



**Imagine School at Mountain View**  
*Administrative Review Report*

December 23, 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 and SBP administered by Imagine School at Mountain View (ISMV) from December 9-10, 2010.

An exit conference was held on Tuesday, December 10, 2010 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 Imagine School at Mountain View 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, December 9, 2019. The review was conducted at Imagine School at Mountain View in Las Vegas, Nevada. The Administrative Review was conducted by Bobbie Beach, School Nutrition Specialist; and Doreece Winfield, School Nutrition Coordinator II. ISMV staff included Loretta McDonald, Business Manager; and Jennifer Drummond, NSLP Coordinator. 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 Tuesday, December 10, 2019 which provided a summary of the work performed at ISMV 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, September 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, 2017-2018 edition. It included evaluating ISMV'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

- Professional Standards Recordkeeping: ISMV keeps excellent, well documented logs of the training hours completed by its school nutrition employees
- Counting and Claiming- ISMV has made significant improvements in their counting and claiming system from the previous administrative review. All counts were taken at the Point of Service and matched what was claimed for the month of review.

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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
  - 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**

**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); 210.19(c)(2)(ii); and the *Eligibility Manual For School Meals*(July 18, 2017 edition).

	<b>Finding</b>	<b>Corrective Action</b>	<b>Due Date</b>
#1	<p><b>Certification and Benefit Issuance</b> Applications received by SFA must be certified for the correct meal benefit level (either free, reduced or paid) as detailed in the <i>Eligibility Manual for School Meals</i>, July 18, 2017 edition.</p> <p><i>Repeat finding-</i> Of the 237 student certifications reviewed, the following errors were noted:</p> <ul style="list-style-type: none"> <li>• Nine (9) student applications did not enter the last four digits of the parent’s social security number or indicate that they had no social security number</li> <li>• Two (2) student applications were denied but, qualified for reduced benefits</li> <li>• One (1) student application had an invalid case number</li> </ul>	<p>(1) Correct all application detailed in Appendix D. Submit a signed copy of Appendix D including the date in which the applications were corrected.</p> <p>(2) Create a business process detailing how applications will be screened for completion prior to processing. Include the name(s)/ and or title(s) of the person(s) responsible for ensuring this business process is followed. Submit to NDA for approval.</p>	<b>January 23, 2020</b>
#2	<p><b>Verification</b> Section 9(b)(3) of the National School Lunch Act and regulations 7 CFR 245.6a(c)(1) establish requirements for SFAs in conducting verification of eligibility for free and reduced-price meals on applications in participating schools,</p> <p>Of the verification documentation reviewed, the following error was noted:</p> <ul style="list-style-type: none"> <li>• One (1) student’s verified application was verified using the family’s net</li> </ul>	<p>(1) Reevaluate the verified application detailed in Appendix D based on the family’s gross income. Make corrections to the student’s eligibility. If the student’s eligibility is decreased the family must have 10 days advance notification before the reduction or termination of benefits occurs. Submit a signed copy of Appendix D to NDA for approval.</p>	<b>January 23, 2020</b>

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	income instead of gross income. Using the gross income would have resulted in the student being denied for benefits.		
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**General Program Compliance**

**Food Safety** – SFAs must ensure that all school sites meet the food safety and storage requirements. This includes any facility where food is stored, prepared, or served for the purposes of the NSLP, SBP and other FNS programs. References include but are not limited to 7 CFR 210.13(c) (1-3); NRS 439.200, 444.335; NRS chapter 446; and *Guidance for School Food Authorities: Developing a School Food Safety Program Based on the Process Approach to HACCP Principles*.

	<b>Finding</b>	<b>Corrective Action</b>	<b>Due Date</b>
#3	<p><b>Hazard Analysis Critical Control Point (HACCP) Manual</b></p> <p>7 CFR 210.13 (c) requires SFA to establish a food safety program for any facility where food is stored, prepared or served.</p> <p>HACCP manual was out of date (expired 2013) and was not site specific.</p>	<p>Update the HACCP manual for ISMV. The HACCP manual should include:</p> <ul style="list-style-type: none"> <li>• Table of Contents</li> <li>• Standard Operating Procedures for all aspects of food handling from receiving to serving.</li> </ul> <p>Submit to NDA for review and approval.</p> <p>Resources for creating a HACCP plan can be found at the Institute of Child Nutrition: <a href="https://theicn.org/icn-resources-a-z/food-safety">https://theicn.org/icn-resources-a-z/food-safety</a></p>	<p><b>January 23, 2020</b></p>

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## 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. 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 move food safety inspection report to be placed in a visible area. 7 CFR 210.13(b) requires schools to post the most recent food safety inspection report in a publicly visible location for all participants of the school meal program to view.

## 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.

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### X. Appendix

- A. Appeal Procedure-attached
- B. Procurement Review Detail-attached
- C. Guidance on Farm to School and Local Purchasing
- D. Application/Verification Errors

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