

BRIAN SANDOVAL
Governor

STATE OF NEVADA

JAMES R. BARBEE
Director



Las Vegas Office:
2300 E. St. Louis Ave.
Las Vegas NV 89104-4211
(702) 668-4590
Fax (702) 668-4567

Elko Office:
4780 E. Idaho Street
Elko NV 89801-4672
(775) 738-8076
Fax (775) 738-2639

DEPARTMENT OF AGRICULTURE

405 South 21st Street
Sparks, Nevada 89431-5557
Telephone (775) 353-3601 Fax (775) 353-3661
Website: <http://www.agri.nv.gov>

January 4, 2018

Prim Walters
Principal
Mater Academy of Northern Nevada
2680 East 9th Street
Reno, NV 89512

Dear Ms. Walters:

The Nevada Department of Agriculture, Food and Nutrition Division conducted an Administrative Review of the Mather Academy of Northern Nevada (MANN) on October 30, 2017. The Administrative Review team consisted of Edward Coleman, Quality Assurance Specialist and Stephanie Disuanco, Program Officer. The purpose of the Administrative Review is to ensure compliance with federal regulations and to provide technical assistance for program improvement. Our team greatly enjoyed working with all food service staff members. Thank you for accommodating our staff during the review and for providing all the needed documentation in a timely fashion. Staff was very helpful in providing documentation and answering questions throughout the review process.

We conducted an exit conference on October 30, 2017 to discuss the major findings of the review. Prim Walters and Stephanie Hillyer representing Mater Academy of Northern Nevada and Kendra Thornton of Academica were in attendance. Administrative Reviews are required to be conducted on a three-year review cycle. Mater Academy of Northern Nevada received an onsite review its National School Lunch Program (NSLP). The findings of the review are detailed below by the three main sections of the Administrative Review, Performance Standard I, Performance Standard II and Other Areas. The new procurement review is being coupled with the administrative review and the findings of the procurement review are also included in this letter.

Performance Standard I – Meal Access and Reimbursement

The National School Lunch Program (NSLP) and the School Breakfast Program (SBP) have counting and claiming systems that are federally mandated for all School Food Authorities (SFAs) that are participating in these programs. All free, reduced price, and paid meals claimed for reimbursement must be served only to children eligible for free, reduced- price, or paid meals. The certification and benefits issuance process is the

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SFA's certification of a student's eligibility for free or reduced-price meals and serves as the link to the SFA's meal counting and claiming system. Validation of this system during the Administrative Review ensures that eligible children receive meals to which they are entitled and that claims for reimbursement are valid.

The applications for free and reduced priced meals were reviewed for the Mater Academy of Northern Nevada. eighty applications were reviewed and the following errors were noted;

- The applications for two households were denied but they are listed as free on the benefit issuance document
- An application for a student was approved as homeless but this is not indicated on the application itself
- Five applications that were reviewed had the benefit determination date marked prior to the date the applications were received onsite.

Corrective Action Required: Determine the correct eligibility benefits level for the two households that was denied but listed as free on the benefit issuance document. Submit documentation indicating the correct eligibility status for this family. If the family was supposed to be denied, but has been receiving free meal benefits, submit the total numbers of meals they have received to NDA.

For the student that was listed as homeless, either submit documentation supporting the child's homeless status, such as a list of homeless students from the homeless liaison of MANN, or submit documentation of an updated benefit issuance document where the child's correct method of determination for benefit status, homeless or assistance program, is indicated.

Finally, acquire a date stamp and create a business process governing using the date stamp on applications that are received at the SFA for processing. The business process should include the following;

- Applications must be date stamped on the day they are received at the SFA for processing
- A date stamp will be used to date stamp all applications

Submit all requested documentation to NDA for review.

Denied Applications

The denied applications were reviewed as part of the onsite assessment of Mater Academy of Northern Nevada. The following issues were noted;

- The income on one application was unclear or was changed without proper documentation

Technical assistance was provided onsite to address the following issue;

- Income is not annualized if there are multiple incomes with the same income frequency

Corrective Action Required: Contact the family whose income was changed/unclear. Document who was talked to, when they were talked to and the outcome of the conversation. If the family should be at the reduced price for meals, reimburse the family for all meals they have paid for at the paid rate. Submit documentation showing the family was reimbursed.

Technical assistance was provided onsite for the following applications issues;

- The confirming official and the determining official must be two different individuals and these roles can be interchangeable.

Verification

The verified applications for this site were not reviewed. They are in their first year on the program and the onsite review occurred on October 30, 2017 which is prior to the November 15, 2017 end date for verification. Instead, technical assistance was offered on the verification process.

Documents

The documents, notice of adverse action, approval/denial letter, information letter to households, the public release, and the media release were reviewed while onsite and the following technical assistance was provided for each document;

Notification of adverse action

- does not state 10 calendar days to file an appeal
- families may reapply at any time statement needs to be added

Approval/Denial Letter

- does not state 10 calendar days from receipt of letter to file an appeal
- does not have the correct reapply at any time statement

Household Letter

- No income eligibility guidelines (IEG's)
- Households may reapply at any time statement needs to be added
- No notice that information can be verified
- No notification of the 30- day carry over period for student eligibility
- Letter is split into multiple documents and needs to be combined
- the nondiscrimination statement is not on the document

Media Release

- The media release indicates that MANN is participating in the Special Milk Program (SMP) and it is not currently participating in SBP

Information that was missing, needed to be clarified, or needed to be removed was corrected onsite as part of technical assistance and no further action is needed on these items.

Counting and Claiming

The point of service system (POS) for the counting and claiming system is at the beginning of the line. This is not incorrect as long as there is an adult at the end of the line verifying that all meals being served are compliant with program regulations. During the second lunch service, the individual at the end of the line left and several students moved through the line without having their meals verified. At least one student was observed coming through the unobserved line without their milk component.

Corrective Action Required: The point of service must be at the end of the line as it is where the reimbursable meal is counted and claimed. If you choose to keep your point of service at the front of your

meal service line, per regulations, you must request a waiver from NDA before the POS can be kept at the front of the line. Submit a written statement outlining how Mater Academy of Northern Nevada will become compliant with counting and claiming requirements. Submit the statement to NDA for review.

Performance Standard II- Meal Pattern and Nutritional Quality

The National School Lunch meal pattern is the foundation of federal school nutrition programs, and sponsors of the program must ensure that they are offering reimbursable meals for breakfast and lunch according to regulations (7 CFR 210.10 and 220.80). Schools operating NSLP and/or the SBP must prepare, offer, and serve meals to students that meet the meal pattern requirements for the appropriate age/grade groups on all reimbursable meal service lines.

The meal pattern standards have specific requirements for minimum amounts of fruit, vegetables, meat/meat alternates, and grains that must be offered daily and weekly. In addition, there are standards for vegetable sub-groups which must be offered each week. The meal pattern also requires that all creditable grain items be whole grain rich. The meal pattern limits calories (minimum and maximum levels), restricts sodium levels, limits saturated fat, and eliminates trans fats.

Meal Components and Quantities

While onsite, the meal service was observed and the kitchen manager was interviewed. It was noted that standardized measuring utensils were not being used to ensure that the age grade group being served was receiving the correct minimum quantities. For the age grade group, you are required to serve $\frac{3}{4}$ cup vegetables or use a level 6 oz. scoop. The kitchen manager was asked to show the utensils he was serving the vegetables with and it was a 4oz. scoop. When asked about this the manager stated that he was using a “rounded 4 oz. scoop”.

Corrective Action Required: All meals served must meet the minimum requires for the age grade group being served. The correct measuring utensils should be used to ensure each student receives the minimum requirement for their age grade group. Purchase a 6oz. measuring scoop to be used for the meal service if you do not already possess one. In addition to this, create a business process that outlines the proper serving sizes for each age grade group that is served. All individuals that serve food should sign this document indicating that they know what the proper size is per age grade group. This signed business process should be returned to NDA for review.

Milk

When following the straight serve meal option, students must take one of each component or item offered for their meal service. Additionally, they must have a choice between two milk types at every meal service. The choices can be 1% milk and 0% milk flavored or unflavored. While onsite it was noted that children were only given one milk choice each day at the meal service. Signage stated, “White Milk Tuesday and Thursday” and “Chocolate Milk Monday, Wednesday, Friday”. Another sign stated, “One Milk per Meal”.

Corrective Action Required: All participants in the Food and Nutrition Programs, must be allowed 2 milk choices with each meal they are served. Remove the signage stating that certain milk types are only available on certain days and make multiple milk choices available and this should be documented on the production records going forward. Create a business process governing milk availability during the NSLP lunch service.

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It should include direction that two milk choices must be made available at each meal service as described above. Have all food service staff sign this business process indicating that they understand it and submit the signed policy to NDA for review.

Whole Grain Rich Items

While reviewing the freezers and dry storage onsite, it was noted that there are several items that do not meet the whole grain rich criteria. The following items were noted;

- Del Pasado 6 inch pressed flour tortillas
- Roseli Enriched Macaroni Product
- New York Bakery 6 inch garlic breadsticks
- Hilltop Hearth Sliced Texas Toast
- Hilltop Hearth 6 inch Sliced Individual Hot Dog Buns
- Hilltop Hearth 4 inch Sliced Hamburger Buns

It is known that multiple other food services are run through this kitchen including CACFP and another non-Food and Nutrition sponsored program and it is possible these items were used for those programs. The issue with this is that there was not a clearly organized system for what foods went with what program. Prior to looking, the kitchen manager was asked about this. He stated that all of the programs were similar and that there did not need to be a division by program. As we looked this answer changed and certain shelves of items were dedicated to specific programs and there did not seem to be an original system supporting these decisions.

Corrective Action Required: Foods for non NSLP programs should not in general be comingled with the foods for the NSLP program. There was plenty of space to house all food programs so the foods used for the NSLP program should be separated and clearly marked as such to prevent items that are not compliant from making it into the meal services for NSLP programs.

Production records

The production records that are used onsite were reviewed. These documents are the supporting documentation for the meals that are served and are some of the more important documents in the NSLP program. They were missing the following required elements;

- No offer vs serve yes or no section
- Projected servings
- Amount of food used
- Actual servings
- Leftovers

Corrective Action Required: Update your menu production records to include all the missing elements. Submit one weeks' worth of updated and completed menu production records along with the corresponding menu for that week to NDA for review. Examples of menu production records may be found at the NDA website http://nutrition.nv.gov/layouts/Page_Style_1.aspx?id=8674.

Menus

The menu was not initially posted but was posted before the end of the meal services. No further action is needed here as technical assistance was provided onsite.

Comprehensive Resource Management

The intent and scope of monitoring in this section is to apply a systemic approach to ensuring the overall financial health of an SFA's nonprofit school food services account.

Maintenance of the Nonprofit School Food Services Account

This section of the Comprehensive Resource Management review focuses on ensuring the SFA is maintaining and using its nonprofit school food services account according to regulatory requirements, which include observing the limitation on the use of the nonprofit school food services account revenue as set forth in 7 CFR 210.14 and ensuring that enumerated costs are necessary, reasonable, and allocable as set forth in 2 CFR 225.

The invoice and the supporting documentation for meals that was submitted to MANN for billing for the month of September was reviewed. The following issues were noted;

- The invoice for meals from the Boys and Girls Club billed for 2117 meals. The POS count for MANN indicated that only 2115 meals had been served.
- There were several days where the supporting documentation from the Boys and Girls Club was not completed yet those meals were claimed; On September 18, 2017, 102 total meals are claimed but there is no indication that a count was done on the Boys and Girls Club side. Additionally, for this same day the POS at MANN claimed 103 meals.
- The count sheets for September 20, 2017 through September 22, 2017 from the Boys and Girls Club are not signed or dated.

Corrective Action Required: Please create a business process that governs how the invoices will be paid.

This business process should include the following;

- A system that compares what the Boys and Girls Club invoices state as opposed to what the MANN POS system shows as the number of reimbursable meals served for the time frame of the invoices.
- This system should include a day by day comparison of the counts from Boys and Girls Club and the POS of MANN.
- A mechanism to reconcile differences between the MANN POS counts and the Boys and Girls Club counts should be included.
- A system to ensure that meals not properly counted and documented by the Boys and Girls Club will not be paid until proper supporting documentation is provided.

Please provide a copy of this business processes to NDA for review.

General Program Compliance

Civil Rights

It is not clear if all staff that interact with program participants have been given civil rights training. The kitchen staff did not submit documentation that would support whether they had received this training.

Corrective Action Required: Submit the annual civil rights trainings and copies of the testing materials for all kitchen staff that interact with program participants to NDA for review. The civil rights training power point and testing materials may be found in CNP at the following address;

<https://cnp.nv.gov/frameManager.aspx>.

Local School Wellness Policy

While onsite, the meal service was observed and it was noted that in some instances the children may not be receiving their full 20 minutes of seat time at lunch. It was clarified with MANN staff onsite as technical assistance that the 20-minute seat time begins when the last child in the line has sat down and began to eat.

Professional Standards

It is not clear that training hours have been met for all staff that have duties related to the school food program and for staff that interact directly with program participants. The USDA tracker tool that was submitted for MANN staff, was unclear.

Corrective Action Required: Please submit the training information for the kitchen staff that interact with program participants. Additionally, for MANN staff, you will only need to submit the following information;

- MANN Staff are considered “employees with duties related to the school food program” and as such they only require training in the specific area of the school food program they interact with. For example, if you only run the point of service system, you only need training in recognizing a reimbursable meal and proper counting and claiming techniques. There are no hourly requirements. You would document the employees name, the duties they perform that are related to the school food program and the training they had received that is specific to the duties they perform.
- Kitchen staff will need to submit their names, employment status, and training hours to date and a plan to complete their training hours by the end of the school year. This information should be kept and tracked as well by MANN staff to ensure compliance with program requirements.

Water

Water was not initially available during the meal service. This was corrected onsite as technical assistance.

Food Safety/Buy American

While the meal service was being observed, it was noted that food service staff were not keeping a proper check on the temperatures of the food they were serving. As noted in the contract, the food service staff will monitor food temperatures prior to and during the meal service itself. Temperatures were observed being taken prior to meal service. The food being served was not observed having the temperature checked during the meal service.

Corrective Action Required: Create a business process to guide food service staff in the proper techniques of temperature checking as outlined in the contract that MANN has with their Food Service Provider. This process should outline the requirements for maintaining proper temperature controls as noted in the contract. All food service staff should sign this process indicating they understand this and the signed process should be submitted to NDA for review.

HAACP Manual

The HAACP manual for the site was not readily available in the kitchen where the meals are prepared and served.

Corrective Action Required: Please add a copy of the HAACP manual to the kitchen area where the food is prepared and served. Submit a written statement stating that the HAACP manual is now in the kitchen area where the food is served.

Health Inspections

A copy of the most recent health inspection was posted in the kitchen but it was not readily viewable by program participants.

This was handled onsite as technical assistance. No further action is required.

Summary

None of the above-mentioned items currently require fiscal action nor require a change in your performance based \$0.06 reimbursement. However, please note that if repeat violations are found on subsequent reviews in any program area fiscal penalties may be assessed and the additional \$0.06 reimbursement may be turned off until the program is brought into compliance with federal regulations. **All corrective actions must be completed and submitted by February 5, 2018.** If 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 complete if not submitted by the required due date. Please see the attached document, NSLP-SBP-SMP Appeals sponsor handout for direction on how to appeal the denial of all or a part of the claim for reimbursement or withholding funds. If you have any questions about the required corrective action, please contact Edward Coleman at (775) 353-3666 as soon as possible.

Best regards,



Edward Coleman

Quality Assurance Specialist

Phone: 775-353-3666 Email: ecoleman@agri.nv.gov