



Young Women's Leadership Academy
Las Vegas
Administrative Review Report
January 17, 2023

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 Young Women's Leadership Academy (YWLA) from January 10-12, 2023.

An exit conference was held on Thursday, January 12, 2023 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 YWLA and Academica Nevada 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 Tuesday, January 10, 2023. The review was conducted at the Young Women’s Leadership Academy in Las Vegas, Nevada. The Administrative Review was conducted by Erica Jaramillo. YWLA staff included Tiana McGowan and Ayana Williams. Academics Nevada staff included Kendra Thornton and Jennifer Lindemon. 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 Thursday, January 12, 2023 which provided a summary of the work performed at YWLA 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, November 2022. 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 YWLA’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

- Recordkeeping: YWLA demonstrates exceptional organization which helped the review run smoothly.

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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
 - Dietary Specifications and Nutrient Analysis

- First Year Resource Management
 - Maintenance of the Non-Profit School Food Services Account

- 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 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.			
Finding		Corrective Action	Due Date
#1	<p>Menu Production Records Production and menu records must be maintained in accordance with FNS guidance. Production records for the review month of November 2022 were reviewed.</p> <p>Records did not differentiate between age/grade groups the following: Serving sizes and contribution to meal pattern.</p>	<p>Consult with vendor, Better 4 You Meals, to provide production records (transport records) for the two age groups: 6-8 and 9-12.</p> <p>Submit one week worth of lunch production records for NDA to review.</p>	February 17, 2023
#2	<p>Nutrient Analysis/Meal Components All areas must be compliant for all age/grade groups for total Calories, Saturated Fat, and Sodium requirements set forth in HHFKA of 2010.</p> <p>The reports submitted were for K-8 age group when YWLA serves grades 6th & 9th only. This caused the 9th grade group to be under served Calories by 47 and short ½ cup vegetables (1/4 cup legumes, ¼ cup additional)</p>	<p>Consult with vendor, Better 4 You Meals, to update lunch menus to separate the age groups of 6-8 and 9-12 to accurately meet nutrient requirements.</p> <p>Submit one week of Nutrient Analysis and meal worksheets to NDA for review.</p>	February 17, 2023

VIII. Recommendations and Technical Assistance

Recommendations:

1. **Stager middle school and high school meal service:** Consider staggering the meal service of middle school and high school age groups to help staff differentiate serving sizes of the two groups.

Technical Assistance:

1. Application Notification Letter: Technical assistance was provided to add the approval date to template. This was completed during the review.

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2. Verification Signature: Technical assistance was provided to ensure confirmation and verification signatures were completed on verified applications. This was completed during the review.

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-attached
- B. Procurement Review Detail-attached

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