



**Quest Preparatory Academy**  
*Administrative Review Report*

February 1, 2023

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 and SBP administered by Quest Preparatory Academy from January 24-25, 20123.

An exit conference was held on Wednesday, January 25, 2023, 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 Quest Preparatory 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, January 23, 2023. The review was conducted at the Quest Preparatory Academy Northwest Campus in Las Vegas, Nevada. The Administrative Review was conducted by Erica Jaramillo. Quest staff included Renee Crain, Wendy Siedlecki, Janelle Veith, Stacy Cool, and Taylor Davis. 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 Wednesday, January 25, 2023, which provided a summary of the work performed at Quest Northwest Campus 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, November 2023. 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 Quest'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

- Recordkeeping: Quest demonstrates exceptional organization with binders and files. Keeping records from previous years neatly separated and accessible.
- Meal counting: Quest has an accurate meal counting process for both cafeteria and classroom meal service.
- Production Records: Quest has an accurate system of recording meal preparation process.

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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
  - 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>			
Local School Wellness Policy(LSWP)-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).			
	<b>Finding</b>	<b>Corrective Action</b>	<b>Due Date</b>
#1	<p><b>School Wellness Committee Meeting 2x/year</b> Nevada’s School Wellness Policy states stakeholders/committee needs to meet at least twice a year. There were no committee meetings for 2021-2022 or 2022-2023 school years. Also, annual assessment was not completed.</p>	<p>1.Create a business policy/process that details how Quest will ensure meetings are held twice a year and annual assessment is completed. Include how documentation of meeting attendance and topics discussed will be keep in records.</p> <p>2.Create business plan to hold at least one meeting during the remaining months of this school year. Include assessment in meeting.</p> <p>Submit both plans to NDA for approval.</p>	<b>March 2, 2023</b>
#2	<p><b>Nevada Local School Wellness Policy</b> Quest’s LSWP is missing the following requirements per Nevada’s policy: Advisory group, Wellness Coordinator, Recordkeeping, Incentives/Rewards, Fundraising, Special Occasions, Revenue, Meal Consumption times, Physical Activity, Recess, and Marketing</p>	<p>Update Quest’s LSWP to include Nevada requirements. See attached Nevada School Wellness Policy</p> <p>Submit policy to NDA for review.</p>	<b>March 2, 2023</b>

**VIII. Recommendations and Technical Assistance**

**Recommendations:**

1. **Share Table:** Incorporate share tables to help reduce food waste during meal service for those uneaten items.

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2. **Offer vs Serve:** Consider offer vs serve to reduce food waste overall and to allow students to choose what foods they want to eat.
3. **Adult Meal Pricing:** In the future, if Quest decided to serve adult meals, ensure that appropriate adult meal prices are charged either to staff/adult or pulled from general funds into Nonprofit School Food Service Account to cover the cost of the meal.
4. **Procurement Code of Conduct:** NDA recommends adding specific language for conduct and possible disciplinary actions to Quest Procurement Policies. See Procurement Review for more information.
5. **USDA Foods Entitlement:** To date DoD Fresh Produce has no usage and Quest has over \$17,000 to spend before June 30, 2023. See Procurement Review for more information.

**Technical Assistance:**

1. Production Records: Technical assistance was provided to add age group served on production records. This was completed during review.
2. Non-discrimination statement: Technical assistance was provided to add non-discrimination statement to Civil Rights complaint procedure.

**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**

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- A. Appeal Procedure-attached
- B. Procurement Review Detail-attached
- C. Nevada Local School Wellness Policy
- D. School Wellness Assessment Tool

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