



**Nevada
Department
of Agriculture**

Doral Academy of Nevada
Administrative Review Report

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 Doral Academy of Nevada from 01/24/2024 to 01/25/2024.

An exit conference was held on 01/30/2024 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 Doral Academy of Nevada staff for the time and assistance extended to our State Agency staff during this process.

II. Introduction

An entrance conference was conducted on 01/24/2024. The review was conducted at the Doral Academy of Nevada in Las Vegas, Nevada. The Administrative Review was conducted by Abigail Hanson and Erica Jaramillo. Doral Academy of Nevada staff included Gena Richardson; Academica staff included Kendra Thornton. 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 01/30/2024 which provided a summary of the work performed at Doral Academy of Nevada 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, November 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 Doral Academy of Nevada'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.
- Documents submitted were well organized, making the application review process effortless.
- Great use of milk coolers and share bins in each meal service at the Red Rock campus.

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 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/Question	Finding	Corrective Action	Due Date
Red Rock Campus Q409	<p>Per 7 CFR 210.10(d)(1)(i), Schools must offer students a variety (at least two different options) of fluid milk. Unflavored milk must be offered at each meal service.</p> <p>Doral Academy uses milk coolers in each cafeteria, with a variety of milk flavors in each cooler.</p> <p>After review of November 2023 production records, the following days noted that there were no leftovers of one milk variety.</p> <p><u>ES Breakfast & Lunch:</u> 11/13-11/17 no leftovers for skim white milk</p> <p><u>MS Lunch:</u> 11/15 no leftovers for 1% white milk</p> <p><u>HS Lunch:</u> 11/13-11/15 no leftovers for 1% white milk</p> <p>Production records need to have an accurate count of milk pulled/placed in the cooler to demonstrate compliance with the milk variety requirement.</p>	<p>1. 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, accurate leftovers, and condiments/extras -How production records information will be filled out by kitchen staff daily (include how milk pulled in coolers will be recorded) -How records will be monitored daily by NSLP manager to ensure reimbursable meals were served (including correct meal count based on meals served) <p>2. Re-train or complete a policy review with Red Rock kitchen staff on how to complete productions records, including when pulling additional items to meet the meal pattern.</p> <p>Suggest adding 'Return to Stock (RTS)' to production records when re-using any leftover items.</p> <p>Submit procedure and proof of training to NDA for review.</p>	03/08/2024

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/Question	Finding	Corrective Action	Due Date
District Level Q1213	Professional Standards For new directors hired after July 1, 2015, at least 8 hours of food safety training is required either not more than 5 years prior to their starting date or completed within 30 calendar days of employee’s starting date. The current director had not completed the 8 hours of food safety training at the time of review.	Create a plan for how Gena will complete the 8 hours of food safety training within 30 days. Submit plan to NDA for review.	03/08/2024
District Level Q1217b	Professional Standards Training Tracking All SFAs are required to track and maintain records regarding employees’ annual training. USDA’s Professional Standards Training Tracker may be used, or an alternative tracking tool may be developed but must include at minimum these required fields: employee name, hiring date, employee position, required hours of training, training title/subject, length or training, school year training is applied to, and completed training hours to date. The current tracker is missing the required number of hours of training for each employee.	Add the required number of hours for each employee to the current professional standards tracker. Submit updated tracker to NDA for review.	03/08/2024

VII. Recommendations and Technical Assistance

Recommendations:

Meal Components & Quantities:

1. Suggest adding more signage to the High School serving lines that explains what is needed for a reimbursable lunch, especially for fruit and vegetable offerings (3-5 components and 1/2 cup fruit or vegetable). See template in the appendix.

Local School Wellness Policy:

2. Doral Academy opted into the local school wellness policy triennial assessment waiver in SY 22-23. Suggest completing an annual assessment this year to determine if you may want to make updates to your wellness policy.

See an example of an assessment tool in the appendix.

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:

1. Appeal Procedure
2. Procurement Review
3. OVS Signage Templates (attached)
4. Wellness Policy Assessment Tool (attached)