



**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

February 1, 2017

Mrs. Ariel McCallum, Director  
Knowledge Academies  
5320 Hickory Hollow Parkway  
Antioch, TN 37013

Dear Mrs. McCallum:

Please find attached the summary review of findings from the School Nutrition Program's 2016-17 fiscal year administrative review of Knowledge Academies' National School Lunch Program and School Breakfast Program. This review was conducted the week of January 9, 2017, with the exit date of January 12, 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** require fiscal action. An explanation of the findings is included in the attached review summary. All corrective actions for Knowledge Academies shall be documented, supported, and listed in the "Compliance" section in TMAC no later than March 10, 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 Knowledge Academies' 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 that reads "Phyllis M. Hodges".

Phyllis Hodges, State Director

**Knowledge Academies (C295)**  
**Review ID: 583**  
**Exit Conference Date: 1/12/2017**

Review Year: 2017

Month of Review: December

Lead Reviewer: Cindy Cooper

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

100 - Certification and Benefit Issuance	V-0100	Households that submitted applications and were denied benefits were not notified. Households with children who are denied benefits must be provided with written notification of the denial.	Provide the written notification by mail or email to the adult household member who signed the application.  Upload a copy of the sample letter.
100 - Certification and Benefit Issuance	V-0100	The school food authority (SFA) did not send direct certification households a notification letter.	Notify households of their direct certification status as of January 2017 forward.  Upload a notification sample letter specific to Knowledge Academies that has been sent to a direct certification household as documentation of compliance.
100 - Certification and Benefit Issuance	V-0100	There were numerous income applications that contained illegible information. Applications had items that were repeatedly marked through or marked over. There was not follow-up documentation to clarify the illegible information.	Create a procedure or checklist for applications that are illegible.  Upload a procedure for application clarification with households.
100 - Certification and Benefit Issuance	V-0100	The benefit issuance document did not have the date that the benefit was issued or terminated. The certification date was found on the paper applications. However, for the directly certified students,	Upload the modified document or newly developed document that includes change dates. Include the dates that benefits were issued, changed, or terminated for January forward.  Upload the meal count roster with the

		there was not a document to indicate the date that the benefit was issued. There were not dates found during the review that had the termination or change of benefits. Per interview of the staff, this process had not occurred all year.	benefits issued for January and February 2017.
100 - Certification and Benefit Issuance	V-0100	The school food authority did not allow the carryover of eligibility for up-to thirty operating days for returning students. The staff was not aware of the carryover process.	Allow returning students the carryover of eligibility for up-to thirty operating days or until a new eligibility determination is made for the current school year, whichever comes first.  Submit a written plan on how the district will implement the carryover process for school year 2016-17.
100 - Certification and Benefit Issuance	V-0100	There were no back up documents to validate that there was a back-up system in place. There were not any previous benefit issuance documents maintained prior to the review month.	Maintain all rosters and benefit issuance documents for the current year and at least three years prior.  Submit a plan to the state agency on how the district will back up benefit issuance documents.
100 - Certification and Benefit Issuance	V-0100	There were errors in application processing. Seven applications were approved as free that should have been reduced, and there were three applications approved as reduced that should have been denied.	Correct and update the application statuses on the roster (benefit issuance document) as indicated on the SFA1 form submitted to the school food authority.  Notify the households of the changes and maintain copies of the adverse action notifications.  Upload a copy of the updated roster that includes all of the new benefits issued and the dates that the benefits were changed.  Upload copies of all the adverse action letters sent home to the households.
1200 - Professional Standards	V-1200	As verbally stated during the review, the food service director was hired after July 1,	Complete the required food safety training.  Upload the certificate of completion for the

		2015. He has not had food safety training within 30 days of hire or five years prior to his hire date.	food safety course.
1500 - Reporting and Recordkeeping	V-1500	Upon request there were not any production records or benefit issuance documents for the prior years or for the beginning of the current school year. There were not any production records available prior to October 2016.	Maintain all school nutrition records for the current year plus three years prior.  Create and upload a plan or checklist for maintaining program records.
1600 - School Breakfast and SFSP Outreach	V-1600	There was not any evidence provided to the reviewer that families were informed of the availability and the location of free summer meals in the area.	Create and provide summer foodservice program (SFSP) information to families for the surrounding area.  Upload the information provided to families.
1600 - School Breakfast and SFSP Outreach	V-1600	There was not any evidence provided to the reviewer that families were informed of the availability of the school breakfast program prior to or at the beginning of the school year.	Create and provide breakfast information to families.  Upload informational documents or links to demonstrate compliance.
200 - Verification	V-0200	Adverse action was not conducted, and written notifications were not sent to households receiving a decrease in benefits as a result of verification.	Conduct adverse action on all applications chosen for verification that decreased in benefits.  Upload all copies of the letters to the state agency. Change the benefit issued on the rosters and upload the current rosters.
200 - Verification	V-0200	Verification was conducted on eight household applications. Seven verified applications required adverse action. Adverse action was not conducted, and the benefit issuance was not updated.	Update the status of the applications that were chosen for verification.  Update the rosters with the correct status and notify the families of the adverse action.  Maintain documentation.  Upload a copy of the roster showing the updated statuses, and copies of all the adverse action letters sent home to the households.
300 - Meal	V-0300	The program agreement (A28	Update the program agreement to indicate

Counting and Claiming		and A29) indicated that the site was issuing the benefit for the application based on the date on the submission of the application, and issuing the benefit for the direct certification based on the effective date on the direct certification lists. Upon interview and observation, the benefit issuance date for both actions was when the application was processed and when the direct certification list was processed. The program agreement (A24) indicated that the hearing official was the operations director. He was also involved in issuing the meal benefits. The program agreement (B3) indicated that offer versus serve was not implemented for all grades. Through interview and observation all grades were participating in offer versus serve for breakfast.	the correct information as indicated in the finding description.  No upload needed. State Agency will confirm updates made to the program agreement before closing the review.
800 - Civil Rights	V-0800	The nutrition section of the student handbook did not have the non-discrimination statement included.	Include the appropriate non-discrimination statement on all program materials that are available for the public.  Upload a copy of the revised nutrition section for the student handbook that includes the correct non-discrimination statement.

**Site - Level Findings: Knowledge Academies (8012)**

1400 - Food Safety	V-1400	The food safety plan was not available upon request. The staff contacted the vended meal provider, and the provider emailed a copy of the plan. The plan had a different facility's name on the plan.	Maintain an updated copy of the local food safety plan on site.  Update and upload the plan to include procedures that are relevant to the site.
1400 - Food	V-1400	The site was not following the	Develop a cleaning and sanitizing schedule for

Safety		provided food safety plan. The food service surfaces and equipment were not being cleaned and sanitized as guided by the written plan.	all equipment and food service surfaces as noted in the food safety plan. Obtain acceptable food service chemicals for cleaning and sanitizing.  Upload the cleaning and sanitizing schedule. Upload a picture of the labels of the chemicals that will be utilized.
1400 - Food Safety	V-1400	Thermometer calibration logs were not available for the review month.	Calibrate thermometers weekly as indicated in the state agency sample food safety plan. Document the date, time and any corrective action(s) taken.  Upload the calibration logs for January 2017.
1400 - Food Safety	V-1400	The milk was placed on the serving line from the start of breakfast until the end of breakfast (6:30 - 8:15 a.m.) at room temperature.	Maintain the internal temperature of the milk at 41 degrees Fahrenheit or below during meal service.  Submit a picture of the cooler relocation or allowable cold holding of the milk during meal service.
1400 - Food Safety	V-1400	The orange juice was non domestic. There was not documentation available that indicated that the district made a decision to purchase and accept the non-domestic product either based on availability or costing analysis.	Develop and implement a procedure for accepting or rejecting non domestic food products.  Upload the process for accepting or rejecting the items.
300 - Meal Counting and Claiming - Breakfast	V-0300	The meal counts were not correctly counted and recorded from the manual point of service rosters.	Implement a second count process of the manual meal count rosters, or utilize the electronic point of sale meal counting system immediately.  Upload 30 consecutive correct meal counts to enable the state agency to recalculate the meal counts from July 1, 2016 forward.
300 - Meal Counting and Claiming - Lunch	V-0300	The district was using a coded paper roster with marks being placed beside the student code upon receipt of the meal. The meal counts were not correct for the day of the review. The reviewer obtained different	Implement a procedure to double check the daily roster counts, or implement a different meal counting system that will result in correct meal counts.  Submit thirty days of correct meal counts after the manual meal counting system is

		counts than the site staff.	corrected or after the electronic system is implemented correctly.  Submit a written plan for monitoring the meal counting system that the district will be using.
300 - Meal Counting and Claiming - Lunch	V-0300	The site did not conduct attendance adjusted edit checks or any edit checks based on enrollment.	Conduct attendance adjusted edit checks and continue conducting the edit checks monthly.  Upload the evidence of edit checks and meal count totals supporting the edit checks.
300 - Meal Counting and Claiming - Lunch	V-0300	The manual meal counting rosters were incorrectly totaled for the review month. Every day had errors in the meal count totals. This is considered a systemic error.	Implement a second count process of the manual meal count rosters, or utilize the electronic point of sale meal counting system immediately.  Upload 30 consecutive correct meal counts to enable the state agency to recalculate the meal counts from July 1, 2016 forward.
400 - Meal Components and Quantities - Lunch	V-0400	There were seven lunches served for the 9-12 grade group that had inadequate portions for the meat/meat alternate component on the day of the review. The meat/meat alternate was composed of one ounce equivalent for hummus and a one ounce equivalent for yogurt. Seven meals had only one ounce equivalent for hummus. The yogurt was not served with the hummus.	Schedule additional meal pattern training with your regional consultant ensure that the SFA serves all planned items that compose the meal components' quantities for all grade groupings.  Upload an agenda and sign-in sheet reflecting the training.