



**Nevada
Department
of Agriculture**

**Coral Academy of Science
Las Vegas**
Administrative Review Report

National School Lunch Program
Division of Food and Nutrition

Coral Academy of Science Las Vegas Administrative Review Report

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Table of Contents

- I. Executive Summary
- II. Introduction
- III. Scope
- IV. Methodology
- V. Noteworthy Initiatives
- VI. Critical Areas of Review
- VII. Findings and Required Corrective Actions
- VIII. Recommendations and Technical Assistance
- IX. Corrective Action Response
- X. Appendix
 - a. Appeal Procedure
 - b. Procurement Review
 - c. iCN Production Records Training
 - d. iCN Meal Pattern Training
 - e. OVS Signage Templates
 - f. NV School Wellness Policy Best Practices Manual
 - g. Wellness Policy Assessment Tool
 - h. Serving School Meals to Preschoolers
 - i. Professional Standards Memo
 - j. Eligibility Manual for School Meals

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 Coral Academy of Science Las Vegas from 01/16/2024 to 01/18/2024.

An exit conference was held on 01/23/2024 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 Coral Academy of Science Las Vegas staff for the time and assistance extended to our State Agency staff during this process.

II. Introduction

An entrance conference was conducted on 01/16/2024. The review was conducted at the Coral Academy of Science Las Vegas in Las Vegas, Nevada. The Administrative Review was conducted by Abigail Hanson and Erica Jaramillo. Coral Academy of Science Las Vegas staff included Jennifer Minassian. 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 01/23/2024 which provided a summary of the work performed at Coral Academy of Science Las Vegas 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 2022-2023.

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 Coral Academy of Science Las Vegas'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

- Coral Academy staff were friendly and open to feedback during the review.
- The kitchens were organized and very clean at all sites observed.

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/Questions	Finding	Corrective Action	Due Date
District Level Q126	Certification and Benefit Issuance Applications received by the 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. One application was noted as free on the Benefit Issuance Document (BID), but the SFA could not find the income application on file. In addition, most applications appeared to be processed past the 10-day deadline (determination date compared to parent's signature date).	<ol style="list-style-type: none"> 1. Coral Academy to develop a procedure for how paper applications are processed (including the organization of applications, use of a receiving stamp, proper income conversions, and 10-day process timeframe). Submit procedure to NDA for review. 2. For the missing application, find the document in Infinite Campus or have the family submit a new application. If no application is submitted, update the status to paid and send a letter to the family for a reduction in benefits (with 10 days of notice). Submit a copy of the letter sent to NDA for review. 3. Submit a copy of the completed application or the updated BID with corrections to NDA for review. 	04/04/2024

District Level Q209c	Verification Verification of children’s eligibility must be completed on a sample of household applications per 7 CFR 245.6a(c). Based on the review of verification documentation for this school year, one family should have their eligibility status changed from reduced to paid based on the pay stub document submitted.	1. Coral Academy to develop a procedure for how verification is completed annually (including timeline, documentation collection and eligibility status verification process). Submit procedure to NDA for review. 2. Send a notification letter to the family indicating a reduction in benefits, with 10 days of notice. Submit letter to NDA for review.	03/11/2024
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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/Questions	Finding	Corrective Action	Due Date
Cadence Campus Q404a	There was no signage posted explaining what constitutes a reimbursable meal at Cadence during breakfast on the day of review.	Kitchen manager posted signs before the lunch service began on the day of review. Suggest using OVS signage that is easier for participants to understand and can be modified for each meal. See templates in appendix.	Proof submitted on 1/17/2024

Cadence Campus Q410	<p>Menu Production Records</p> <p>Coral Academy started receiving separate production records from their vendor (Revolution Foods) for High School in January 2024. It is unclear from production records if High School students were served reimbursable meals (per OVS requirements). September 2023 production records were reviewed. The following errors were noted:</p> <ul style="list-style-type: none"> -Not offering the full 1 cup of fruit and vegetables for High School students at lunch each day -All allergy free meals (AFMs) were missing meal pattern contributions -Not completing all required fields when pulling additional items to make more meals -Not correctly recording milks pulled to show compliance for milk variety requirement <p>Revolution Foods will need to include all meal pattern contributions for any allergy free meals provided. Coral Academy will need to monitor and ensure all production records have required components completed daily including meal pattern contributions, correctly recorded additional items when pulled and separate records for High School.</p> <p>***Potential for future fiscal action, if found as a repeat finding on a future review. ***</p> <p>*See detailed list below.</p>	<p>1. Kitchen Managers or staff who complete production records at Cadence campus must complete production record and meal pattern training.</p> <p><u>Reference:</u> the iCN Production Record & Meal Pattern training in appendix.</p> <p>2. Create a procedure detailing:</p> <ul style="list-style-type: none"> -How SFA plans to ensure records have the following 12 items: Date/site name, menu/food items, OVS (yes/no), recipes/products, age group/grade served (each on separate page), portions of servings (both planned and served), contribution to the meal pattern, total projected servings, amount of food used, actual servings, leftovers, and condiments/extras -How production records information will be filled out by kitchen staff daily (include how meal contributions for all meals will be recorded) -How records will be monitored daily by NSLP coordinator to ensure reimbursable meals were served (including two choices of milks) <p>Submit proof of training/certificates, procedure, and February 2024 production records (1 week for each site) to NDA for review.</p>	03/11/2024
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<p>Nellis Air Force Base Campus Q410</p>	<p>Coral Academy started receiving separate production records from Revolution Foods for Pre-K in December 2023. It is unclear from production records if Pre-K students were served reimbursable meals (per CACFP requirements).</p> <p>September 2023 production records were reviewed. The following errors were noted:</p> <ul style="list-style-type: none"> -Because Pre-K is not separated, it was not clear if there was enough 1% white milk for both Pre-K and K-8 during lunch each day -Not writing in the final meal count total on the production record -Not completing all required fields when pulling additional items to make more meals (should not have a negative number of leftovers) -Not correctly recording milks pulled to show compliance for milk variety requirement <p>Coral Academy will need to monitor and ensure all production records have required components completed daily, including meal pattern contributions, correctly recorded additional items when pulled and separate records for Pre-K.</p> <p>***Potential for future fiscal action, if found as a repeat finding on a future review. ***</p> <p>*See detailed list below.</p>	<p>1. Kitchen Managers or staff who complete production records at Nellis AFB campus must complete production record and meal pattern training.</p> <p>2. Include in the procedure requested for Cadence (Q410), how total meal counts will be noted on production records each day. Submit proof of training/certificates, procedure, and February 2024 production records (1 week for each site) to NDA for review.</p>	<p>03/11/2024</p>
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Cadence Campus September production records were reviewed. The following errors were noted:

9/5 Breakfast: only offered ½ cup fruit for 33 students, milk types need to be specified when pulled

9/5 Lunch: did not offer 1 cup of fruit for HS, no leftovers for 1% white milk

9/6 Breakfast: milk types need to be specified when pulled

9/6 Lunch: did not offer 1 cup of fruit or veg for HS, short 50 milks

9/7 Breakfast: only offered ½ cup fruit for 24 students, milk types need to be specified when pulled

9/7 Lunch: did not offer 1 cup of fruit for HS, no leftovers for 1% white milk

9/8 Breakfast: no leftovers for 1% white milk
9/8 Lunch: did not offer 1 cup of fruit for HS, only extra chocolate milk pulled
9/11 Lunch: did not offer 1 cup of fruit or veg for HS, no leftovers for 1% white milk
9/12 Breakfast: no leftovers for both milk varieties
9/12 Lunch: did not offer 1 cup of fruit for HS, only extra white milk pulled
9/13 Breakfast: milk types need to be specified when pulled
9/13 Lunch: did not offer 1 cup of fruit or veg for HS, no leftovers for 1% white milk
9/14 Breakfast: no leftovers for both milk varieties, short 15 milks (no additional noted)
9/14 Lunch: did not offer 1 cup of fruit or veg for HS, no leftovers for 1% white milk
9/15 Breakfast: no leftovers for 1% white milk
9/15 Lunch: did not offer 1 cup of fruit for HS, short 40 milks (no additional noted)
9/18 Breakfast: no leftovers for 1% white milk
9/18 Lunch: did not offer 1 cup of fruit or veg for HS, no leftovers for 1% white milk
9/19 Breakfast: only offered ½ cup fruit for 44 students, no leftovers for 1% white milk
9/19 Lunch: did not offer 1 cup of fruit for HS, no leftovers for 1% white milk
9/20 Breakfast: no leftovers for 1% white milk
9/20 Lunch: did not offer 1 cup of fruit or veg for HS, no leftovers for 1% white milk
9/21 Breakfast: no leftovers for 1% white milk
9/21 Lunch: did not offer 1 cup of fruit for HS, entree served does not match total meal count, no leftovers for 1% white milk
9/25 Breakfast: no leftovers for 1% white milk
9/25 Lunch: entrée served does not match total meal count, no leftovers for 1% white milk
9/26 Breakfast: no leftovers for 1% white milk
9/26 Lunch: did not offer 1 cup of fruit for HS, entree served does not match total meal count, milk type needs to be specified when pulled
9/28 Breakfast: no leftovers for 1% white milk
9/28 Lunch: did not offer 1 cup of fruit for HS, no leftovers for 1% white milk
9/29 Breakfast: no leftovers for 1% white milk
9/29 Lunch: did not offer 1 cup of fruit for HS, no leftovers for 1% white milk

Nellis AFB Campus September production records were reviewed. The following errors were noted:

9/5 Breakfast: no leftovers for skim white milk
9/5 Lunch: entrée served does not match total meal count, no leftovers for chocolate milk
9/6 Breakfast: no leftovers for skim white milk
9/6 Lunch: no leftovers for both milk varieties
9/7 Lunch: no leftovers for chocolate milk
9/8 Lunch: no leftovers for both milk varieties, milk types need to be specified when pulled
9/11 Breakfast: entrée served does not match total meal count
9/11 Lunch: entrée served does not match total meal count, milk types need to be specified when pulled
9/12 Breakfast: entrée served does not match total meal count, too many milks served (22)
9/12 Lunch: entrée served does not match total meal count, short on milk

9/13 Breakfast: too many milks served (98)
9/13 Lunch: did not note additional fruit/veg pulled for 17 students (alternate entrée), too many milks served (16)
9/14 Breakfast: too many milks served (84)
9/14 Lunch: did not note additional fruit/veg pulled for 17 students (alternate entrée), too many milks served (17)
9/15 Breakfast: no leftovers for skim white milk
9/15 Lunch: entrée served does not match total meal count, too many milks served (43)
9/18 Breakfast: entrée served does not match total meal count, too many milks served (91)
9/18 Lunch: entrée served does not match total meal count, too many milks served (22)
9/19 Breakfast: too many milks served (68)
9/19 Lunch: did not note additional fruit/veg pulled for 15 students (alternate entrée), too many milks served (32)
9/20 Breakfast: too many milks served (22)
9/20 Lunch: too many milks served (8)
9/21 Breakfast: too many milks served (81)
9/21 Lunch: did not note additional fruit/veg pulled for 15 students (alternate entrée), too many milks served (13)
9/25 Breakfast: negative number of leftovers but no additional pulled items noted
9/25 Lunch: served does not match total meal count, too many milks served (4)
9/28 Breakfast: too many milks served (41)
9/28 Lunch: did not note additional fruit/veg pulled for 18 students (alternate entrée), short 6 milks (no additional noted)
9/29 Breakfast: not enough milks served, should not have negative leftovers
9/29 Lunch: entrée served does not match total meal count, if a different lunch entrée is served then staff need to complete full meal pattern contributions

Cadence Campus Q501	Offer Verses Serve (OVS) Per 7 CFR 210.10(e), every student is offered the option to select the full amount of all five food components. During the observations of High School breakfast and lunch service, NDA observed that kitchen staff were requiring students to take milk. Technical assistance was given on the OVS requirements, including that students must take at least 3 components with one being a 1/2 cup of fruit or vegetables at lunch.	Re-train Cadence kitchen staff on what makes a reimbursable meal with OVS. Submit documentation of training (PowerPoint, handouts, certificates, etc.) to NDA for review.	03/11/2024
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Comprehensive Resource Management

All revenues and expenses under the nonprofit school food service account must be allowable- used only for the operation and improvement of the food service and net cash resources may not exceed three months’ average operating expenses. References include not are not limited to 7 CFR 210.14.

Site/Questions	Finding	Corrective Action	Due Date
Off-site Assessment Resource Management Q706	Per 7 CFR Part 210.14(e)(7)(i), school food authorities shall report prices charged for paid lunches to the State agency. Coral Academy's paid lunch prices do not match the prices listed on the site application for this school year.	Coral Academy must revise the site application in CNP to reflect the current paid lunch price documented in their completed PLE Tool for this school year.	03/11/2024

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/Questions	Finding	Corrective Action	Due Date
District Level Q1212b	The 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. Jennifer currently holds the director position but after discussion during the review, she does not meet the hiring standards. The SFA will need to choose someone else to fill the role of the director.	1. Choose someone to fill the role of director and submit reasoning (including proof of educational background and job duties) to NDA for review. 2. Submit plan for the director to complete the required food safety training within 30-days of hire and half the annual training hours by June 30, 2024.	03/11/2024

District Level Q1217a	<p>Per 7 CFR Part 210.30(g), the school food authority director must document compliance with the requirements of this section for all staff with responsibility for school nutrition programs, including directors, managers, and staff. Documentation must be adequate to establish, to the State's satisfaction during administrative reviews, that employees are meeting the minimum professional standards.</p> <p>SFA did not have documentation to show that staff met the annual training hours.</p>	<p>Develop a plan to ensure that appropriate training documentation (certificates, attendee lists, etc.) is kept on file for each nutrition staff member. Submit plan to NDA for review.</p> <p>Suggest using iCN or another professional site that provides a certificate for trainings to make tracking hours easier.</p>	03/11/2024
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Local School Wellness Policy

To help foster a healthy school environment, Section 204 of the Healthy, hunger Free-Kids Act added section 9A to the Richard B. Russell National School Lunch Act (NSLA) to expand the scope of wellness policies. References include but are not limited to 7 CFR 210.11; 7 CFR part 210 Appendix B; and The Healthy Hunger Free Kids Act Section 9A (204).

Site/Questions	Finding	Corrective Action	Due Date
Off-site Assessment Q1004	SFA's are required to include language related to permitting the public to participate in the local school wellness policy development, implementation, and review in the written policy. In addition, this group must meet at a minimum twice a year to review and update the local school wellness policy (LSWP), as needs change, goals are met, new information emerges, and the annual review is completed. Coral Academy did not have anything written in their wellness policy regarding a committee or public involvement in the school's wellness policy review. The SFA noted that wellness committee meetings are conducted during board meetings but there was no documentation on file to confirm who is present or what is covered.	1. Add language to your LSWP regarding your wellness policy advisory committee members. Submit updated LSWP to NDA for review. 2. Create a plan for how wellness policy meeting documentation will be kept on file to show compliance with the requirement to meet twice a year. Submit plan to NDA for review.	03/11/2024
Off-site Assessment Q1005	Nevada's School Wellness Policy states that the school district must inform and update the public (including parents, students, and others in the community) about the content and implementation of the local school wellness policy annually. No assessment was completed for the wellness policy last school year.	Create a plan for when Coral Academy will complete the annual wellness policy assessment and how the results will be made available to the public. Submit plan to NDA for review.	03/11/2024

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/Questions	Finding	Corrective Action	Due Date
Cadence Campus Q1408	Reviewed January 2024 temperature logs. Temperature logs were missing information for 1/12/24 and 1/16/24.	Create a procedure for how temperature logs will be completed daily in each kitchen. Submit the procedure and 2 weeks of completed temperature logs at Cadence to NDA for review.	03/11/2024

Infant and Pre-K Meal Pattern

If multiple age/grade groups including Pre-K are being served in the same service area, the SA must determine how the meal service is structured to meet meal pattern requirements for each age/grade group. The Pre-K and Infant meal pattern updates are part of the Child and Adult Care Food Program (CACFP): Meal Pattern Revisions Related to the Healthy, Hunger-Free Kids Act of 2010.

Site/Questions	Finding	Corrective Action	Due Date
Nellis AFB Campus Infant & Pre-K Meal Pattern Checklist Q2	<p>Per 7 CFR 210.10(p)(1), because Pre-K is not co-mingled and are served in their classrooms for breakfast and lunch, these students must have a separate menu that follows the CACFP meal pattern to ensure the limit of one juice per day; sugar limits in yogurt and cereal; and non-creditable grain-based desserts. In addition, production records must show how the meals offered contribute to the required food components and food quantities for each age/grade group every day.</p> <p>From review of September 2023 production records, it was unclear if Pre-K got the correct amount of milk. The food vendor created a separate menu for Pre-K in December 2023. Production records are currently only separated for Pre-K at breakfast.</p> <p>Pre-K food items need to be separated on the production records due to their age group, so it is clear what quantities are being served to those participants at breakfast and lunch. Conchas were served to Pre-K students at breakfast before the separate menu was implemented, leading to non-reimbursable meals for those classrooms. Reviewed production records for September- December 2023; the following days include non-reimbursable meals for Pre-K due to missing the grain component at breakfast:</p> <p>-9/12/23 -9/26/23 -10/3/23 -10/17/23 -10/24/23 -10/31/23</p> <p>*Fiscal action calculated is \$344, qualifying for the disregard as this does not exceed \$600 per program.</p>	<ol style="list-style-type: none"> 1. Coral Academy must request separate production records for Pre-K for breakfast and lunch (can still be detailed on the same sheet for K-8 but needs to be clear what items are for Pre-K/CACFP). 2. Create a procedure for how the menu and production records will be monitored at the Nellis campus to ensure compliance for both NSLP and CACFP. Submit procedure to NDA for review. 3. Submit 2 weeks of completed production records for Pre-K to NDA for review. 	03/11/2024

VII. Recommendations and Technical Assistance

Recommendations:

Meal Components & Quantities:

1. Suggest adding additional cartons of one milk variety at the end of the serving line during breakfast to ensure there are always two varieties available. This will allow students to easily make a choice between the two milk varieties if the more popular milk choice is already pre-plated on serving boats.
2. Add an additional share bin to the Cadence cafeteria for milk only. This will allow students to easily find other food items they may want from the share bin, while also keeping the discarded milks cold as they are stored together.
3. Coral Academy did not have a procedure for students to receive partial meals or milk only. Recommend implementing a process for students who only wish to purchase milk or a la carte items during the meal period. This will help with unnecessary food waste due to students being told to take one or two items.

Food Safety:

4. All commodities and products must be of domestic origin to the maximum extent practicable, as required by 7 CFR Part 210.21(d). Train kitchen staff at each location to spot-check deliveries for compliance with Buy America provisions.

On-Site Monitoring:

5. Nellis Air Force Base campus was the only school that had their SBP reviewed for the 22-23 school year. Create a plan for the 23-24 on-site monitoring to ensure all sites that serve breakfast receive a SBP review (Cadence, Eastgate, Windmill).

Technical Assistance:

Site/Questions	Technical Assistance
Off-site Assessment	Technical assistance given to SFA to ensure that the
Civil Rights	current discrimination compliant log includes the school
Q804	year to ensure there is an annual record of any civil
	rights complaints made (even if blank for the year).

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
- B. Procurement Review
- C. [iCN Production Records Training](#)
- D. [iCN Meal Pattern Training](#)
- E. OVS Signage Templates (attached)
- F. NV School Wellness Policy Best Practices Manual (attached)
- G. Wellness Policy Assessment Tool (attached)
- H. Serving School Meals to Preschoolers (attached)
- I. Professional Standards Memo (attached)
- J. [Eligibility Manual for School Meals](#)