



**Washoe County Department of
Juvenile Services**
Administrative Review Report

October 7, 2019

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 programs (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 Washoe County Department of Juvenile Services (WCDJS) from September 10-11, 2019.

An exit conference was held on Wednesday, September 11, 2019 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 WCDJS 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, September 10, 2019. The review was conducted at the WCDJS in Reno, Nevada. The Administrative Review was conducted by Bobbie Beach, School Nutrition Coordinator II; Chris Tate, Program Officer; Gurvir Singh, Dietetic Intern. WCDJS staff included Christine Eckles, Division Director; Troy Harper, Program Manager; Jon Bozanich, Fiscal Compliance Officer; Brenda Carrera, Program Coordinator; Kaimi Coonrad, Food Service Manager. 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 Wednesday, September 11, 2019 which provided a summary of the work performed at WCDJS 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, July 2019. The Procurement Review covered all documents, records, invoices, and procedures relating to the procurement for the SFA for the year of review, school year 2018-2019.

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 WCDJS'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

- Meal Quality: Food service staff prepare fresh, scratch-cooked meals daily, providing appealing menu choices for students.
- Program Administration Improvement: WCDJS have improved program oversight and administration. WCDJS significantly decreased the number of findings identified in the previous review from 17 findings identified in 2016-17 to 1 identified in the 2019-20 review.

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VI. Critical Areas of Review

- Performance Standard I- Meal Access and Reimbursement
 - Eligibility Documentation Sheet
 - Meal Counting and Claiming

- Performance Standard II- Meal Pattern and Nutritional Quality
 - Meal Components and Quantities
 - Offer versus Serve
 - Dietary Specifications and Nutrient Analysis
 - Menu Production Records

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

- General Areas
 - Civil Rights
 - Professional Standards
 - SFA On Site Monitoring
 - 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

General Program Compliance			
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			
	Finding	Corrective Action	Due Date
#1	<p>Supporting Documentation According to the <i>Administrative Review Manual</i> (2018-19 edition), supporting documentation for all completed training, i.e., agendas, sign-in sheets, certificates of completion, etc. must be maintained on file three years plus the current school year for all school nutrition employees.</p> <p>At time of review, no supporting documentation was kept verifying the number of training hours completed by each school nutrition employee.</p>	<p>Develop a business process to address how these records will be maintained going forward.</p> <p>Submit to NDA for review and approval.</p>	November 7, 2019

VIII. Recommendations and Technical Assistance

Recommendations:

- 1. Recommendation: Implementing an NSLP Snack Service.** WCDJS is already serving a snack to its juvenile residents. WCDJS can add the Afterschool Snack Service and receive federal reimbursement for snacks served. To add on an Afterschool Snack Program, contact NDA.
- 2. Recommendation: Participating in the USDA Farm to School Program through local purchasing.** Nonprofit school food service funds can be used to purchase local foods. See Appendix C for more information.
- 3. Recommendation: Menu Production Record training.** WCDJS completed daily menu production records (MPR) but information entered was lacking detail. NDA recommends having food service staff complete the Production Records Training at the [School Nutrition Toolbox](#).

Technical Assistance:

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1. Technical assistance provided to adjust WCDJS's service style to an Offer versus Serve model. WCDJS's records indicated a Straight Serve model; however, under this service style students must take all menu items offered daily. During observation, WCDJS was operating an Offer versus Serve model in which students received some pre-plated items from the cafeteria and had a choice of beverages and sides from the salad bar. Food service staff placed Offer versus Serve signage and will indicate going forward on menu production records of this change. New Offer versus Serve signage can be downloaded at [USDA's Team Nutrition Website](#).

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
- C. Guidance on Farm to School and Local Purchasing

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