



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

December 22, 2016

Dr. Bruce Borchers, Director
Oak Ridge City Schools
304 New York Avenue
Oak Ridge, TN 37830-5217

Dear Dr. Borchers:

Please find attached the summary review of findings from the School Nutrition Program's 2015-16 fiscal year administrative review of Oak Ridge City's National School Lunch Program and School Breakfast Program. This review was conducted the week of November 28, 2016, with the exit date of December 1, 2016. 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 Oak Ridge City shall be documented, supported, and listed in the "Compliance" section in TMAC no later than January 30, 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 Oak Ridge 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 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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Phyllis Hodges, State Director

Oak Ridge City (012)

Review ID: 541

Exit Conference Date: 12/1/2016

Review Year: 2017

Month of Review: September

Lead Reviewer: Clint Hufford

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

100 - Certification and Benefit Issuance	V-0100	Out of the 490 students selected for review, 53 applications were missing and thus were not available to be reviewed for accuracy.	<p>Ensure a staff member is responsible for maintaining eligibility certification accuracy by delegating this task to a specific role/position in the school system.</p> <p>Create a process for double-checking the accuracy of eligibility certification.</p> <p>Upload documentation that shows that this process is in place.</p>
100 - Certification and Benefit Issuance	V-0100	All direct certification (DC) students were not correctly certified. Twenty-eight of the students categorized as DC on the district's benefit issuance document could not be found on the DC lists for the months of May, June, July, August or September 2016.	<p>Ensure there is a staff member responsible for maintaining accurate DC certification by delegating this task to a specific role/position in the school system.</p> <p>Create a process for double-checking the accuracy of the DC certification.</p> <p>Upload documentation that shows that this process is in place.</p>
100 - Certification and Benefit Issuance	V-0100	The SFA did not accurately transfer the correct benefit from the eligibility determination document to the Point of Service (POS) benefit issuance document. One household's application correctly categorized the students as "reduced" based on income, but the POS benefit issuance document listed them	<p>Transfer the correct eligibility status from the household application to the benefit issuance document.</p> <p>Upload a copy of the POS benefit issuance document that shows this correction.</p>

		as eligible for free meals.	Notify the household of their status change within 10 days of updating the benefit issuance document with the correct status. Upload a copy of the notification letter sent to the household.
1500 - Reporting and Recordkeeping	V-1500	Non-program revenue tool had not been completed.	Complete the non-program revenue tool to ensure Oak Ridge is charging enough for their non-program revenue (a la carte) foods. Upload a copy of the non-program revenue tool once completed.
200 - Verification	V-0200	Oak Ridge verified one too many students for verification. Initial Skyward report told the district to verify 13 students. The district then verified the 13 selected students. The district later went into Skyward and was told to verify only 12 students.	Work with Skyward to determine the source of error and reasoning to why the report indicated two different student verification numbers and fix issue moving forward. Upload a plan to avoid future errors.
200 - Verification	V-0200	Skyward did not pull the total number of directly certified students for Supplemental Nutrition Assistance Program (SNAP) or Temporary Assistance for Needy Families (TANF) on the verification report. These totals should have been reported on sections 3-2 and 3-3 in the verification report, but were not.	Work with Skyward to determine the source of error and reasoning to why the report didn't document the total numbers of students directly certified through SNAP and TANF on the verification report. Upload a plan to avoid future errors.
800 - Civil Rights	V-0800	Free/reduced application contained the old civil rights statement. There was no civil rights statement posted on the food service website: http://ortn.schooldish.com .	Update all program materials and include the updated civil rights statement. Submit proof that the food service website has been updated.
800 - Civil Rights	V-0800	"And Justice for All" posters were displayed in two prominent locations in the cafeteria. However, they were the old versions of the poster.	Replace the old posters with the updated posters in all schools. Upload pictures of updated posters posted in cafeterias as documentation of compliance.

Site - Level Findings: Glenwood Elementary (0015)

1100 - Smart Snacks in School	V-1100	1105a: Food sold to students during the school day did not meet Smart Snack standards. Harvest Cheddar Sun Chips are offered as an a la carte item, but they are not compliant with Smart Snack standards.	<p>Sell remaining inventory of Harvest Cheddar Sun Chips, then discontinue ordering and selling the product.</p> <p>Replace the non-compliant product with a compliant alternative and upload documentation (such as a CN label or Smart Snack Calculator result) that verifies compliance of the new product.</p>
1300 - Water	V-1300	Potable water was not available for students in the cafeteria during lunch meal service.	<p>Make potable water available to students during meal service in the cafeteria.</p> <p>Upload a photograph of the water that has been made available in the cafeteria as documentation.</p>
1700 - Afterschool Snack	V-1700	<p>The program had been monitored within the first 4 weeks of operation but was not being documented.</p> <p>A sample monitoring form is available at: https://www.tn.gov/education/topic/snpprograms - "Afterschool Snack Program" - area eligible toolkit - monitoring form tab in the excel document.</p>	<p>Review each afterschool snack program within the first four weeks of operation and one other time during the afterschool snack service.</p> <p>Upload the monitoring form to verify that the afterschool snack program has been monitored.</p>
300 - Meal Counting and Claiming - Breakfast	V-0300	Reimbursable meals were not being correctly claimed for the review month, September. An issue occurred with Skyward and only accounted for two serving days in the month of September instead of the full 21 serving days.	<p>Work with Skyward to ensure the technology glitch is fixed and accurate meals counts are added correctly moving forward.</p> <p>Check previous months to see if error also occurred before the month of September.</p> <p>Submit reasoning as to what caused the error and update all claims affected by the technological mistake.</p>
300 - Meal Counting and Claiming - Lunch	V-0300	A daily edit check is not being conducted and the monthly edit check is not being conducted accurately. The Oak Ridge staff indicated that no matter what	Work with Skyward to implement a daily edit check and also correct the monthly edit check.

		attendance factor they put in their software, it does not change their monthly attendance adjusted edit check numbers.	Upload documentation to validate daily and monthly edit checks are in place.
300 - Meal Counting and Claiming - Lunch	V-0300	Reimbursable meals were not being correctly claimed for the review month, September. An issue occurred with Skyward and put 26 reimbursable meals into another column that was not being accounted for when using the Skyward report for the claim numbers.	<p>Work with Skyward to ensure the technology glitch is fixed and accurate meals counts are added to the correct column moving forward.</p> <p>Check previous months to see if error also occurred before the month of September.</p> <p>Upload reasoning as to what caused the error and update all months effected by the technology mistake.</p>

Site - Level Findings: Oak Ridge High School (0035)

1100 - Smart Snacks in School	V-1100	Foods and beverages sold to students during the school day from the cafeteria are not all smart snack compliant. After evaluating the side items it was found that the tater tots are not compliant. One beverage was found to be non-compliant.	<p>Evaluate all items, including side items, sold as ala carte for smart snack compliance. Remove any items that are not compliant from the menu or the ala carte selection.</p> <p>Provide documentation that the ala carte items have been evaluated and menu changed where required.</p> <p>Provide documentation that the non-compliant beverage has not been ordered on future orders.</p>
1400 - Food Safety	V-1400	<p>A review of products indicates violations of the Buy American provision in 7 CFR 201.21(d). Two items were found that were of non-American origin. There is no process in place to monitor the contractor's compliance with the Buy American Provision.</p> <p>The Food Service Management Company (FSMC) contractor must determine if any items currently being ordered for schools are not compliant with the Buy American provision and seek a waiver from the district to</p>	<p>Train cafeteria managers to review items as received for compliance with the Buy American provision.</p> <p>Document completed corrective action with a waiver request to the district, a copy of the list posted in school store rooms and training documentation.</p>

		purchase those items. A list of waived items must be posted in school cafeterias so that they can monitor items upon receipt.	
300 - Meal Counting and Claiming - Lunch	V-0300	The system staff could not print an override or voided transaction report. Due to that fact, they do not have a way to determine if excessive overrides exist.	Contact the software company to determine if that reporting function is available. If it is not, develop a system to ensure there are checks and balances in place to review cashier transactions. Document corrective action by providing an override transaction report generated from the system or a report utilizing a manual process.
300 - Meal Counting and Claiming - Lunch	V-0300	The meal count totals by category reported by the school on the daily activity report do not match the meal counts by category pulled from the system at the central office level. This is a systemic error since we found the same problem with total counts at the elementary school.	Contact the software vendor to determine the source of the reporting errors. Correct the reports for all schools and revise claims that have been submitted.