



**Nevada Youth Training Center**  
*Administrative Review Report*

March 1, 2021

National School Lunch Program  
*Food and Nutrition Division*

# Administrative Review Report

## Food and Nutrition Division

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# Administrative Review Report

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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 Nevada Youth Training Center (NYTC) from January 25-29, 2021.

An exit conference was held on Thursday, February 4, 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 Nevada Youth Training Center 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 Monday, January 25, 2021. The review was conducted remotely with video observation at Nevada Youth Training Center in Elko, Nevada. The Administrative Review was conducted by Bailey Taber, School Nutrition Coordinator II. NYTC staff included Vern Harlow, Administrative Service Officer; and Arturo Martinez, Food Service Manager. This report is based on the results of the offsite assessment, the review of files, and virtual meal service observations of the breakfast and lunch programs. An exit conference was held on Thursday, February 4, 2021 which provided a summary of the work performed at NYTC 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, October 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 NYTC'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:** NYTC demonstrates great organization and had all documents systematically filed and readily shareable for review.
- **Menus and nutrition:** All of NYTC's menus and nutrient standards were well within the compliance range and were demonstrated during the meal observations.
- **Communication:** NYTC staff were consistent and timely in their communication. Inquiries and requests for documentation were clear and prompt.

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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
  - 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

No findings or corrective actions were documented for NYTC's 2021 Administrative Review.

## VIII. Recommendations and Technical Assistance

### Recommendations:

1. **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. There are also numerous benefits to youth residents of juvenile detention facilities. 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.

### Technical Assistance:

1. Technical assistance provided to accurately track adult meals in the Ending Year Balance Report. At the time of review, the EYBR only reflected the number of days in the month for the amount of adult meals served each month, rather than the total number of adult meals served each day for the entire month. These numbers were tracked on the meal production records, and were readily transferred to the EYBR. This correction did not change any of the accounting for the school meals programs as the adult meals are reimbursed from another source outside the Nonprofit School Foodservice Account. NYTC shared the updated form with NDA and it was approved as an accurate record.

## 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.

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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. Guidance on Farm to School and Local Purchasing

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