



BILL LEE
GOVERNOR

STATE OF TENNESSEE
DEPARTMENT OF EDUCATION
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NASHVILLE, TN 37243-0375

PENNY SCHWINN
COMMISSIONER

March 2, 2020

Mr. Todd Dickson
Valor Collegiate Academies
4527 Nolensville Pike
Nashville, TN 37211-4732

Dear Director Dickson:

Please find attached the summary review of findings from the School Nutrition Program's 2019–20 fiscal year administrative review of Valor Collegiate's National School Lunch Program and School Breakfast Program. This review was conducted the week of February 10, 2020, with the exit date of February 14, 2020. The attached 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 must 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 district 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 13, 2020. During this timeframe, if you find errors or points of disagreement in our findings, please contact me, to discuss next steps. 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 Valor Collegiate'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

Valor Collegiate Academies (C900)

Review ID: 1846

Exit Conference Date: 2/14/2020

Review Year: 2019-2020

Month of Review: December

Lead Reviewer: Chris Crutcher

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

100 - Certification and Benefit Issuance	V-0100	Certification and benefit issuance requirements were not met. One student in the review sample was approved for benefits based on an incomplete application.	Contact the household to obtain the missing information, and upload a copy of the new application to demonstrate compliance.
100 - Certification and Benefit Issuance	V-0100	Certification and benefit issuance requirements were not met. Two student in the review sample were approved via direct certification but there was no documentation to support the determination. However, an application based on income was available.	Change the determination type of both students on the benefit issuance document. Upload a corrected document to demonstrate compliance.
1200 - Professional Standards	V-1200	Professional standard requirements were not met. Training agendas did not indicate the length of training, and the number of hours each employee was trained could not be validated.	Develop a training template that includes a placeholder for professional standard codes and the length of each session. Upload a copy of the template to demonstrate compliance.

800 - Civil Rights	V-0800	Civil rights requirements were not met. The individual health plans (IHP) collected by the school indicated food allergies for multiple students, but the cafeteria staff was not making any accommodations. In addition, no physician statements were available for review, and the need for meal modifications outside of the meal pattern could not be determined.	Train cafeteria staff on meal modifications and revise the IHP process to ensure all students have the opportunity to participate in school meals. Upload a copy of the agenda, training roster, and updated process to demonstrate compliance.
200 - Verification	V-0200	Verification requirements were not met. Three applications selected for verification were not processed correctly. All three households provided sufficient documentation to determine eligibility, but they were denied benefits for not providing a full month's worth of income.	Change the status of each student in error on the benefit issuance document and send the household a notice of benefit change. Upload the letter for each household to demonstrate compliance.
800 - Civil Rights	V-0800	Civil rights requirements were not met. The website did not contain the USDA nondiscrimination statement.	Update the website to display the full nondiscrimination statement, and provide a link to the updated webpage to demonstrate compliance.
200 - Verification	V-0200	Verification requirements were not met. The household notification of selection did not contain information about how household can call at no cost for assistance.	Revise the notification letter to include all required components, and upload a copy of the corrected letter to demonstrate compliance.
100 - Certification and Benefit Issuance	V-0100	Certification and benefit issuance requirements were not met. Household applications for free and reduced school meals were not approved in a timely manner. Multiple applications in the sample size exceeded the maximum processing timeframe of 10 operating days.	Develop a procedure to ensure household applications for free and reduced school meals are processed with 10 operating days. Upload a copy of the procedure to demonstrate compliance.

Site - Level Findings: Valor Flagship Academy (8045)

400 - Meal Components and Quantities - Breakfast	V-0400	Breakfast meal pattern requirements were not met. Breakfast signage explaining what constitutes a reimbursable breakfast to students was incorrect. It instructed students to choose a 1/2 cup fruit or vegetable and 2 other components, rather than two other items.	Modify signage that properly explains what constitutes a reimbursable meal and display it in the meal service area. Upload a picture of the corrected signage to demonstrate compliance.
1400 - Food Safety	V-1400	Food safety requirements were not met. Logs documenting thermometer calibrations and cooling potentially hazardous foods were not available for review.	Train staff on using and calibrating thermometers and cooling potentially hazardous food procedures. Upload an agenda and training roster to demonstrate compliance.
500 - Offer versus Serve	V-0500	Offer versus serve (OVS) requirements were not met. On the day of review during lunch, students were forced to go back and get a milk. Also during lunch, the main entrée and vegetable were pre-plated and students did not have an opportunity to decline one of the components. During breakfast, two individual grains were pre-plated and students did not have the option to decline one of the items.	Train cafeteria line staff and point of sale staff on OVS. Upload agenda and training roster to demonstrate compliance.
1400 - Food Safety	V-1400	Food safety requirements were not met. On the day of review, one food service employee was wearing hoop earrings during food preparation.	Train staff on personnel hygiene standard operating procedure. Upload an agenda and training roster to demonstrate compliance.