



CLV Strong Start Academy
Administrative Review Report

April 11, 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, SBP, and the After-School Snack Program administered by CLV Strong Start Academy from April 5-10, 2023.

An exit conference was held on Wednesday, April 5, 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 CLV Strong Start Academy and School Food Solution 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 Wednesday, April 5, 2023. The review was conducted at the CLV Strong Start Academy in Las Vegas, Nevada. The Administrative Review was conducted by Erica Jaramillo. CLV Strong Start staff included Miriam Benitez and School Food Solution staff included Kaylee Smith and Casey-Leigh Turner. 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 Monday, April 10, 2023, which provided a summary of the work performed at CLV Strong Start 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, February 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 2022-2023.

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 CLV Strong Start 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 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

- Recordkeeping: CLV Strong Start Academy demonstrates exceptional organization with keeping all records accessible.
- Production Records: Sonia, Kitchen Manager, took excellent counts and notes on production records.

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VI. Critical Areas of Review

- Performance Standard I- Meal Access and Reimbursement
 - Certification and Benefits Issuance
 - Meal Counting and Claiming
 - Verification
- Performance Standard II- Meal Pattern and Nutritional Quality
 - Meal Components and Quantities
 - Offer versus Serve
 - Dietary Specifications and Nutrient Analysis

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

- General Areas
 - Civil Rights
 - Professional Standards
 - 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>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 meal observation, in the second-grade class upstairs only, staff recorded names of students that did not take a meal, which is not a true meal count.</p> | <p>Create a business plan for all teachers to count meals at the point in which they are served to the actual student.</p> <p>Submit plan to NDA for review.</p> | May 11, 2023 |
| #2 | <p>Verification Verification of student’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>Complete the verification processes for applications received for the 2021-2022 school year.</p> <p>Submit all verification documents to NDA to review: Verification report, letters sent, and any documents received.</p> | May 11, 2023 |

VIII. Recommendations and Technical Assistance

Recommendations:

- Water availability in new cafeteria:** For the new cafeteria that is currently under construction, keep in mind that water must be available without restriction in the location where meals are served.
- Posters and signage in new cafeteria:** Once the new cafeteria is ready to be used for meal service, move the following items to the cafeteria for participants to see: ‘And Justice for All’ poster, current health inspection, and menu (all are currently posted in entrance due to meal service in the classroom).

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Technical Assistance:

1. Straight Serve: Technical assistance was provided to teacher in downstairs classroom to not ask students 'if they wanted' meal items and then teacher placed item on share table. Teachers was instructed to serve all meal items to the student, requirement of straight serve, and then the student can choose to place unwanted items on the share table. The teacher completed the rest of the meal service correctly.
2. Applications: Technical assistance was provided on one application that was missing last four of social or checked 'no social' box. Application was corrected during review.
3. Resource Management: Technical assistance was provided to create procedures for the maintenance of the non-profit school food service account. Procedure was provided before the end of the review process.
4. Wellness Policy: Technical assistance was provided to update the following in CLV Strong Start's wellness policy: hyperlinks for Smart Snack Standards and have two committee meetings a year. An updated policy was provided before the end of the review process.

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

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