



Battle Born Academy
Administrative Review Report

February 21, 2023

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 Battle Born Academy from January 17-26, 2023.

An exit conference was held on Thursday, January 26, 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 Battle Born and Healthy School Food Collaborative 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, January 17, 2023. The review was conducted at the Battle Born Academy in Las Vegas, Nevada. The Administrative Review was conducted by Erica Jaramillo. Battle Born Academy staff included Kathy Rudd and Katie Krackhardt; Healthy School Food Collaborative staff included Alyssa Wronkowski-Tirone. 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, January 26, 2023, which provided a summary of the work performed at Battle Born Academy 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, October 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 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 Battle Born Academy'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 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

- All Battle Born staff were friendly and cooperative with review process and recommendations.

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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

- Resource Management- First Year

- 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 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).

	Finding	Corrective Action	Due Date
#1	<p>Certification and Benefit Issuance Applications received by SFA must be certified for the correct meal benefit level (either free, reduced or paid) as detailed in the Eligibility Manual for School Meals, July 18, 2017 edition.</p> <p>Battle Born Academy (BBA) was introduced to Direct Certificate (DC) matching during Pre-assessment but prior to that was having all households’ complete applications. After reviewing Benefit Issuance Document (BID) and applications the following were noted:</p> <ul style="list-style-type: none"> • DC matches were not uploaded into Newton or Infinite Campus • Income Guidelines were used wrong (only referring to Reduced table not looking at Free table) • Categorical SNAP case numbers were missing or less than 9 digits. 	<p>1. Complete the <u>Determining Free and Reduced-Price Lunch Eligibility</u> training March 2021 version from our NDA YouTube Channel.</p> <p><u>For all children:</u></p> <p>2.Upload DC matches into Infinite Campus.</p> <p>3.For any children/households not matched with DC, refer to their application. Re-evaluate income by following Free and Reduced tables on Income Eligibility Guidelines attached.</p> <ul style="list-style-type: none"> • If no income is listed but they completed Step 2 for assistance programs, make sure case number is listed and is at least 9 digits. <p>4. Update BID to reflect corrections/uploads. Infinite Campus can be used to do this.</p> <p>Submit updated BID and re-evaluated applications to NDA for review.</p>	<p>March 23, 2023</p>

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#2	<p>Verification Verification of children’s eligibility must be completed on a sample of household applications per 7 CFR 245.6a(c). If the household refuses to cooperate in verification, per 7 CFR 245.6a(f)(4), their benefit shall be terminated (updated to paid).</p> <p>Verification was not completed at time of review.</p>	<p>Once updates are made to benefit issuance status in #1, use Infinite Campus to pull a verification report on 3% or error prone applications. Of the households pulled, send the verification letter requesting verification documents.</p> <p>Submit all verification documents to NDA to review: Verification report, letters sent, and any documents received.</p> <p>Reference Eligibility Manual for School Meals.</p>	March 23, 2023
#3	<p>Meal Counting and Claiming Per 7 CFR 210.8, the meal counts for the review period must yield an accurate result, must be comparable to the day of review meal counts, and must not exceed the number of eligible students. Monthly and daily claim reconciliation must yield accurate meals.</p> <p>During lunch observation, it was observed that meal counts were not taken as meals were served to students but after by the teachers not the person passing out meals. This leads to inaccurate meal counts and no way to capture second meals or incomplete meals.</p>	<p>Create a business procedure for meal counting that more accurately records children as they receive a complete meal. This process should ensure that second meals and incomplete meals are not counted with reimbursable meal counts.</p> <p>Submit procedure to NDA for review.</p>	March 23, 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.

Finding	Corrective Action	Due Date
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#4	<p>Menu Production Records</p> <p>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>During review it was noted that production records provided by Better 4 You Meals were not completed by BBA. The right side of the production records should be completed to detail how many meals were prepared, served, and leftover/wasted.</p>	<p>Consult with Equipo Academy as they are warming up meals and receiving your production records. Equipo can fill out how many received and prepared, and BBA can complete how many served and leftover.</p> <p>Create a procedure detailing how records will be completed and by who.</p> <p>Submit procedure and two weeks' worth of completed production records for NDA to review.</p>	<p>March 23, 2023</p>
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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
#5	<p>Professional Standards Training Tracking</p> <p>7 CFR 210.30(g) requires all SFAs to track and maintain records regarding employees' annual training. USDA's Professional Standards Training Tracker may be used, or an alternative tracking tool may be developed but must include at minimum these required fields: employee name, hiring date, employee position, required hours of training, training title/subject, length of training, school year training is applied to, and completed training hours to date.</p> <p>Tracking system was missing at the time of review.</p>	<p>Create tracker or use USDA's Professional Standards Training Tracker. Create a plan for how required hours will be completed by June 30, 2023.</p> <p>Submit Trackers and plan to NDA or review.</p> <p>Reference Professional Standards Guide.</p>	<p>March 23, 2023</p>
<p>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).</p>			

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#6	School Wellness Committee Meeting 2x/yr. Nevada’s School Wellness Policy states stakeholders/committee needs to meet at least twice a year. There were no committee meetings in 2021-2022 school year.	Create a business policy/process that details how BBA will ensure meetings are held twice a year and how documentation of meeting attendance and topics discussed will be kept in records. Please submit a timeline/date when the committee will meet next.	March 23, 2023
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Procurement – 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			
	Finding	Corrective Action	Due Date
#7	SFA Worksheet The SFA Worksheet must be completed for the State Agency to determine which invoices to review as part of the Procurement Review. During the process of the review, the SFA worksheet was not obtained despite multiple attempts.	Complete the SFA Worksheet and submit it to NDA for review. This may require additional invoice document requests.	March 23, 2023

VIII. Recommendations and Technical Assistance

Recommendations:

1. **Cease snack orders:** During review, it was noted that snacks are not being claimed, most likely because they were served during the school day. NDA recommends ceasing snack ordering or to initiate the Afterschool Snack Program after school day hours.

Technical Assistance:

1. Income Eligibility Guidelines: Technical Assistance was provided on how to properly use current Income Eligibility Guidelines and Error Prone table was provided to assist in application and verification if Infinite Campus modules could not be utilized.
2. Civil Rights

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- Technical assistance was provided to incorporate USDA’s complaint procedure for participants. Template was shared and this was implemented during the review.
 - Technical assistance was provided to have a complaint log on file annually. This was completed during the review.
 - Technical assistance was provided to display ‘And Justice for All...’ posters in the cafeteria, where participants are served. This was completed during the review.
3. Water Availability: Technical assistance was provided to ensure that water was in direct access to participants during lunch service in the cafeteria. Water fountains were located outside in hallway with double door obstruction. BBA has a water pitcher with cups available during meal service now.

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. Eligibility Manual for School Meals
- D. Professional Standards Guide
- E. Nevada School Wellness Policy

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