



**Northeastern Nevada Juvenile  
Detention Center**  
*Administrative Review Report*

December 14, 2018

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 Northeastern Nevada Juvenile Detention Center (NENVJDC) from November 5-6, 2018. The Procurement Review was led by Jillian Smith.

A preliminary exit conference was held on Tuesday, November 6, 2018 to provide a summary of the work performed and to discuss any anticipated findings and required corrective actions. A follow-up phone discussion was held on Thursday, December 6, 2018 to further discuss current procurement practices and to provide technical assistance. Participants on the phone discussion included Glen Ingham, Jillian Smith, and Rose Wolterbeek.

We commend your agency's commitment to improving operations of this essential nutrition assistance program. We wish to thank the Northeastern Nevada Juvenile Detention Center 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 held on Monday, November 5, 2018. The review was conducted at the Northeastern Nevada Juvenile Detention Center in Elko, Nevada. The Administrative Review was led by Jillian Smith. NENVJDC staff included Glen Ingham, Sherry Harris, and Juanita Torivio. 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 Tuesday, November 6, 2018 which provided a summary of the work performed at NENVJDC 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, September 2018. The Procurement Review covered all documents, records, invoices, and procedures relating to the procurement for the SFA for the year of review, school year 2017-2018.

## **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 NENVJDC'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**

- **School Wellness:** NENVJDC has met its School Wellness goals for the 2017-2018 school year. A unique initiative includes the onsite garden which is then harvested and incorporated into the menu.
- **Recordkeeping:** NENVJDC demonstrates exceptional organization with binders keeping records from previous years neatly separated and accessible.
- **Onsite Self-Monitoring:** Though annual self-monitoring is not required for sponsors with only one site, NENVJDC monitors their program monthly. A self-monitoring form is used, and records are kept onsite.

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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
  - Offer versus Serve
  - Dietary Specifications and Nutrient Analysis
  
- Comprehensive Resource Management
  - Maintenance of the nonprofit school food services account
  - Revenue from non-program foods
  - Indirect Costs
  
- 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**

**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.

<b>Finding</b>		<b>Corrective Action</b>	<b>Due Date</b>
#1	<p><b>Menu Production Records</b>            Production and menu records must be maintained in accordance with FNS guidance. Production records for the review month of September 2018 were reviewed.</p> <p>a. Production records missing the following essential components: Amount of food pulled/needed, amount actually served, amount of leftovers</p>	<p>a. Add these required components to current production records in use. Submit a week’s worth of production records, using your updated template.</p>	<p><b>a. January 14, 2019</b></p>

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<b>General Program Compliance</b>			
<b>Professional Standards</b> – 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			
	<b>Finding</b>	<b>Corrective Action</b>	<b>Due Date</b>
#2	Tracking system in place is missing the following essential components: Date hired, title/position, required hours of training, training title, and professional standards learning code.	Update the current Professional Standards tracking system to include the missing required components or use <a href="#">USDA’s Professional Standards Training Tracker 2.0</a> . Please send updated tracking system with the added required components.  See Appendix C for Professional Standards Learning Topic Codes	<b>January 14, 2019</b>

**VIII. Recommendations and Technical Assistance**

**Recommendations:**

- 1. Best Practice: Separate Training Tracker into School Years-** The excel spreadsheet used by NENVJDC to track staff member training hours is not separated by school year. All history of trainings is combined into one spreadsheet, making it more difficult to decipher if staff members completed the annual training hours requirement.

**Technical Assistance:**

1. Technical assistance provided for including an estimated date of release and title of the facility official signature on benefit issuance document. According to Federal regulations, the benefit issuance document for Residential Child Care Institutions must include: child’s name, personal income received by the child, child’s date of birth, date of admission, date of release/expected date of release, facility official signature/contact information/and title.
2. Technical assistance was provided for creating a Procurement Plan that encompasses all USDA requirements. NENVJDC sent in a copy of their Procurement Plan on

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- 12/12/18, using the approved NDA template (provided to NENVJDC on 12/6/18). The Procurement Plan was reviewed and approved for compliance by NDA staff.
3. Technical assistance was provided for adding a clause that prohibits the acquisition of unnecessary or duplicative items to the Code of Ethics being used at NENVJDC. NENVJDC added the missing clause to their Code of Ethics. A copy was sent in and approved by NDA on 12/11/18.

## 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 ten 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. Professional Standards Learning Topic Codes-attached

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