



**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

December 13, 2018

Dr. Mike Looney  
Williamson County Schools  
1761 West Main Street  
Franklin, TN 37064

Dear Director Looney:

Please find attached the summary review of findings from the School Nutrition Program's 2017–18 fiscal year administrative review of Williamson County's National School Lunch Program and School Breakfast Program. This review was conducted the week of March 19, 2018, with the exit date of March 22, 2018. 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.

All corrective actions shall be documented and supported in the "Compliance" section in TMAC no later than March 1, 2019. During this timeframe, 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 potential fiscal action.

Upon receipt of Williamson 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 our office at (800) 354-3663.

Sincerely,

Sandy Dawes  
State Director, School Nutrition Program

**Williamson County (940)**

**Review ID: 830**

**Exit Conference Date: 3/22/2018**

Review Year: 2018

Month of Review: January

Lead Reviewer: Kristen Nauss

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

**SFA - Level Findings**

100 - Certification and Benefit Issuance	V-0100	Three electronic applications were approved for benefits incorrectly. All three were approved with an ineligible or missing case number.	Work with the software company to put internal controls in place to ensure only eligible case numbers are submitted and approved. Upload communication with software company confirming a fix or upload a screen shot of software settings.
1200 - Professional Standards	V-1200	The school food authority (SFA) was not tracking professional development by employee position, employee status (full time, part time), required training hours and professional standard codes.	Create a tracking system to record and document all school nutrition staff training hours. For proof of compliance, upload the completed training tracker.
200 - Verification	V-0200	The verification notification letter was missing the required modified Use of Information Statement and an explicit warning that failure to provide the requested information will result in a termination of benefits.	Update the template notification letter and upload a copy to demonstrate compliance.

200 - Verification	V-0200	The adverse action letter was missing the statement that an appeal must be filed within 10 calendar days and that the household can reapply at any time.	Update the template letter to include the missing pieces of information and upload a copy to demonstrate compliance.
600 - Dietary Specifications and Nutrition Analysis	V-0600	Production record templates for the district did not separate planned quantities for students versus adults.	Update the production record template or have staff write in student and adult planned quantities. Upload copy of one completed production record at breakfast and lunch from Allendale Elementary, Mill Creek Elementary, and Mill Creek Middle.
700 - Resource Management (2018)	V-0700	The SFA did not accurately track expenses transferred out of the nonprofit school food service account. The starting balance and expenditures reported to the state agency (SA) did not match the comptroller's 2017 annual financial report.	Investigate the source of the discrepancy and contact the SA to revise the financial report. Upload a copy of the updated report to demonstrate compliance.
800 - Civil Rights	V-0800	No documentation was provided to support that civil rights training covered the required topics of data Collection and Use, public notification, complaint procedures, compliance reviews, resolution of noncompliance, reasonable accommodation of disabilities, requirements for language assistance, conflict resolution, and customer service.	Retrain school nutrition employees on civil rights. Upload proof of training, including an agenda with required topics and sign in sheet.
900 - SFA On Site Monitoring	V-0900	On site monitoring for breakfast was not conducted, nor were the readily observable general areas monitored for lunch.	Monitor the general areas of review at all sites, and monitor the meal counting and claiming system for breakfast at fifty percent of all sites. Upload the monitoring form for the reviewed schools to demonstrate compliance.

Resource Mgt Comprehensive Review	V-RMCRF	Indirect costs were charged to food service without the food service reserve fund being greater than three months operating expenses, as required by TCA 49-6-2305.	Reimburse the foodservice account from the general fund the portion of charges that were unallowable. Upload documentation of the transfer to demonstrate compliance.
-----------------------------------	---------	---	---

**Site - Level Findings: Mill Creek Elementary (0071)**

1400 - Food Safety	V-1400	On the day of review, the milk cooler temperature was above 41 degrees. Upon review of the milk cooler temp log for the week of review, out of compliant temperatures were recorded for prior days, but corrective action was not taken to correct an unsafe holding temperature.	Retrain staff on the storage standard operating procedure (SOPs) and upload a roster demonstrating staff have been retrained on the storage SOP.
--------------------	--------	---	--

**Site - Level Findings: Mill Creek Middle (0072)**

500 - Offer versus Serve	V-0500	Offer versus serve signage did not comply with program regulations. It limited students to two half cup servings of either fruit or vegetable. Students must be offered 3/4 cup of vegetable and one half cup of fruit.	Update signage or remove it from the service line. Upload new signage or the communication to schools instructing them to remove the signs.
--------------------------	--------	---	---