



Sage Collegiate Public Charter School
Administrative Review Report

March 15, 2023

National School Lunch Program
Food and Nutrition Division

Administrative Review Report
Food and Nutrition Division



Table of Contents

I. Executive Summary..... 2

II. Introduction..... 3

III. Scope..... 3

IV. Methodology 3

V. Noteworthy Achievements..... 3

VI. Critical Areas of Review..... 4

VII. Findings and Required Corrective Action 5

VIII. Recommendations and Technical Assistance 9

IX. Corrective Action Response 10

X. Appendix..... 11

- a. Appeal Procedure
- b. Procurement Review
- c. Eligibility Manual for School Meals
- d. Professional Standards Guide
- e. Sample Written Code of Conduct
- f. Production Plan Template
- g. Allowable Milk Substitutions

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Administrative Review Report

Food and Nutrition Division



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 Sage Collegiate Public Charter School from March 7-8, 2023.

An exit conference was held on Wednesday, March 8, 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 Sage Collegiate 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, March 7, 2023. The review was conducted at the Sage Collegiate in Las Vegas, Nevada. The Administrative Review was conducted by Erica Jaramillo. Sage Collegiate staff included Jenni Woodard, Jayla Jones, and Healthy School Food Collaborative staff included Alyssa 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 Wednesday, March 8, 2023, which provided a summary of the work performed at Sage Collegiate 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, December 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 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 Sage Collegiate'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: Sage Collegiate's School Wellness Policy was unique in that it provided supporting research and data regarding obesity and physical activity in children.
- Share basket: Sage Collegiate made great use of a shared basket. It was great to see it being used by students.
- Staff: All Sage Collegiate team members were cooperative and willing to take feedback.

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VI. Critical Areas of Review

- Performance Standard I- Meal Access and Reimbursement
 - Certification and Benefits Issuance
 - Verification
 - Meal Counting and Claiming

- Performance Standard II- Meal Pattern and Nutritional Quality
 - Meal Components and Quantities
 - 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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Administrative Review Report
Food and Nutrition Division



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>All applications were processed after the 10-day timeframe. Of the 62 applications reviewed the following errors were noted:</p> <ul style="list-style-type: none"> • 7* were missing last four of social, making app incomplete (2 of which were also miscategorized) • Miscategorized based on income: <ul style="list-style-type: none"> ○ 9*-Free should be Reduced ○ 1*-Free should be Paid ○ 1*-Reduced should be Paid • Miscategorized based on Errors from Benefit Issuance Document (BID): <ul style="list-style-type: none"> ○ 4-Free should be Reduced ○ 1-Reduced should be Paid <p>From Direct Certification (DC) list the following errors were noted:</p> <ul style="list-style-type: none"> • 5 were found on DC as Free but Reduced on BID • 1 in household of DC match as Free; Reduced on BID • 16 found on DC as free, did not have to completed application. • 5 found on DC as Reduced, did not have to complete application 	<ol style="list-style-type: none"> 1. Complete the Determining Free and Reduced-Price Lunch Eligibility training March 2021 version from our NDA YouTube Channel. 2. Create procedure that details how applications will be evaluated within 10-day timeframe. Include the names(s)/titles(s) of the persons responsible for ensuring process is followed. Submit procedure to NDA for review. 3. Correct and resubmit 16* error applications (list provided separately), to NDA for review. 4. Update BID with DC and applications corrections, submit to NDA for review. 	<p>April 14, 2023</p>

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Administrative Review Report
Food and Nutrition Division



<p>#2</p>	<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 in process during review. Of documents reviewed, the following was noted:</p> <ul style="list-style-type: none"> • Confirmation review and signature missing (determination was wrong on one application) • Two students were found on Direct Certification (counts as verification completed) 	<p>Create business process detailing when, how, and who (title) will complete verification process annually, including completing confirmation review before sending out household notice.</p> <p>Once verification is completed, updated Benefit Issuance document (BID) and turn in all documents (household letters, household submitted documents, and final determination letter sent to household.)</p> <p>Submit business process and all verification documents to NDA for review.</p>	<p>April 14, 2023</p>
<p>#3</p>	<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 claim review and meal observations the following was noted:</p> <ul style="list-style-type: none"> • <u>Claim review</u>: Roster counts were compared to submitted claim, showing claim was short 34 breakfasts and 12 lunches. • <u>Meal observation</u>: Roster meal counts taken at table my teachers for breakfast were accurate. Roster meal counts for lunch were not taken at point of service but as a pre-count and then edited as meals handed out. This is not an accurate representation of meals served and produced inaccurate meal counts. Roster count was over 15 meals. 	<p>Create a procedure to accurately record meal counts for lunch. Either use printed rosters, recording students as they take a meal (point of service) OR use an electronic system. This can include using pin numbers or cards/scanner with Infinite Campus or Newton.</p> <p>Submit procedure and one weeks’ worth of rosters and meal counts to NDA for review.</p>	<p>April 14, 2023</p>

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Administrative Review Report
Food and Nutrition Division



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
#4	<p>Menu Production Records Production records must be maintained in accordance with FNS guidance. Production records for the review month of December 2022 were reviewed.</p> <p>Production records were not completed in their entirety. Columns for total prepared, served, and leftover/wasted were left blank.</p>	<p>Create process for staff to complete all sections of production records.</p> <p>Provide Process and one weeks’ worth of production records (same week as rosters from finding # 3) with all columns completed for NDA to review.</p>	April 14, 2023

General Program Compliance

Local School Wellness Policy (LSWP)-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).

	Finding	Corrective Action	Due Date
#5	<p>School Wellness Committee Meeting 2x/year Nevada’s School Wellness Policy states stakeholders/committee needs to meet at least twice a year.</p> <p>There were no meetings completed or plans in place for committee meetings for 22-23 school year during the review.</p>	<p>Create business plan to hold at least one committee meetings this year and two committee meetings per year going forward.</p> <p>Submit plan to NDA for review.</p>	April 14, 2023
#6	<p>Competitive foods Per 7 CFR 210.11(b), no specifically exempt foods or beverages may be in competition with school meals in the food service area during the meal service.</p> <p>Sage Collegiate’s LSWP stated birthday cupcakes would be served at lunch.</p>	<p>Edit LSWP and process to not serve birthday cupcakes during any meal service.</p> <p>Submit updated LSWP to NDA for review.</p>	April 14, 2023

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Administrative Review Report

Food and Nutrition Division



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
#7	<p>Continuing Education/Training Per 7 CFR 210.30(d), each school year, SFAs must ensure that all staff with school nutrition responsibilities completed annual training applicable to their job.</p> <p>During review, it was noted that only two staff members had started completing trainings.</p>	<p>Create business plan on how staff will complete required training hours by June 30, 2023, and include meal pattern training for all staff. Also include plan for how trainings will be completed annually going forward.</p> <p>Submit plan to NDA for review.</p>	April 14, 2023

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
#8	<p>Procurement Plan Per USDA guidance, the procurement plan must outline the specific procedures per 2CFR Part 200 for program operators 2CFR 318 (a). Please see Procurement Review Report (attached) for more detailed information on what is required.</p> <p>With regards to a procurement plan, no specific language exists to address the non-profit school foodservice account or how procurement for account is managed.</p>	<p>Add language specific to the management of the non-profit foodservice account, including procurement, into Fiscal Policies and Procedures.</p> <p>Reference template attached.</p> <p>Submit updated Procurement Plan to NDA for review.</p>	April 14, 2023
#9	<p>Code of Conduct Per 2CFR 200.3189(c)(1), the non-federal entity must maintain written standards of conduct covering conflict of interest and to govern the actions of its employees engaged in the selection, award, and administration of contracts. The code of conduct must also provide for disciplinary action for violations by officers, employees, or agents.</p>	<p>Develop a written Code of Conduct related to procurement for the non-profit school foodservice account.</p> <p>Submit Code of Conduct to NDA for review.</p>	April 14, 2023

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Sparks, NV 89431

2300 East St. Louis Ave.
Las Vegas, NV 89104

4780 East Idaho St.
Elko, NV 89801

Administrative Review Report
Food and Nutrition Division



	With regards to a code of conduct, Fiscal Policies and Procedure lacked specific language of Code of Conduct.		
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VIII. Recommendations and Technical Assistance

Recommendations:

1. **Utilize Infinite Campus for Benefit Issuance Document (BID):** Infinite Campus eligibility report includes all required information for BID and is easy to input Direct Certification information.
2. **Direct Certification:** Pulling this report from Big Horn at least once a month will help students get the best eligibility status possible and help Sage Collegiate’s reimbursement claim totals.
3. **Soy milk as alternative:** Consider offering soy milk as a milk alternative for dairy free students. This would provide students with a milk they can drink and cut down on waste (milks put in share basket). Consult with vendor about an approved soy milk as an option.

Technical Assistance:

1. Certification and Benefit Issuance
 - Technical assistance was provided on using Big Horn to pull Direct Certificate list.
 - Technical assistance was provided to send out household letters for all eligibility determinations: Direct Certification, applications, categorical.
 - Technical assistance was provided to keep all verification documents once process is complete.
2. Meal Patterns:
 - Technical assistance was provided to nutrition program staff to ensure full components are served to students. During first meal service it was noted that full ¾ cup vegetable component was not in boats. This was corrected during the review and the full component serving size was served with meals in cafeteria.

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- Technical assistance was provided regarding meals served in resource rooms still needing to be served will all full meal components to be claimed. If a medical or IEP document is on file, a substitute item should be provided to meet the component requirements to count the meal.
3. Civil Rights: Technical assistance was provided to have civil rights complaint procedure and form available on website. This was completed during on-site review.
 4. Professional Standards: Technical assistance was provided to have professional standards tracker to record all annual trainings. Template was shared and tracker was started during on-site review.
 5. Food Safety:
 - Technical assistance was provided to post most recent inspection in the cafeteria, where visible to participants. This was completed during on-site review.
 - Technical assistance was provided to have HACCP manual available in kitchen. This was completed during on-site review.

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.

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Administrative Review Report

Food and Nutrition Division



X. Appendix

- A. Appeal Procedure-attached
- B. Procurement Review Detail-attached
- C. Eligibility Manual for School Meals
- D. Professional Standards Guide
- E. Sample Written Code of Conduct
- F. Procurement Plan Template
- G. Allowable Milk Substitutions

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