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## DEPARTMENT OF AGRICULTURE

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June 1, 2017

Certified Letter # 7006 2760 0000 0509 5782

Dave Jensen, Superintendent  
Humboldt County School District  
310 East Fourth Street  
Winnemucca, NV 89445

Dear Mr. Jensen,

The Nevada Department of Agriculture, Food and Nutrition Division conducted an Administrative Review of the Humboldt County School District (HCSD) from April 18-19, 2017. The Administrative Review team consisted of Brittany Mally, Quality Assurance Specialist. Also Rose Wolterbeek, School Nutrition Services Specialist and Edward Coleman, Quality Assurance Specialist visited on April 27<sup>th</sup> to complete the procurement review and resource management section. The purpose of the Administrative Review is to ensure compliance with federal regulations and also provide technical assistance for program improvement. Our team greatly enjoyed working with all food service staff members. Thank you for accommodating our staff during the review and for providing all the needed documentation in a timely fashion. Staff was very helpful in providing documentation and answering questions throughout the review process.

We conducted an exit conference on April 19, 2017 to discuss the major findings of the review. Laura Jensen, Food Service Coordinator, Ian Tolotti, Director of Dining Services for Chartwells, Linnea Cochrane, Accounting, Ronda Havens, Finance Supervisor, and Dave Jensen, Superintendent were in attendance. The Administrative Review evaluates compliance with the regulatory provisions of the National School Lunch Program (NSLP) and School Breakfast Program. Administrative Reviews are required to be conducted on a three year review cycle. The HCSD received an onsite review its National School Lunch Program (NSLP), School Breakfast Program (SBP), and its Fresh Fruit and Vegetable Program (FFVP). The findings of the review are detailed below by the three main sections of the Administrative Review, Performance Standard I, Performance Standard II and Other Areas. The new procurement review is being coupled with the administrative review and the findings of the procurement review are included in this letter.

### **Performance Standard I – Meal Access and Reimbursement**

The National School Lunch Program (NSLP) and the School Breakfast Program (SBP) have counting and claiming systems that are federally mandated for all School Food Authorities (SFAs) that are participating in these programs. All free, reduced price, and paid meals claimed for reimbursement must be served only to children eligible for free, reduced- price, or paid meals. The certification and benefits issuance process is the SFA's certification of a student's eligibility for free or reduced price meals and serves as the link to the SFA's

meal counting and claiming system. Validation of this system during the Administrative Review ensures that eligible children receive meals to which they are entitled and that claims for reimbursement are valid.

A review of applications at HCSD revealed no errors. Review of the direct certification lists and verified applications also revealed no errors. HCSD is doing a fantastic job certifying applications and ensuring that the students are on the correct eligibility.

**Best Practice**

HCSD is still using the old prototype application. NDA recommends as a best practice to switch over to the new USDA prototype application for the new school year. A sample is attached. This is not required, just recommended.

**Meal Counting and Claiming**

HCSD uses the database system Infinite Campus as their POS and for consolidating their meal claims. For the month of review (October 2016), the meal claim was reviewed and checked against the back-up documentation for the meals claimed at each site. Lowery HS and Winnemucca GS (WGS) were the two schools initially reviewed. The report showing the meals served each day for the month of review (Daily Transaction Summary Report) for each category (free, reduced, and paid) does not match the totals found on the monthly transaction summary report that is used to submit the meals claimed for reimbursement to NDA. All back-up documentation needs to be able to support and clearly show that the number of meals submitted for reimbursement are correct.

For Lowery HS not all daily reports were pulled and attached with the claim as back-up so accurate numbers for the meals actually served cannot be determined and compared against the monthly summary report. Instead the reviewer decided to double check the counts for Winnemucca JHS (WJHS) as all the daily reports were there. WJHS does not serve breakfast so only lunch counts are available. Below is a summary of the meal counts for October for both Winnemucca GS and Winnemucca JHS.

<b>WGS Breakfast</b>	<b>Humboldt/IC totals</b>	<b>NDA/Daily Report Totals</b>	<b>Difference</b>
<b>Free</b>	1423	1397	26
<b>Reduced</b>	273	273	0
<b>Paid</b>	194	221	-27
<b>Total</b>	1890	1981	-1

<b>WGS Lunch</b>	<b>Humboldt/IC totals</b>	<b>NDA/Daily Report Totals</b>	<b>Difference</b>
<b>Free</b>	2208	2063	145
<b>Reduced</b>	409	468	-59
<b>Paid</b>	648	656	-8
<b>Total</b>	3265	3187	78

<b>WJHS Lunch</b>	<b>Humboldt/IC totals</b>	<b>NDA/Daily Report Totals</b>	<b>Difference</b>
<b>Free</b>	1541	1471	70
<b>Reduced</b>	464	432	32
<b>Paid</b>	647	613	34
<b>Total</b>	2652	2516	136

There have been similar problems at other districts who are using the program Infinite Campus as their POS and for the meal counting and claiming. Technical assistance was provided to HCSD on how to proceed for the

remainder of the school year when submitting their claims. For the months of April, May, and June 2017 the food service coordinator will enter the meal counts from the daily transaction summary report into an Excel sheet and total the meals at the end of the month in Excel. Those are the totals to be used for the claim for reimbursement, not the totals from the monthly summary transaction report from Infinite Campus.

### **Notice of Fiscal Action**

The difference in those meals counts totals to the amount of \$675.01. This amount is over the \$600 threshold and therefore fiscal action is warranted and these meals will be recouped on future meal claims.

**Corrective Action Required:** Please inform NDA in writing if HCSD will continue to use IC next year for meal counting and claiming, if not provide the name of the program to be used. Before submitting May's claim for reimbursement, send the meal count totals for WGS and WJHS to Brittany Mally to be revised for the recoupment of the miss claimed meals from October 2016.

### **Breakfast at Lowery HS**

During the onsite review it was discovered that breakfast is only being served at Lowery HS one day per week. When the reviewer inquired about it the FSMC Director of Dining said "since breakfast participation is chronically low that it was easier and more cost effective to only serve it on Thursday when they have a late start. They sell just as many meals on that one day as they do for the rest of the week." NDA determined that this process of breakfast being served one day per week at LHS began in January of 2016. The meals being served on these days are being counted as reimbursable and being claimed monthly.

According to federal regulations, if a school operates 5 days (or 4 days) a week, the school is required to serve meals on all days the school operates. 7CFR 220.2 defines breakfast as "a meal which meets the meal requirements set out in 7CFR §§220.8 and 7CFR220.23, and which is served to a child in the morning hours. The meal shall be served at or close to the beginning of the child's day at school." Furthermore, meal requirements for breakfast include minimum daily servings, which implies the breakfast must be served on an operating day to meet the minimum daily requirements. Instruction 788-2 also addresses the limited scenarios in which partial implementation of the SBP is allowable, noting that "in general, all children in attendance during the breakfast period should have access to the breakfast program in participating schools."

NDA is available to discuss ideas on how to increase breakfast participation at Lowery HS. For example, offering a second chance breakfast daily during one of the morning passing periods.

**Corrective Action Required:** Make a decision on the following and notify NDA in writing:

- Lowery HS will participate in the School Breakfast Program (SBP) next school year 17/18. If breakfast is to be served at Lowery HS as part of the SBP and the meals to be claimed as reimbursable then breakfast must be served every day of the week that the school is open.
- Lowery HS will not participate in the SBP next school year and will continue to serve breakfast one day per week. The meals served on this day can only be served as a la carte and cannot be counted as reimbursable meals and claimed for reimbursement.

### **Performance Standard II- Meal Pattern and Nutritional Quality**

The National School Lunch Program meal pattern is the foundation of federal school nutrition programs, and sponsors of the program must ensure that they are offering reimbursable meals for breakfast and lunch according to regulations (7 CFR 210.10 and 220.80). Schools operating NSLP and/or the SBP must prepare, offer, and

serve meals to students that meet the meal pattern requirements for the appropriate age/grade groups on all reimbursable meal service lines.

The meal pattern standards have specific requirements for minimum amounts of fruit, vegetables, meat/meat alternates, and grains that must be offered daily and weekly. In addition, there are standards for vegetable sub-groups which must be offered each week. The meal pattern also requires that all creditable grain items be whole grain rich. The meal pattern limits calories (minimum and maximum levels), restricts sodium levels, limits saturated fat, and eliminates trans fats.

HCSD is offering a menu full of variety that meets the meal pattern and contains great choices for the students. The meals observed were well received by students and the staff interviewed were excited about the food they were offering the students.

### **Production Records**

Per 7 CFR 210.10 schools must follow a food based menu planning approach and produce enough food to offer each child the quantities specified in the meal pattern and must also keep production and menu records for the meals they produce/serve. Production and menu records must be maintained in accordance with Food and Nutrition Service (FNS) guidance. The menu production records must be filled out completely and daily for all NSLP programs.

When reviewing the production records (PR) for HCSD the following issues were found:

- The template used for PR for this FSMC does not have a column for the amount of food pulled/used to be recorded. The handout for the items that must be included on a PR can be found here under Production Records required information: [http://nutrition.nv.gov/layouts/Page\\_Style\\_1.aspx?id=8674](http://nutrition.nv.gov/layouts/Page_Style_1.aspx?id=8674)
- On the breakfast PR for WGS October 19, 2016 the a la carte meals are not being totaled at the top of the page and all meals served are totaled under reimbursable. The PR indicates that there were a la carte meals served.
- On the breakfast PR for WGS 10/19/16 and 10/20/16 the total number of fruit servings served as a part of a reimbursable meal is less than the total number of reimbursable meals served for those meals. This is an issue because the site is offer versus serve and for breakfast each reimbursable meal must have a fruit. This indicates that not all reimbursable meals had a fruit.
- On the lunch PR for WGS for 10/21/16 it was noted that the fresh whole fruit served for lunch was cutie oranges and 1 each to equal ½ cup of fruit. One cutie does not equal ½ cup of fruit so more than one cutie would have needed to be served per meal to be reimbursable.
- On the lunch PR for Lowery HS on 10/17/16 and 10/20/16 the total number served on the front page is totaled incorrectly. The total on 10/17 shows 199 served but if all the totals are added up it equals 186 and on 10/20 it shows 195 but the totals added up equals 175.
- On all the lunch PR submitted for LHS for October 2016, they are incomplete and not filled out correctly. When the Director of Dining Services was asked to explain them to the reviewer and why certain parts were filled out a certain way he was unable to explain.
- On the PR for lunch for LHS for the day of review 4/18/17 the total number of reimbursable meals served shown on the PR does not match the number of reimbursable meals counted at the point of sales (POS) system. The POS count shows 145 total and the PR shows 103 total reimbursable meals served.

It is evident that more training on PR and how to correctly fill them out is needed for the food service staff. NDA is aware that this FSMC is working on editing this PR template to include an amount pulled/used column.

**Corrective Action Required:** Please complete the following corrective actions:

- Add a column for the amount pulled/used to the current template used for the PR. This column verifies that the planned menu was actually prepared and served and must be recorded in common units of measure, e.g., number, size, weight or volume.
- Please submit to NDA one weeks' worth of completed production records for both breakfast and lunch meals from Winnemucca GS, and lunch only for Lowery HS. Feel free to submit revised templates or completed records for review to NDA at any time.
- In addition, the food service director and each kitchen manager must complete the Food Production Records course from the Institute of Child Nutrition. Which can be found here: <http://www.nfsmi.org/Templates/TemplateDefault.aspx?q=cELEPTIzOA>. Submit certificate of completion to NDA.
- Either have all staff tasked with completing productions also complete the food production records course from ICN and submit certificates as proof or hold a training on production records and submit sign in sheet's as proof of staff who attended.

### **Whole Grain Rich**

The following menu items were found to not be whole grain rich and will need to be discontinued from the menu. Serve the remaining that are in inventory but do not order more of these items.

- General Mills Pillsbury Biscuit Dough #31151 (this was found at both the HS and the GS)

The FSMC also does catering and the high school kitchen is used for that purpose. It was noted that some of the no-whole grain rich items are used for catering purposes only.

**Corrective Action Required:** Remove these items from the menu and discontinuing ordering them.

At Winnemucca GS Fruit Loops cereal was found. Kellogg's does make a Fruit Loops cereal product that is for schools specifically so it will meet the nutrition requirements. However, the Fruit Loops found at this site is not that approved product for schools. The Director of Dining Services did provide NDA with the correct product specifications for the approved Fruit Loops that they order. However the Fruit Loops observed in the kitchen was the 10 grams of whole grain, which listed sugar as the first ingredient.

**Corrective Action Required:** Make sure that any future orders of Fruit Loops is for the following product specifically:

- Kellogg's® Froot Loops® for Schools      Code No: 38000 11467

When the delivery is made, make sure that is the product that is delivered to you from the distributor. If it is not, do not accept it and send it back. If it is not that specific product then it cannot be served as a part of a reimbursable meal.

### **Reimbursable Meal Signage**

Proper signage for what constitutes a reimbursable meal was posted at Lowery HS and Winnemucca GS. However, at Winnemucca GS the children kept coming up to the sign the reviewer overheard them saying "I wish this was always up." When the reviewer asked the children if they had seen that sign before and if it is up every day they said no it is not.

**Corrective Action Required:** For Winnemucca GS make sure the reimbursable meal signage is up daily and changed to reflect each meal. Submit to NDA one week's worth of photographs showing the board displayed in the cafeteria, for both breakfast and lunch meals. Also submit the corresponding menus.

### **Nutrient Analysis and Menu Certification Worksheets**

In order to correctly review the menu and make sure that the menu is meeting the meal pattern requirements, menu certification worksheets and a nutrition analysis are needed. During the onsite review this was discussed with the FSMC Director of Dining Services. At that time the reviewer requested a nutrient analysis for each week of the different menus for the month of April. These nutrient analysis' were sent to NDA on May 2, 2017 and have been reviewed and the following problems have been found:

- For the K-12 breakfast menu the week of April 10-14, the weekly average calories is 116.8 calories above the max allowable amount and the sodium is 167 mg above the limit of 540 mg.
- For the K-12 breakfast menu the week of April 17-21, the weekly average calories is 81.7 calories above the max allowable amount and the sodium is 67.4 mg above the limit of 540 mg.
- For the K-12 breakfast menu the week of April 24-28, the weekly average calories is 26.5 calories above the max allowable amount and the sodium is 194 mg above the limit of 540 mg, and the saturated fat is 0.8% above the 10% or less requirement.
- For the 9-12 lunch menu the week of April 24-28 the weekly average sodium is 107.7 mg above the limit of 1420 mg.

The sodium limits being out of compliance are a repeat finding from the last Admin Review conducted in April of 2015.

Along with the nutrient analysis of the menu a menu contribution report needs to be submitted for each week of each menu submitted. This report will show that the menus are meeting the meal pattern requirements. As NDA has reviewed other SFAs in Nevada that have Webtrition as their nutrient analysis software, it is known that this specific report is not printable. This was demonstrated in person during the review. A screenshot of the menu contribution report saved as a PDF will suffice for this requirement. If the district would prefer to use the USDA menu crediting worksheets, those will also be accepted.

**Corrective Action Required:** Please submit to NDA the following corrective actions:

- For the weeks of the menus that are out of compliance as listed above, bring each week into compliance. Resend the nutrient analysis for those weeks after the changes have been made.
- Send a copy of the update menu if changes are made to meet the sodium requirements.
- Send a PDF screen shot of the menu contribution report for each week of the April menu for all menus used. This means there should be at least 9 weeks of menu contribution reports submitted as there were three weeks of school in April. Make sure that it is clearly indicated which week of the menu the report is for. Alternatively the USDA menu certification worksheets may also be used to fulfill this requirement.

### **Comprehensive Resource Management**

A comprehensive resource management review is required when certain risk based criteria are met by the school district. The HCSD triggered a comprehensive resource management review of two areas, the maintenance of the non-profit school food service account and the sale of non-program foods. The intent and scope of this part of the Administrative Review is to apply a systematic approach to ensuring the overall financial health of an SFA's nonprofit food service.

After an in depth review of the sale of non-program foods there were no findings and therefore no corrective action is necessary in this area.

## **General Program Compliance**

### **Professional Standards**

The Professional Standards regulations in 7 CFR 210.30 establishes hiring standards for new school nutrition program directors at the School Food Authority (SFA) level (effective July 1, 2015). In addition, the regulations establish annual training standards for all school nutrition program directors, managers, and staff. The required annual training hours vary according to the employee's role in the management and operation of the school nutrition program. The current food service director was hired prior to July 1, 2015.

Training must be job-specific and is intended to help employees perform their duties well. Training needs are best assessed by an employee in consultation with their manager, director, or the Nevada Department of Agriculture. Training may be obtained in many ways, such as in-person, online, through local meetings, webinars, conferences, etc. A variety of free and low-cost training resources and formats are available.

USDA Training Tracking Tool has been provided as a resource to assist SFAs to track and record the annual training hours completed by each school nutrition program employee. Supporting documentation for all completed trainings, i.e., *agendas, sign-in sheets, certificates of completion, etc.* must be maintained on file.

The required training hours are as follows:

- Food Service Director/Supervisor 12 hours
- Food Service Manager 8 hours
- All other full time staff 6 hours
- Part time staff 4 hours

HCSD is doing a great job of keeping track of all employee training hours. The hours were reviewed and there were several employees who will need more training hours by June 30, 2017 in order to meet the requirements.

- Vicki Cox – needs 2 more hours to meet 4 hours
- Caroline Etchevary – needs 2 more hours to meet 4 hours
- Rachelle Harris – needs 1.75 hours to meet 4 hours
- Tina Johnson – needs 2 more hours to meet 4 hours
- Penny Lynch – needs 2.25 more hours to meet 6 hours
- Evangelina Solis – needs 1.75 hours to meet 4 hours

**Corrective Action Required:** Update the USDA Training Tracker or trainer tracker spreadsheet with any training hours earned to date. For the training hour requirements have not been met yet provide a plan for how the remaining hours will be met by the end of the current school year. Submit training tracker tool and plan to NDA for review.

### **Food Safety**

At Lowery HS the food safety inspection was not publically posted. It was posted in the kitchen where only kitchen staff had access to it. Technical assistance was provided and the inspection report was moved out front to the serving area of the cafeteria where it can be read by the public. No further action is necessary.

A review of the HACCP manual showed that it was missing a table of contents. Technical assistance was provided and the table of contents were added to all HACCP manuals during the review. No further action is necessary.

HCSD has met the requirements for all other areas that fall under general compliance including: civil rights, local school wellness policy, water, on-site monitoring, reporting and recordkeeping, SBP outreach, and the Fresh Fruit and Vegetable Program. No corrective actions are required for those areas.

### **Procurement Review**

The procurement of goods and services is a significant responsibility of a school food authority (SFA). Obtaining the most economical purchase should be considered in all purchases when using the nonprofit food service account. The Nevada Department of Agriculture (NDA) is required to ensure that SFAs 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 that 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. With all contracts where a Food Service Management Company is providing purchasing services involving food program regulations for procurement must be in place (7CFR 210.21):

- Properly procure goods and services
- Award contracts only to responsible contractors
- Not restrict competition
- Follow procurement standards in program regulations (7 CFR 210.21 & 2 CFR 200.318-.326)
- Prohibit conflicts of interest
- Use required procurement methods
- Take affirmative steps to use small, minority, women's business and labor surplus enterprises, when possible
- Oversee contractors to ensure all contract provisions are fulfilled for the duration of the contract
- Buy American Provision

With regards to a procurement plan for Child Nutrition program at the Humboldt County School District a plan was not in place at the time of the review; the staff person was developing one per NRS Chapter 332: Purchasing for Local Governments. Per USDA guidance, the procurement plan must outline the specific procedures per 2CFR Part 200 for program operators. Specifically, the plan must follow types of procurement available: micro purchase, small purchase, and formal procurement methods. A sample chart is attached with may be used as a guide. Also, a pilot procurement plan is attached which the district may consider for use for its school nutrition purchases. In addition to the purchasing thresholds, the plan must prohibit the acquisition of unnecessary or duplicative items per 2CFR 218(d). The plan must ensure that all solicitations incorporate a clear and accurate description for the material, product or service to be procured. It must not be duly restrictive as to limit competition; it must also take steps to assure that small, minority and women's business are used when possible.

In addition, a written code of standard of conduct was requested as part of the procurement review. It was determined that Humboldt County School District did not have one in place. Per 2CFR Part 200.3189(c)(1) the non-Federal entity must maintain written standard of conduct covering conflicts of interest and to govern the actions of its employees engaged in the selection, award and administration of contracts. No employee, officer, or agent may participate in the selection, award, or administration of a contract supported by a Federal award if he or she has a real or apparent conflict of interest. The code of conduct must also provide for disciplinary action

for violations by officers, employees or agents (2CFR 200.318 (c)1). A sample code of conduct is attached with the district may choose to use, or it may develop its own.

Based on the returned worksheet and paid meal vendor list from the district staff, it was determined that the district was using the following procurement method in its operation:

- Micro-purchase Method
- Small Purchase Method
- Formal Purchase Method

As part of the **Micro Purchase**, the Nevada Department of Agriculture reviewed one vendor (2015/16 School year) for purchases below the micro-purchase threshold (\$0-\$3,500): Quill Corporation. The reviewer examined receipts/invoices and purchase orders to determine:

- If the transactions were below \$3,500
- If the prices for products were purchased reasonable
- If the SFA equitably distributed purchases among qualified sources

The method was in compliance in all three areas with the regulations on Federal purchasing.

As part of the **Small Purchase Method**, the Nevada Department of Agriculture reviewed one vendor (2015/16) for a purchase made below the federal small purchase threshold (under \$150,000): Meal Magic Corporation. It could not be determined if the purchase was in compliance: no solicitation documents or other offerors proposals were available to be reviewed when on site. The signed contract indicated that the purchase was for a POS software system for meal counting, claiming, and processing of free and reduced lunch applications. It was determined that the contract was in the final year of a five year agreement; the total amount spent for the 2015/16 year was \$3,527.50. In the future, all solicitation documents must be kept and made available to determine if the selection was done correctly.

As part of the **Formal Purchase Method**, NDA reviewed one vendor, in its renewal year review, with its food service management company:

- Chartwell's Compass Group

The submission of the renewal documents by HCSD was done in compliance with Federal regulations as the approval of the subsequent year contract was done by NDA on June 8<sup>th</sup>, 2015, prior to execution of the contract start date of July 1<sup>st</sup> 2015. The district was monitoring the contract by using the provided monitoring form from NDA. For the current year (2016/17), the document was being reviewed by the superintendent as it was just presented to him by the food service coordinator.

Regarding USDA Foods, for the 2015/16 School year, the district was given entitlement of \$ 48,036.87 dollars and \$ 36,405.96 was used; this is a 76% usage rate. The result was \$11,630.91 was left unused, which could have been taken as a credit off the food service management company invoice for the year, to the benefit of the nonprofit school food service account.

As a best practice, the Nevada Department of Agriculture recommends that the HCSD District continues to fully utilize the entire amount of the USDA Foods entitlement dollars through the State of Nevada Commodity Food Distribution Program and/or with the DOD Fresh program. Since a food service management company is in place for the upcoming year (2017/18), it is required that the district receives full credit of the Federal Food value, shipping, and handling for the USDA Food purchases made within that school year. Based on interviews

with HCSD staff, it appears that the USDA Foods crediting has been more efficient and streamlined in the current year (2016/17). Moving forward, it is highly suggested that the district staff continues to credit the entire monthly purchases on the monthly food service invoice with a copy of the NDA and DOD Fresh invoices attached.

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.

As part of training and technical assistance, please find attached the following guidance documents: Numbered memo NSLP 2016-14 (issued on November 3, 2015): *Questions and Answers on the Transition to and Implementation of 2 CFR Part 200*, Procurement Methods Quick Reference Chart, a pilot Procurement Plan prototype, and a sample written code of standard of conduct policy. In addition, further technical assistance will be provided if requested by staff on the procurement review findings.

**Corrective Actions Required:**

- Develop a Food Service purchasing plan to bring it into compliance with the Federal regulations per 2 CFR Part 200.320 with regards to procurement methods for program operators. A sample pilot procurement plan is provided which the district may use or they may develop their own procurement plan. Once the final plan is approved by NDA, all district purchases in child nutrition must follow the plan as prescribed.
- Develop a written code of standards of conduct to cover conflicts of interest (real or apparent) and to govern the actions of the employees engaged in the selection, award and administration of contracts. The standard of conduct must provide for disciplinary actions to be applied for violations of such standards by officers, employees, or agents of the non-Federal entity.

**Summary**

One of the above mentioned items currently require fiscal action: meal counting and claiming. As noted above the total amount of fiscal action for this area is \$675.01 which will be reclaimed on future claims for reimbursement. Please note that if repeat violations are found on subsequent reviews in any program area fiscal penalties may be assessed and the additional \$0.06 reimbursement may be turned off until the program is brought into compliance with federal regulations. **All corrective actions must be completed and submitted by June 30, 2017.** If 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 complete if not submitted by the required due date. Please see the attached document, NSLP-SBP-SMP Appeals sponsor handout for direction on how to appeal the denial of all or a part of the claim for reimbursement or withholding funds. If you have any questions about the required corrective action please contact Brittany Mally at (775) 353-3663 as soon as possible.

**Best Regards,**



Brittany Mally RD,  
NV Dept. of Agriculture, Food and Nutrition Division

Humboldt County School District

June 1, 2017

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Attachments: Appeal Procedures, USDA Prototype Application, Procurement Package

Cc: Laura Jensen, Food Service Coordinator  
Ian Tolotti, Director of Dining Services Chartwells  
Ronda Haven, Finance Supervisor  
Catrina Peters, School Nutrition Services Manager, NV Dept. of Agriculture, FND  
Rose Wolterbeek, School Nutrition Services Specialist, NV Dept. Of Agriculture, FND  
Edward Coleman, Quality Assurance Specialist, NV Dept. Of Agriculture, FND

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