



**Cristo Rey St. Viator Las Vegas  
College Preparatory**  
*Administrative Review Report*

May 25<sup>th</sup>, 2022

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 Cristo Rey from March 30<sup>th</sup>-31<sup>st</sup>.

An exit conference was held on Thursday, March 31<sup>st</sup>, 2022 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 Cristo Rey 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, March 30<sup>th</sup>, 2022. The review was conducted via Microsoft TEAMS. The Administrative Review was conducted by Brittany Mally and Dan Pimm. Cristo Rey staff included Sandy Tsutahara and Ana Rodriguez. 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, March 31<sup>st</sup>, 2022 which provided a summary of the work performed at Cristo Rey 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, January 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 2020-2021.

## 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 Cristo Reys 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

- The school nutrition program at Cristo Rey is very organized and the people running it were knowledgeable about their program and operations.

## 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

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- Offer versus Serve
- Dietary Specifications and Nutrient Analysis
  
- 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 Record

### VII. Findings and Required Corrective Action

There were no findings during this administrative review and therefore no corrective actions are required at this time.

### VIII. Recommendations and Technical Assistance

#### Recommendations:

1. **Media Release:** Cristo Rey is still paying for the media release to be posted in the newspaper. It is expensive to advertise this way. In this day and age it is acceptable to meet this requirement by advertising on social media, the school website and emails to the parent. We recommend to stop paying for the newspaper media release.

#### Technical Assistance:

1. **Meal Benefit Applications:** Technical assistance was provided on the meal benefit applications. There was no confirming official's signature on the applications, only the determining official's signature. When asked why, Cristo Rey said that the computer application system was the confirming piece of that. For paper applications, the confirming signature must be of a second person reviewing it. The application information in the computer system is only as good as the person entering it. NDA asked for a policy on how Cristo Rey will process meal benefit applications that includes a confirming official's signature. They submitted their application processing procedure to NDA on April 13, 2022.

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2. Nutrition Analysis: The nutrition analysis for the breakfast and lunch menus was not completed on the USDA Menu Certification worksheets that were originally sent. Revolution Foods, their vended meal partner provided the nutrient analysis for all four weeks of the cycle menus for both breakfast and lunch to NDA on April 8<sup>th</sup>, 2022. They were in compliance.
3. HACCP/Food Safety Manual: Cristo Rey provided a HACCP manual, but it was the one for Revolution Foods and their kitchen. Revolution Foods is providing the meals, but the Cristo Rey kitchen still needs their own HACCP manual with policies that apply to their kitchen. They submitted a HACCP manual on April 8<sup>th</sup>, 2022. It contains appropriate policies for how the food is handled and cooked at Cristo Rey. I suggest adding a cover page with the name of the school. Also please add the dates of adoption/implementation to the end of each policy, there is a spot for it, please fill it out.

### 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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