

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

April 27, 2017,

Ms. Pamela Johnson, Director Greater Praise Christian Academy 2025 Clifton Avenue Memphis, TN 38127

Dear Ms. Johnson:

Please find attached the summary review of findings from the School Nutrition Program's 2016-17 fiscal year administrative review of Greater Praise Christian Academy'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 7, 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 **300: Meal Counting and Claiming, 400: Meal Components and Quantities, 500- Offer Versus Serve, and 1700 Afterschool Snack** were determined to require fiscal action. An explanation of the findings is included in the attached review summary. All corrective actions for Greater Praise Christian Academy shall be documented, supported, and listed in the "Compliance" section in TMAC no later than June 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 Greater Praise Christian Academy'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,



BILL HASLAM GOVERNOR

Myslis M. Horzes

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Phyllis Hodges, State Director



Greater Praise Christian Academy (P325) Review ID: 1156

Exit Conference Date: 4/7/2017

Review Year: 2017

Month of Review: February

Lead Reviewer: Audra Henderson

	Findings		
Area	ID	Finding Description	Required Corrective Action

SFA - Level Findings

1200 - Professional Standards	V-1200	There was no documentation available for review to determine if professional standards requirements were being met.	Begin training all school nutrition staff to ensure that all required professional standards are met. Upload documentation of stated training hours that includes topics, agendas, dates, sign in sheets, and hours of all required professional development training for all persons involved in the school nutrition program.
1500 - Reporting and Recordkeeping	V-1500	There was no record keeping plan in place. The SFA was unable to provide records to substantiate proper record keeping/storage.	Develop a procedure for adequate record keeping to ensure all records are maintained for required timeframe. Upload the procedure as evidence of compliance.
1600 - School Breakfast and SFSP Outreach	V-1600	There was no documentation that families were informed of the school breakfast program.	Create documentation to inform families of the school breakfast program, Upload documentation indicating that information was dispersed to families.
300 - Meal Counting and Claiming	V-0300	The school food authority (SFA) was not following their approved agreement. The breakfast and lunch serving times were incorrect and offer versus serve (OVS) was not being implemented.	Correct the application packet and resubmit for approval.
300 - Meal	V-0300	Based on the daily tally sheets	Implement a counting and claiming



Counting and Claiming		provided for the month of February, the total numbers of lunches, breakfasts, and snacks did not match the number of meals claimed in TMAC.	procedure to ensure the claims are accurate. Upload the procedure for counting and claiming as evidence of compliance. Submit a 30-day meal counting documentation so that state agency can validate the new procedure is reliable.
700 - Resource Management	V-0700	The SFA did not have a separate financial account for the school nutrition food service's income and expenses as required.	Establish a separate financial account for the SFA and upload bank statements to document account.
800 - Civil Rights	V-0800	The SFA did not have a complaint procedure available for review.	Create a copy of the complaint procedure and upload for review.
800 - Civil Rights	V-0800	The SFA was unable to provide documentation that civil rights training had taken place All persons involved in the School Nutrition program must receive civil rights training.	Conduct civil rights training with all persons involved in the program, and include all required topics. Upload an agenda and sign in sheet once training has been completed.
800 - Civil Rights	V-0800	Some reviewed documentation did not contain the required non-discrimination statement, and others had an incorrect statement.	Modify any documents that students may receive to include the correct non-discrimination statement. Upload sample documents that include the correct non-discrimination statement.
Resource Management Comprehensive Review	V-RMCRF	The expenses in the financial report were not accurate, and would exceed the revenue according to the SFA supervisor. There was no report or record of expenses and revenues to explain how funds were received to cover a shortage.	Correct the financial report to reflect accurate expenses. Upload evidence of accurate expenses.
Resource Management Comprehensive	V-RMCRF	The SFA was unable to provide any documentation to determine that only allowable	Provide documentation from step 3 of the Resource Management Comprehensive Review so that the allowable/unallowable



Review		cost had been charged to the school food service account.	expenses can be evaluated. Upload documentation for review
Resource Management Comprehensive Review	V-RMCRF	means of tracking expenses.	Provide a detailed record of all expenses, including checks written and invoices paid, with an explanation/description of payment. Upload documentation for review.
Resource Management Comprehensive Review	V-RMCRF	The SFA did not provide adequate documentation to determine their three months' average expenses.	Provide documentation from step 3 so that the SFA's three months' expenses can be calculated. Upload documentation for review.

Site - Level Findings: Greater Praise Christian Academy (0001)

1400 - Food Safety	V-1400	There was no Hazard Analysis and Critical Control Points (HACCP) plan available to site staff. The HACCP Plan provided to the reviewer did not contain all required components	Provide an updated HACCP plan to the site staff that includes all of the required components. Upload a copy of the revised plan.
1400 - Food Safety	V-1400	Only one inspection had been completed this school year.	Request a second inspection before the last day of school. Upload correspondence with the health department requesting a second inspection.
1400 - Food Safety	V-1400	There was no implementation of the food safety plan during on-site observations. Infractions witnessed by the reviewer included no temping of foods for critical control points during cooking, serving, and cooling, no use of temperature logs, improper bare hand contact with ready to eat foods, improper glove usage, and improper hand washing.	Provide an updated and accurate HACCP plan to the site staff that includes all of the required components. Train the site staff using the revised plan and upload an agenda and sign-in sheet as evidence that the training has taken place.
1400 - Food Safety	V-1400	There are no temperature logs to review.	Use temperature logs daily and correctly. Upload a week of temperature logs for documentation of compliance.



1400 - Food Safety	V-1400	There was one item that indicated a violation in the Buy American provision. Jelly from Peru was on site and there was no Buy American exception.	Check products when purchasing for origin and complete Buy American waiver for foreign products. Upload the approved Buy American exception as documentation of compliance.
1700 - Afterschool Snack	V-1700	The documentation provided for after school snack for the review period did not match the number of snacks claimed in TMAC. One of the days that SFA claimed snacks was a day that students were not in school. Errors indicate a flawed counting and claiming system.	Implement a counting and claiming procedure to ensure that snack claims are accurate and upload the procedure as evidence of compliance. Submit 30 consecutive days of snack counting documentation so that state agency can validate the new procedure is reliable
1700 - Afterschool Snack	V-1700	There were no production records or menus available for review for after school snacks.	Complete snack production records and supporting documentation for February 20-24 as well as from April 3-7. Upload the production records as evidence of compliance.
1700 - Afterschool Snack	V-1700	The afternoon snack program was not monitored in the first for weeks of operation. The SFA had still not monitored the program at the time of the review.	Complete snack monitoring and upload the completed form.
400 - Meal Components and Quantities - Breakfast	V-0400	The required daily minimums were not offered. Students were served approximately 4-6 oz. of milk instead of the 8 oz. required serving.	Serve the minimum amount of milk required. Upload receipts or invoices showing the purchase of larger cups or pre-portioned containers.
400 - Meal Components and Quantities - Breakfast	V-0400	Milk choices were available but do not meet the requirements. The white milk is 2% and it must be 1% or less.	Purchase 1% or lower milk in all available choices. Upload invoice/receipt showing proof of purchase.
400 - Meal Components and Quantities - Breakfast	V-0400	There is no required signage explaining reimbursable meals.	Create/develop signage explaining a reimbursable meal. Upload photo of signage on display in cafeteria.



400 - Meal	V-0400	All grain products were not	Submit a grain waiver to the state agency for
Components and Quantities		whole grain and there was no grain waiver provided. On the	approval or purchase whole grain products.
- Breakfast		day of review, the French toast and substituted waffles were not whole grain.	Upload an approved waiver or invoices/receipts to show whole grain items are being purchased.
400 - Meal Components and Quantities	V-0400	There were no production records available for review.	Provide of breakfast production records for the week of February 20-24.
- Breakfast			Upload production records for review
400 - Meal Components and Quantities	V-0400	The reviewer was unable to determine if planned menu quantities met meal pattern	Plan future menus to provide minimum daily quantities in all components.
- Breakfast		requirements.	Upload a May menu, with correct component serving sizes, and crediting information for documentation.
400 - Meal Components and Quantities - Lunch	V-0400	Meals counted for reimbursement did not contain all meal components. The lunch observed lunch on 4/3/17 consisted of 1/2 cup vegetable,	Conduct training to ensure that all meals prepared contain all of the required components necessary to be claimed as a reimbursable meal.
		.66 oz. meat, and 3/4 cup milk. There was no fruit or grain	Upload a training agenda and sign in sheet to document that training has occurred.
		offered.	
400 - Meal Components	V-0400	The SFA offered only one type of milk.	Offer two milk choices.
and Quantities - Lunch			Upload production records and invoices/receipts to support two milk choices being purchased, prepared, and served.
400 - Meal Components and Quantities	V-0400		Create signage explaining a reimbursable meal.
- Lunch			Upload photo of signage on display in cafeteria.
400 - Meal Components and Quantities - Lunch	V-0400	The meal service structure did not comply with the required age/grade group meal pattern. High school students were not receiving the required one cup of fruit or vegetables, nor were	Overlap meat and grain serving sizes to meet the high school minimum and serve to all grades. Offer high school students a larger amount of vegetables and fruit.
		offered the minimum meat and grain required for grade 9-12.	Upload corrected May menus to show adequate serving sizes and choices for the different age groups.

400 - Meal Components and Quantities - Lunch	V-0400	The planned lunch menu listed applesauce but students did not have a fruit serving.	Provide training regarding required meal components. Upload an agenda and sign in sheet from the completed training.
400 - Meal Components and Quantities - Lunch	V-0400	A February lunch menu was not provided for review.	Create a February menu and upload the menu for review
500 - Offer versus Serve	V-0500	Offer versus serve (OVS) was not being implemented correctly at the reviewed school. All other components except milk and juice were being preplated for high school students.	Provide OVS training to ensure that meal components are being separated and offered to students rather than pre-plated. Upload an agenda and sign in sheet for the completed training.
500 - Offer versus Serve	V-0500	OVS training had not been conducted with staff.	Provide OVS training and upload an agenda and sign in sheet for the completed training.
600 - Dietary Specifications and Nutrient Analysis	V-0600	There were no dietary specifications to review for the items on the menu to determine component sizes, calories, fat, and sodium)	Provide dietary specification information to support the breakfast and lunch menus February 20-24 and April 3-7. Upload the documentation for review.