



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

May 2, 2017,

Mrs. Evelyn Rafalowski, Director
Sullivan County Schools
P.O. Box 306
154 Blountville Bypass
Blountville, TN 37617-0306

Dear Mrs. Rafalowski:

Please find attached the summary review of findings from the School Nutrition Program's 2016-17 fiscal year administrative review of Sullivan County's National School Lunch Program, School Breakfast Program and Afterschool Snack Program. This review was conducted the week of April 3, 2017, with the exit date of April 6, 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** were determined to require fiscal action. An explanation of the findings is included in the attached review summary. All corrective actions for Sullivan County shall be documented, supported, and listed in the "Compliance" section in TMAC no later than May 20, 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 Sullivan County'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 closure 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

Sullivan County (820)
Review ID: 1165
Exit Conference Date: 4/6/2017

Review Year: 2017

Month of Review: February

Lead Reviewer: Lindsay Baldwin

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

100 - Certification and Benefit Issuance	V-0100	There were two application errors found during the review. One application was reduced and should have been free, because the student was a foster child. One application was reduced and should have been paid due to income.	Change the applications to the appropriate benefit issuance status. Upload the letters that were mailed to the household as evidence of the change.
1200 - Professional Standards	V-1200	The school nutrition program director did not meet the required food safety training requirement. The Healthy, Hunger-Free Kids Act of 2010 (HHFKA) requires new program directors to receive at least eight hours of food safety training within 30 days of the employee's start date.	Complete food safety training to meet the school nutrition supervisor training hour requirements. Maintain proper documentation of training to include certificate of completion for application trainings, training agendas, and dates of planned or scheduled trainings. Attach agenda's, sign-in sheets and or certificates of completion to demonstrate compliance.
1200 - Professional Standards	V-1200	As of the week of review, some full-time employees had not completed their 6 hours of required training.	Create a training plan for those full-time employees that have not completed their training hours. For proof of compliance, attach the training plan, training agendas and sign-in sheets along with the corrected training tracker.
1400 - Food Safety	V-1400	The district-wide Hazard Analysis Critical Control Points (HACCP) plan has not been updated since 2014.	Update the HACCP plan. Provide a copy of the updates to the HACCP plan.

1400 - Food Safety	V-1400	The School Food Authority (SFA) did not have an approved exception list for their products that did not meet the Buy American requirement.	The School Food Authority (SFA) must submit a Buy American exemption, listing the items, along with the reason why the SFA can't meet the Buy American requirement or the SFA can procure items that meet the Buy American requirement. Upload the exemption list or invoices of domestic items purchased as proof of compliance.
200 - Verification	V-0200	One application was verified incorrectly. The incorrect verification changed the students' status from reduced to paid, but they should have remained at the reduced status.	Change the students' status back to reduced. Provide documentation showing the change in status.
300 - Meal Counting and Claiming	V-0300	The SFA was not following their approved State Agency agreement for Blountville Middle School. Their site application states that they were using an electronic system for meal counting, however, they were using a combination system.	Correct the program agreement to reflect a combination meal counting system.
800 - Civil Rights	V-0800	Program materials did not contain the appropriate non-discrimination statement.	Revise all program materials to ensure that they include the appropriate non-discrimination statement. Upload updated copies of materials as proof of compliance.
Revenue from Non-program Foods Testing Chart	V-NPFTC	The non-program revenue tool has not been completed since 2013-2014 school year.	Complete a non-program revenue tool for the current school year. Upload the completed tool as proof of compliance.

Site - Level Findings: Blountville Middle (0030)

1400 - Food Safety	V-1400	The receiving logs and temperature logs for cold foods were not being completed, and thermometer calibration logs were not being filled out	Complete receiving logs, cold holding temperature logs, and thermometer calibration logs. Upload one week of the receiving, cold
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		properly. The staff was not logging the corrective action once calibration had been completed.	holding, and thermometer calibration logs as evidence of compliance.
1400 - Food Safety	V-1400	Meat was being stored on the top shelf of the freezer, which was an improper storage procedure.	Store meat on the bottom shelves of the freezer. Upload a picture of the freezer storage as evidence of compliance.
1700 - Afterschool Snack	V-1700	Production records did not indicate that each student received both components.	Update production records to include the meal components. Upload a copy of the updated production records.
1700 - Afterschool Snack	V-1700	The manager had documentation to indicate that a review of the snack program was completed, but there was no date listed on the form to indicate that the review was done within the first 4 weeks of the program.	Add an area on the review form for the date. Upload the updated review form as evidence of compliance.
300 - Meal Counting and Claiming - Lunch	V-0300	There were multiple days during the review period where meal counts exceeded the number of eligible students.	Contact your software provider to adjust the CEP claiming percentage for the district, and conduct an edit check at the site level daily. Upload documentation showing that the CEP claiming percentage has been corrected in the software, and upload 5 days of edit check to ensure that they are being conducted.
300 - Meal Counting and Claiming - Lunch	V-0300	An attendance adjusted edit check was not conducted.	Utilize PowerSchool reports to confirm the correct attendance. Upload 5 days of an attendance adjusted edit check report.
900 - SFA On Site Monitoring	V-0900	The on-site monitoring form was not available for review.	Create a plan to ensure that all on-site monitoring forms are completed prior to February 1. Upload plan as evidence of compliance.

Site - Level Findings: Sullivan East High School (0080)

1400 - Food	V-1400	Cafeteria employees were not	Retrain cafeteria staff on proper glove use.
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Safety		changing gloves between tasks.	Upload an agenda and signed roster of trainees as documentation that training has occurred.
1400 - Food Safety	V-1400	Manager and staff were not utilizing receiving, holding, reheating, or cooling temperature logs.	Retrain the staff on the proper utilization of receiving, holding, reheating, and cooling temperature logs. For proof of compliance, attach the agenda, sign-in sheet, and one week of receiving, holding, reheating, and cooling logs.
1400 - Food Safety	V-1400	Manager and staff were not following the Receiving and Storage Standard Operating Procedure (SOP). Items in dry storages; reach-in freezers, walk-in refrigerator and walk-in freezer were not dated upon delivery.	Retrain staff on proper procedures for the receiving and storage of food in dry storage, refrigeration and freezer storage. Attach agenda and sign-in sheets as proof of compliance.
500 - Offer versus Serve	V-0500	Signage was not displayed at the serving line to explain what constitutes as a reimbursable meal to students.	Display signage at the serving line that explains what constitutes a reimbursable meal to students including the requirement to select 1/2-cup fruit or vegetable. Upload a copy of the signage posted in the meal service area.
900 - SFA On Site Monitoring	V-0900	The on-site monitoring form was not available for review.	Create a plan to ensure that all on-site monitoring forms are completed prior to February 1. Upload plan as evidence of compliance.

Site - Level Findings: Sullivan Gardens K8 (0175)

1400 - Food Safety	V-1400	On the day of review, employees were witnessed handling food then recording temperatures without changing gloves and were taking temperatures of the sandwiches through the paper wrapping.	Retrain staff on proper glove use and proper temperature taking techniques. Upload the agenda and sign in sheet from the training as evidence of compliance.
1400 - Food Safety	V-1400	There were no receiving logs available on the day of review.	Complete receiving logs and upload one week of receiving logs as evidence of compliance.
900 - SFA On	V-0900	The on-site monitoring form was	Create a plan to ensure that all on-site

Site Monitoring		not available for review.	monitoring forms are completed prior to February 1. Upload the plan as evidence of compliance.
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Site - Level Findings: Ketrion Elementary School (0215)

1400 - Food Safety	V-1400	Items in dry storage, walk-in refrigerator and walk-in freezer were not dated in accordance with their storage/receiving SOP.	Retrain staff on correct procedures for the receiving and storage of food, specifically the dating of items upon receipt. Upload a picture of the dated items as well as the agenda and sign in sheet from the training.
1700 - Afterschool Snack	V-1700	There was no roster being used during afterschool snack meal service. Daily snack counts were production record based. The difference between what was sent and what was returned was what was being claimed.	Provide rosters for each afterschool snack location within the school. Train teachers and cafeteria staff on what constitutes a reimbursable snack. Upload training agenda, sign-in sheets and the roster that is being used to properly account for the reimbursable snack count.
900 - SFA On Site Monitoring	V-0900	The on-site monitoring form was not available for review.	Create a plan to ensure that all on-site monitoring forms are completed prior to February 1. Upload a copy of the plan as proof of compliance.