



**Nevada
Department
of Agriculture**

**Signature Preparatory
Academy**
Administrative Review Report

National School Lunch Program
Food and Nutrition Review Report

Signature Preparatory Academy

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 an 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. The Nevada Department of Agriculture (NDA) conducted the Procurement Review in tandem with the Administrative Review of the programs administered by Signature Preparatory Academy on 12/12/2023.

An exit conference was held on 12/15/2023 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 Signature Preparatory Academy staff for the time and assistance extended to our State Agency staff during this process.

II. Introduction

An entrance conference was conducted on 12/12/2023. The review was conducted at the *Signature Preparatory Academy* in *Henderson, Nevada*. The Administrative Review was conducted by *Abigail Hanson, Erica Jaramillo, and Cindy Cohen*. *Signature Preparatory Academy* staff included *Tracie Salgado*; Sodexo staff included *Michelle Woeller*. This report is based on the results of the offsite assessment, the offsite and onsite review of files, and meal service observations of the SFA's participating program. An exit conference was held on 12/15/2023 which provided a summary of the work performed at *Signature Preparatory 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 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 *Signature Preparatory Academy'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 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

- The kitchen was very clean and well organized.
- Staff members were friendly and responsive to feedback during the review.

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
- Comprehensive Resource Management
 - Maintenance of the Non-Profit School Food Services Account
 - Revenue from non-program foods
 - Paid Lunch Equity
 - Indirect Costs
- General Areas
 - Civil Rights
 - Professional Standards
 - SFA On Site Monitoring
 - Local School Wellness Policy
 - Smart Snacks in School
 - Water Availability
 - Food Safety
 - Reporting and Recordkeeping
 - SBP and SSO Outreach
- Procurement
 - Procurement Plan
 - Code of Conduct
 - Procurement Documents and Records

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).

Site Name	Question	Finding	Corrective Action	Due Date
District Level	Q126	<p>Certification and Benefit Issuance</p> <p>Applications received by the 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. Three applications were noted as an incorrect benefit status on the Benefit Issuance Document (BID):</p> <ul style="list-style-type: none"> -One noted as Reduced on BID (but denied on application) -One noted as reduced on BID (but denied on application due to no social security number or checkmark in the box for none) -One noted Free on BID (but reduced on application) <p>In addition, 10 applications appeared to be processed past the 10-day deadline (determination date compared to parent's signature date).</p> <p>*Repeat Finding*</p> <p>*Fiscal action calculated is \$127.95, qualifying for the disregard as this does not exceed \$600.</p>	<p>Create procedure to maintain benefit document (roster) with required information, include how often it will be updated. Submit to NDA the procedure and current benefit document (roster) with required information, for review.</p>	11/01/2023

District Level	Q209a	<p>Verification</p> <p>Per page 102 of the Eligibility Manual, "If the LEA determines it is eligible to use an alternate sample size, the LEA must contact the State agency in accordance with any procedures established by the State agency for approval prior to use an alternate sample size [7 CFR 245.6a(d)(4)]."</p> <p>Signature Prep did not select from error-prone applications but instead used an alternate sample size and choose a random sample from their sample pool.</p>	<p>Create a procedure detailing how verification will be completed annually, including using the correct verification sample size, appeal information and 10-day notice of reduction in benefits when applicable. Submit procedure to NDA for review.</p>	11/01/2023
District Level	Q213	<p>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>Signature Prep did not give 10 calendar days of notice when a child's benefit status changed from reduced to paid. The email notice of a termination in benefits also did not include the appeal rights.</p>	<p>In the procedure requested for Q209a, include the process for what information will be included for all verification documentation requests and benefit changes.</p>	02/05/2024

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.

Site Name	Question	Finding	Corrective Action	Due Date
Signature Preparatory Academy	Q401	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. NDA staff noted on the day of review that a few children gave their card at the POS and then only grabbed milk. Sodexo staff began monitoring the line to ensure every child took a reimbursable meal after giving their card at the POS. To better ensure every child takes a reimbursable meal, NDA suggests moving the POS to the end of the serving line. This will ensure a more accurate count of reimbursable meals at the POS.	1. Sodexo to develop a procedure for how and when to count a reimbursable meal at the POS. Submit procedure and proof it was reviewed with food program staff (sign off sheet, etc.) to NDA for review. 2. Send a picture of the updated service line to NDA for review.	02/05/2024
Signature Preparatory Academy	Q410a	Per 7 CFR 210.10(b)(1)(i), daily, school lunches offered to each age/grade group must include the food components and food quantities specified in the appropriate meal pattern. Reviewed two weeks of October 2023 nutrient analysis and production records (10/2-10/13). The following errors were noted: Not offering any vegetables from the legumes subgroup weekly for both weeks reviewed.	1. Sodexo to fix the Buffalo Chicken wrap meal pattern components (recipe does not indicate that there are any legumes). Update those weeks in the menu cycle to ensure they include accurate vegetable contributions from the legume subgroup.	1) Updated BC wrap recipe submitted on 12/15/23 (with no legumes) Remaining items due 02/05/2024

Not offering the full 3/4 cup vegetables for every student each day (including when additional veggies are served in only one of the entrée options):

10/4/23: offered 1/2 cup celery, but no additional veggies in the pancake entrée

10/6/23: only offered 1/2 cup cucumber

10/10/23: only offered 1/2 cup potato wedges

10/11/23: only offered 1/2 cup carrots

10/13/23: offered 1/2 cup of celery, but no additional veggies in the cheese pizza entrée and only 1/8 cup for the pizza entree

Week of 10/2-10/6, not meeting the weekly minimum for the Meat/MA component

It was also noted during the review of documents from Sodexo titled Menu Analysis Main Event, that the evaluation includes a garden bar. However, Signature Prep does not have a garden bar on site. This could be a miscommunication leading to noncompliant vegetable offerings.

***Potential for future fiscal action, if found as a repeat finding on a future review.

2. To meet the 3/4 cup daily vegetable requirement, add extra vegetable servings to the end of the service line so students may take the full serving if they choose or implement a garden bar.

3. Signature Prep to create a procedure to monitor the menu and production records. Provide training for staff to ensure they can follow the procedure and understand the requirements. Submit updated menu, nutrient analysis, and procedure to NDA for review.

Comprehensive Resource Management

All revenues and expenses under the nonprofit school food service account must be allowable- used only for the operation and improvement of the food service and net cash resources may not exceed three months' average operating expenses. References include not are not limited to 7 CFR 210.14.

Site Name	Question	Finding	Corrective Action	Due Date
Off-Site Assessment	Q710	<p>Pricing of Adult Meals</p> <p>Per FNS Instruction 782-5, "Breakfast and lunches served to teachers, administrators, custodians, and other adults must be priced so that the adult payment in combination with any per-lunch revenues from other sources designated specifically for the support of adult meals (such as State or local fringe benefits or payroll funds, or funding from voluntary agencies) is sufficient to cover the overall cost of the lunch. Including the value or any USDA entitlement and bonus donated foods used to prepare the meal." During the pre-assessment, Signature Prep noted that they do not sell adult meals but on the day of review, NDA staff observed one adult meal sold. When asked, Signature Prep indicated that they do sell adult meals to teachers at \$4/meal but do not have a formal meal charge policy.</p>	<p>Signature Prep must develop a procedure for pricing of adult meals to ensure compliance (at minimum it must be equal to the free reimbursement rate for non-pricing schools) and describe how the revenue from adult meals is deposited into the Nonprofit School Food Service Account.</p> <p>Submit procedure to NDA for review.</p>	02/05/2024

Civil Rights

Regulations require SFAs to comply with civil rights provisions to ensure that no child is denied benefits or otherwise discriminated against because of race, color, national origin, age, sex, or disability. References include but are not limited to 7 CFR 210.23(b), 7 CFR 210.18(h)(2)(ii), FNS Instruction 113-1, USDA memo SP59-2016.

Site Name	Question	Finding	Corrective Action	Due Date
Off-Site Assessment	Q801	Per Instruction 113-1, programs must inform potentially eligible persons, applicants, participants, and grassroots organizations, of programs or changes in programs. This includes information pertaining to eligibility, benefits, and services, the location of local facilities or service delivery points, and hours of service. This information can be communicated by methods such as, but not limited to, the Internet, newspaper articles, radio and television announcements, letters, brochures, computer-based applications, and bulletins. The SFA did not have a copy of their media/public release for this school year	Signature Prep to develop a policy for how outreach materials and information will be sent out annually to inform families of the food program and how documentation will be kept on file. Submit policy to NDA for review.	02/05/2024

and indicated it was not posted but that information was disseminated by word of mouth.

Off-Site Assessment	Q803	<p>Per Instruction 113-1, SFA’s public notice should contain the elements of: program availability, complaint information and the USDA non-discrimination statement. Signature Prep does not have a written civil rights complaint procedure. In addition, the current complaint log needs to include the school year to ensure there is an annual record of any civil rights complaints made.</p>	<ol style="list-style-type: none"> 1. Develop a Civil Rights complaint procedure. 2. Add the school year to the current complaint log. Submit procedure and updated complaint log to NDA for review. 	
District Level	Level Q810	<p>Per Instruction 113-1, programs must include the required USDA nondiscrimination statement on all appropriate FNS and agency publications, Web sites, posters, and informational materials provided to the public. There is no USDA non-discrimination statement in the Student Handbook</p>	<p>Update the Student Handbook, including adding the USDA non-discrimination statement and updating the language addressing the food program (run by Department of Agriculture instead of the Department of Education). Submit updated Student Handbook to NDA for review.</p>	02/05/2024

where the food program is mentioned.

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

Site Name	Question	Finding	Corrective Action	Due Date
District Level	Q1212a	The Professional Standards regulations in 7 CFR 210.30 establish hiring standards for new school nutrition program directors at the SFA level. In addition, the regulations establish annual training standards for all school nutrition program directors, managers, and staff. No one currently holds the Director position.	Choose someone to fill the role of Director and submit reasoning (including proof of educational background and job duties) for NDA to review. Submit plan for the Director completing required food safety within 30-days of hire and annual training hours by June 30, 2024.	02/05/2024
District level	Q1217b	Professional Standards Training Tracking All SFAs are required 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	Update the professional standards tracker to include the school year and a running total of hours to date. Update the required hours by position, including adding Tracie Salgado to the tracker. Submit the revised tracker to NDA for review. Create a plan for how	

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. Sodexo will need to update the required training hours by position, so they are Accurate (manager/supervisor: 10 hours, full-time staff: 6 hours, part-time staff: 4 hours). The current tracker is also missing the school year the hours are being applied to and completed training hours to date.

all employees will meet the annual training requirements by June 30, 2024, and submit the plan to NDA for review.

Local School 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).

Site Name	Question	Finding	Corrective Action	Due Date
Off-Site Assessment	Q1000	School Wellness Committee Meeting 2x/year Nevada’s School Wellness Policy states stakeholders/committee needs to meet at least twice a year. Signature Prep's wellness policy currently indicates the committee only meets once a year.	1. Update the wellness policy to include that the committee must meet at least twice a year. Suggest to also update the school years listed in the wellness policy so they are current. 2. Create a plan to hold two committee meetings for this school year. Submit updated wellness policy and meeting plan to NDA for review.	02/05/2024
Off-Site Assessment	Q1005	Nevada’s School Wellness Policy states that the school district must inform and update the public (including parents, students, and others in the community) about the content and implementation of the local school wellness policy annually. No assessment was completed for the wellness policy this school year.	Create a plan for when Signature Prep will complete the annual wellness policy assessment and how the results will be made available to the public. Submit plan to NDA for review.	02/05/2024

Food Safety

Regulations require SFAs to establish a food safety program and maintain facilities in accordance with Federal, State, and Local Health Code regulations to reduce risks of food borne illnesses. References include but are not limited to 7 CFR 210.13, USDA Guidance for School Food Authorities: Developing a School Food Safety Program, NRS 429.200, 444.335, and NRS chapter 446.

Site Name	Question	Finding	Corrective Action	Due Date
Signature Preparatory Academy	Q1404	All SFAs are required to establish a food safety program for any facility where food is stored, prepared, or served. No physical copy of the HACCP manual was kept on site.	An electronic copy of the HACCP manual was reviewed and is compliant. Sodexo staff printed a hard copy to be kept in the kitchen during the day of review.	Proof submitted on 12/12/2023
Signature Preparatory Academy	Q1406	Most recent food safety inspection report was only posted in the kitchen and was not visible to program participants.	Sodexo staff posted the full food inspection report at the beginning of the service line in the cafeteria during the day of review.	Proof submitted on 12/12/2023

Reporting and Recordkeeping

Regulations require SFAs to submit reports to NDA to report to RNS compliance with program requirements as well as for SFAs to retain records for three years plus the current year. References includes but is not limited to 7 CFR 210.20 and 7 CFR210.23(c).

Site Name	Question	Finding	Corrective Action	Due Date
Signature Preparatory Academy	Q1502	Recordkeeping SFAs must maintain records for three years plus the current year to demonstrate compliance with program requirements. SFA could not easily locate the school's wellness policy, media release, procurement documents or procedures specific to the food program.	SFA to create a policy for where, how, and how long NSLP documents are kept on file (including all documentation related to the food program).	Proof submitted on 12/12/2023

VII. Recommendations and Technical Assistance

Recommendations:

Meal Components & Quantities:

1. Implement the use of a share table in cases where children do grab an item that they do not want to eat/drink. Include appropriate signage so students can properly use the share table.
2. Signature Prep did not have a procedure for students to receive partial meals or milk only. Recommend implementing a process for students who only wish to purchase a milk or a la carte items during the meal period. This will help with unnecessary food waste due to students being told to take one or two items.

Record Keeping:

3. Organize all the food program related materials in one place on the school website so everything is easy to find. This can include menus, meal charge information, media release, and wellness policy information.

Technical Assistance:

1. Confirmation review: Direction was given on when confirmation reviews need to be completed, when application is selected for verification, confirmation is completed first. However, it is a best practice to confirm all applications, so if Signature Prep chooses to continue this practice, the confirmation review should be completed before the benefit is applied to the student (on benefit issuance document or in POS).

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 Report (attached)
- C. [Eligibility Manual for School Meals](#)
- D. Professional Standards Memo (attached)
- E. [Professional Standards Guide](#)
- F. USDA Complaint Procedure (attached)
- G. Sample Media Release (attached)
- H. [USDA Wellness Policy Toolkit](#)
- I. Procurement Plan Template (attached)
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