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January 11, 2017

Certified Letter# 7005 0390 0002 3297 8546

Chris Cooper, Nutrition Coordinator  
Carson City School District  
P.O. Box 603  
Carson City, NV 89702

Dear Ms. Cooper,

The Nevada Department of Agriculture, Food and Nutrition Division conducted an Administrative Review of the Carson City School District from December 6-8, 2016. The Administrative Review team consisted of Catrina Peters, School Nutrition Services Manager, Rose Wolterbeek, School Nutrition Services Specialist, and Brittany Mally, Quality Assurance Specialist. 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 December 8, 2016 to discuss the major findings of the review. Chris Cooper, Nutrition Coordinator, Katie Schartz, Food Service Director Aramark, and Andrew Feuling, Director of Fiscal Services were in attendance. The Carson City School District received an onsite review of its School Breakfast Program (SBP), its National School Lunch Program (NSLP), After School Snack Program, and 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.

The counting and claiming of meals observed during the onsite review is in compliance. In addition no errors were found for the meal counts reviewed for the month of review. The benefit issuance document contained all the necessary information. A randomized sample of 341 applications were reviewed to ensure that they were correctly certified and not missing information. This contained students who were certified via the direct certification list. Below is a list of the errors found:

- Three applications were found to have the student at the wrong benefit status. The students were certified as free but should have been reduced.
- When verifying the students applications that were marked as categorically eligible, there were two applications that were filled out on the online system with Horizon that had no case number on them, and one online application with no parent/guardian signature entered
- One paper application had a case number that was 11 numbers long, a valid case number contains 9 numbers
- There were multiple applications that had a certified eligible date past the ten day processing requirement after the application was returned to the school district. This was explained and was a result of the student database program Infinite Campus not being able to recognize the students. As a result the admin assistant had to take additional time to figure out why the program was not recognizing the student and correct it so the student's meal eligibility could go through to Infinite Campus.

All errors found with the paper applications were fixed during the review and no further action is needed for them. The errors found with the web based applications required a call to the application program company and was to be fixed on their end. Documentation will be needed to show that those problems have been addressed and fixed. All verified and denied applications selected for review were in compliance.

**Corrective Action Required:**

- For the web based application that had the wrong eligibility status with the students marked free and should have been reduced, please show documentation that their status has been changed to reduced.
- For the web applications that were marked as categorically eligible but no case numbers were provided, show documentation that a case number has been received and that the problem has been fixed by Horizon.

- For the web applications that had no signature entered, provide documentation that Horizon has or is working on fixing that problem.

All letters sent home to families for the school meal program must contain the most current USDA statement against discrimination. Upon review of the letters used by CCSD it was found that the non-discrimination statement being used is an old version of the statement.

**Corrective Action Required:** For the following letters: denied, free, reduced, and direct certification please replace the non-discrimination with the full USDA statement against discrimination found below. Submit to NDA for review.

“In accordance with Federal civil rights law and U.S. Department of Agriculture (USDA) civil rights regulations and policies, the USDA, its Agencies, offices, and employees, and institutions participating in or administering USDA programs are prohibited from discriminating based on race, color, national origin, sex, disability, age, or reprisal or retaliation for prior civil rights activity in any program or activity conducted or funded by USDA.

Persons with disabilities who require alternative means of communication for program information (e.g. Braille, large print, audiotape, American Sign Language, etc.), should contact the Agency (State or local) where they applied for benefits. Individuals who are deaf, hard of hearing or have speech disabilities may contact USDA through the Federal Relay Service at (800) 877-8339. Additionally, program information may be made available in languages other than English.

To file a program complaint of discrimination, complete the [USDA Program Discrimination Complaint Form](#), (AD-3027) found online at: [http://www.ascr.usda.gov/complaint\\_filing\\_cust.html](http://www.ascr.usda.gov/complaint_filing_cust.html), and at any USDA office, or write a letter addressed to USDA and provide in the letter all of the information requested in the form. To request a copy of the complaint form, call (866) 632-9992. Submit your completed form or letter to USDA by:

- (1) mail: U.S. Department of Agriculture  
Office of the Assistant Secretary for Civil Rights  
1400 Independence Avenue, SW  
Washington, D.C. 20250-9410;
- (2) fax: (202) 690-7442; or
- (3) email: [program.intake@usda.gov](mailto:program.intake@usda.gov).

This institution is an equal opportunity provider.”

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

The National School Lunch 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.

Carson City School District has a great menu and variety of foods offered for students. Meals looked appetizing and meet all meal pattern requirements. Staff interviewed were friendly and knowledgeable and helpful. Proper signage of what constitutes a reimbursable meal was easily visible at all point of sales. Offer versus serve was being implemented correctly and staff were seen making students grab an additional fruit and or vegetable to make the meal reimbursable.

### **Production Records**

It is a Federal requirement that menu production records (MPRs) must provide certain information. A list of the required information is attached to this letter. Following is a timeline from the Admin Review conducted in December of 2013 in regards to the production records.

- May 21, 2014 corrective action letter sent which included these findings:
  - o Veggies bars were not being included on the production records. Technical assistance was provided on how to incorporate veggies bars into the production records or have a standalone production record for them.
  - o At Carson High School the production record for the deli line was very difficult to read and determine what amount of product was pulled, prepared, served and left over. Corrective action required that information be provided on how that was to be corrected.
- June 30, 2014 Carson City School District responded
  - o Letter stated that "The District will assure that the deli production records are easier to read, and understand what items were prepared, served and left over."
- October 2014 CCSD submitted production records for the deli.
  - o They were using the standard production record form from Nutrikids for the deli items which did make it clear what items were being prepared, the product pulled, reimbursable meals served, and amount left over. They were still using the deli production record form from Aramark as it was also submitted with those production records but all reimbursable meals served were tracked on the standard production record form from Nutrikids which met the corrective action.
  - o Production records submitted had the amount pulled listed and all required information for production records.

When production records were reviewed for sites for the current Admin Review conducted in December of 2016 the following issues were found:

- Not all of the required information was listed such as amount of product pulled. In place there was amounts of items listed to make the food item however that was in the form of a recipe. That is the amount needed which is not always the amount that was pulled.
- For Carson High School the deli production record was back to being kept on the same form as when the prior review was conducted and not on the standard production record form from Nutrikids. The deli production form from Aramark is hard to read and it is difficult to tell what amounts were prepared, served, and left over. It cannot be determined how many reimbursable meals were served by looking at that production record. After that was brought up to the staff at that site it was determined that the production record wasn't filled out completely and the total reimbursable meals served was not listed.

When looking at production records it should be clear how many reimbursable meals were served based on the amount of planned meals, amount pulled, actually prepared, and amount leftover. This information is necessary to support the claiming of reimbursable meals. When reviewing production records from CCSD that information is unclear, especially with the deli production record. Since it was observed during the current Admin Review that production records are incomplete and that the deli production records have reverted back to the same form, this counts as repeat findings. Per the Administrative Review manual page (78) fiscal action may only be taken for repeated violations that violate Performance Standard 2 if:

- The Nevada Department of Agriculture (NDA) has provided technical assistance
- The NDA has previously required and monitored corrective action
- The SFA remains noncompliant with the meal requirements established in 7 CFR 210 or 220

Technical assistance was provided during the last Admin Review in 2013 and the corrective actions then submitted for production records met the standards. CCSD has been provided with sufficient technical assistance on this matter and webinars, samples of completed production records, and the list of what information is required on a complete production record is available on the NDA website. It is expected that CCSD meet the standard for production records.

**Notice of Fiscal Action:** Fiscal action will be taken for this repeat violation. Since the number of reimbursable meals served from the deli could not be determined from the production records submitted for the month of review for the week of 9/26-9/30/16, those meals cannot be claimed for reimbursement. The month of review was September 2016 and during the week of 9/26/16-9/30/16, 426 reimbursable meals were served through the deli line. Per the attached fiscal action sheet the total of those meals resulted in a fiscal action of \$1,102.32 which is above the \$600 threshold, as such fiscal action is being taken. NDA must recoup that amount from the CCSD.

**Corrective Actions Required:** Please make the following corrective actions.

- Add a column for amount pulled to production record form.
- Edit the deli production record to make it more clear or begin recording deli production on the standard production record form from Nutrikids.
- Submit one weeks' worth of production records for Mark Twain Elementary School and Carson High School. Be prepared to submit one week's worth of production records to NDA at any point throughout the next year. NDA will be spot checking production records from CCSD to make sure the corrective actions made stay in place.
- All food service staff tasked with filling out production records 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?qs=cEIEPTIzOA>. Submit certificates of completion to NDA.

### **Comprehensive Resource Management**

A comprehensive resource management review is required when certain risk based criteria are met by the school district. The Carson City School District triggered a comprehensive resource management review of two areas: the maintenance of the nonprofit 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. The areas covered are detailed below.

After an in depth review of the maintenance of the nonprofit school food service account there were no findings and no corrective actions necessary in this area. In regards to the sale of non-program foods there were no major findings. It was noted that the prices of a la carte foods have not been reviewed. At the exit conference the food service coordinator and the FSMC consultant were advised to review the a la carte pricing with the FSMC pricing tool.

**Corrective Action Required:** Review the a la carte pricing with the FSMC pricing tool. Submit pricing adjustments made and an updated list of the a la carte prices to NDA for review.

### **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 director was hired in October of 2016 and has met the new hiring requirements.

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 have increased for the 2016/2017 school year and will remain as such going forward. The 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

All training hours for food service employees were met for last school year 2015-2016. No corrective action is required.

### **Food Service Management Company**

As Carson City School District utilizes a Food Service Management Company (FSMC), this area was reviewed as well. Several areas needing correction were identified and some items are repeat findings from previous reviews.

Per USDA guidance, the school district must monitor the FSMC contact on an annual basis. During the Admin Review conducted in December of 2013 it was found that an annual review process was not in place. There were aspects of the contract that were not being fully executed by the FSMC. The corrective action was to provide information on how those items related to the FSMC contract will be addressed and corrected. In response CCSD said "we will conduct an annual review with the FSMC's District Manager or VP of Operations. This review process (check list) will help monitor the contract obligations of the FSMC. We will also conduct quarterly reviews with the FSMC's on site consultant." A year later in the fall of 2015 it was determined by NDA that the review process was not being followed as the district had outlined in its FSMC Contract Monitoring document. This prompted a meeting between NDA and the CCSD that was held on January 21<sup>st</sup>, 2016 to discuss what part of the annual and quarterly reviews were being completed and how the FSMC contract was being monitored, items not being monitored, and items in the contract that were not being fulfilled were discussed in detail. The items specifically discussed were:

1. Overview of contract monitoring

- a. Were deadlines met as dictated in the “Carson City School District FSMC Contract Monitoring” document
  - b. Was the December 1 deadline for the Quarterly Monitoring Review met
  - c. How are invoices reviewed to ensure they only include allowable expenses
  - d. How are discounts, rebates and credits monitored to ensure the correct amount is credited
    - i. How is commodity entitlement being monitored
2. First 21 days of menu—approval by district
  3. Nutrition Education
  4. Uniforms
  5. Food Committee and Advisory Board
  6. Health Certificates
  7. Monitoring of projected “subsidy”

NDA made it clear that they expected CCSD to follow the plan made for monitoring the FSMC and that CCSD would be receiving an Administrative Review this coming school year to ensure the contract was being monitored and the action was being taken on contract provisions that were not being put into place.

During the onsite portion of the Admin Review conducted in December 2016 it was determined that annual and quarterly monitoring is being conducted as planned. However, certain items in the contract have not been addressed and continue to not be followed or monitored. This includes the following:

- In the FSMC contract it states that the district shall “establish an advisory board composed of parents, teachers and students to assist in menu planning.” This is a federal requirement and was addressed at the January 21<sup>st</sup>, 2016 meeting. One attempt was made to have a meeting about menu planning and only one principal attended with no students or parents. That meeting was held in 2015. No other attempts have been made to form the advisory board since then.
- The FSMC contract also contains several items that the FSMC is supposed to be providing for CCSD. These are the following which can be found on page 6 of the FSMC contract:
  - o Item D: Nutrition Education
  - o Item F: Uniforms
- Upon review and discussion with CCSD the FSMC has not been providing these services. Since that is the case, either these items need to be removed from the contract or they need to be monitored and made sure that the FSMC is providing all of the services included in the contract.

### **Corrective Action Required**

- Choose at least one district staff involved in monitoring the FSMC to complete the USDA State Agency Guidance to Procurement Topics 1, 2, & 3 courses from

the Institute of Child Nutrition. The course can be found here:  
<http://www.nfsmi.org/Templates/TemplateDefault.aspx?qs=cEIEPTIzOA>.

- Submit copies of certificates of course completion to NDA.
- As the contract with the FSMC is up for renewal this year, of the components that are not required to be in the contract such as uniforms and nutrition education, decide which ones the district will retain in the contract or if any of the items will be removed through a contract amendment. List these items in a formal document and include explanations as to why you will be keeping or removing them. Submit to NDA for review.
- Additionally, a draft of the contract renewal document must be submitted to and approved by NDA before a renewal is executed.

### **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 Carson City School District the reviewer examined the District's procurement procedures. A district purchasing policy was in place found in a number of Policies (#601, 606, 606.2, 607, and a Purchasing Process Summary and Guideline document (effective July 1, 2013)). The Carson City School District will need a few modifications to meet Federal requirements. Per USDA guidance, the procurement plan must outline the specific procedures per 2CFR

Part 200 for program operators 2CFR 318 (a). Specifically, the revised 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 to modify the existing plan. Also, a pilot procurement plan is attached which the district may consider for use for its school nutrition purchases. 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.

Based on the responses received by Carson City School District's responses from NDA's procurement worksheet, 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): Nevada Exhaust Cleaning. The reviewer examined the Carson City School District's purchase orders and receipts/invoices 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): John Burrows Bonanza Produce. The reviewer found the purchase was not in compliance. No solicitation documents were available to be reviewed when requested. The acquisition of fresh produce was not procured with any process in place by the district or by the contracted Food Service management company. Based on discussions with food service staff it was selected as the vendor based on the fact that it was a local company as a criteria for award, not based on any object criteria or formal procurement process.

The District's Procurement Policy for Supplies and Services (per the **Purchasing Process Summary and Guideline** document) require formal bids and advertisement for purchases made \$50,000 and up. This threshold is more restrictive than the State and Federal purchasing threshold, so the most restrictive thresholds apply in general procurement practices with Federal funds. While the State procedures for local government purchasing per NRS 332 are in effect, and referenced in the district's Purchasing Guidelines, per NRS 332.115(e), perishable goods are an exception to

requirements for competitive bidding. This exception was not noted on the district's current guidelines even though it is in effect under NRS Procedures for Local Government Purchasing and should be incorporated.

Based on the district's current Purchasing Process Summary and Guidelines, currently in place, the annual purchases for fresh produce are over \$50,000 so the district must advertise and use a formal sealed bid method with a public bid opening. If the district chooses to modify its child nutrition procurement plan to align with NRS 332.115 (perishables are exempt as noted above) the threshold would be held at the Federal value of \$150,000. Therefore, the district could obtain two or more quotes for produce and proceed with a small purchase threshold criteria. If the solicitation document contained a clause for local purchase preferences as one of its scoring criteria, then the district could still allow for Local Purchasing to align with its current policy (#608 Rev. May 10, 2011). The largest component of the scoring rubric still must be evaluated on price.

However, if the district does not divert USDA Foods entitlement funds to the Department of Defense produce program, then the annual amount of produce may exceed the district's small purchase threshold if the same amount of produce is made in a subsequent school year. Thus, a formal purchase method may be needed. For example, the amount of produce spent in the 2015/16 school year was self-reported at \$89,466.35. In addition, the amount of DOD Fresh entitlement was \$63,496.88. The total amount of produce, therefore, is valued at \$152,963.23. Since this amount exceeds the Federal threshold of \$150,000 a formal method should be in place if DOD Fresh produce is not to be utilized in future years.

As part of the **Formal Purchase Method**, NDA reviewed two vendors:

- Aramark Educational Services LLC for Food Service Management

The contract with Aramark was a new contract year for the District; it was signed on June 12, 2015 by the district and Aramark. The renewal was not received and approved prior to execution by NDA as requested via email on February 12, 2015 (prior to contract signing) and via correspondence on August 3, 2015 (after contract signing). While the NDA cannot prohibit a district from entering into a legally binding contract for Food Service, federal reimbursement funds from the National School Lunch Program cannot be used for unallowable expenses, such as to pay fees that result from a contract that has unallowable provisions. Per USDA guidance, and in an effort to prevent districts from engaging in a contract that would not be an allowable use of federal funds, the state agency must approve a FSMC contract before it is fully executed.

- Model Dairy

Regarding the district's milk purchases, no solicitation documents were in place for this purchase by the district or the contracted food service management company. Based on the annual dollar amount spent in 2015/16 reported at \$160,880.17, the district must conduct a formal procurement process (over \$150,000 in expenses). Since the district is only buying a few fluid milk products (0% unflavored, 0% flavored, and 1% unflavored

products in the half pint size), NDA suggests considering conducting an Invitation for Bid which would allow a specification to include the products to be purchased, detailed delivery locations and allowable delivery times.

A written code of standard of conduct was requested as part of the procurement review. It was determined that Carson City 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.

**Corrective Action Required:**

- Modify the district's current 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 incorporate into their current district plan. Once the plan is approved by NDA, all school nutrition purchases must follow the plan.
- 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.
- Properly procure using a formal procurement method for milk for the upcoming school year (2017/18); a sample IFB is provided that the district may use for milk purchases. This should be completed by June 30, 2017 and must be fully in place by July 1, 2017.
- Properly procure produce for the upcoming school year; the district should develop clear specifications for requested products and obtain two or more bids for purchased items. If the district wishes to follow NRS 332.115 for exempting perishable goods from competitive bidding requirements, it may do so if it is part of the approved procurement plan (#1 above).
- All Food Service management contracts and renewals must be approved by NDA prior to execution if the district wishes to use Federal funds to pay for these services. Please send the contract amendment for the 2017/18 school year to NDA for prior approval if the district plans on continuing with a one year extension with Aramark. Please allow two weeks minimum for NDA to approve the amendment.

- 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 written code of standard of conduct sample. As mentioned in the exit conference reaching out to Washoe County School District is suggested to see a sample Invitation for Bid template (suggested for milk). In addition, further technical assistance will be provided if requested by staff on the procurement review findings.

### Summary

One item listed above, production records, requires fiscal action. The total amount of fiscal action to be taken on CCSD is \$1,102.32. 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 February 10, 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,LD, Quality Assurance  
Specialist, NV Dept. of Agriculture, Food and  
Nutrition Division

Attachments: Appeal Procedures, Administrative Review Forms, Procurement Package

Cc: Andrew Feuling, Director of Fiscal Services CCSD  
Katie Schartz, Food Service Director Aramark

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January 11, 2017

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Catrina Peters, School Nutrition Services Manager, NV Dept. of Agriculture, Food and Nutrition Division

Rose Wolterbeek, School Nutrition Services Specialist, NV Dept. Of Agriculture, Food and Nutrition Division