



**Founder's Classical Academy
of Las Vegas**
Administrative Review Report
April 19, 2023

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 administered by Founder's Classical Academy of Las Vegas from March 21-28, 2023.

An exit conference was held on Tuesday, March 28, 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 Founder's Classical and Pizza Nation 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 21, 2023. The review was conducted at the Founder's Classical Academy in Las Vegas, Nevada. The Administrative Review was conducted by Erica Jaramillo. Founder's Classical staff included Daisy Morales and Pizza Nation staff included Roberto Armanino. 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 Tuesday, March 28, 2023, which provided a summary of the work performed at Founder's Classical 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 Founder's Classical'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

- Staff: Founder's Classical team members were cooperative and open to feedback and technical assistance.

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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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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>There were eight students listed twice on Benefit Issuance Document (BID), these were fixed by end of review. Of the 35 applications reviewed the following errors were noted:</p> <ul style="list-style-type: none"> • One was missing last four of social or checkmark for ‘no social’- this was corrected on 3/27/23. • 14 were evaluated past the 10-day timeframe. <p>From Direct Certification (DC) matches the following errors were noted:</p> <ul style="list-style-type: none"> • Past DC match lists were not kept in records to verify against 67 students that were not on March 1, 2023 list. NDA was able to locate students through Single Student Look Up Tool to verify eligibility. 	<p>Create Certification and Benefit Issuance procedure that included the following:</p> <ul style="list-style-type: none"> • How applications will be evaluated within the required 10-day timeframe. • How all DC matches/lists will be uploaded and kept on file. • Include the names(s) and titles(s) or the person(s) responsible for ensuring process is followed. <p>Submit procedure to NDA for review.</p>	May 19, 2023
#2	<p>Verification Verification of student’s eligibility must be completed on a sample of household applications by November 15 of each school year per 7 CFR 245.6a(b)(1).</p> <p>Founder’s Classical started the verification process after the pre-assessment for this Administrative Review.</p>	<p>Create an internal procedure detailing how and when verification will be completed annually by November 15.</p> <p>Submit procedure to NDA for review.</p>	May 19, 2023

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#3	<p>Meal Counting and Claiming</p> <p>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 day of review meal observation and consolidation the following were noted:</p> <ul style="list-style-type: none"> • Consolidation Errors: Rosters are used to check off students at the beginning of line, then staff enters student pin in Infinite Campus (IC). Errors from comparing rosters to IC report: <ul style="list-style-type: none"> ○ One first grade class roster was missing (19 students). ○ Six students on IC did not have check on roster. ○ Ten students on the roster had checks but not entered in IC. ○ Roster total was 507, IC total 522. • Meal Observation: 23 meals were non-reimbursable due to student not taking milk when Founders meal service is a straight serve. These meals were included in served meal counts because count is taken before meals are handed to students. 	<p>Create a business plan for a meal counting process that accurately counts served meals. Either move point of sale to the end of service line or ensure staff at end of line is trained on straight serve requirements (all meal components served, including milk).</p> <p>Submit plan and claim documents for one month (April 2023) to NDA for review.</p> <p>Also, for March 2023 claim, adjust claim totals to allowable calculations from ‘Founder’s Open Claim Adjustment Letter’ attached.</p>	May 19, 2023
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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 (MPR)</p> <p>Production and menu records must be maintained in accordance with FNS guidance. Production records for the review month of February 2023 were reviewed.</p>	<p>Create a business plan on how Pizza Nation and Founders will work together to complete all sections of MPRs with accurate numbers per item and served meals.</p>	May 19, 2023

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	<p>Production records did not record quantities for milk. Also served counts were copied numbers of prepared not actual served numbers.</p>	<p>Submit plan and one month's (April 2023) worth of MPRs to NDA for review.</p>	
<p>#5</p>	<p>Nutrient Analysis/Meal Components All areas must be compliant for all age/grade groups for meal components and total Calories, Saturated Fat, and Sodium requirements set forth in HHFKA of 2010.</p> <p>The following meal components and dietary specifications were non-compliant:</p> <ul style="list-style-type: none"> • K-8: <ul style="list-style-type: none"> ○ Pizza day: not meeting 3/4 cup daily vegetable requirement- served 5/8 cup creditable. ○ Legumes: not meeting 1/2 cup weekly requirement-served zero. ○ Dark Greens: not meeting 1/2 cup weekly requirement; served 1/4 cup creditable. ○ Whole Grain Rich (WGR): Not meeting 80% WGR items- served 55.56% ○ Calories over 27.2 and not meeting less than 10% saturated fat- at 10%. • 9-12: <ul style="list-style-type: none"> ○ Hot dog day: not meeting 1 cup daily fruit requirement- served 1/2 cup creditable. ○ Pizza day: not meeting 1 cup daily vegetable requirement-served 3/4 cup creditable. ○ Legumes: not meeting 1/2 cup weekly requirement- served zero. ○ Dark Greens: not meeting 1/2 cup weekly requirement- served 1/4 cup creditable. ○ WGR: Not meeting 80% WGR items- served 18.52%. ○ Calories over 30.78 	<p>The vendor, Pizza Nation, must adjust the weekly menu to meet both the daily and weekly meal pattern requirements, including 80% WGR. Also, they must meet the dietary specifications of Calories, saturated fat, and sodium limits.</p> <p>Serving staff (Pizza Nation) must understand the serving sizes for each age group and so should complete meal pattern training.</p> <ol style="list-style-type: none"> 1. Submit updated weekly menu to NDA to review. 2. Submit proof meal pattern training completion by Pizza Nation serving staff. 	<p>May 19, 2023</p>

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	On the day of review, when 9-12 service started, serving staff (Pizza Nation) did not start larger portion of vegetable until reviewer mentioned portion size. The rest of the meal service continued with the correct vegetable serving size.		
#6	<p>CN Labels/Spec Sheets Per 7 CFR 210.10(a)(3) the school must keep production and menu records that must show how the meals offered contribute to the required food components and food quantities for each age/group every day.</p> <p>Labels or manufacturer specifications for all food products were not available during review. Missing for spaghetti pasta, hot dog, hot dog bun, and French toast.</p> <p>The following grain items did not meet WGR requirements: pancakes, waffles, mac & cheese, chicken tenders, flour.</p>	<p>The vendor, Pizza Nation, must obtain all labels for food items used for offered meals. We encourage Child Nutrition (CN) labels are obtained to better determine meal component quantities. Pizza Nation must work with their vendor to obtain WGR grain items and increase the menu to the 80% requirement.</p> <p>Submit missing labels and new WGR labels to NDA for review.</p>	May 19, 2023

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.

	Finding	Corrective Action	Due Date
#7	<p>Maintenance of the Non-Profit School Food Services Account (NSFSA) For new SFAs in their first year of operation, must demonstrate a sound financial accounting system and sufficient procedures in place to ensure compliance with resource management requirements.</p> <p>No specific language exists to address the non-profit school foodservice account or how account is managed.</p>	<p>Create policy specific to the management of the non-profit foodservice account or add language into existing financial policies and procedures.</p> <p>Submit updated policy to NDA for review.</p> <p>Reference Whole Grain Resource attached.</p>	May 19, 2023

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General Program Compliance		
<p>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).</p>		
Finding	Corrective Action	Due Date
<p>#8 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 a business plan to hold at least one committee meeting this year and two committee meetings per year going forward.</p> <p>Submit plan to NDA for review.</p>	<p>May 19, 2023</p>
<p>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, <i>USDA Guidance for School Food Authorities: Developing a School Food Safety Program</i>, NRS 429.200, 444.335, and NRS chapter 446.</p>		
Finding	Corrective Action	Due Date
<p>#9 Internal Thermometer Internal thermometer was missing from fridge, staff was using external thermometer to record temperature.</p>	<p>Obtain internal thermometer to use for fridge temperature.</p> <p>Submit picture as proof to NDA.</p>	<p>May 19, 2023</p>

VIII. Recommendations and Technical Assistance

Recommendations:

1. **Implement students using pin pad at POS:** During day or review, rosters were used to check off students’ names and then staff entered student’s pin numbers after. Having students memorize pin numbers and use pin pad would help the line move faster and cause less errors in meal counts.
2. **Utilize Infinite Campus for household applications:** Having households’ complete applications in Infinite Campus will help simplify administrative eligibility process and make records easier to access.
3. **Direct Certification:** Pulling this report form Big Horn at least once a month will help students get the best eligibility status possible and help Founder’s Classical’s reimbursement claim totals.

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4. **Soy milk as alternative:** Consider offering soy milk as a milk alternative for dairy free students. This would provide students with milk they can drink and cut down on waste (milks put on a shared table). Consult with milk vendor about an approved soy milk as an option.

Technical Assistance:

1. Meal Counting: Technical assistance was provided to implement a share table for the milk that is not wanted but students must take as part of straight serve service that the school follows.
2. Verification: Technical assistance was provided on the verification process and the verification letters sent out to households. Verification was completed late but was completed by the end of the review process.
3. BID: Technical assistance was provided to implement Benefit Issuance Document (BID) and to remove duplicate student names. This was completed during the review.
4. Applications: Technical assistance was provided to make sure applications have the last four of social or check in 'no check' box. One application that was missing was corrected during review.
5. Meal Pattern:
 - Technical assistance was provided to add milk offered on menu posted.
 - Technical assistance was provided to Pizza Nation on how to use USDA worksheets for menu compliance.
 - Technical assistance was provided to post menu in cafeteria.
6. Production Records: Technical assistance was provided on how productions records should be filled out between Founders Classical and Pizza Nation.
7. Civil Rights:
 - 'And Justice for All' poster: Technical assistance was provided to post 'And Justice for All...' poster. This was completed during the review.
 - Compliant procedure and log: Technical assistance was provided to have complaint procedure and log on record. During review, complaint procedure was posted to website for parents and complaint log was created.

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- Annual Training: Technical assistance was provided to complete Civil Rights training annually. Training was completed after pre-assessment.
8. Professional Standards: Technical assistance was provided to create a tracker and to start recording professional standards training. This was completed during the review.
9. Food Safety:
- Technical assistance was provided to post current health inspections in the cafeteria, where visible to participants. This was completed during the review.
 - Technical assistance was provided to implement a site-specific HACCP manual. This was completed during 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
- C. Nevada's School Wellness Policy
- D. Allowable Milk Substitutes for Nondisabled Children
- E. Whole Grain Resource

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