issues were observed, including the following. (See Appendix L Food Safety for a list of issues noted by site.)</p> <p>a. Dropped food items</p> <p>b. Missing Standard Operating Procedures (SOPs)</p> <p>c. Workers not compliant with health and safety regulations governing food handling and serving</p>	<p>a. Create and implement a dropped food item policy in CCSD. This policy should address the following issues:</p> <ul style="list-style-type: none"> <li>It should provide direction to staff on how to handle when a student drops an individual food item such as milk, an apple, etc.</li> <li>For example, it could state that if a child drops an individual item, they are to place it in a food waste bin and get another item of the same type as the one that was dropped.</li> <li>Provide a copy of this process to NDA for review.</li> </ul> <p>b. For missing SOPs, acquire or create the missing SOP and add it to your standardized HAACP manual. A standardized set of HAACP SOPs may be found at the following website <a href="http://sop.nfsmi.org/sop_list.php">http://sop.nfsmi.org/sop_list.php</a>. For missing or unorganized HAACP manuals, create and submit a business process governing the use of the HAACP manual. The process should include the following:</p> <ul style="list-style-type: none"> <li>The manual should be easily accessible</li> <li>It should be organized and have a table of contents that is clear and easy to follow</li> <li>It should have all necessary SOPs</li> <li>The area supervisors and their supervisor(s) should sign off indicating that they are aware of this process and will ensure that it is enforced.</li> <li>Submit the signed business process and a copy of your updated HAACP manual to NDA for review.</li> </ul> <p>c. For workers not compliant with health and safety regulations</p>	<p><b>September 17, 2018</b></p>	

**National School Lunch Program (NSLP)  
Administrative Review Findings - Revised**

**Date: January 8 – February 8, 2018**

**Sponsor: Clark County School District**

Page 13 of 14

	<p>d. Noncompliance with regulations governing that food temperatures are monitored and recorded, and that food preparation and service areas are clean</p>	<p>governing food handling and serving, create a business process governing proper training of all student workers in the Clark County School District. The students must adhere to the same health and safety requirements as regular staff. Please adhere to FSD-M503 Secondary Student Worker Handbook that was provided for review.</p> <p>d. For sites at which food temperatures were not monitored and recorded, and/or had unclean food preparation and service areas, submit documentation indicating how CCSD will become compliant at all sites with Federal regulations governing Food Safety.</p>	
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**Fresh Fruit and Vegetable Program (FFVP) – Provides all children in participating schools with a variety of free fresh fruits and vegetables throughout the school day. References include but are not limited to Subpart C section 210.13 of Facilities Management.**

	<b>Finding</b>	<b>Corrective Action</b>	<b>Due Date</b>
<b>#19</b>	<p>a. NDA reviewed the supporting documentation for the month of review, November 2017, as the first part of the Administrative Review of FFVP. During the on-site review, the following issue was observed:</p> <p><b>Sandy Valley Combined</b></p> <ul style="list-style-type: none"> <li>Several items that were received at this site during the review had the packaging seal broken.</li> <li>While the items were placed in the cooler, it was not certain that this process was always followed by on-site staff. Staff was not sure if items received were always refrigerated or if the seals on items were checked to ensure they were not broken.</li> </ul>	<p>a. Create a business process for the proper receiving and storage of items for the FFVP. You may also adapt another receiving SOP to accommodate this program.</p> <ul style="list-style-type: none"> <li>If you choose to adapt another receiving SOP, it should include direction to check the items for broken seals, detail which staff have what responsibility, etc.</li> <li>This SOP should also direct staff in the proper storage of items that may also be under time or temperature constraints.</li> <li>Submit a copy of this SOP to NDA for review.</li> </ul>	<b>September 17, 2018</b>

**Procurement – 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.**

	<b>Finding</b>	<b>Corrective Action</b>	<b>Due Date</b>
<b>#20</b>	With regards to a procurement plan for the Child	Please modify the district’s current Food Service purchasing plan (April	<b>September</b>

**National School Lunch Program (NSLP)  
Administrative Review Findings - Revised**

**Date: January 8 – February 8, 2018**

**Sponsor: Clark County School District**

**Page 14 of 14**

	<p>Nutrition program at CCSD, NDA reviewed the sponsor’s and district’s procurement procedures. (See Appendix N for a list of purchases examined as part of this review.) A procurement plan was not in place at the time of the review. The reviewer received a procurement plan (<i>Clark County School District Procurement Plan-Child Nutrition Program</i>) dated April 6, 2018. A district purchasing policy was in place: Regulation 3310-3318, which is primarily guided by Nevada Revised Statutes 332.</p> <p>The plan needs a few minor additions and/or clarifications as outlined in the corrective action, as they were not adequately addressed in the provided procurement plan.</p>	<p>6, 2018 version) to bring it into full compliance with the Federal regulations per 2 CFR Part 200.320 with regards to procurement methods for program operators. Address the following four items with a statement and/or clarification in the procurement plan, as appropriate:</p> <ul style="list-style-type: none"> <li>• Utilization of the Capital Approved List for equipment</li> <li>• Non-Competitive Purchasing clarification</li> <li>• Buy American Provision: adherence and monitoring</li> <li>• Acquisition of unnecessary or duplicative items</li> </ul> <p>(See Appendix N for specific information: Per 2 CFR 200.320(c)(2)(iii) (iii) All bids will be opened at the time and place prescribed in the invitation for bids, and for local and tribal governments, the bids must be opened publicly;)</p> <p>Please add the updated procurement changes.</p> <p>Please keep all solicitation documents for all future procurement methods per the approved procurement plan for the current year plus three years after the contract year purchasing is finalized. The documents must be kept longer if there are unresolved audit findings.</p>	<p><b>30, 2018</b></p>
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**Revised Findings Form completed by:**

*Patricia Heppc*, Deputy Administrator

Date: 8/30/18

**Document Reviewed by:**

*Rose Welterbeek*, Nutrition Programs Professional

Date: 8/30/18