



BILL LEE
GOVERNOR

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

PENNY SCHWINN
COMMISSIONER

February 13, 2018

Mr. Benny Pace
Lewis County Schools
206 South Court Street
Hohenwald, TN 38462

Dear Director Pace:

Please find attached the summary review of findings from the School Nutrition Program's 2018–19 fiscal year administrative review of Lewis County's National School Lunch Program and School Breakfast Program. This review was conducted the week of January 14, 2019, with the exit date of January 16, 2019. 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 February 18, 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 Lewis 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

Lewis County (510)

Review ID: 1094

Exit Conference Date: 1/16/2019

Review Year: 2019

Month of Review: December

Lead Reviewer: Randa Meade

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. Six students in the review sample were certified for benefits incorrectly.	Change the status of each student in error on the benefit issuance document and send the households a notice of benefit change. Upload the letters to demonstrate compliance.
1000 - Local School Wellness Policy	V-1000	The local school wellness policy did not include all required elements. It lacked policies for food and beverage marketing, standards for all foods and beverages provided (but not sold) to students, description of public involvement, and how policy assessments would be made available to the public.	Revise the local wellness policy to include all required content and upload an updated policy to demonstrate compliance.
700 - Resource Management	V-0700	The starting balance, revenues, and expenses reported to the state agency for 2017-18 school year did not match the 2018 Tennessee Comptroller's annual financial report.	Investigate the discrepancy and upload documentation outlining the differences.

RMCR - Revenue From Nonprogram Foods	V-RMCR	The adult breakfast meal price was not sufficient to cover the overall cost of the meal. Adults were being charged \$2.00, but the federal reimbursement is \$2.14. Per FNS instruction 782-5, breakfast meals served to adults at non-pricing schools must not be less than the federal reimbursement.	Raise adult breakfast meal prices and upload a screen shot from the POS that reflects the price change.
RMCR - Revenue From Nonprogram Foods	V-RMCR	On the day of review, meals were provided free of charge to three custodians without state agency (SA) approval. Per FNS instruction 782-5, meals may only be furnished to adults free of charge who are directly involved in the operation and administration of school meal programs unless approved by the SA.	Reimburse the nonprofit food service account in full for the cost of adult meals served free of charge to custodians. Upload documentation to demonstrate the transfer of funds.
RMCR - Revenue From Nonprogram Foods	V-RMCR	Revenue from nonprogram foods (NPR) requirements were not met. The percent of total revenue versus total food costs could not be determined because nonprogram costs were not included in the NPR calculation.	Calculate the non-program revenue ratio and the food cost ratio including all revenues and costs. Upload a copy of the corrected calculation to demonstrate compliance.

Site - Level Findings: Lewis County High (0010)

1100 - Smart Snacks in School	V-1100	Smart snack requirements were not met. One non-complaint beverage and one non-complaint snack was sold to students on the day of review. The 12 ounce and 16 ounce hot chocolate exceeded the calorie per ounce allowance. The Doritos exceeded the sodium and percentage of calories from fat allowances.	Eliminate the use of these non-compliant products or replace them with compliant alternatives. Upload nutrition information for the new products to demonstrate compliance.
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1100 - Smart Snacks in School	V-1100	The number of days that school-sponsored fundraisers where foods or beverages were sold to students during the school day could not be determined. Documentation used to track fundraisers was inaccurate. On the day of review, the concession stand was not open to students. However, documentation showed that it was open.	Create a new procedure for tracking infrequent fundraisers to ensure the state-defined limit of 20 days per semester is maintained. Upload the new procedure and tracker to demonstrate compliance.
1400 - Food Safety	V-1400	The food safety plan was not properly implemented. Some foods observed on the day of review in the refrigerator and freezer were not dated, and first in, first out (FIFO) inventory management could not be confirmed.	Retrain staff on proper receiving and storage procedures. Upload a copy of the agenda and training roster for proof of compliance.
1400 - Food Safety	V-1400	Hot and cold holding temperature logs for selected dates were available for review but were incomplete. Temperatures were only recorded for one day of the review period.	Retrain staff on proper holding of hot and cold foods. Upload a copy of the agenda and training roster for proof of compliance.
400 - Meal Components and Quantities - Breakfast	V-0400	Breakfast meal pattern requirements were not met. Signage explaining what constitutes a reimbursable breakfast to students was not available.	Develop signage that explains what constitutes a reimbursable meal and display it in the meal service area. Upload a picture of the service area where the signage is displayed to demonstrate compliance.
400 - Meal Components and Quantities - Lunch	V-0400	Lunch meal pattern requirements were not met. Signage explaining what constitutes a reimbursable lunch to students was not available.	Develop signage that explains what constitutes a reimbursable meal and display it in the meal service area. Upload a picture of the service area where the signage is displayed to demonstrate compliance.

400 - Meal Components and Quantities - Lunch	V-0400	On one day of the review period, the planned menu quantities for the meat/meat alternate component did not meet daily meal pattern requirements. The Salisbury steak served during the review period only credited as a 1.5 ounce meat equivalence, and did not meet the daily 2 ounce meat equivalence for the 9-12 grade group.	Research an alternate meat/meat alternate that meets daily meal pattern requirements, and modify the menu to reflect this change. Upload updated menu and supporting documentation to demonstrate the new product meets meal pattern requirements.
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