



**CIVICA Nevada Career & Collegiate
Academy**

Administrative Review Report

November 2, 2022

National School Lunch Program
Food and Nutrition Division

Administrative Review Report
Food and Nutrition Division



Table of Contents

I. Executive Summary..... 2

II. Introduction..... 3

III. Scope..... 3

IV. Methodology 3

V. Noteworthy Achievements..... 3

VI. Critical Areas of Review..... 4

VII. Findings and Required Corrective Action 5

VIII. Recommendations and Technical Assistance 6

IX. Corrective Action Response 7

X. Appendix..... 7

- a. Appeal Procedure
- b. Procurement Review
- c. NDA approved Production Record Template

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Administrative Review Report

Food and Nutrition Division



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 administered by CIVICA Nevada Career and Collegiate Academy from October 4-6, 2022.

An exit conference was held on Thursday, October 6, 2022, 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 CIVICA Nevada Career and Collegiate Academy 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, October 4, 2022. The review was conducted at the CIVICA Nevada Career and Collegiate Academy in Las Vegas, Nevada. The Administrative Review was conducted by Erica Jaramillo. CIVICA Academy staff included Flora Leon and Bruno Espey. Academica Nevada staff included Kendra Thornton and Jennifer Lindemon. 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 6, 2022, which provided a summary of the work performed at CIVICA Academy 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, August 2022. The Procurement Review covered all documents, records, invoices, and procedures relating to the procurement for the SFA for the year of review, school year 2021-2022.

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 CIVICA Academy'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

- School Wellness: CIVICA Academy has a unique webpage for sharing wellness information with public. Including policy, menus, Civil Rights, and Nutrition education website.
- Implementation of Donation Bags at lunch time instead of share table.

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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

- 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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Administrative Review Report
Food and Nutrition Division



VII. Findings and Required Corrective Action

Performance Standard II – Meal Pattern and Nutritional Quality – Meals claimed for reimbursement must contain food components in specific quantities and requirements as required by regulations; the meal pattern limits calories, restricts sodium levels, limits saturated fat, and eliminates trans fats. References include but are not limited to 7 CFR 210.10 and 220.80.			
	Finding	Corrective Action	Due Date
#1	<p>Menu Production Records Production and menu records must be maintained in accordance with FNS guidance. Production records for the review month of August 2022 were reviewed.</p> <p>a. Production records missing the following essential components: Amount of food prepared, and amount served, accurate meal pattern contributions.</p>	<p>Add these required components to current production records in use. Submit a week’s worth of production records, using your updated template.</p>	December 2, 2022
#2	<p>Nutrient Analysis All areas must be compliant for all age/grade groups for total Calories, Saturated fat, and Sodium requirements set forth in HHFKA of 2010.</p> <p>For Lunch condiments, sides, and desserts were not accurately recoded based on MPRs for the month of August 2022 and September 1 & 2, 2022. With missing items accounted for, the following weeks were outside of the Sodium target of ≤ 1,230 mg and outside Calorie range of 600-650:</p> <ul style="list-style-type: none"> • August 15-19 and August 29-September 2 	<p>Consult with vendor and coordinate menus so that Calorie and Sodium requirements are met for each week of future menus.</p> <p>Submit to NDA menus and nutrient analysis for two full weeks from December 2022.</p>	December 2, 2022

General Program Compliance			
<p>Food Safety- Regulations require SFAs to establish a food safety program and maintain facilities in accordance with Federal, State, and Local Health Code regulations to reduce risks of food borne illnesses. References include but are not limited to 7 CFR 210.13, <i>USDA Guidance for School Food Authorities: Developing a School Food Safety Program</i>, NRS 429.200, 444.335, and NRS chapter 446.</p>			
	Finding	Corrective Action	Due Date

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Administrative Review Report
Food and Nutrition Division



#3	<p>Temperature Log During the breakfast meal service observation, leftover meals that were served outside, were not temped when brought back in to be stored and used the following day.</p> <p>Potentially Hazardous Foods Served for breakfast on day of review:</p> <ul style="list-style-type: none"> • Yogurt • Milk 	<p>Reference CIVICA’s HACCP SOP: Holding Hot and Cold Potentially Hazardous Foods. Incorporate procedure to temp PHFs leftover that CIVICA intends to serve again.</p> <p>Submit procedure to NDA for review.</p>	<p>December 2, 2022</p>
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VIII. Recommendations and Technical Assistance

Recommendations:

1. **Utilize the Better 4 You Meals Production Records:** The production record sheets provided by Better 4 You Meals contain the required information and would help to alleviate the double work of CIVIA staff transposing meal component information into excel production record.

Technical Assistance:

1. Meal Counting: Technical assistance was provided to edit meal counting sheet to match how Kitchen Manager is recording by periods/grade groups. This will help clean up daily consolidation counts. This was completed on-day of review for lunch counts.
2. Civil Rights: Technical assistance was provided to edit contact information throughout entire Civil Rights complaint procedure. This was completed by the end of the review process.
3. Wellness Policy: Technical assistance was provided to include breakfast consumption times on CIVICAs Wellness Policy. This was completed by the end of the review process.
4. Professional Standards: Technical assistance was provided to include missing hire date on tracking tool. This was completed by the end of the review process.

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Administrative Review Report

Food and Nutrition Division



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. NDA approved Production Record Templates-attached

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