



BILL HASLAM
GOVERNOR

STATE OF TENNESSEE
DEPARTMENT OF EDUCATION
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CANDICE MCQUEEN
COMMISSIONER

March 10, 2017

Mr. Dorsey Hopson, Director
Shelby County Schools
160 South Hollywood Street
Memphis, TN 38112-4801

Dear Mr. Hopson:

Please find attached the summary review of findings from the School Nutrition Program's 2016-17 fiscal year administrative review of Shelby County's National School Lunch Program, School Breakfast Program, Fresh Fruit and Vegetable Program and Afterschool Snack Program. This review was conducted the week February 6, 2017, with the exit date of February 10, 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.

All corrective actions for Shelby County shall be documented, supported, and listed in the "Compliance" section in TMAC no later than May 31, 2017. 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 Shelby 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 Quache Spencer or me at (800) 354-3663.

Sincerely,

A handwritten signature in cursive script that reads "Phyllis M. Hodges".

Phyllis Hodges, State Director

Shelby County Schools (792)

Review ID: 536

Exit Conference Date: 2/10/2017

Review Year: 2017

Month of Review: December

Lead Reviewer: Chris Crutcher

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

1000 – Local School Wellness Policy	V-1000	The Shelby County local wellness policy was not implemented properly at Oakhaven Elementary. The catered lunches served to students to celebrate good behavior did not meet the Minimal Nutritional Standards of Tennessee. The local wellness policy states that food served for school/classroom celebrations shall meet the Minimal Nutritional Standards of Tennessee.	Research other ways of encouraging the use of non-food or beverage items and/or physical activity as rewards for academic performance or good behavior, or revise the local wellness policy to reflect appropriate practice. Submit a plan to demonstrate compliance with the policy.
1200 – Professional Standards	V-1200	The professional standards requirements were not met for all employees. Training hours could not be determined for temporary employees.	Create and submit a plan for tracking professional standard training hours for temporary employees. Also attach a copy of the tracking documentation for newly hired temporary employees.
1400 – Food Safety	V-1400	The SFA was not following the district-wide Hazard Analysis and Critical Control Points (HACCP) plan. It states that the district does not currently have any complex food items. However, leftovers are being used at each site which are considered complex food items.	Update the district-wide HACCP plan to include the process for handling complex food items. Upload documentation showing that the HACCP plan has been updated.
1400 – Food	V-1400	An excessive amount of food	Collaborate with the state agency

Safety		inventory marked for donation was observed in the freezer of the self-operated warehouse.	to schedule a technical assistance visit to determine the reason for excessive inventory. After that visit, develop and submit a comprehensive plan to control inventory.
2100 – Special Provision Options	V-2100	Documentation did not support the Identified Student Percentage (ISP) used to establish the Community Eligibility (CEP) claiming percentage. Nine of the 590 sampled students were not found on source direct certification (DC) lists.	Contact the state agency to adjust the ISP from 63.36% to 63.35%. Attach a screenshot of the revised ISP to demonstrate compliance.
300 – Meal Counting and Claiming	V-0300	The school food authority (SFA) was not following their state approved application at breakfast. The SFA was approved to charge \$1.75 at breakfast on the state application. However, the reviewers were charged different breakfast prices across the SFA during the week of review.	Communicate the adult breakfast price that should be charged to school office personnel. Attach a copy of the communication or update the state application to indicate the correct adult breakfast prices.
900 – SFA On Site Monitoring	V-0900	The on-site monitoring requirements were not met as required in 7 CFR 210.18(h) and 7 CFR 220.11(d). Four of the reviewed sites required corrective action, but no action was documented. Because no corrective action was documented, the 45 day follow-up deadline was not met.	Train area managers on properly documenting corrective action for problems found during the on-site review. Attach an agenda and signed roster of trainees as documentation that this training has occurred.
900 – SFA On Site Monitoring	V-0900	The on-site monitoring requirements were not met as required in 7 CFR 210.18(h) and 7 CFR 220.11(d). The locally developed on-site monitoring form did not include a mechanism to review readily observable general areas.	Use state prototype or revise the current monitoring form to include all required components. Upload the monitoring form that will be utilized moving forward to demonstrate compliance.
Resource	V-RMCRF	Documentation was not	Develop internal controls for

Management Comprehensive Review		available to confirm that all adult meals sales were being deposited into the school nutrition account. No reconciliation was being conducted to ensure deposits matched school receipts.	tracking adult meal sales and attach the new process.
Resource Management Comprehensive Review	V-RMCRF	Documentation was not available to demonstrate that the adult meal prices for lunch and breakfast were sufficient to cover the cost of the meal. A breakfast price of \$1.75 and a lunch price of \$2.00 is not compliant with formula outlined in FNS Instruction 782-5 Rev. 1.	Perform a cost analysis of the cost of adult meals or raise prices based on the formula. Attach a copy of the analysis or attach board minutes showing the approval for raising prices.

Site - Level Findings: Frayser Achievement Elementary (ASD) (0015)

1400 - Food Safety	V-1400	Dry storage logs and freezer logs were available for review, but the documented temperatures were consistently too high as outlined by the food safety plan.	Contact maintenance to repair freezer and dry storage area to ensure that temperature ranges are correct and able to be maintained. Attach documentation of the communication regarding the repair of the freezer and dry storage areas.
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Site - Level Findings: A B Hill Elementary (2005)

1400 - Food Safety	V-1400	The SFA's food safety plan was not implemented correctly. Two employees were observed handling ready to eat food without gloves.	Retrain cafeteria staff on safe food handling practices. Attach an agenda and signed roster of trainees as documentation that this training has occurred.
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Site - Level Findings: Cordova Middle School (2118)

1400 - Food Safety	V-1400	The SFA's food safety plan was not implemented correctly. The thermometer calibration logs indicated that three of the four thermometers were not calibrated. Employees initialed that the task was complete, but a corrective	Retrain cafeteria staff on proper thermometer calibration procedures. Attach an agenda and signed roster of trainees as documentation that this training has occurred.
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		action plan was not documented.	
800 - Civil Rights	V-0800	On the day of review, students were segregated by gender during the last lunch meal service period. Students considered to have behavior issues were required to sit boy-girl.	Train school personnel on allowable meal seating models. Attach the training agenda and signed roster of trainees as well as a statement from school administration indicating that this procedure has been discontinued.

Site - Level Findings: Douglass Elementary/Middle (2155)

800 - Civil Rights	V-0800	On the day of review, students were segregated by gender during the lunch meal service. Students were required to sit at tables by gender.	Train school personnel on allowable meal seating models. Attach the training agenda and signed roster of trainees as well as a statement from school administration indicating that this procedure has been discontinued.
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Site - Level Findings: Getwell Elementary School (2259)

1400 - Food Safety	V-1400	Temperatures of cold ready to eat (RTE) menu items were not being recorded. The food safety plan stated that RTE items must be held at 41 degrees or lower and that temperatures should be recorded in production temperature logs.	Retrain cafeteria staff on proper logging procedures. Attach an agenda and signed roster of trainees as documentation that this training has occurred.
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Site - Level Findings: Goodlett Elementary (2260)

1400 - Food Safety	V-1400	On the day of review, insects were observed on the floor in the kitchen and in the water fountain in the cafeteria.	Contact a pest control company for an appointment to spray the affected areas. Attach documentation to demonstrate that the service has occurred.
1400 - Food Safety	V-1400	The food safety plan was not being implemented correctly. On the day of review, the area supervisor was observed touching her nose and hair	Retrain cafeteria staff on proper glove usage and hand washing procedures. Attach an agenda and signed roster of trainees as

		while transporting food from the kitchen to the serving line without following proper glove usage or hand washing procedures.	documentation that this training has occurred.
1400 – Food Safety	V-1400	Temperature logs for the dry storage area were not available for review.	Retrain cafeteria staff on proper logging procedures. Attach an agenda and signed roster of trainees as documentation that this training has occurred.

Site – Level Findings: Hollis F. Price Middle College High School (2338)

400 – Meal Components and Quantities – Lunch	V-0400	A chicken Alfredo entree that credited as a 1 ounce grain equivalent was chosen by three students. These meals did not meet the 2 oz. minimum daily grain requirement for high school.	Revise the grains offered to ensure the daily grain minimum requirement is met. Attach a menu reflecting a change of entree listings to demonstrate compliance.
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Site – Level Findings: Holmes Road Elementary School (2343)

1400 – Food Safety	V-1400	The SFA’s food safety plan was not implemented correctly. The reviewer observed an employee handling ready to eat (RTE) foods after handling chemicals without following proper hand washing and glove usage procedures.	Retrain cafeteria staff on proper handling of RTE foods. Attach an agenda and signed roster of trainees as documentation that this training has occurred.
1400 – Food Safety	V-1400	The SFA’s food safety plan was not implemented correctly. While confirming record keeping requirements were met, insects were found in the storage area inside a box of records.	Contact a pest control company for an appointment to spray the affected areas. Attach documentation to demonstrate that the service has occurred.
1400 – Food Safety	V-1400	Temperature logs for selected dates were not available for review. Cooler, freezer, and dry storage logs were not available for review.	Retrain cafeteria staff on proper logging procedures. Attach an agenda and signed roster of trainees as documentation that this training has occurred.
1400 – Food	V-1400	Onsite storage violations	Retrain cafeteria staff on

Safety		were observed. Chemicals were found stored in the dry storage room, which is the same area that has food stored in it.	chemical storage procedures. Attach an agenda and signed roster of trainees as documentation that this training has occurred.
500 – Offer versus Serve	V-0500	On the day of review, Offer versus Serve (OVS) was not implemented correctly at lunch. Students who were not allowed in the meal service line did have the choice of two types of milk. The teachers picking up these meals only selected one type of milk instead of giving a choice of two types of milk. One student was sent back to get another item when they already had a reimbursable tray.	Retrain cafeteria staff and teachers on OVS practices. Attach an agenda and signed roster of trainees as documentation that this training has occurred.

Site – Level Findings: Magnolia Elementary (2470)

1100 – Smart Snacks in School	V-1100	On the day of review, documentation was not available to determine if fundraisers were held during the school day.	Establish a procedure to track fundraisers and attach a prototype of the tracking mechanism.
1400 – Food Safety	V-1400	The SFA’s food safety plan was not properly implemented. Leftover foods were covered with plastic while in ice baths during the cooling process.	Retrain cafeteria staff on proper cooling procedures. Attach an agenda and signed roster of trainees as documentation that this training has occurred.
1400 – Food Safety	V-1400	The SFA’s food safety plan was not properly implemented. On the day of review, the pre-k teacher was observed transporting and preparing trash cans for service before serving food without changing gloves or washing her hands.	Retrain pre-k teacher on proper hand washing and glove usage procedures, or leave the main meal service line open until all students, including Pre-k, have had a chance to receive a meal. Attach an agenda and signed roster of trainees as documentation that this training has occurred.
1400 – Food Safety	V-1400	The SFA’s food safety plan was not properly	Retrain cafeteria staff on the proper transportation of food, or

		implemented. The boats containing a chicken and biscuit were stacked on top of each other instead of being individually wrapped.	Leave the main meal service line open until all students, including Pre-k, have had a chance to receive a meal. Attach an agenda and signed roster of trainees as documentation that this training has occurred.
1400 – Food Safety	V-1400	One temperature log for selected dates were not available and two others were incomplete. No receiving log was available for review. The time and temperature was not recorded on the cooling log to show temps had reached the proper storage temperature. Additionally, thermometer calibration logs indicated that they were not calibrated, but a corrective action plan was not documented.	Retrain cafeteria staff on proper thermometer calibration procedures. Attach an agenda and signed roster of trainees as documentation that this training has occurred.
400 – Meal Components and Quantities – Breakfast	V-0400	On the day of review, the meal component requirements were not met at breakfast. One meal served during the Pre-k meal service time did not include a fruit component. Pre-k students were served in the cafeteria after the main line had closed and meals were administered by the teacher.	Leave the main meal service line open until all students, including Pre-k, have had a chance to receive a meal. Attach documentation from POS to demonstrate an alternative practice.

Site – Level Findings: Mitchell High School (2520)

1400 – Food Safety	V-1400	The SFA’s food safety plan was not properly implemented. The area manager was observed touching ready to eat food with ungloved hands during breakfast service.	Retrain cafeteria staff and area manger on proper bare hand contact procedures. Attach an agenda and signed roster of trainees as documentation that this training has occurred.
1400 – Food Safety	V-1400	Onsite storage violations were observed. Hazardous chemical spray was stored	Retrain cafeteria staff on proper chemical storage.

		in the dry storage area where food was also stored.	Attach an agenda and signed roster of trainees as documentation that this training has occurred.
400 – Meal Components and Quantities – Lunch	V-0400	The minimum daily grain component was not met throughout the lunch meal service. The grain component was not available for the last 15 students through the meal service period.	Retrain cafeteria staff on food substitution procedures when food projections fall short of usage. Attach an agenda and signed roster of trainees as documentation that this training has occurred.
400 – Meal Components and Quantities – Lunch	V-0400	On the day of review, six incomplete meals were observed and counted for reimbursement. Only two of the required three components were taken.	Retrain cafeteria staff on the proper implementation of OVS. Attach an agenda and signed roster of trainees as documentation that this training has occurred.
500 – Offer versus Serve	V-0500	On the day of review, Offer versus Serve (OVS) was not implemented correctly at lunch. Multiple students were sent back to get another item when they already had a reimbursable tray.	Retrain cafeteria staff on the proper implementation of OVS. Attach an agenda and signed roster of trainees as documentation that this training has occurred.

Site – Level Findings: Oakhaven Elementary (2540)

1400 – Food Safety	V-1400	The food safety plan was not properly implemented. Foods were covered with plastic wrap while in ice baths during the cooling process for leftover foods.	Retrain cafeteria staff on proper cooling procedures. Attach an agenda and signed roster of trainees as documentation that this training has occurred.
1400 – Food Safety	V-1400	The SFA’s food safety plan was not properly implemented. Insects were observed in the dry storage area, behind the hot holding unit, and on the floor in the kitchen.	Contact a pest control company for an appointment to spray the affected areas. Attach documentation to demonstrate that the service has occurred.
1400 – Food Safety	V-1400	The SFA’s food safety plan was not properly implemented. The sanitation buckets used to wipe down the counters in the kitchen	Retrain cafeteria staff on proper storage of chemicals. Attach an agenda and signed roster of trainees as

		were kept on the shelves where potatoes and spices were stored.	documentation that this training has occurred.
1400 – Food Safety	V-1400	The written food safety plan was not properly implemented at lunch. The area manager was observed using the same gloves throughout the meal service, which were being kept in his pocket.	Retrain area managers on proper glove usage procedures. Attach an agenda and signed roster of trainees as documentation that this training has occurred.
400 – Meal Components and Quantities – Lunch	V-0400	On the day of review, the portioning of lettuce stated in the standard recipe for the side salad was not being followed. The recipe stated that the lettuce should be portioned out using a #8 scoop and scooping two 1/2 cup portions of lettuce into the clamshell container.	Retrain cafeteria staff on the importance of following a standard recipe. Attach an agenda and signed roster of trainees as documentation that this training has occurred.
800 – Civil Rights	V-0800	On the day of review, students were segregated by gender during the lunch meal service period. Students considered to have behavior issues were required to sit boy-girl. If the students were considered to have good behavior, they were required to sit at a table by gender.	Train school personnel on allowable meal seating models. Attach the training agenda and signed roster of trainees as well as a statement from school administration indicating that this procedure has been discontinued.

Site – Level Findings: Shady Grove Elementary (2640)

1400 – Food Safety	V-1400	Temperatures of cold ready to eat menu items were not being recorded. The food safety plan states that ready to eat foods should be held at 41 degrees or lower.	Retrain cafeteria staff on proper logging procedures. Attach an agenda and signed roster of trainees as documentation that this training has occurred.
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