



Summit View Youth Center
Administrative Review Report

November 18, 2019

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, SBP, and the After-School Snack Program (ASSP) administered by Summit View Youth Center (SVYC) from October 1-2, 2019.

An exit conference was held on Wednesday, October 2, 2019 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 Summit View Youth 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 Tuesday, October 1, 2019. The review was conducted at the Summit View Youth Center in Las Vegas, Nevada. The Administrative Review was conducted by Bobbie Beach, School Nutrition Coordinator II, and Chris Tate, Program Coordinator. SVYC staff included Monica Jimenez, Account Technician I, and Marco Iglesia, Food Service Manager I. This report is based on the results of the offsite assessment, the onsite review of files, and meal service observations of the breakfast, lunch, and snack programs. An exit conference was held on Wednesday, October 2, 2019 which provided a summary of the work performed at SVYC 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, July 2019. The Procurement Review covered all documents, records, invoices, and procedures relating to the procurement for the SFA for the year of review, school year 2018-2019.

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 SVYC'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: SVYC demonstrates exceptional organization of files keeping records from previous years neatly separated and accessible.
- Food Quality: SVYC kitchen staff is dedicated to making fresh, appealing meals for its students.
- Kitchen Facilities: Kitchen facilities were kept in clean and in excellent repair.

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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
 - Straight Serve
 - Dietary Specifications and Nutrient Analysis

- General Areas
 - Civil Rights
 - Professional Standards
 - SFA On Site Monitoring
 - Local School Wellness Policy
 - Water Availability
 - Food Safety
 - Reporting and Recordkeeping

- Comprehensive Resource Management
 - Maintenance of the Nonprofit School Food Service Account

- Other Federal Programs
 - Afterschool Snack Program

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

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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).

	Finding	Corrective Action	Due Date
#1	<p>Meal Counting and Claiming The SFA must have a meal counting and claiming system that accurately counts, records, consolidates, and reports the number of reimbursable meals claimed, by category.</p> <p><i>Repeat Finding-</i> SVYC’s meal consolidation system did not accurately consolidate daily meal counts for breakfast, lunch, and snack. This resulted in SVYC underclaiming 87 breakfasts, 96 lunches and 86 snacks for July 2019. This consolidation error extended through August and September 2019’s claims.</p>	<p>(1) Develop a business process to address how SVYC staff will ensure daily meal counts will be consolidated correctly. Business Process should identify by name and/or title the individual(s) responsible for consolidating daily meal counts.</p> <p>(2) Resubmit claims for July 2019, August 2019, and September 2019 in CNP with the correct meal counts.</p> <p>(3) Submit monthly consolidation meal counts to Bobbie Beach, bdavidson@agri.nv.gov, in conjunction with October, November, and December’s monthly claim.</p>	<p>(1) December 18, 2019</p> <p>(2) December 18, 2019</p> <p>(3) March 1, 2019</p>

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
#2	<p>Menu Production Records (MPRs) 7 CFR 210.10 (3) requires schools or SFAs to maintain daily Menu Production Records to show how the meals offered contribute to the</p>	<p>(1) Revise SVYC’s MPR template and submit to NDA for approval. Example MPR templates can be found in Appendix D.</p>	<p>(1) December 18, 2019</p>

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	<p>required food components and food quantities for each age grade group.</p> <p><i>Repeat Finding</i>-SVYC’s MPRs were missing the following required components:</p> <ul style="list-style-type: none"> • Offer vs. Serve: Yes or No • Age grade group served • Contribution to the meal pattern • Total projected servings • Amount of food used • Actual servings • Leftovers <p>More information on the required elements of a MPR can be found in Appendix D</p>	<p>(2) Submit one weeks’ worth of completed MPRs on SVYC’s new approved MPR template</p> <p>(3) Complete NDA’s Menu Production Workbook training (found in Appendix D). Submit to NDA the dates, times, and signatures from all staff that completed workbook.</p>	<p>(2) December 18, 2019</p>
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Other Federal Programs

NSLP Afterschool Snack Program – Under the ASSP an SFA must ensure students are receiving nutritionally-balanced snacks, receive appropriate educational or enrichment activities, and count and claim snacks accurately. References include but are not limited to 7 CFR 210.10(o), 7 CFR 210.9(c)(7), 7 CFR 210.13(c), and 7 CFR 210.23(b).

	Finding	Corrective Action	Due Date
#3	<p>Afterschool Snack Program Self-Monitoring 7 CFR 210.9 (c)(7) requires SFAs to conduct self-monitoring activities twice per year, once being within the first four weeks of operation.</p> <p><i>Repeat Finding</i>-At the time of review, SVYC staff had not conducted any ASSP self-monitoring activities. An ASSP self-monitoring form was provided to staff onsite.</p>	<p>(1) Develop a business process to ensure ASSP self-monitoring activities will occur at minimum twice per year.</p> <p>(2) Submit a completed ASSP self-monitoring form of SVYC’s ASSP assessment to NDA for review and approval.</p>	<p>(1) December 18, 2019</p> <p>(2) December 18, 2019</p>

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VIII. Recommendations and Technical Assistance

Recommendations:

1. **Incorporate School Garden/locally grown produce in NSLP, SBP or ASSP 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.

Technical Assistance:

1. Technical assistance provided to update SVYC's Civil Rights Policy to contain accurate USDA/State contacts. According to Federal regulations, the benefit issuance document for Residential Child Care Institutions must include: child's name, personal income received by the child, child's date of birth, date of admission, date of release/expected date of release, facility official signature/contact information/and title.
2. Technical assistance was provided to SVYC to create a Civil Rights Complaint log. FNS regulation requires SFAs to keep an annual log to track any complaints alleging discrimination within its school meal programs.
3. Technical assistance was provided to SVYC to add employee hire date, employee position title, required number of training hours, and number of training hours complete to it's professional standards training tracker. The *USDA Administrative Review Manual*, 2017-18 edition, requires SFAs to maintain an annual professional standards tracker including but not limited to the following fields: employee name, hire date, employee position, required hours of training, training title/subject, training date, length of training, and completed training hours to date.

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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
- C. Guidance on Farm to School and Local Purchasing
- D. Menu Production Record Guidance

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