

Nevada Youth Training Center

Administrative Review Report

December 13, 2018

National School Lunch Program Food and Nutrition Division

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Food and Nutrition Division

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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's administered by the Nevada Youth Training Center (NYTC) from November 7-8, 2018.

An exit conference was held on Thursday, November 8, 2018 which provided a summary of the work performed and we discussed 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 NYTC staff for their time and assistance extended to our State Agency staff during this process.



II. Introduction

An entrance conference was conducted on Wednesday, November 7, 2018. The review was conducted at the Nevada Youth Training Center in Elko, Nevada. The Administrative Review was conducted by Rose Wolterbeek (lead) and Jillian Smith. NYTC staff included Greg Thornton, Arturo Martinez, Vern Harlow and Nancy Potter. 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 Thursday, November 8, 2018 which provided a summary of the work performed at NYTC 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, September 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 NYTC'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

- NYTC offers a culinary program for the students to obtain their food safety certifications and gain working food service experience.
- NYTC continues to offer many scratch cooked items as possible. The menu includes a variety of dishes including home-made soups, whole grain biscuits, crisp salads, fresh fruits and vegetables on the breakfast and lunch menus.
- The kitchen is clean, well-organized, and run efficiently. All records were available on site and kept in accordance with program regulations.



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VI. Critical Areas of Review

- Performance Standard I- Meal Access and Reimbursement
 - o Certification and Benefits Issuance
 - Meal Counting and Claiming
- Performance Standard II- Meal Pattern and Nutritional Quality
 - o Meal Components and Quantities
 - o Offer versus Serve
 - o Dietary Specifications and Nutrient Analysis
- Comprehensive Resource Management
 - Maintenance of the nonprofit school food services account
- General Areas
 - o Civil Rights
 - Professional Standards
 - o Local School Wellness Policy
 - Water Availability
 - o Food Safety
 - Reporting and Recordkeeping
- Procurement
 - o Procurement Plan
 - Code of Conduct
 - Procurement Documents and Records



VII. Findings and Required Corrective Action

Finding	Corrective Action	Due Date
No findings were identified on the Review	Not applicable	N/A

VIII. Recommendations and Technical Assistance

Recommendations:

1. Best Practice: On the monthly Count Sheet consolidation, please add a signature line. (Note: this was done and completed on site so no further suggestions from NDA staff).

Technical Assistance:

1. <u>Technical assistance provided for Procurement Review record keeping</u>: On two sample invoices, the vendor substituted the product to meet the delivery item (flavored milk). Since the substituted product was a different price (lower cost per the RFP documents) a credit should have been issued for the variance, or the invoice should have been manually adjusted upon payment for the correct price. This was corrected on site so no further action is required. Moving forward, NYTC staff should monitor the bid price with the invoice price and pay accordingly.

IX. Corrective Action Response: None due

X. Appendix

- A. Appeal Procedure-attached
- B. Procurement Review Detail-attached

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