



**Northeastern Nevada Juvenile
Detention Center**
Administrative Review Report

June 15, 2021

National School Lunch Program
Food and Nutrition Division

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 and SBP administered by Northeastern Nevada Juvenile Detention Center (NNJDC) from May 10 – May 12, 2021.

An exit conference was held on Friday, May 14, 2021 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 Northeastern Nevada Juvenile Detention Center staff for the time and assistance extended to our State Agency staff during this process.

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II. Introduction

The review was originally scheduled for the week of November 8 - 12, 2021, but was postponed due to an unexpected outbreak and staffing shortage caused by COVID-19 at NNJDC's facility. Following communications between NDA and NNJDC staff, the review was subsequently rescheduled for May 10-14, 2021. Since NNJDC had already submitted a majority of the required documentation prior to postponement, NDA accepted retaining November as the month of review as submission of an additional month was unnecessary.

An entrance conference was conducted on Monday, May 10, 2021. The review was conducted remotely with video observation at Northeastern Nevada Juvenile Detention Center (NNJDC) in Elko, Nevada. The Administrative Review was conducted by Bailey Taber, NDA School Nutrition Coordinator II. SJRC staff included Glen Ingham, Detention Director, and Juanita Coochyouma, Detention Officer III. This report is based on the results of the offsite assessment, the review of electronic files, and video observations of meal services for the breakfast and lunch programs. An exit conference was held on Friday, May 14, 2021 which provided a summary of the work performed at NNJDC along with discussion of 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, November 2020. The Procurement Review covered all documents, records, invoices, and procedures relating to the procurement for the SFA for the year of review, school year 2019-2020.

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 NNJDC'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 procedures 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

- Facility organization and cleanliness: the food storage, meal preparation, and serving areas were all clean and well organized.

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- Communication: NNJDC staff were always quick to communicate and provide any requested documentation to NDA.
- Records and resource management: the records maintained by NNJDC for the School Nutrition Program were clear and organized.

VI. Critical Areas of Review

- Performance Standard I- Meal Access and Reimbursement
 - Eligibility Documentation
 - 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
 - Revenue from non-program foods
- 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

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>Meal Pattern and Menu Planning 7 CFR 210.10 (i) requires SFAs to follow a food-based menu planning approach and produce enough food to offer each child the quantities specified in the menu pattern for the appropriate age grade group. SFAs are also required to keep documentation including menu, USDA Foods Information Sheets, CN labels, standardized recipes and/ or manufacture’s Product Formulation Statements to support the foods/recipes offered on the menu.</p> <p>NDA reviewed the waiver which was issued in 2016 for the ability to serve all youth the same meal pattern. While this is acceptable, the meal pattern implemented at NNJDC does not follow a consistent pattern in either the 6-8 or 9-12 grade groups, and in some instances even fell within the K-5 grade range. The majority of youth documented at NNJDC for SY20-21 are in the 9-12 grade category, which should be reflected in the implemented meal pattern.</p>	<p>(1) The menu cycle implemented at NNJDC must be altered to fit the requirements for the 9-12 grade meal pattern. Since NNJDC utilizes a one-week menu cycle, NDA will accept submission of one week of nutrient documents reflecting the new pattern from the end of June. This includes the weekly certification sheets and the base menu spreadsheets (nutrient analysis) for both breakfast and lunch.</p>	<p>July 14, 2021</p>

General Program Compliance

Wellness Policy – To help foster a healthy school environment, Section 204 of the Healthy, Hunger Free Kids Act added section 9A to the Richard B. Russell National School Lunch Act (NSLA) to expand the scope of wellness policies. References include but are not limited to 7 CFR 210.11; 7 CFR part 210 Appendix B; and The Healthy Hunger Free Kids Act Section 9A (204), N

Finding	Corrective Action	Due Date
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<p>#2</p>	<p>Local School Wellness Policy Compliance for the Local School Wellness Policy must meet the minimum requirements outlined in 7 CFR 210.31. These include documentation that the policy has been made available to the public, efforts to review and update the policy and how stakeholders may be made aware of their ability to participate, along with evidence of the most recent triennial assessment of the policy implementation.</p> <p>The findings pertaining to the NNJDC School Wellness Policy are as follows:</p> <ul style="list-style-type: none"> • The language outlined within the Wellness Policy for the “other wellness” goal were directed toward the benefit of adult staff of NNJDC, not the youth, which contradicts the nature and purpose of the Wellness Policy. • No evidence was supplied that the Wellness Policy goals and progress is reviewed twice per school year by the wellness committee in the past several years. 	<p>(1) Provide specific documented evidence of the assessment and/or updates of NNJDC’s School Wellness Policy. Alternatively, provide evidence to NDA that these meetings are scheduled for the upcoming school year.</p>	<p>(1) July 14, 2021</p>
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VIII. Recommendations and Technical Assistance

Recommendations:

- 1. Consider utilizing the USDA Professional Standards Training Tracker Tool –**
Although the training tracker submitted by NNJDC meets the minimum requirements, NNJDC staff expressed significant difficulty maintaining this document due to high staff turnover. NNJDC should also be tracking training hours on an annual basis and be maintaining the records on file for three years, which is a requirement for submission to NDA during the review period. The free [USDA Professional Standards Training Tracker Tool](#) should assist NNJDC staff to more adequately and accurately track school nutrition staff training hours. This was a finding on NNJDC’s last review.

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2. **Place “And Justice for All” poster inside more secure display housing** – During one of the video observations it was noted that the “And Justice for All” poster was not displayed within the meal service areas as required. NNJDC staff shared that it had just fallen down recently and showed video evidence that it had been re-hung using scotch tape. NDA recommends that NNJDC utilize more permanent measures to affix the poster to the wall, such as a plexiglass frame or cork board, so that the poster is not at risk of being displaced or lost.
3. **Maintain nutrient and component requirements within specific ranges, not to greatly exceed these amounts** – The meat/meat alternative component on the weekly cycle menu is in excess of the required range on all but one day, with several days near or more than double this amount, resulting in a weekly amount in significant excess of the maximum (23.5oz versus 17oz, 6.5oz over for the week). Although this finding has not resulted in a corrective action, NDA would prefer to see NNJDC’s menus reflect component requirements that do not greatly exceed the specified ranges, as they do in this instance. NDA recommends that NNJDC alter their menu to account for this.
4. **Consider transitioning nutrient analysis software programs** – NNJDC currently utilizes the Nutrikids program by Heartland School Solutions for their menu planning nutrient analysis software. Although this program has been in widespread use in School Nutrition Programs across the U.S., the company has been transitioning their clients away from this software to utilize newer and more user-friendly programs. Nutrikids is known to be difficult to implement, customize, and train on. NNJDC shared during the exit conference their challenges with maintaining and updating this program given significant staff turnover. NDA recommends that NNJDC consider researching and implementing a software program that is easier to use, train, and maintain for their School Nutrition Program, which should help to alleviate some of the challenges experienced in this area. Refer to the list of [USDA Approved Nutrient Analysis Software](#) for possible alternatives.
5. **Incorporate School Garden/locally grown produce in NSLP 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.

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Technical Assistance:

1. Civil Rights complaint log should document the year to which it applies, and all records should be maintained three years: The complaint log submitted by NNJDC did not specify which year it was for, and past year documents were not supplied. NNJDC shared that there had not been any complaints, and NDA clarified that although this may have been the case, those files are required to be maintained for three years regardless. NNJDC staff shared the updated and required documents with NDA.
2. Completed and filed Menu Production Records (MPRs) should include all required elements: The MPRs originally shared did not include the amounts of ingredients pulled, used, and leftover. This was also a finding on NNJDC's last AR. In the documents submitted for the last review, NNJDC was granted allowance to submit an alternate report pulled from their nutrient analysis software program to include these values. The submission of this alternative report is acceptable for this program requirement, as shared during NNJDC's last AR and reviewed during the current AR.

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
- B. Procurement Review Detail
- C. NDA School Garden Resources

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