



Freedom Classical Academy
Administrative Review Report

March 14, 2022

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 Freedom Classical Academy from March 2nd-3rd, 2022.

An exit conference was held on Thursday, March 3, 2022, 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 Freedom Classical Academy and Sodexo 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 Wednesday, March 2, 2022. The review was conducted virtually over Microsoft TEAMS. The Administrative Review was conducted by Brittany Mally and the Procurement Review was conducted by Dan Pimm. Freedom Classical staff included Shawna Settles and Sodexo staff included Julie Shelton. This report is based on the results of the offsite assessment, the onsite review of files, and meal service observation of the lunch program. An exit conference was held on Thursday, March 3rd, 2022, which provided a summary of the work performed at Freedom Classical Academy 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, January 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 2020-2021.

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 Freedom 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 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

- High Volume of Meals Being Served: Freedom Classical Academy is serving a high number of lunches each day. It is great to see so many students eating lunch, and this requires great efficiency and hard work by the kitchen staff. The kitchens are being run very well, are organized and efficient.

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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

- 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

VII. Findings and Required Corrective Action

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
#1	<p>Menu Production Records (MPRs) Production and menu records must be maintained in accordance with FNS guidance. They must show how the meals offered contribute to the required food components and food quantities for each age grade group. Production records for the review month of January 2022 were reviewed.</p>	<p>Add the required components to current production records in use. Submit a week’s worth of production records, using your updated template.</p>	<p>April 13th, 2022</p>

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	<p>Production records were missing the following essential components:</p> <ul style="list-style-type: none"> • Amount of food pulled/needed. • OVS needs to be indicated, circled yes or no. • Breakfast or lunch also needs to be indicated, circled is fine. • Age/grade group being served needs to be added. • The meal totals served need to be broken up to show reimbursable and non-reimbursable totals. <p>**Copy of sample PR attached**</p>		
#2	<p>Nutrient Analysis All areas must be compliant for age/grade groups for total calories, saturated fat, and sodium requirements as set forth with HHFKA of 2010 for each age/grade group.</p> <p>Sodexo is not currently using a nutrient software program for menu planning for Freedom Classical, so they must complete the USDA worksheets including the Simplified Nutrient analysis tab to determine if the school is meeting the dietary specifications. This was submitted initially, and the Simplified Nutrient analysis tab was not filled out. Technical assistance was provided, and they were resubmitted, however it was still not filled out completely so the nutrient analysis is incomplete and therefore not in compliance. All sides (meaning all fruit and veggies offered) and condiments need to be included with their calorie, saturated fat, and sodium amounts.</p>	<p>Please completely fill out the Simplified Nutrient Analysis tab (on the USDA worksheet) for each week of the lunch cycle menu. Make sure all fruits, veggies, and condiments are included in this analysis.</p>	<p>April 13th, 2022</p>

General Program Compliance

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).

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Finding		Corrective Action	Due Date
#3	<p>SW Committee Meeting 2x/year A Local School Wellness stakeholder/committee needs to meet at least twice a year. There is no committee at Freedom Classical Academy.</p>	<p>Form a school wellness committee and report who is on the committee. As well as create a business policy/process to replace members and keep a committee in place. Please submit a timeline/date for when this committee will meet at least once this school year and what topics will be covered at the meeting.</p>	<p>April 13th, 2022</p>

VIII. Recommendations and Technical Assistance

Recommendations:

1. Since you are using the POS Infinite Campus for counting meals during lunch, then you should use the reports in IC for your totals and consolidated totals for the monthly claim. Totals submitted for the January meal counts requested, were on tally sheets, not reports from IC, even though we saw IC being used during the lunch observation.
2. Begin using a nutrition software program for menu planning. Sodexo is a national food service management company and has the resources and capability to be using a nutrition software program. This is something that should have been set up prior to starting the school year as meals have been served all year now and may not have been in compliance as no correct nutrient analysis has been conducted.
3. School Wellness Policy: We recommend posting this to your school website. It is currently available in the front office for parents to view, however they must ask for it. Making it accessible online to parents, the community, and students is a best practice.

Technical Assistance:

1. Free and reduced-price meal applications: Currently Freedom Classical is not and has not been collecting meal applications for the current school year 2021-2022, as they have been operating under the USDA Waiver #85 and serving all meals for free under SSO. Collection of meal applications was not a requirement this year due to waiver #85, however still collecting them is a best practice as the free or reduced-price eligibility can make student eligible for other benefits such as PEBT and reduced testing fees. A copy of the USDA meal application is attached. Please edit it to reflect Freedom Classical’s information. This meal application can be used right away for

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- this school year, which is recommended, and then must be used the following school years.
2. Direct Certification matching process: Currently Freedom Classical has not been conducting direct certification matches for the current school year 2021-2022, as they have been operating under the USDA Waiver #85 and serving all meals for free under SSO. Conducting direct certification matching was not a requirement this year due to waiver #85, however still conducting this process is a best practice as the free or reduced-price eligibility can make student eligible for other benefits such as PEBT and reduced testing fees. In order to get access to the monthly direct certification list, access to Bighorn is needed, which is housed by the Nevada Department of Education.
 3. Approval and denial letters: Since Freedom Classical has not been certifying students for free or reduced price eligibility this year, they did not have household letter templates in place for any processes including: notice of filling out an application, approved or denied for free or reduced price meals, direct certification notification, and verification notification. Samples of what these letters should include is attached. Additionally, usually the point of sale or program being used to keep the benefit issuance document has these letter templates included.
 4. Verification Process: Since Freedom Classical did not collect any meal applications they did not conduct the verification process. The Eligibility Manual for School Meals is included in the appendices, as it explains this process in detail.
 5. Benefit Issuance Document: As free or reduced-price eligibility was not being collected for students this year, there was no benefit issuance document in place. Again, please refer to the Eligibility Manual attached for more information on what this document needs to include and used for. One will need to be in place and used for next school year.
 6. Professional Standards Training Tracker: This item was submitted upon initial request. It was missing the following components: the required hours of training for each staff member, training title/subject, and school year training applied to. These items were added, and the tracker resubmitted. It is now in compliance.
 7. Civil Rights Complaint Procedure: This item was submitted upon initial request; however, it was USDA's complaint procedure. We asked for a Civil Rights complaint procedure that was specific to Freedom Classical Academy and how it would handle a complaint if one was received. This was written and resubmitted and is now in compliance.

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

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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. Sample menu production record- attached
- D. Eligibility Manual for School Meals-attached
- E. Free and Reduced-Price Meal Application prototype- attached
- F. Household letter templates- attached

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