



Nevada Department of Agriculture

St. Judes Ranch for Children

Administrative Review Report

September 29th, 2023

National School Lunch Program
Division of Food and Nutrition

St. Judes Ranch for Children Administrative Review Report

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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 National School Lunch Program, School Breakfast Program, and Afterschool Snack Program administered by ST JUDES RANCH FOR CHILDREN from 08/29/2023 to 08/30/2023.

An exit conference was held on 8/30/2023 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 ST JUDES RANCH FOR CHILDREN staff for the time and assistance extended to our State Agency staff during this process.

II. Introduction

An entrance conference was conducted on 08/29/2023. The review was conducted at the ST JUDES RANCH FOR CHILDREN in Boulder City, Nevada. The Administrative Review was conducted by Erica Jaramillo. ST JUDES RANCH FOR CHILDREN staff included DaShun Jackson and TyTaliayah Parker. 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 which provided a summary of the work performed at ST JUDES RANCH FOR CHILDREN 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, June 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 2021-2022.

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 ST JUDES RANCH FOR CHILDREN'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

Site Name	Question	Achievements
St Clare Cottage	Q409	St. Jude staff members were diligent in completing the production records right after meal service.

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 I – Meal Access and Reimbursement

Federally mandated counting and claiming systems for all SFAs that participate in NSLP and SBP. Free, reduced-price, and paid meals claimed for reimbursement must be served only to eligible children. Certification and benefits issuance process is the SFA’s certification of student eligibility for FRL meals and serves as a link to the SFA’s meal counting and claiming system. References include but are not limited to 7 CFR 245.2(1)(i); 7 CFR 245.6(b)(1); 7 CFR 210.7 (c)(1)(iii)(iv); 7 CFR 210.18 (g)(1)(ii)(A); CFR 210.19(c)(2)(i); and 210.19(c)(2)(ii).

Site Name	Question	Finding	Corrective Action	Due Date
	Q125	During the review, St. Jude's did not have proof of roster in households with the following required information: child's name, child's date of birth, personal income received by child, date of admission, and date of release. *Repeat Finding*	Create procedure to maintain benefit document (roster) with required information, include how often it will be updated. Submit to NDA the procedure and current benefit document (roster) with required information, for review.	11/01/2023
	Q315	For June 2023, the month of review, it was observed that the number of served meals from Health e-pro production records were not the same as the number of meals entered on claim. Also, St. Jude's did not have documentation of meal consolidation daily or monthly. Staff stated that claims were calculated by multiplying the number of participates by days in the month. *Calculated overclaim for NSLP is \$527.17 and for SBP is \$320.40, qualifying for the disregard as this does not exceed \$600 per program. *	(1) Develop a procedure to document daily meals served that assists in the consolidation of meals served for each month, per house. Procedure should include how this documentation will then be used to enter meals served in monthly claims. This can be done by using a spreadsheet, monthly tally sheet, etc. Submit procedure to NDA for review. (2) Submit to NDA monthly consolidation document for September and October 2023 before claim is submitted.	11/01/2023

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 Name	Question	Finding	Corrective Action	Due Date
St Clare Cottage	Q409	SFA's are required to keep documentation including menu, CN labels, standardized recipes, and manufacture's production formulation statements to support the foods/recipes offered on the menu. During the review, formulation statements and CN labels were not available for manufactured food items. Also, it was observed that canned items in the pantry were not the low sodium versions used for the nutrient analysis. *Repeat Findings*	(1) Create a procedure that outlines how St. Jude will keep all required documentation that supports the food and recipes offered on the menu. Submit to NDA for review. (2) Create a procedure that outlines how St. Jude will ensure that items purchased for meals match the items entered into nutrient analysis, ensuring that meal pattern and dietary specifications are meet. Submit to NDA for review. (3) Submit Recipes, CN labels, and formulation statements for September 2023 menu for NDA to review.	11/01/2023

Comprehensive Resource Management- Revenue from non-program foods

All revenues and expenses under the nonprofit school food service account must be allowable- used only for the operation and improvement of the school food service and net cash resources may not exceed three months’ average operating expenses. References include but are not limited to 7 CFR 210.14.

Site Name	Question	Finding	Corrective Action	Due Date
	Resource Management- Comprehensive	During the review, the SFA submitted two differing profit and loss statements for July 2022 -June 2023. When net cash was calculated, it was over the three-month average allowed by \$1,99.64. Also, the SFA submitted a net cash resource worksheet in May 2023 with higher totals for expenditures, resulting in a negative net cash resource and not requiring a spend down plan at that time.	(1) Submit to NDA an accurate statement of revenues and expenditures for the food programs for July 2022- June 2023. (2) Submit to NDA an updated Net Cast Resource Worksheet, with the spend down plan completed, if applicable. *Submit via email*	11/01/2023

General Program Compliance

Civil Rights

Regulations require SFAs to comply with civil rights provisions to ensure that no child is denied benefits or otherwise discriminated against because of race, color, national origin, age, sex, or disability. References include but are not limited to 7 CFR 210.23(b), 7 CFR 210.18(h)(2)(ii), FNS Instruction 113-1, USDA memo SP59-2016.

Site Name	Question	Finding	Corrective Action	Due Date
	Q806	During the review, St. Jude's was not able to provide documentation of the completed annual civil rights training.	Submit to NDA a plan on how staff will complete civil rights training before June 30, 2024, include how documentation of training will be kept on file.	11/01/2023

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

Site Name	Question	Finding	Corrective Action	Due Date
	Q1216	During the review of Professional Standards, all nutrition program trainings were listed with company trainings. Nutrition program trainings for all staff had zero completed hours for school year 22-23. For school year 23-24, only two new employees had trainings recorded. St. Jude staff stated that all employees complete onboarding training and annual training related to the nutrition program but was not able to provide documentation of training.	Create a procedure on how required training hours will be completed annually. Include how they will be recorded and how required hours will be based on staff roles in nutrition programs. Submit procedure to NDA for review.	11/01/2023
	Q1217b	Current tracking tool is an internal system that records all annual required company training. The system did not record the staff's position or role to determine the number of hours required specific to the nutrition program. It also did not separate trainings or hours specific to the nutrition program to assist the SFA in determining if hours were met.	Establish a way to track professional standard training to include the required elements: Employee name, hiring date, employee position, required number of training hours, training title/subject, training date, length of training, school year applied to, and completed training hours to date. Either use an internal system to track school nutrition trainings separately (with requirements above) or use a separate medium to track trainings specific to the nutrition program. Submit new tracker to NDA for review.	11/01/2023

On Site Monitoring

Regulations require SFAs with more than one school to perform no less than one on-site review annually of the counting and claiming system and the readily observable general areas for NSLP and for SBP, each school must be reviewed at least every other year. References include but are not limited to 7 CFR 210.8(a)(1), 7 CFR 210.18(h), and 7 CFR 220.11(d)(1).

Site Name	Question	Finding	Corrective Action	Due Date
St Clare Cottage	Q901a	During the review, it was noted that St. Jude's had not completed the required SFA On-Site monitoring form for breakfast or lunch for the previous school year.	(1) Develop a plan on how the on-site self-monitoring will be completed for this school year. All sites must be monitored for lunch and half of the sites must be monitored for breakfast. This must be completed before February 1st, annually. It was suggested that these be completed during the winter break, when participants are not in school. Submit plan to NDA for review. (2) Develop a procedure to ensure that this self-monitoring be completed annually. Include title of responsible personnel. Submit to NDA for review.	11/01/2023

Local School Wellness Policy

To help foster a healthy school environment, Section 204 of the Healthy, hunger Free-Kids Act added section 9A to the Richard B. Russell National School Lunch Act (NSLA) to expand the scope of wellness policies. References include but are not limited to 7 CFR 210.11; 7 CFR part 210 Appendix B; and The Healthy Hunger Free Kids Act Section 9A (204).

Site Name	Question	Finding	Corrective Action	Due Date
	Q1002	During the review, it was noted that St. Jude's did not complete two annual committee meetings or an annual review of their wellness policy.	(1) Create a plan on how two meetings will be held this school year and a review of the policy will be included. Submit plan to NDA for review. (2) Create a procedure on how two committee meetings will be held annually moving forward. Include how documentation will be kept on file and an review of the policy will be completed. Submit procedure to NDA for review.	11/01/2023

Other Federal Programs

NSLP Afterschool Snack Program (ASSP)

Under the ASSP an SFA must ensure students are receiving nutritionally-balanced snacks, received appropriate educational or enrichment activities, and count and claim snacks accurately. References include but are not limited to 7 CFR 210.10(o), 7 CFR 210.9(c)(7), 7 CFR 210.13(c), and 7 CFR 210.23(b).

Site Name	Question	Finding	Corrective Action	Due Date
St Clare Cottage	Q1704a	Snack meals were not recorded in Health e-pro production records during observation. Also, submitted day of review production records were blank for snack.	(1) Develop a procedure to ensure that staff enter served meals in Health e-pro and are recorded for meal count claims. Submit to NDA for review. (2) Submit to NDA 1 months' work of snack production records and meal counts for September 2023.	11/01/2023
St Clare Cottage	Q1707a	St. Jude's did not complete a snack monitoring during the first 4 weeks of implementation of this school year or last.	(1) Create a plan on how snack will be monitoring twice this school year. Submit plan to NDA for review. (2) Create a procedure to ensure snack monitoring is completed annually moving forward. Should include how it will be completed in the first 4 weeks of implementation and once before end of school year. Also include title of personnel responsible. Submit to NDA for review.	11/01/2023
St Clare Cottage	Q1708	During the observation of snack, an activity was not complete and is not recorded on production records.	(1) Create a procedure on how activities will be included with all snacks moving forward. Submit procedure to NDA for review. (2) Submit 1 months' worth of proof of completed activity to NDA for review. Can be included on snack production records.	11/01/2023

Procurement Review

SFAs must comply with the applicable regulations for procurement of goods and services, including using the specified methods in federal, state, and local laws and regulations; with all contracts, purchasing services involving the child nutrition program regulations for procurement must be in place. References include but are not limited to 7 CFR 210.19(a)(3); 2 CFR 200.318-326; 7 CFR 210.21; 2 CFR 200; 2 CFR 318(a-d); 2 CFR 200.320

Site Name	Question	Finding	Corrective Action	Due Date
	Vendor Paid List- SFAs must submit information for all vendors paid for items used for the food programs.	During the review, it was noted that St. Jude's did not complete two annual committee meetings or an annual review of their wellness policy.	(1) Create a plan on how two meetings will be held this school year and a review of the policy will be included. Submit plan to NDA for review. (2) Create a procedure on how two committee meetings will be held annually moving forward. Include how documentation will be kept on file and an review of the policy will be completed. Submit procedure to NDA for review.	11/01/2023

VIII. Recommendations and Technical Assistance

Recommendations

1. Professional Standards: NDA recommends that St. Jude categorize their positions in the following manner within the nutrition program: St Jude title: Nutrition program title (required annual training hrs) Program Director: Director (12 hrs.); Foster Home Supervisors and Program Assistant/In-Hone Trainer: Managers (10 hours); House Parents: staff working 20hrs or more (6hours); all other house staff: staff working less than 20hrs/wk. (4hrs)
2. Lunch SFA on-site monitoring: NDA recommends that St. Jude completing lunch self-monitoring during times children are out of school, the summer months (July or August or during the winter break (December), to meet the February 1st deadline.
3. Infant meals: Infant meals are allowed under the National School Lunch Program and can be claimed for reimbursement. All program requirements must be maintained in the same manner as for all other youth age groups. This includes meeting the daily and weekly nutrition requirements for age group and maintaining accurate infant meal record/menu production records.
4. Menu documentation: keep a folder per month of copies of food documentation to support food items served. Child Nutrition (CN) labels, manufacture formulation statements, recipes (to scale for house), etc.

Technical Assistance

Site Name	Question	Technical Assistance
	Q1000	Technical assistance was provided to update the meal pattern charts referenced in wellness policy to current USDA tables. This was completed during the review.
St Clare Cottage	Q409	Technical assistance was provided to ensure that the leftover and waste sections are completed daily in Health e-pro production records. This was implemented on site during lunch observation.
St Richards	Q1404	Technical assistance was provided to have the most updated HACCP manual in all houses. Manual in St. Richards has a different revision date that the other house, but all manuals were 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. Appeal Procedure
- B. Procurement Review Report
- C. [Professional Standards Guide](#)
- D. Professional Standards Tracking example
- E. [Wellness Policy Assessment Tool](#)
- F. [The iCN \(training website\)](#)