



BILL HASLAM
GOVERNOR

STATE OF TENNESSEE
DEPARTMENT OF EDUCATION
NINTH FLOOR, ANDREW JOHNSON TOWER
710 JAMES ROBERTSON PARKWAY
NASHVILLE, TN 37243-0375

CANDICE MCQUEEN
COMMISSIONER

February 15, 2017

Mr. Stuart Tutler, Director
New Hope Academy- Franklin
1820 Downs Blvd.
Franklin, TN 37064-6859

Dear Mr. Tutler:

Please find attached the summary review of findings from the School Nutrition Program's 2015-16 fiscal year administrative review of New Hope Academy- Franklin's National School Lunch Program and School Breakfast Program. This review was conducted the week of November 14, 2016, with the exit date of January 13, 2017. The summary includes the identified findings and the corrective actions required.

District responses and supporting documentation of corrective actions are required for all findings, and findings must be corrected district wide. The School Nutrition Program Director will provide the responses to the findings via the Tennessee: Meals, Accounting, and Claiming (TMAC) system in the "Compliance" section, as discussed with the lead reviewer. Technical assistance areas do not require responses; these suggestions are only to help the system improve the program. They are also available in the "Compliance" section in TMAC.

During the review, findings in sections **100: Certification and Benefit Issuance and 300: Meal Counting and Claiming, 400: Meals Components and Quantities and 1700: Afterschool Snack** require fiscal action. An explanation of the findings is included in the attached review summary. All corrective actions for New Hope Academy- Franklin shall be documented, supported, and listed in the "Compliance" section in TMAC no later than March 15, 2017.

If you find errors or points of disagreement in our findings, please contact me, and I will assist you with your next course of action. If there are no errors or points of disagreement, please be mindful that refusal or failure to comply with the required corrective actions within the allotted timeframe may result in further potential fiscal action.

Upon receipt of New Hope Academy- Franklin's documented corrective action, the Tennessee Department of Education will determine whether the documentation is complete and resolves the findings identified. Once the department approves the corrective actions, your district will receive a letter closing the review within 30 calendar days.

If you have any questions or concerns, please contact Quache Spencer or me at (800) 354-3663.

Sincerely,



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Phyllis M. Hodges

Phyllis Hodges, State Director

New Hope Academy - Franklin (P330)

Review ID: 584

Exit Conference Date: 1/13/2017

Review Year: 2017

Month of Review: October

Lead Reviewer: Sarah Martin/ Phyllis Hodges

Area	Findings ID	Finding Description	Required Corrective Action
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SFA - Level Findings

100 - Certification and Benefit Issuance	V-0100	There were errors in the application process with using incorrect conversion factors. The School Food Authority (SFA) did not annualize multiple income sources with varying frequency, resulting in incorrect income leading to miscategorized certifications.	Annualize multiple income sources with varying frequency when processing household applications. Do not round values resulting from conversions. Determine appropriate eligibility status and inform families of change of benefits Upload copies of recalculated applications and copies of letters informing households of status changes
1000 - Local School Wellness Policy	V-1000	There was no local wellness policy in place at the School Food Authority (SFA). None of the required content was addressed in the school's student handbook or online. The SFA was not in compliance with the requirements.	Create a local wellness policy that includes the required contents. Upload the completed local wellness policy to demonstrate compliance
1200 - Professional Standards	V-1200	The School Nutrition Program Director has not met the training requirement for the school year.	Schedule and complete required trainings to meet the school nutrition supervisor training hours. Upload documentation of training registrations and completions as documentation of compliance.
1200 - Professional Standards	V-1200	The School Food Authority (SFA) was not tracking training hours on an annual basis. The off-site response noted that each person is tracking their own	Create a tracking system to record and document all school nutrition staff training hours. Upload proof of training completion all school

		training hours, but the two part-time staff are not maintaining training records.	nutrition staff and copies of tracking devices for each staff member
1200 - Professional Standards	V-1200	Part-time staff did not meet the training requirements from the previous school year. Part-time staff are not aware they are required to meet training requirements.	Mandate 4 hours of school nutrition professional standards training for each part-time staff member. Upload documentation to support the 4 hours of training have been met for each part-time staff member.
1200 - Professional Standards	V-1200	The School Nutrition Director has not met the food safety training requirements.	Participate in a food safety certification course to meet the food safety requirements for professional standards. Upload evidence of course completion as evidence of compliance.
1400 - Food Safety	V-1400	There was no food safety plan being implemented for the School Food Authority (SFA).	Develop and implement a food safety plan for the SFA. Place relevant SOPs in the manual and include in training for all staff. Update the food safety manual regularly and train all staff on updates. Upload a copy of the SFA's food safety plan and evidence of staff training.
200 - Verification	V-0200	The School Food Authority (SFA) did not meet the verification requirements. The SFA did not select the correct sample size of applications to review for verification and therefore did not verify the correct number of applications.	Create a plan to properly complete the verification process including selecting the correct number of applications to review and verify. Upload the verification plan as evidence of compliance.
200 - Verification	V-0200	There is no verification notification letter on file for the application reviewed.	Create a plan to properly complete the verification process including notification of families with increases in benefit status. Upload the verification plan as evidence of compliance
200 - Verification	V-0200	The School Food Authority (SFA) did not complete the verification report for 2015-2016 school year by November 15th. The report was submitted	Create a plan to properly complete the verification process including selecting the correct number of applications to review and verify.

		by November 18th. There is currently no verification report submitted for this school year. This is was a repeat violation.	Upload the verification plan as evidence of compliance
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Site - Level Findings: New Hope Academy - Franklin (0010)

1400 - Food Safety	V-1400	There was no food safety plan available for review. The food safety plan on file was guidance for School Food Authorities on developing a school food safety program.	Develop and implement a food safety plan that is relevant for the SFA and its needs Train all staff on the food safety plan. Upload the completed food safety plan, training agenda, and sign-in sheets from staff training.
1700 - Afterschool Snack	V-1700	Snack counts by student/benefit category were not being maintained based on point-of-service. A student attendance roster was being used to determine snack counts. Student/benefit category is later determined by student attendance rosters on a separate excel spreadsheet, which is then entered into monthly claims. Snack counts are different from the roster than what is counted and claimed.	Create a plan to properly record snack counts at point-of-service to ensure compliance in counting and claiming. Transfer eligibility status accurately from snack count at point-of-service to the benefit issuance roster. Provide an accurate count of snacks served each month. Upload plan and revised rosters as documentation of compliance.
1700 - Afterschool Snack	V-1700	On the day of review, snacks were not properly being counted and claimed	Implement a plan for afterschool meal counting meal counting system that accurately counts and claims snacks. Maintain meal counting records and report counts to the school nutrition supervisor. Upload the plan and the revised meal counting system as documentation of compliance.
1700 - Afterschool Snack	V-1700	Snack counts for the review period did not match snack counts claimed. When reviewing the snack count tallies on the checklist, the number of snacks claimed are different. Counts were being taken based on student	Implement a plan for afterschool meal counting meal counting system that accurately counts and claims snacks. Maintain meal counting records and report counts to the school nutrition supervisor. Upload the plan and the revised meal counting system as documentation of compliance.

		attendance and not from snacks taken at the point of service.	
1700 - Afterschool Snack	V-1700	<p>Production records for the afterschool snack program did not contain all of the information needed to determine if snack menu complies with the meal pattern requirements and serving size requirements. The production records used are from an old template that does not include information for food items and portion sizes. When reviewing the records, reviewers cannot determine if snacks meet the requirements.</p> <p>None of the snacks from the review period nor the week of review can be substantiated.</p>	<p>Begin using the revised production records for afterschool snack. Ensure all snacks meet the required meal pattern.</p> <p>Upload one week of snack production records as documentation of compliance.</p>
1700 - Afterschool Snack	V-1700	There was no documentation of afterschool snack program monitoring within the first 4 weeks of operation.	<p>Monitor the afterschool snack program to meet the program requirements of twice a year monitoring during the year.</p> <p>Upload the monitoring documentation as evidence of compliance/</p>
300 - Meal Counting and Claiming - Breakfast	V-0300	On the day of review at the site, the meal counts were being tallied on multiple forms of documentation which appeared to create questionable patterns in daily meal counts. The tally sheets have a different total of meal counts for free, reduced, and paid than what is on the claim for the month of review.	<p>Develop a plan and a system for manual meal counting that consolidates meal counts accurately and correctly without using multiple methods of documentation.</p> <p>Upload a copy of the plan and the tool used to consolidate meal counts</p>
300 - Meal Counting and Claiming -	V-0300	The breakfast meal counts for the review period were not correctly consolidated and claimed for reimbursement.	Develop a plan and a new meal counting system that correctly consolidates and claims meals for breakfast. Maintain 30 consecutive days of correct meal counts for

Breakfast		The School Food Authority (SFA) manually counts meals as students receive them with a checklist. The checklist is then inputted on an excel spreadsheet before being entered into the claim. All three counts were different.	documentation of the corrective action. Upload the planned new meal counting tool used to consolidate meals. Upload 30 consecutive days of meals counts to determine a recalculation of reimbursements
300 - Meal Counting and Claiming - Lunch	V-0300	On the day of review, while on site, free, reduced, and paid meal counts were inaccurate and appeared questionable. The manual checklist contains a different meal count per category than what is being claimed. Some students are marked off or crossed out which makes consolidating counts difficult to perform.	Develop a plan and a new meal counting system that correctly consolidate and claim free, reduced, and paid meals. Maintain 30 consecutive days of correct meal counts for documentation of the corrective action. Upload the planned new meal counting tool used to consolidate meals. Upload 30 consecutive days of meals counts to determine a recalculation of reimbursements
300 - Meal Counting and Claiming - Lunch	V-0300	The lunch counts by category were not correctly consolidated and reported in the meal claim. For October, the tally sheets performed manually by the School Food Authority (SFA) are different than the numbers reported on the excel spreadsheet and the claim. Tally marks were difficult to count due to being marked out or erased.	Develop a plan and a new meal counting system that correctly consolidate and claim free, reduced, and paid meals. Maintain 30 consecutive days of correct meal counts for documentation of the corrective action. Upload the planned new meal counting tool used to consolidate meals. Upload 30 consecutive days of meals counts to determine a recalculation of reimbursements
400 - Meal Components and Quantities - Breakfast	V-0400	All required meal components were not available to students on the reimbursable meal service line during the meal service. Three students did not have all components available to them during meal service time. The Grain and Meat/Meat Alternate (M/MA) components were missing.	Ensure all required meal components are available to students at the reimbursable meal service line at the beginning of service and throughout the meal service time. Increase breakfast orders to ensure enough breakfast meals are available to students daily. Upload one week breakfast meals orders as evidence of increased orders.
400 - Meal Components and	V-0400	Four meals observed and counted at breakfast for reimbursement did not contain	Train staff on Offer versus Serve (OVS) to ensure all meals counted for reimbursement contain all the required meal components.

Quantities - Breakfast		the required meal components. The 1/2 cup fruit/vegetable requirement was missing.	Upload agenda and sign-in sheet from the OVS training.
500 - Offer versus Serve	V-0500	Offer versus Serve requirements were not met according to Regulation 7 CFR 220.8 and Regulation 7 CFR 210.10. There were four meals missing the 1/2 cup of fruit/vegetable requirement that were taken during breakfast.	Train staff involved at breakfast and lunch on Offer versus Serve and the requirements. Upload agenda and sign-in sheet from the OVS training.
500 - Offer versus Serve	V-0500	Staff who work in the dining area had not been properly trained on Offer versus Serve. When asked what the requirements are for a reimbursable meal, they are not able to answer the question. For breakfast, the staff member did not understand the requirement of 1/2 cup fruit/vegetable.	Train all staff who work in the dining area on Offer versus Serve. Upload agenda and sign-in sheet from the OVS training.