



Signature Preparatory Charter School

Administrative Review Report

April 17, 2020

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 Initiatives	3
VI.	Critical Areas of Review	4
VII.	Findings and Required Corrective Actions	5
VIII.	Recommendations and Technical Assistance	9
IX.	Corrective Action Response	10
X.	Appendix	11
	a. Appeal Procedure	
	b. Procurement Review	

This institution is an equal opportunity provider

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 Signature Preparatory Academy from February 12-13, 2020.

An exit conference was held on Thursday, February 13, 2020 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 Signature Preparatory Academy (SPA) staff for the time and assistance extended to our State Agency staff during this process.

This institution is an equal opportunity provider

II. Introduction

An entrance conference was conducted on Wednesday, February 12, 2020. The review was conducted at the Signature Preparatory Academy in Henderson, Nevada. The Administrative Review was conducted by Doreece Winfield. SPA staff included Ronna Krantzman, Director of Federal Programs; Carey Roybal-Benson, Principal and _____. This report is based on the results of the offsite assessment, the onsite review of files, and meal service observations of the lunch program. An exit conference was held on Thursday, February 13, 2020 which provided a summary of the work performed at SPA 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, November 2019. The Procurement Review covered all documents, records, invoices, and procedures relating to the procurement for the SFA for the year of review, school year 2019-2020.

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 SPA's administration of the National School Lunch Program 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. 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

This institution is an equal opportunity provider

Administrative Review Report
Food and Nutrition Division



- Maintenance of the Non Profit 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

VI. 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); 210.19(c)(2)(ii); and the *Eligibility Manual For School Meals* (July 18, 2017 edition).

	Finding	Corrective Action	Due Date
#1	Certification and Benefit Issuance Applications received by SFA must be certified for the correct meal benefit level	(1) Correct all application detailed in Appendix C. Submit a signed copy of Appendix C	5/13/2020

This institution is an equal opportunity provider

Administrative Review Report
Food and Nutrition Division



	<p>(either free, reduced or paid) as detailed in the <i>Eligibility Manual for School Meals</i>, July 18, 2017 edition.</p> <p>Of the 237 student certifications reviewed, the following errors were noted:</p> <ul style="list-style-type: none"> • Nine (9) student applications did not enter the last four digits of the parent’s social security number or indicate that they had no social security number • Two (2) student applications were denied but, qualified for reduced benefits • One (1) student application had an invalid case number 	<p>including the date in which the applications were corrected.</p> <p>(2) Create a business process detailing how applications will be screened for completion prior to processing. Include the name(s)/ and or title(s) of the person(s) responsible for ensuring this business process is followed. Submit to NDA for approval.</p>	
--	---	--	--

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 Part 200.318-326; 7CFR 210.21; 2CFR Part 200; 2CFR 318 (a-d); 2 CFR Part 200.320.

	Finding	Corrective Action	Due Date
#2	<p>Procurement Plan 7 CFR 200.318 requires SFAS to establish and document their procurement procedures which reflect applicable State, local and federal laws and regulations.</p> <p>SPA’s procurement plan was missing the following required components:</p> <ul style="list-style-type: none"> • Prohibit the acquisition of unnecessary or duplicative items • Written procedures for procurement transactions that ensure that all solicitations incorporate a clear and accurate description of the technical requirements for the material, product, or service to be procured • Assure that small, minority and women’s businesses enterprises and 	<p>Update SPA’s current procurement plan to encompass all the required elements as outlined in 7 CFR.318. Submit to NDA for review and approval.</p>	5/13/2020

This institution is an equal opportunity provider

Administrative Review Report
 Food and Nutrition Division



	labor surplus firms are used when possible		
--	--	--	--

VII. Recommendations and Technical Assistance

Recommendations:

- 1. Incorporate School Garden/locally grown produce in NSLP programs-** School Gardens and purchasing locally grown food provides a multitude of benefits for students including learning about healthy food, learning how to grow fruits and vegetables, and promoting better nutrition. USDA supports such efforts through its Farm to School Program. Nonprofit School Food Service Funds can be used to support local farmers and school garden programs. See Appendix C for more information.

VIII. 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.

IX. Appendix

- A. Appeal Procedure-attached
- B. Procurement Review Detail-attached

This institution is an equal opportunity provider

Administrative Review Report
Food and Nutrition Division



This institution is an equal opportunity provider

405 South 21st St.
Sparks, NV 89431

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

4780 East Idaho St.
Elko, NV 89801