



**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

December 13, 2019

Mr. Randy Dowell  
KIPP Nashville  
3410 Knight Road  
Nashville, TN 37207

Dear Director Dowell,

Please find attached the summary review of findings from the School Nutrition Program's 2019–20 fiscal year administrative review of KIPP Nashville's National School Lunch Program and School Breakfast Program. This review was conducted the week of December 9, 2019, with the exit date of December 12, 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 January 17, 2020. 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 KIPP Nashville'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,

A handwritten signature in cursive script that reads "Dr. Sandy Dawes".

**Sandy Dawes**  
State Director

**KIPP Nashville (C291)**

**Review ID: 1844**

**Exit Conference Date:**

**Review Year:** 2019-2020

**Month of Review:** November

**Lead Reviewer:** Jasmine Taylor

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

1400 - Food Safety	V-1400	KIPP Nashville Antioch Prep Elementary did not provide the reviewers with a copy of the HACCP plan at the site.	Upload a copy of the HACCP (Hazard Analysis and Critical Control Point) Plan/Food Safety Plan that is being utilized at the KIPP Nashville Antioch Prep feeding site.
800 - Civil Rights	V-0800	The SFA provided sign in sheets to show that civil rights training was conducted, however, KIPP Nashville does not have evidence (agenda) to support that the required civil rights topics were covered in the training.	Provide documentation to the state agency to confirm that the required civil rights topics were covered in the SFAs civil rights training. The required topics are:  <ul style="list-style-type: none"> <li>&amp;bull;Collection and use of data;</li> <li>&amp;bull;Effective public notification systems;</li> <li>&amp;bull;Complaint procedures;</li> <li>&amp;bull;Compliance review techniques;</li> <li>&amp;bull;Resolution of noncompliance;</li> <li>&amp;bull;Reasonable accommodation of people with disabilities;</li> <li>&amp;bull;Language assistance;</li> <li>&amp;bull;Conflict resolution; and</li> <li>&amp;bull;Customer service</li> </ul>
800 - Civil Rights	V-0800	KIPP Nashville does not have a written procedure for receiving and processing complaints alleging civil rights discrimination within United States Department of Agriculture (USDA) school meal programs.	KIPP Nashville must develop written procedures for receiving and processing complaints alleging civil rights discrimination within United States Department of Agriculture (USDA) school meal programs for use. Upload a copy of the completed procedure as evidence of corrective action for this finding.
1600 - School Breakfast and SFSP Outreach	V-1600	KIPP Nashville does not promote Summer Feeding opportunities info to students and families that participate in the National School Lunch Program (NSLP), as required by United States Department of Agriculture (USDA).	Although KIPP Nashville does not participate in Summer Feeding, the School Food Authority (SFA) is responsible for promoting the availability of summer feeding opportunities to their student population, as required by United States Department of Agriculture (USDA). Upload proof or documentation that Summer Feeding site information is provided to local households.

**Site - Level Findings: KIPP Antioch College Elem (8015)**

1400 - Food Safety	V-1400	KIPP Antioch College Elementary did not have a specific Standard Operating Procedure (SOP) within their Hazard Analysis and Critical Control Point (HACCP) Plan/Food Safety Plan for maintaining the proper temperature for meals and milk transported to classrooms, and stored in classrooms, for their Breakfast in the Classroom feeding model. Also, on the day of observation, breakfast pizza and waffles were served and were not wrapped or covered individually, in order to prevent contamination.	<p>Develop an alternative method for food delivery and storage in the classrooms in order for the proper temperature of meals and milk to be maintained until the meals are consumed by the students and provide evidence to the state agency that food delivery and storage will allow proper temps of breakfast food, meals and milk, to be maintained and provide evidence to support the alternative method is being utilized.</p> <p>Provide evidence that meals are covered/protected when stored in insulated bags, prior to consumption by recipients.</p>
1400 - Food Safety	V-1400	During the on-site visit, the reviewers did not see staff utilize thermometers to temp foods as written in the School Food Authority's (SFAs) HACCP plan/Food Safety plan, nor were there any thermometers observed on-site to calibrate.	Provide evidence that thermometers are being used to temp foods, up to and including the retraining of staff in Food Safety methods, as written in the SFA's HACCP plan/Food Safety plan.