



Southern Nevada Trades High School

Administrative Review Report

December 5, 2023

National School Lunch Program
Division of Food and Nutrition

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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 an 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 programs administered by Southern Nevada Trades High School on 11/28/2023.

An exit conference was held on 12/04/2023 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 Southern Nevada Trades High School staff for the time and assistance extended to our State Agency staff during this process.

II. Introduction

An entrance conference was conducted on 11/28/2023. The review was conducted at the Southern Nevada Trades High School in Las Vegas, Nevada. The Administrative Review was conducted by Abigail Hanson and Erica Jaramillo. Southern Nevada Trades High School staff included Dawn Marsh, Jason Marsh, and Candi Wadsworth; School Food Solutions staff included Ryan Gomes, Casey-Leigh Turner, and Kaylee Smith. This report is based on the results of the offsite assessment, the offsite and onsite review of files, and meal service observations of the SFA's participating programs. An exit conference was held on 12/04/2023 which provided a summary of the work performed at Southern Nevada Trades High School and we discussed any additional documentation needed, preliminary findings, and observations.

III. Scope

The Administrative Review covered documents, records, and procedures relating to the administration of the NSLP for the month of review, *September 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 *2023-2024*.

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 Southern Nevada Trades High School'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 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

- Staff members were very friendly and responsive to feedback during the review.
- Financial policies were very clearly outlined and included definitions for allowable costs.
- All documents submitted were well organized, making the review process effortless.

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

- Comprehensive Resource Management
 - Maintenance of the Non-Profit School Food Services Account
 - Revenue from non-program foods
 - Paid Lunch Equity
 - Indirect Costs

- General Areas
 - Civil Rights
 - Professional Standards
 - SFA On Site Monitoring
 - Local School Wellness Policy
 - Smart Snacks in School
 - Water Availability
 - Food Safety
 - Reporting and Recordkeeping
 - SBP and SSO Outreach

- 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).

Site Name/Question	Finding	Corrective Action	Due Date
District Level Q126	<p>Certification and Benefit Issuance Applications received by SFA must be certified for the correct meal benefit level (either free, reduced or paid) as detailed in the Eligibility Manual for School Meals, July 18, 2017, edition.</p> <p>One application was processed without an adult signature, making the application incomplete.</p>	SFA contacted the adult on the day of review to get the application signed.	Proof submitted on 11/30/2023

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.

Site Name/Question	Finding	Corrective Action	Due Date
Site Level Q410b	<p>Menu Production Records Production and menu records must be maintained in accordance with FNS guidance. Records for the review month of September 2023 and the day of review were evaluated.</p> <p>Per 7 CFR 210.10(e), SFAs must plan lunches and breakfasts that meet all meal pattern requirements and provide all students access to the required meal components and quantities. Production records for the following days indicate that not enough fruit and/or vegetables (1 cup each) were offered for every student: **See list below**</p>	<p>1. Develop a procedure detailing who and how production records will be completed daily, including when additional items are pulled to meet the meal pattern requirements as well as condiments. Also include how production records will be monitored to ensure the items pulled meet the requirements for components and quantities.</p> <p>2. Write on production records when you must pull additional fruits or vegetables to meet the meal pattern requirements. Ensure the following are completed for any additional items pulled/served: food item, meal component contribution, number pulled/planned, number served and leftovers.</p> <p>Submit procedure and December 2023 production records to NDA for review.</p>	01/13/2024

9/5/23 lunch: missing 75 additional (0.5 c) servings to meet 1 cup veg; missing 30 additional (0.5 c) servings to meet 1 cup fruit
9/6/23 breakfast: missing 28 additional (0.5 c) servings to meet 1 cup fruit
9/6/23 lunch: missing 39 additional (0.5 c) servings to meet 1 cup veg; missing 44 additional (0.5 c) servings to meet 1 cup fruit
9/7/23 lunch: missing 46 additional (0.5 c) servings to meet 1 cup fruit
9/11/23 lunch: missing 33 additional (0.5 c) servings to meet 1 cup veg; missing 35 additional (0.5 c) servings to meet 1 cup fruit
9/12/23 lunch: missing 45 additional (0.5 c) servings to meet 1 cup veg; missing 46 additional (0.5 c) servings to meet 1 cup fruit
9/13/23 breakfast: missing 22 additional (0.5 c) servings to meet 1 cup fruit
9/13/23 lunch: missing 43 additional (0.5 c) servings to meet 1 cup veg; missing 48 additional (0.5 c) servings to meet 1 cup fruit
9/14/23 lunch: missing 27 additional (0.5 c) servings to meet 1 cup fruit
9/18/23 lunch: missing 37 additional (0.5 c) servings to meet 1 cup veg; missing 31 additional (0.5 c) servings to meet 1 cup fruit
9/19/23 lunch: missing 39 additional (0.5 c) servings to meet 1 cup veg; missing 15 additional (0.5 c) servings to meet 1 cup fruit
9/20/23 breakfast: missing 16 additional (0.5 c) servings to meet 1 cup fruit
9/20/23 lunch: missing 37 additional (0.5 c) servings to meet 1 cup veg; missing 36 additional (0.5 c) servings to meet 1 cup fruit
9/21/23 lunch: missing 31 additional (0.5 c) servings to meet 1 cup fruit
9/25/23 lunch: missing 19 additional (0.5 c) servings to meet 1 cup veg; missing 35 additional (0.5 c) servings to meet 1 cup fruit
9/26/23 lunch: missing 23 additional (0.5 c) servings to meet 1 cup veg; missing 21 additional (0.5 c) servings to meet 1 cup fruit
9/27/23 lunch: missing 17 additional (0.5 c) servings to meet 1 cup veg; missing 38 additional (0.5 c) servings to meet 1 cup fruit
9/28/23 lunch: missing 37 additional (0.5 c) servings to meet 1 cup fruit
11/28/23 lunch: missing 30 additional (0.5 c) servings to meet 1 cup fruit

Professional Standards

Regulations establish hiring standards for new school nutrition program directors at the School Food Authority (SFA) level and annual training standards for all school nutrition program directors, managers, and staff. References include but are not limited to 7 CFR 210.30

Site Name/Question	Finding	Corrective Action	Due Date
District Level Q1212b	<p>Professional Standards Regulations in 7 CFR 210.30 establish hiring standards for new school nutrition program directors at the SFA level. In addition, the regulations establish annual training standards for all school nutrition program directors, managers, and staff.</p> <p>Candi Wadsworth was originally listed as the director. Due to her other job duties as Principal and the training requirements, the SFA decided during the review that it would be beneficial to appoint Jason Marsh to the director role moving forward.</p>	<p>Submit proof that Jason meets the hiring standards (including job duties related to the role, educational background, and proof of any food service experience) to NDA for review.</p> <p>Submit plan for how Jason will meet the remaining required training hours by June 30, 2024.</p>	01/13/2024

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, USDA Guidance for School Food Authorities: Developing a School Food Safety Program, NRS 429.200, 444.335, and NRS chapter 446.			
Site Name/Question	Finding	Corrective Action	Due Date
Site Level Q1409	Food must be stored 6" above ground on clean shelving: Boxes with produce were sitting directly on the floor in the storage room.	Fixed on site. All boxes were re-organized on shelves or raised on crates, so they are 6 inches off the ground.	Proof submitted on 11/28/2023
VIII. Recommendations and Technical Assistance			
Technical Assistance:			
Site Name/Question	Technical Assistance		
Site Level Q501	Offer Versus Serve: Dawn was able to describe that each student must have three items in their serving boat to count as a reimbursable meal (including pre-plated entree). NDA provided more accurate verbiage for what counts as a reimbursable meal: at breakfast, at least 3 items with one being 1/2 cup of fruit; and at lunch, at least 3 meal components with one being a 1/2 cup of fruit or vegetable.		
Q605	Condiments: Per page 10 of USDA’s Nutrient Analysis Protocols Manual, “All food or menu items offered in a reimbursable meal, including condiments/accompaniments, are included in the nutrient analysis and count toward meeting the Dietary Specifications for the meal.” If condiments are offered to students with their meals, they must be included on the production records and nutrient analysis. NDA suggests creating a plan for how the condiments will be monitored on the service line so there are accurate quantities recorded.		

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 Report (attached)
- c. [Professional Standards Memo](#)
- d. [Nutrient Analysis Protocols Manual](#)