



BILL LEE
GOVERNOR

STATE OF TENNESSEE
DEPARTMENT OF EDUCATION
NINTH FLOOR, ANDREW JOHNSON TOWER
710 JAMES ROBERTSON PARKWAY
NASHVILLE, TN 37243-0375

PENNY SCHWINN
COMMISSIONER

November 25, 2019

Dr. Corey Gardenhour
Elizabethton City Schools
804 South Watauga Ave
Elizabethton, TN 37643-4207

Dear Director Gardenhour:

Please find attached the summary review of findings from the School Nutrition Program's 2019–20 fiscal year administrative review of Elizabethton City's National School Lunch Program and School Breakfast Program. This review was conducted the week of November 4, 2019, with the exit date of November 8, 2019. 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 December 20, 2019. 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 Elizabethton City'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



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Summary of Findings

Review Year: 2019-2020

The month of Review: September

Lead Reviewer: Andrew McCluskey

Question	Finding ID	Finding Description	Required Corrective Action
SFA - Level Findings			
1600 - School Breakfast and SFSP Outreach	V-1600	The answer to the question was N/A. All schools must perform breakfast outreach at the beginning of each school year.	Prepare documents that will be sent home with students at the beginning of the school year. May add breakfast outreach to the website. Upload documents and new policies for informing families of breakfast outreach. USDA requirements allow website notification as one form of notification. Add USDA link on website to SFSP and SSO sites. https://www.fns.usda.gov/summerfoodrocks
RMCR - Revenue From Nonprogram Foods	V-RMCR	Non-program food cost ratios have not been calculated. You must be able to show the ratio of non-program revenue to program food revenue.	Per 7 CFR 210.14(f), an SFA must determine that its not-program revues and expenses are in line with reimbursable meal cost and revenue ratios.; see USDA Memo SP39-2011. To comply with requirements, the SFA must perform a five day analysis of non-program food cost/revenue to reimbursable meals cost/revenue. A 5-day tracking of meal costs and non-program food cost. Attach analysis to corrective action.
800 - Civil Rights	V-0800	Non-discrimination statement on main nutrition page for https://www.ecschools.net/administration/10 is improperly formatted. The wording is current, but layout and format must match USDA prototype NDS statement. Also, USDA requirements are that the font size of the NDS statement is to be no smaller than the font on the material.	Correct layout and formatting of NDS statement on the website. Increase font size of NDS on the webpage to be no smaller than the smallest font of the page. Correct items and email new link to Andrew McCluskey. A simple solution that is allowable would be to add just a link to the current USDA NDS on the district website.



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			<p>Email andrew.mccluskey@tn.gov the correct link.</p> <p>Prototype - https://fns-prod.azureedge.net/sites/default/files/cr/nondiscrim-english.pdf</p>
1400 - Food Safety	V-1400	<p>The copy of the district-wide HACCP showed no evidence of being updated since November 2015. Each SOP should be verified and updated, and any new SOPs added, and outdated SOPs removed on an annual basis. SOPs should be signed and dated by the district supervisor each year.</p>	<p>HACCP and other safety policies must be trained on each year for all SNP employees. Update district-wide HACCP manual to make sure it only includes up to date SOPs and policies that are used in the district. District supervisor should review and sign off each SOP annually to make sure they are still up to date.</p> <p>Update district HACCP manual and sign off on all SOPs. Upload samples of updated SOPs.</p>
1600 - School Breakfast and SFSP Outreach	V-1600	<p>The question was answered N/A. SFA must inform families of the availability of breakfast and summer outreach even if they do not operate summer feeding.</p>	<p>Prepare flyers and add link to USDA summer feeding website on SFA website. Upload flyers to be handed out at the end of the school year. Attach link to website with information.</p>
200 - Verification	V-0200	<p>Two Parts:</p> <p>The adverse action letter used in 18-19 is unclear of how many days the household had to appeal.</p> <p>The letter was dated 11/12 and stated that benefits would change on 11/22. This is correct, ten days. In the body of the letter, it stated that the household must request a hearing by 11/16 for the student's benefits to remain unchanged during the appeal. That is only four days and is incorrect.</p>	<p>Part one:</p> <p>Update adverse action letter so that it clearly states that the household has 10 days from the date of the letter to appeal.</p> <p>Part two:</p> <p>Update explanation that student's benefits will remain unchanged if the request for appeal is requested within the 10 days and until the final appeal.</p> <p>Attach updated letter.</p>
200 - Verification	V-0200	<p>Verification notification/selection letter did not include the required language stating the application was selected due to the Russell</p>	<p>Update verification notification letter to include the correct language stating that the selection is required per the Russell Act. Include some form</p>



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		<p>Act. Some form of the following statement must be on the verification selection later.</p> <p>A modified Use of Information Statement as follows:</p> <p>The Richard B. Russell National School Lunch Act requires the information requested in order to verify your children's eligibility for free or reduced price meals. If you do not provide the information or provide incomplete information, your children may no longer receive free or reduced price meals.</p>	<p>of the following statement. Print and scan the corrected verification letter and attach.</p> <p>A modified Use of Information Statement is as follows:</p> <p>The Richard B. Russell National School Lunch Act requires the information requested in order to verify your children's eligibility for free or reduced price meals. If you do not provide the information or provide incomplete information, your children may no longer receive free or reduced price meals.</p>
1200 - Professional Standards	V-1200	<p>Documentation for the previous school year was not found. The previous supervisor was tracking, but the information could not be found. Explained that a complete agenda must be outlined and maintained with sign-in sheets in order to apply professional standards hours to staff.</p>	<p>Have local consultant, Leslea Miller, explain and demonstrate how to track professional standards either on spreadsheet or in TMAC. Attach a sample of the method to be used for current year's professional standards.</p>

Site - Level Findings: East Side (0010)

900 - SFA On Site Monitoring	V-0900	<p>On-site monitoring for East Side appears to have been performed for last year. However, the on-site monitoring form was not dated.</p>	<p>Make sure the on-site monitoring forms for the current year are completely filled out and dated. Detail an action plan to assure that the on-site monitoring process will be followed completely and all forms dated and signed as required. Attached action plan here.</p>
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Site - Level Findings: T. A. Dugger JHS (0025)

1700 - Afterschool Snack	V-1700	<p>Not all after school snack production records were maintained for three years. Work needs to be done on a method of tracking snacks on a production record. I will also be requesting training on After School snack monitoring and documentation from local consultant to assist.</p>	<p>Create a document outlining the responsibility of records retention for after school snack to be three years plus current, like other records. Attach a document to this action.</p>
1700 - Afterschool Snack	V-1700	<p>Snack program was not monitored within first four weeks of starting and again at another point during the year. Requirements are twice a year.</p>	<p>All snack programs must be monitored for recording and meal requirement during the first four weeks of the program and again during the year. (Twice a year) Perform on-site monitoring</p>



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		<p>Regulation:</p> <p>The SFA conducts a self-review of each NSLP Afterschool Snack operation twice per school year: The SFA conducts the first self-review during the first four weeks of NSLP Afterschool Snack Service operations each school year; and SFA conducts the second self-review of the NSLP Afterschool Snack Service prior to the end of each school year.</p>	and attached documentation to this action.
1400 - Food Safety	V-1400	Two #10 cans found in dry storage with dented rims that were mixed with good cans. Inspect all cans for dents and store dented cans in labeled area.	Inspect and remove any dented cans. Store in area labeled dented cans. Take a picture of labeled storage area and attach.
1300 - Water	V-1300	Water was not accessible for breakfast nor lunch.	<p>Free water must be made available to all students for breakfast and lunch. Regina instructed staff here to add water in pitchers and provide cups.</p> <p>Water and cups were added for Lunch and will be provided from now on. Attach work order for installation of a water fountain that was discussed.</p>