



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

January 9, 2017

Mr. Jason Manuel, Director
Germantown Municipal Schools
6685 Poplar Avenue, Suite 202
Germantown, TN 38138

Dear Mr. Manuel:

Please find attached the summary review of findings from the School Nutrition Program's 2015-16 fiscal year administrative review of Germantown Municipal Schools' National School Lunch Program and School Breakfast Program. This review was conducted the week of December 12, 2016, with the exit date of December 16, 2016. 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 section **100: Certification and Benefit Issuance** require fiscal action. An explanation of the findings is included in the attached review summary. All corrective actions for Germantown Municipal Schools shall be documented, supported, and listed in the "Compliance" section in TMAC no later than March 1, 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 Germantown'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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A handwritten signature in cursive script, reading "Phyllis M. Hodges".

Phyllis Hodges, State Director

Germantown (796)

Review ID: 1148

Exit Conference Date: 12/16/2016

Review Year: 2017

Month of Review: October

Lead Reviewer: Phyllis Hodges

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 are not met: One income application was approved without the household member's social security number. One application was approved without clarifying household income which was questionable. Other applications were not completed in system due to the fact that the school food authority (SFA) thought they were DC. The SFA must ensure that certifications and benefit issuance requirements are met such as: ensuring the last four digits of the social security number are documented on the application or check the "no" box before approving the	Ensure that certification and benefit issuance requirements are met as outlined in the finding and special instructions. Provide documentation that all questioned applications have been corrected.
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		application, that any unclear income information is clarified before approving the application and that all applications are correctly approved if they are not directly certified.	
100 - Certification and Benefit Issuance	V-0100	The statement that a family may reapply for free and reduced benefits at any time during the school year was missing from the denial notification letter sent to households.	Correct the formatted denial letter in the software program. Upload a copy of a corrected denial letter.
100 - Certification and Benefit Issuance	V-0100	There were numerous students approved as free by direct certification that could not be found on the direct certification rosters downloaded from the state files. Those students are not eligible for benefits for the 2016-17 school year.	Investigate the source of this error. Correct any software or process issues that caused this error. Conduct a thorough review of all eligibilities and make appropriate changes in the free and reduced software. Provide documentation that this process has been completed and only students who are eligible for the current school year are receiving benefits.
1600 - School Breakfast and SFSP Outreach	V-1600	Families were not informed of the availability and location of free summer meals. There was no record detailing the posting to the website or the targeted email blast which was used to advertise summer feeding locations.	Create email blast text and/or a website posting that will be utilized in the spring of 2017. Upload informational documentation that has been created to inform families about free summer meals opportunities.
200 - Verification	V-0200	The correct sample size was not chosen and	Contact the state agency consultant for additional

		verified. The SFA selected six applications to verify. They should have selected two applications for verification.	training on the verification selection process and the eligibility confirmation process. Upload documentation demonstrating correspondence between the consultant and SFA has occurred and that the required training has taken place.
200 - Verification	V-0200	Based on the review of verified applications, verification requirements are not met. A case number application was not selected for verification. The income documentation provided did not substantiate that the student qualified for free meals.	Contact the state agency consultant for additional training on the verification process. Upload documentation demonstrating correspondence between the consultant and SFA has occurred and that the required training has taken place.
200 - Verification	V-0200	The SFA's verification notification letter did not include all of the required information. The warning that benefits would be discontinued due to non-response and a toll-free phone number were not provided.	Correct the verification notification letter to include the warning from page 86 in the Eligibility Manual and to provide instructions for families as to how to contact the SFA at no cost. Upload the corrected letter as documentation of the required corrective action.
200 - Verification	V-0200	The SFA's notice of adverse action did not contain the date generated/sent. The date of eligibility change and the last day to file an appeal should be the same. They were not and it is not possible to determine if the 10	Correct the notice of adverse action to include required components and processes outlined in the special instructions of the finding. Upload a corrected household notice template. Upload documentation demonstrating that a process

		calendar day appeal period was provided.	has been put in place for ensuring a 10 calendar day appeal period has been provided for all adverse actions.
300 - Meal Counting and Claiming	V-0300	Edit checks are not being performed.	Utilize the edit check report to perform an attendance adjusted edit check. Upload documentation that the edit check process was completed for the December 2016 claim before it is processed.
800 - Civil Rights	V-0800	The non-discrimination statement on all publications is not the correct statement required by USDA.	Modify all publicized materials to include the correct non-discrimination statement as required by USDA. Upload corrected copies of menus, formatted letters, posters and/or any current parent notifications in order to demonstrate that all materials have been revised.
Resource Management Comprehensive Review	V-RMCRF	The non-program food ratio and food cost ratio were not calculated correctly.	Choose a representative week and determine the values needed to complete the non-program food calculator. Upload the completed calculator and supporting documentation.

Site - Level Findings: Dogwood Elementary School (0070)

1400 - Food Safety	V-1400	Six products stored on-site at the school were found that were not compliant with the Buy American provision.	Ensure that the contractor fully implements the Buy American requirement that was certified in the food service management contract attachment 9.1. Provide documentation that a process is in place to ensure Buy American requirements are
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			being met as outlined in the special instruction portion of the finding.
800 - Civil Rights	V-0800	The school had designated a table with a sign that says "Allergy Table." This is not allowable under current guidance.	Remove the "Allergy Table" signage. Upload documentation that the school community has been notified that labeling the table with a sign is not allowed in order to protect all children's privacy and civil rights.