



**Nevada  
Department  
of Agriculture**

---

**PINECREST ACADEMY OF  
NEVADA**  
*Administrative Review Report*

National School Lunch Program  
***Division of Food and Nutrition***

**PINECREST ACADEMY OF NEVADA**  
**Administrative Review Report**  
Division of Food and Nutrition



**Nevada**  
**Department**  
**of Agriculture**

---

**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 Report
  - c. NDA Menu Production Record Guide

## **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 programs administered by PINECREST ACADEMY OF NEVADA from 05/07/2024 to 05/08/2024.

An exit conference was held on 05/13/2024 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 PINECREST 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 05/07/2024. The review was conducted at the PINECREST ACADEMY OF NEVADA in Henderson, Nevada. The Administrative Review was conducted by Abigail Hanson and Erica Jaramillo. PINECREST ACADEMY OF NEVADA staff included Lora Flitton and Sarah Goodsell; Academica staff included Kendra Thornton and Rachel Law. 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 05/13/2024 which provided a summary of the work performed at PINECREST 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, February 2024. 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 PINECREST 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

Question	Achievements
Food Safety Q1407	All kitchens observed during the review were very clean and organized.
Recordkeeping Q1500	NSLP information has a separate tab, and documents are very easy to navigate on the school's website.
Recordkeeping Q1501	Documentation submitted was well organized, making the review process effortless.

## **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
SLOAN CANYON Q401	<p>Offer Verses Serve (OVS) Per 7 CFR 210.10(e), under offer versus serve students must be allowed to decline two components at lunch, except that students must select at least 1/2 cup of either the fruit or vegetable component.</p> <p>During the on-site review of the High School lunch service, it was observed that students who did not want an entree (2 components) were only required to take milk and one 1/2 cup fruit and vegetable serving. Technical assistance was given on-site for the High School requirements under OVS. Students must take two full meal components in addition to 1/2 cup fruit or vegetable serving to count as a reimbursable meal. SA counted 3 non-reimbursable meals that were served.</p>	<p>SFA submitted revised production records and meal count report for the Sloan Canyon on-site day of review to reflect the 3 non-reimbursable meals served.</p>	<p>Proof received on 05/16/2024</p>

SPRINGS Q409	<p>Menu Production Records</p> <p>Per 7 CFR 210.10(a)(3), production and menu 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>February 2024 and day of review production records were reviewed. The following errors were noted:</p> <ul style="list-style-type: none"> <li>-Not all required fields were completed when additional food items were pulled to make more meals</li> <li>-Milk count was not correctly recorded on production records to show compliance with milk variety requirement. There were days when there are no leftovers noted on records.</li> </ul>	<p>1. Kitchen Manager or staff who complete production records at Springs campus must complete a production record training.</p> <p>2. Create a procedure detailing:</p> <ul style="list-style-type: none"> <li>-How SFA plans to ensure all production 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</li> <li>-How production record information will be filled out by kitchen staff daily (include how meal contributions for all meals will be recorded)</li> <li>-How records will be monitored daily by NSLP coordinator to ensure reimbursable meals were served (including two choices of milk for each participant)</li> </ul> <p>Submit proof of training, procedure, and May 2024 production records (1 week) to NDA for review.</p>	06/24/2024
-----------------	--	---	------------

## VII. Recommendations and Technical Assistance

### Recommendation:

Add additional OVS signage to the serving line for High School students to assist them in choosing fruits and vegetables. This could include verbiage such as "can take up to two bags of carrots" and "can take up to two fruits".

### Technical Assistance:

Site/Question	Technical Assistance
District Level Certification & Benefit Issuance Q126	Technical assistance was given to delete any duplicate family members on electronic applications when parents/guardians accidentally add a family member twice. This will ensure that the household size is accurate. All applications were updated on 5/13/24 with duplicates deleted. Eligibility status was unaffected and remains accurate.
SLOAN CANYON Offer Versus Serve Q500	Technical assistance given on the requirement at High School for students to take 2 full meal components in addition to the ½ cup fruit/vegetable requirement under OVS.
District Level Civil Rights Q810	Technical assistance given on the requirement for the USDA non-discrimination statement (or link to it) to be included on the main 'Lunch' tab of the school's website. The website was updated on 5/13/24 and the full NDS has been added. All other applicable materials include the statement and are compliant.

## 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. A. Appeal Procedure
- B. B. Procurement Report
- C. C. NDA Menu Production Record Guide (attached)