



Lander County School District
Administrative Review Report

January 4, 2019

National School Lunch Program
Food and Nutrition Division

Administrative Review Report
Food and Nutrition Division



Table of Contents

I.	Executive Summary	2
II.	Introduction	3
III.	Scope	3
IV.	Methodology	3
V.	Noteworthy Initiatives	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. NDA Procurement Plan Template	

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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 Lander County School District (LCSD) from December 4-5, 2018.

An exit conference was held on Wednesday, December 5, 2018 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 Lander County School District's 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 4, 2018. The review was conducted at the LCSD main office in Battle Mountain, Nevada. The Administrative Review was conducted by Bobbie Davidson, Program Officer, and Jillian Smith, Program Officer. LCSD staff included Jillian Mills, Carla Gonzalez, Russell Klein, and Shawnee Hess. 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 Wednesday, December 5, 2018 which provided a summary of the work performed at LCSD 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, October 2018. 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.

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 LCSD'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

- Free and Reduced Meal Application Processing: No errors were found in the review of applications
- Recordkeeping: LCSD demonstrates exceptional organization and detailed documentation for all areas of review.
- Entitlement usage: LCSD did an excellent job at utilizing those entitlement dollars. For the 2017-2018 school year LCSD used 102% of their entitlement dollars. \$15,250 of that entitlement was utilized in the DOD fresh program to purchase fresh fruit and vegetables.
- Food Quality: The addition of salad bars at all LCSD school sites offer variety of fresh fruits and vegetables to student's daily.

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VI. Critical Areas of Review

- Performance Standard I- Meal Access and Reimbursement
 - Certification and Benefits Issuance
 - Income Applications
 - Direct Certification
 - Verification
 - 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
 - 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 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>Menu Production Records Production and menu records must be maintained in accordance with FNS guidance. Production records for the review month of October 2018 were reviewed.</p> <p>a. Missing Pulled column in Menu Production Records</p> <p>b. Menu production records were not filled out completely and were missing information.</p>	<p>a. Revise Menu Production Record to add in a ‘pulled’ column to accurately track that enough raw product was planned, pulled, and prepared to serve the number of reimbursable meals LCSD is claiming. Submit a week of complete production records with the addition of the new pulled column for NDA review.</p> <p>b. All staff involved in the completion of Menu Production Records must complete the online Production Records, Standardized Recipes and Usage Recipes Training: http://www.schoolnutritiontoolbox.org/snt-v3/index.php</p> <p>Submit all certificates of completion to NDA for review.</p>	<p>a. February 4, 2019</p> <p>b. February 4, 2019</p>

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Administrative Review Report
Food and Nutrition Division



General Program Compliance			
Smart Snack Standards- Regulations governing all food and beverages sold in school. References include 7 CFR 210.11 and internal regulation Lander County School District Wellness Policy.			
	Finding	Corrective Action	Due Date
#2	The vending machine at Battle Mountain High School was selling items not compliant with Smart Snack Standards regarding portion size.	<p>Create a business process that clearly explains how items in the vending machine will be checked for compliance before they are purchased to be sold. Include names and/or position titles of all staff involved as well as their signatures to show acknowledgement of. Submit to NDA for approval.</p> <p>Or</p> <p>Install a timer on the vending machine, so that non-compliant items will only be sold outside of the school day (Midnight to 30 minutes after the end of the school day). Submit documentation to show timer has been put into place</p>	February 4, 2019

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Administrative Review Report
 Food and Nutrition Division



Procurement

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.

Finding		Corrective Action	Due Date
#3	LCSD's procurement plan was missing several required elements outlined in Federal Regulation 2 CFP Part 200.320 with regards to procurement methods for program operators	Please modify the district's current Food Service procurement plan to bring it into full compliance. Address the following items with a statement and/or clarification in the procurement plan as appropriate: <ul style="list-style-type: none"> • Micro purchasing • Equipment purchasing • Revise all statues/regulations listed in plan to the appropriate NV State laws/regulations • Acquisition of unnecessary or duplicative items • Use of women's businesses <i>*NDA Procurement Plan Template included in Appendix as a resource</i>	February 4, 2019

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VIII. Recommendations and Technical Assistance

Recommendations:

1. **Best Practice: Define the amount/percent of each school's NV Energy bill LCSD's Nutrition Department is responsible for.** LCSD submitted documentation to NDA to demonstrate how the monthly NV Energy charges were calculated for LCSD's Nutrition Department each month however, there was no governing document stating the procedures for this practice. NDA recommends putting a document in place that will define this procedure.

Technical Assistance:

2. Technical assistance was provided to Battle Mountain High School recommending the establishment of a water station inside the cafeteria, the feeding location. Students must have unlimited access to water during meal times. Doorways between water fountains and eating areas are considered a barrier to this access.
3. Technical assistance was provided onsite on the inclusion of the number of employee training hours required into LCSD's professional standards training tracker. Professional Standard's tracking must include the number of hours each employee is required to complete each year. LCSD staff provide documentation that this requirement was now included on their professional standards tracking system.

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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. NDA Procurement Plan Template- attached

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