



**Nevada Rise Academy**  
*Administrative Review Report*  
May 31, 2022

National School Lunch Program  
*Food and Nutrition Division*

**Administrative Review Report**  
Food and Nutrition Division



**Table of Contents**

I. Executive Summary ..... 2

**Administrative Review** ..... 2

        Procurement Review ..... 2

II. Introduction ..... 2

III. Scope ..... 3

V. Noteworthy Achievements ..... 3

VI. Critical Areas of Review ..... 3

VII. Findings and Required Corrective Action ..... 4

VIII. Recommendations and Technical Assistance ..... 5

**Recommendations:** ..... 5

**Technical Assistance:** ..... 5

IX. Corrective Action Response ..... 6

X. Appendix ..... 6

    a. Appeal Procedure

    b. Procurement Review

*This institution is an equal opportunity provider*

## 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 Nevada Rise Academy from May 17-19, 2022.

An exit conference was held on Thursday, May 19, 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 Nevada Rise Academy and School Food Solutions staff for the time and assistance extended to our State Agency staff during this process.

## II. Introduction

An entrance conference was conducted on Tuesday, May 17, 2022. The review was conducted at the Nevada Rise Academy in Las Vegas, Nevada. The Administrative Review was conducted by Erica Jaramillo and Procurement Review was conducted by Daniel Pimm. Nevada Rise Academy staff included Justin Brecht, Anisa Payne, and School Food Solution staff included Kaylee Smith. 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, May 19, 2022, which provided a summary of the work performed at Nevada

*This institution is an equal opportunity provider*

Rise 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, March 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 Nevada Rise 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**

- Responsiveness to requests for AR: Kaylee from School Food Solutions was very easy to work with throughout the AR process. This is appreciated as it helps the AR to run smoother and quicker.

### **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
  - Local School Wellness Policy
  - Water Availability
  - Food Safety
  - Reporting and Recordkeeping

*This institution is an equal opportunity provider*

**Administrative Review Report**  
 Food and Nutrition Division



- Procurement
  - Procurement Plan
  - Code of Conduct
  - Procurement Documents and Records

**VII. Findings and Required Corrective Action**

**Performance Standard I – Meal Access and Reimbursement** – Federally mandated counting and claiming systems for all SFAs that participate in NSLP and SBP. Free, reduced-price, and paid meals claimed for reimbursement must be served only to eligible children. Certification and benefits issuance process is the SFA’s certification of student eligibility for FRL meals and serves as a link to the SFA’s meal counting and claiming system. References include but are not limited to 7 CFR 245.2(1)(i); 7 CFR 245.6(b)(1); 7 CFR 210.7 (c)(1)(iii)(iv); 7 CFR 210.18 (g)(1)(ii)(A); CFR 210.19(c)(2)(i); and 210.19(c)(2)(ii).

	<b>Finding</b>	<b>Corrective Action</b>	<b>Due Date</b>
#1	<p><b>Meal Counting and Claiming</b>            Per 7 CFR 210.8, the school food authority establishes internal controls which ensure the accuracy of meal counts prior to the submission of the monthly claim for reimbursement. The counting and claiming observed during the review were not accurate and the following were noted:</p> <ul style="list-style-type: none"> <li>• Meal counts between SA and SFA did not match during observation: SFA was often missing 1-5 meals; but was over 10 meals at end of one lunch period</li> <li>• Lunch meal count sheets turned in for observation day was over 19</li> <li>• Point of service did not have a permanent designated space for children to pass, to allow for meals to be evaluated and counted by staff both at breakfast and lunch.</li> <li>• At breakfast, flow of line for first group did not allow for children to smoothly walk and grab food items as they had to curve towards doorway</li> <li>• At lunch, all periods entered and formed line differently. All lines causing congestion and so children would leave to cafeteria to get out of congestion and not pass the staff taking meal count.</li> </ul>	<p>Develop a business plan on how to implement a consistent line that children will follow to the point of service and how staff will accurately count and evaluate meals both in cafeteria and window line. Submit plan to NDA for review.</p>	<p><b>July 1, 2022</b></p>

*This institution is an equal opportunity provider*

## VIII. Recommendations and Technical Assistance

### Recommendations:

1. **Consider implementation of Offer vs Serve at Lunch-** There were many children that stated they could not drink milk when walking through line but had to take for meal to be claimed. Also, many children did not grab milk and meal was not claimable. If Offer vs Serve was implemented, this could help with food waste.
2. **Consider implementation of Share Table-** A share table could also help with food waste for items that children have to take with Straight Serve, but they will not end up eating (unopened foods).

### Technical Assistance:

1. Offer vs Serve (OVS) Signage- Technical assistance was provided to have additional OVS signage at the breakfast line in the cafeteria, because OVS is utilized at breakfast. OVS sign was by lunch window, but Straight Serve is utilized at lunch.
2. Production Records- Technical assistance was provided for Nevada Rise staff to record condiments as Menu item on daily production records when there are condiments served with meal.
3. Civil Rights Complaint Log- This item was not turned in upon initial request. Technical assistance was provided to create and ensure Compliant Log is on file for every school year. Compliant Log was created and submitted during onsite review. It is now in compliance.
4. School Wellness Policy- This item was submitted upon initial request. It was missing the following: NRS section and Smart Snacks/Beverage Nutrition Standards. These items were added, and policy resubmitted. It is now in compliance.
5. School Wellness Committee Meeting- Nevada Rise had one committee meeting in the 2021-2022 school year but was unable to complete two meetings. Technical assistance was provided to Nevada Rise staff to ensure that two committee meetings are scheduled and completed during the next school year.
6. Professional Standard Training Tracker- This item was submitted upon initial request. It was missing the hire date. This item was added, and the tracker resubmitted. It is now in compliance.
7. HACCP Manual- This item was submitted upon initial request. It was missing a table of contents. This item was added, and HACCP manual resubmitted. It is now in compliance.

*This institution is an equal opportunity provider*

## 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

---

*This institution is an equal opportunity provider*