



**Northern Nevada Child and  
Adolescent Services**  
*Administrative Review Report*

October 4, 2019

National School Lunch Program  
*Food and Nutrition Division*

# Administrative Review Report

## Food and Nutrition Division

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# Administrative Review Report

## 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, SBP, and the After-School Snack Program administered by Northern Nevada Child and Adolescent Services (NNCAS) from August 20-21, 2019.

An exit conference was held on Tuesday, August 20, 2019 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 Northern Nevada Child and Adolescent Services' 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, August 20, 2019. The review was conducted at the NNCAS Administrative Office in Reno, Nevada. The Administrative Review was conducted by Bobbie Beach, School Nutrition Coordinator II; and Chris Tate, Program Officer. NNCAS staff included Bonnie Vogler, Imran Hyman, Renee Polley, Tiffany Dyer, Susie Miller, and Charles Weaver. This report is based on the results of the offsite assessment, the onsite review of files, and meal service observations of the breakfast, lunch, and snack programs. An exit conference was held on Tuesday, August 20, 2019 which provided a summary of the work performed at NNCAS 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, July 2019. The Procurement Review covered all documents, records, invoices, and procedures relating to the procurement for the SFA for the year of review, school year 2018-2019.

## **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 NNCAS 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**

- Recordkeeping: NNCAS demonstrates exceptional organization with their record keeping.
- Onsite Self-Monitoring: NNCAS self-monitoring forms were extremely detailed. NDA staff could easily trace the date the self-monitoring took place, any corrective actions needed, and the date the deficiency was corrected
- Meal Quality: The meals observed at ATC were all scratched cooked. The meals looked colorful and appealing.

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**VI. Critical Areas of Review**

- Performance Standard I- Meal Access and Reimbursement
  - Certification and Benefits Issuance
  - Meal Counting and Claiming
  
- Performance Standard II- Meal Pattern and Nutritional Quality
  - Meal Components and Quantities
  - Offer versus Serve
  - Dietary Specifications and Nutrient Analysis
  - Menu Production Records
  
- Comprehensive Resource Management
  - Maintenance of the Non Profit School Food Services Account
  
- 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

No findings were identified.

## VIII. Recommendations and Technical Assistance

### Recommendations:

1. **FY2019 Equipment Grant-** When observing the central kitchen and talking with NNCAS staff, they identified some equipment needs. NDA staff encourages NNCAS to apply for the [FY2019 Equipment Grant](#). NDA released the Request for Application (RFA) in September for SFAs to apply. Application deadline is November 15, 2019.
2. **Incorporate School Garden/locally grown produce in NSLP or ASSP programs-** School Gardens and purchasing locally grown food provides a multitude of benefits for students including learning about healthy food, learning how to grow fruits and vegetables, and promoting better nutrition. USDA supports such efforts through its Farm to School Program. Nonprofit School Food Service Funds can be used to support local farmers and school garden programs. See Appendix C for more information.

### Technical Assistance:

1. Technical assistance provided to add position title, hire date, # of required training hours, and total hours year to date to professional standards tracking log. According to *Administrative Review Manual*, 2018-2019 edition, SFAs may create their own method of tracking but it must include all elements listed in USDA's Professional Standards Training Tracking Tool which includes: Employee first and last name, hiring date, employee position, required hours of training, training title, training date, key area(s), length of training, school year training is applied to, and completed hours to date.

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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. USDA Guidance for Local Purchasing

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