



Quest Academy
Administrative Review Report

June 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 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 administered by Quest Academy from May 8th -9th, 2019.

A preliminary exit conference was held on May 9th, 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 Quest Academy's staff for the time and assistance extended to our entire State Agency staff at NDA during this process.

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II. Introduction

An entrance conference was conducted on May 8th, 2019. The review was conducted at Quest Academy (QA) in Las Vegas, Nevada. The Administrative Review was conducted by Rose Wolterbeek and Lindzy Talbot. QA staff included Renee Crain and Casey Parker. This report is based on the results of the offsite assessment, the onsite review of files, and meal service observations of lunch. A preliminary exit conference was held on May 9th, 2019 which provided a brief summary of the work performed at QA and we discussed any additional documentation needed, preliminary findings, and observations.

III. Scope

The Administrative Review covered documents, records, and procedures relating to the administration of the NSLP for the month of review, December 2018. The following site was reviewed as a part of the on-site Administrative Review:

- Northwest Campus

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 QA'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

- State agency staff were extremely impressed with Quest Academy's operation, including the creative use of space in the multi-purpose room/cafeteria. The kitchen made excellent use of a limited space and was kept very clean. Kitchen staff were friendly and knowledgeable of program requirements.
- Record keeping was very well organized, complete and accurate. The staff at Quest Academy is to be commended on how organized the files were for the NSLP operation, especially the Free and Reduced applications & direct certification files.

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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
 - Menu Production Records

- 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
<p>#1 Professional Standards Training Tracking Annual professional standards training hours must be tracked for all employees who have duties associated with the School Nutrition program. SFAs may utilize the USDA Training Tracking tool or develop an alternative training tracking tools that includes all the minimum required fields listed in the USDA Professional Standards Training Tracker Tool.</p> <p>At the time of review, Quest’s tracking system in place was not accessible to review for the Professional Standards requirement due to a staffing vacancy.</p>	<p>Utilize or develop a Professional Standards tracking system to be compliant with <u>USDA’s Professional Standards Training Tracker 2.0</u>. Send a complete sample tracking system, or locate Quest’s tracker tool with information filled in for the 2018/19 School Year for NDA to review.</p> <p>See Appendix C for Professional Standards Learning Topic Objectives & Topics and compliant training tracker templates.</p>	<p>July 8th, 2019</p>

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VIII. Recommendations and Technical Assistance

Technical Assistance:

1. Smart Snack Compliance: the vending machines on site at the Northwest location contained one item that was not allowed: Mr. Flav beverage, due to the disallowance of calories that exceeded the minimum amount for the age group at the school. This was corrected on site with the removal of these products as certified by the meal vending company.
2. After School Snack Program: students receiving snack must be served both menu items at the same time to accurately determine if the child receives a complete reimbursable snack. If offering After School Snack program next year, the monitoring form must be done within the first four weeks of the program start. It was not known if this was done due to a staff on leave at the time of the review.
3. Water availability: this requirement was corrected on site with the water pitchers & disposable cups. Water was available in the adjacent hallway but a barrier to the cafeteria existed during meal service. You may continue to use the pitchers or use a larger container for free potable water during meal services.

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, NDA may need to 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.

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X. Appendix

- A. NDA Appeal Procedure
- B. Procurement Review Detail
- C. Numbered Memos & Guidance Documents (five total)
 - i. Professional Tracker Option #1
 - ii. Professional Tracker Option #2
 - iii. Professional Standard Learning Code Objectives
 - iv. Professional Standard Flyer
 - v. NSLP 2019-14 Federal Micro-Purchase & Simplified Acquisition Thresholds for all Child Nutrition Programs

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