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**Pinecrest Academy**  
*Administrative Review Report*

June 6, 2019

National School Lunch Program  
*Food and Nutrition Division*

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- B. Procurement Review Detail
- C. Procurement Plan Template
- D. NDA Numbered Memos & guidance documents (4 total)

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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 administered by Pinecrest Academy from May 6<sup>th</sup> -7<sup>th</sup>, 2019.

A preliminary exit conference was held on May 7<sup>th</sup>, 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 Pinecrest Academy's staff for the time and assistance extended to our entire State Agency staff at NDA during this process.

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## **II. Introduction**

An entrance conference was conducted on May 6th, 2019. The review was conducted at Pinecrest Academy (PA) in Henderson, Nevada. The Administrative Review was conducted by Rose Wolterbeek and Lindsay Talbot. PA staff included Lora Flitton, Office Manager; and Kendra Thornton, Federal and State Programs Manager of Academica Nevada. This report is based on the results of the offsite assessment, the onsite review of files, and meal service observations of lunch. A preliminary exit conference was held on May 7th, 2019 which provided a brief summary of the work performed at PA and we discussed any additional documentation needed, preliminary findings, and observations.

## **III. Scope**

The Administrative Review covered documents, records, and procedures relating to the administration of the NSLP for the month of review, November 2018. The following site was reviewed as a part of the on-site Administrative Review:

- Cadence Campus

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 EA'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**

- State agency staff were extremely impressed with Cadence Campus operation, including the expansion. The kitchen was remarkable and kept very clean. Kitchen staff were friendly and knowledgeable of program requirements.
- Record keeping was very well organized, complete and accurate. The staff at Pinecrest Academy, including Academica Nevada, are to be commended on how organized the files were for the NSLP operation, especially the Free and Reduced applications, direct certification files and the homeless certification lists.

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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
  
- 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**

<b>General Program Compliance</b>		
<p><b>Professional Standards</b> – Regulations establish hiring standards for new school nutrition program directors at the School Food Authority (SFA) level and annual training standards for all school nutrition program directors, managers, and staff. References include but are not limited to 7 CFR 210.30. At least 8 hours of food safety training is required either not more than 5 years prior to their starting date or completed within 30 calendar days of employee's starting date; Federal Register 26181 Vol. 80, No. 88 Thursday, May 7, 2015).</p>		
<b>Finding</b>	<b>Corrective Action</b>	<b>Due Date</b>
<p>#1 <b>Minimum Prior Training Standards for School Nutrition Directors</b> At least 8 hours of food safety training is required; either not more than 5 years prior to their starting date or completed within 30 calendar days of employee's starting date for all School Nutrition Directors hired after July 1, 2015. <i>Note: at the time of review only the 2-hour food handler card was held by School Nutrition Director.</i></p>	<p>School Nutrition Director/NSLP Coordinator must complete 8 hours of food safety training (manager level)</p> <p>Submit completed training certificate for NDA to review.</p>	<p><b>July 8th, 2019</b></p>
<p>#2 <b>Professional Standards Training Tracking</b> Annual professional standards training hours must be tracked for all employees who have duties associated with the School Nutrition program. SFAs may utilize the USDA Training Tracking tool or develop an alternative training tracking tools that includes all the minimum required fields listed in the USDA Professional Standards Training Tracker Tool.  The alternative training tracker tool utilized by PA was missing the key topic and learning codes for each training.</p>	<p>Add the key topic and learning codes to your professional standards tracking chart. Submit a blank template to NDA for review.</p> <p>See Appendix D for detailed list of professional standards key topic and learning codes.</p>	<p><b>July 8th, 2019</b></p>

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## VIII. Recommendations and Technical Assistance

### Technical Assistance:

1. Smart Snack Compliance: The vending machines on site at the Cadence location contained two items that were not on Pinecrest's *Approved Product List*: Epic & Mr. Flav beverage, due to the disallowance of carbonated beverages in Nevada, and calorie levels, respectively, which exceeded the minimum amount for the age/grade group at the school. This was corrected on site with the removal of these products as certified by the meal vending machine company.
2. Professional Standards: Moving forward, document NDA provided trainings as NDA as the *trainer*, and not "You Tube video". Also, NDA in person trainings may be added to the log, such as the Meal Pattern training and the Procurement training held in February 2019 at our Las Vegas office, as attended by the Pinecrest staff.
3. Civil Rights: The "*And Justice for All*" poster was added to the front administration office at the Cadence Campus. In addition, a civil rights log was created on site.

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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, NDA may need to 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. NDA Appeal Procedure
- B. Procurement Review Detail
- C. Procurement Plan Template
- D. Numbered Memos & Guidance Documents (four total)
  - i. NSLP 2016-42 Q&A on the Final Rule: "Professional Standards for State and Local Nutrition Programs Personnel as Required by the Healthy, Hunger-Free Kids Act of 2010"
  - ii. NSLP 2019-14 Federal Micro-Purchase & Simplified Acquisition Thresholds for all Child Nutrition Programs
  - iii. Professional Standard Learning Code Objectives
  - iv. Professional Standard Flyer

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