

# NORTHERN NV CHILD & ADOLESCENT SVCS

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 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 ASSP administered by *NORTHERN NV CHILD & ADOLESCENT SVCS* from 01/18/2024 to 01/19/2024.

An exit conference was held on 01/19/2024 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 *NORTHERN NV CHILD & ADOLESCENT SVCS* staff for the time and assistance extended to our State Agency staff during this process.

#### II. Introduction

An entrance conference was conducted on 01/17/2024. The review was conducted at the *NORTHERN NV CHILD & ADOLESCENT SVCS* in Reno, Nevada. The Administrative Review was conducted by Allen Whitenack. *NORTHERN NV CHILD ADOLESCENT SVCS* staff included Bonnie Vogler, Renee Polley, Sheila Tompkins-Hess, Imran Hyman, Josef York. This report is based on the results of the offsite assessment, the onsite review of files, and meal service observations of the SFA's participating programs. An exit conference was held on 01/19/2024 which provided a summary of the work performed at *NORTHERN NV CHILD & ADOLESCENT SVCS* 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, October 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 NORTHERN NV CHILD & ADOLESCENT SVCS'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

Site Name	Question	Achievements
PRTF North	Q404b	During lunch service students write the menu on the whiteboard by putting the menu components in the correct food category. This is a great way to engage students in the meal service and provides an excellent educational opportunity.

#### VI. Critical Areas of Review

- Performance Standard I- Meal Access and Reimbursement
  - o Certification and Benefits Issuance
  - Meal Counting and Claiming
- Performance Standard II- Meal Pattern and Nutritional Quality
  - o Meal Components and Quantities
  - o Offer versus Serve
  - o Dietary Specifications and Nutrient Analysis
- Comprehensive Resource Management
  - o Maintenance of the Non-Profit School Food Services Account
  - o Revenue from non-program foods
  - o Paid Lunch Equity
  - Indirect Costs
- General Areas
  - o Civil Rights
  - o Professional Standards
  - o SFA On Site Monitoring
  - Local School Wellness Policy
  - Smart Snacks in School
  - Water Availability
  - o Food Safety
  - o Reporting and Recordkeeping
  - SBP and SSO Outreach
- Procurement
  - o Procurement Plan
  - Code of Conduct
  - o Procurement Documents and Records

## VII. Findings and Required Corrective Action

### **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 Name	Question	Finding	Corrective Action	Due Date
PRTF North	Q1408	A backup thermometer was missing from the refrigerator at 8N site. Staff were using the external thermometer to record temperatures. Technical assistance was provided on the importance of having a backup thermometer even in a digitally monitored refrigerator as thermostats can go out of calibration.	Obtain internal thermometer to use for refrigerator temperature log. Submit picture as proof to NDA.	11/01/2023

#### VII. Recommendations and Technical Assistance

#### **Recommendation:**

Nutrient Analysis of Week 1 lunch was slightly over the target 1A sodium requirements of less than 1240mg average for the week. During the next menu update please review target 1A sodium requirements and make adjustments so that all weeks are within the 1240mg average.

In review of invoices and state job reports, there was no designation of NSLP versus non-program foods. Best practice would be to have non-program food purchases documented with a separate job number and/or general ledger account.

In review of meal claims it was noted that serving days for snacks matched days of month. Snacks were only served on school days on production records, which is correct. Best practice is to having snack serving days match actual days of school instruction.

#### 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