



Equipo Academy
Administrative Review Report

June 24, 2019

National School Lunch Program
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 administered by Equipo Academy from February 28th –March 1, 2019.

A preliminary exit conference was held on Friday, March 1st, 2019 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 Equipo Academy staff for the time and assistance extended to our entire State Agency staff at NDA during this process.

II. Introduction

An entrance conference was conducted on Thursday, February 28th, 2019. The review was conducted at Equipo Academy (EA) in Las Vegas, Nevada. The Administrative Review was conducted by Rose Wolterbeek, Joe Dibble, and Patricia Hoppe. EA staff included Joselyn Navas, Denise Cisneros, Estella Spaine; Ben Salkowe participated in limited portions only, as

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needed. 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. A preliminary exit conference was held on Friday, March 1st, 2019 which provided a brief summary of the work performed at EA and we discussed any additional documentation needed, preliminary findings, and observations.

A follow up visit was conducted on May 13, 2019 by Bobbie Beach, School Nutrition Coordinator; and Jillian Smith, Program Officer to complete EA's application review. An exit conference was held on May 16, 2019 which provided a brief summary of the work performed, preliminary findings identified, and next steps.

III. Scope

The Administrative Review covered documents, records, and procedures relating the administration of the NSLP for the month of review, October 2018. The following sites were reviewed as a part of the on-site Administrative Review:

- Equipo Academy

The Procurement Review covered all documents, records, invoices, and procedures relating to the procurement for the SFA for the year of review, school year 2017-2018.

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 EA'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

- State agency staff were extremely impressed with the remodeled kitchen and meal delivery systems, especially the Breakfast After the Bell operation. The kitchen was remarkable and kept very clean. Kitchen staff were friendly and knowledgeable of program requirements.
- The staff is doing an excellent job at utilizing the entitlement funds of \$19,116 with over 89% usage in the 2017/18 school year, all with the Department of Defense Fresh Program.

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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
 - Menu Production Records
- General Areas
 - Civil Rights
 - Professional Standards
 - SFA On Site Monitoring
 - Local School Wellness Policy
 - Water Availability
 - Food Safety
 - Reporting and Recordkeeping
- Special Provision Options
 - Verification of established claiming percentages
 - Certification of Special Provision Claim
 - 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 <i>Eligibility Manual for School Meals</i>, July 18, 2017 edition.</p> <p>Of the 154 applications reviewed the following errors were noted:</p> <p>a. <u>Repeat Finding-Processing Errors</u>: Six (6) applications were processed outside the 10-day time frame; Twenty-five (25) applications were missing a Staff’s signature; and Twelve (12) applications were unnecessarily annualized.</p>	<p>a. A business process regarding the processing of applications was developed and approved by NDA as a result from the 2015-2016 Administrative Review of Equipo Academy.</p> <p>(1) Provide a written justification or updated business process to address application processing errors. Submit to NDA for approval.</p> <p>(2) Complete the Meal Benefit Application Training Module July 2016 version from our NDA You Tube Channel (#13).</p>	<p>a. June 17, 2019</p>

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	<p>b. <u>Repeat Finding-Incorrect Benefit Certification:</u> Three (3) applications were missing information and/or certified for the incorrect benefit level. See Appendix D for details.</p> <p><i>Please note due to Equipo operating a Provision II base year, fiscal action will be applied to correct meal counts. See Notice of Fiscal Action for details.</i></p>	<p>b. Correct all applications errors identified and Submit signed copy of Appendix D for NDA to Review.</p>	<p>b. June 17, 2019</p>
#2	<p>Verification When a household is selected for verification, it must provide written evidence to confirm current income or participation in a categorically eligible program 7 CFR 245.6A(A)7(i). Two families did not provide income statement documents required with verification only a verbal response. Please contact them for a written response or use a collateral contact for information so EA may make a determination of the income via a written response.</p>	<p>Please contact the two families on their income verification with a written response or acceptable documents so you may make an accurate determination. If their eligibility status changes, then make the changes as needed on your benefit issuance roster.</p>	<p>April 29, 2019</p>
#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 by category (i.e., free, reduced price, and paid). Monthly Claim reconciliation must yield accurate meals.</p> <p>The time frame from August 2018- June 2019 of the school year claims showed systemic errors with data entry errors which resulted in over claims and under claims as submitted in the Child Nutrition Program (CNP) claim system. The net result was an under claim (Aug-June) of \$1,902.27. This underclaim amount has been factored into EA's total fiscal action. See Notice of Fiscal Action for details.</p>	<p>Please develop a business process to identify how the SFA will accurately consolidate meals. The business process must include:</p> <ul style="list-style-type: none"> • A minimum of two checkpoints to ensure meal counts and consolidation efforts are correct • Identify who by name and/or title is responsible for consolidating daily meal counts by category each month. • Signatures from all staff involved in new process <p>Submit new business process for NDA to review.</p>	<p>April 29, 2019</p>

General Program Compliance

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Civil Rights: “And Justice for all Poster”- FNS Instruction 113-1 requires that participating schools prominently display the USDA nondiscrimination poster “And Justice for All”. All posters must be 11” x 17”. The poster must be placed in a location that enables program participants to read the text of the poster without obstruction.

	Finding	Corrective Action	Due Date
#4	<p>“And Justice for All” Poster FNS113-1 requires that participating schools prominently display the USDA nondiscrimination poster “And Justice for All”. All posters must be 11” x 17”. The poster must be placed in a location that enables program participants to read the text of the poster without obstruction. At time of review, the “And Justice for All” Poster did not meet the size requirements nor was placed in a prominent location for program participants.</p>	<p>Please replace the “And Justice for All” poster photocopy with the USDA (11x17) poster. Submit photos that the approved USDA (11x17) posters are in use. Posters may be picked up at NDA’s Las Vegas office at 2300 E St. Louis Ave, Las Vegas, NV.</p>	<p>April 29, 2019</p>

VIII. Recommendations and Technical Assistance

Recommendations:

1. Best Practice: If you are considering a share table program, for perishable items, it is advised to use a method to hold temperatures over the course of the meal service if left out for extended periods of time. For example, a sheet pan with ice or a cold plate could be used for the items that needed cold storage such as milk cartons.

Technical Assistance:

1. Technical assistance was provided on a number of general topics and include the following: share table option, family style meal service option and the inclusion of the revised Diet Modification form (with the 504 plan/IEP addition language inserted).
2. Menu Production Records: when food is substituted from the prescribed menu, please adjust the menu production record to reflect what was provided by the meal vendor and actually served. For example, on 2/28, cantaloupe was planned. However, orange slices were actually served. Please adjust in the comments section or with a hand written note.
3. Breakfast boards are available for use so students may be able to identify a reimbursable meal. Four were sent to the Las Vegas office for pick up and use.
4. Technical assistance was provided to run claim consolidation reports in Infinite Campus. The spreadsheet in place has yielded inaccurate daily totals due to data

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entry error resulting in incorrect claims being submitted. This report can be used as a checkpoint to accurately consolidate daily meal counts by category.

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, NDA may need to 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

- i. NDA Appeal Procedure
- ii. Procurement Review Detail
- iii. Procurement Plan Template
- iv. Application Errors-sample list attached from abbreviated review
- v. Sample Diet Modification Form-Revised
- vi. Numbered Memos & Guidance Documents
 - NSLP 2016-45: The Use of Share Tables in NSLP
 - NSLP 2011-35 Clarification of Offer versus Serve and Family Style Meal Service
 - USDA Infographic on Reducing Food Waste
 - Provision 2 Guidance Manual-*Summer 2002 version*

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