



**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

January 5, 2017

Mr. Jack Vuylsteke, Director  
Memphis Rise Academy  
5130 Raliegth Lagrange Road  
Memphis, TN 38134

Dear Mr. Vuylsteke:

Please find attached the summary review of findings from the School Nutrition Program's 2016-17 fiscal year administrative review of Memphis Rise Academy's National School Lunch Program and School Breakfast Program. This review was conducted the week of December 12, 2016, with the exit date of December 15, 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.

All corrective actions for Memphis Rise Academy shall be documented, supported, and listed in the "Compliance" section in TMAC no later than February 3, 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 Memphis Rise Academy'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

**Memphis Rise Academy (C313)**

**Review ID: 1153**

**Exit Conference Date: 12/15/2016**

Review Year: 2017

Month of Review: October

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 local school wellness policy requirements were not met. The reviewed policy did not include a description of public involvement, public updates, policy leadership, or an evaluation plan. The Healthy, Hunger-Free Kids Act of 2010 added new provisions for local school wellness policies related to implementation, evaluation, and public reporting on progress of local school wellness policies.	Visit <a href="https://www.fns.usda.gov/tn/local-school-wellness-policy">https://www.fns.usda.gov/tn/local-school-wellness-policy</a> to review required content, and revise the local school wellness policy to include the required content.  Attach the revised policy to demonstrate compliance with the minimum requirements.
1200 - Professional Standards	V-1200	The school nutrition program director did not meet the required food safety training requirement. The Healthy, Hunger-Free Kids Act of 2010 (HHFKA) requires new program directors to receive at least eight hours of food safety training within 30 days of the employee's start date.	Complete an eight hour food safety training before the end of the school year.  Attach a certificate of completion to demonstrate compliance with the professional standards final rule.
1200 -	V-1200	The school nutrition	Research additional training opportunities and

Professional Standards		program director did not meet the required annual training hours, nor was a plan available to obtain the required hours. The Healthy, Hunger-Free Kids Act of 2010 (HHFKA) requires program directors to receive 12 hours of training annually, but the director had only received eight hours.	create a plan for the school nutrition program director to receive an additional four hours of training before the end of the school year.  Attach the plan to demonstrate compliance with the professional standards final rule.
1600 - School Breakfast and SFSP Outreach	V-1600	School administration had not decided whether meals would be served in the summer of 2017, and no plans were available to communicate the availability and locations of free meals via the Summer Food Service Program (SFSP).	Contact the Shelby County department of nutrition services to establish a connection with potential SFSP sites, and create a plan to inform families about the availability of free meals.  Attach documentation of the connection and the plan to communicate with families to demonstrate compliance with the SFSP outreach requirement.
300 - Meal Counting and Claiming	V-0300	The school food authority (SFA) was not following their state approved application. The application was approved to serve grades 9 through 12, but was only serving grades 6 through 8.	Revise the site application in the Tennessee: Meals, Accounting, and Claiming system (TMAC) to reflect current operations, and submit for approval.
Resource Management Comprehensive Review	V-RMCRF	The management requirements of the nonprofit school food service account were not met. 7 CFR 210.14(f) requires all revenue from the sale of nonprogram foods to accrue to the nonprofit school food service account. The revenue generated from the sale of adult meals was being held by the point of sale (POS) vendor and had	Contact the POS vendor and establish an appropriate deposit schedule.  Attach the agreed upon schedule and proof that the adult meal revenue from August through December has been deposited.

		not been deposited into the food service account.	
Resource Management Comprehensive Review	V-RMCRF	The adult meal price charged at lunch was not sufficient to cover the overall cost of the meal. \$3.15 was being charged, but \$3.22 should be charged based on the calculation outlined in FNS Instruction 782-5 Rev. 1.	Increase the adult meal price charged at lunch and attach documentation to demonstrate compliance.
Resource Management Comprehensive Review	V-RMCRF	The SFA did not assess its compliance with the revenue from nonprogram food requirements in 7 CFR 210.14(f). SFAs are required to determine if the percent of total revenue that is generated from their nonprogram food sales is equal to or greater than the percent of total food costs that are attributable to the SFA's purchase of nonprogram foods.	Complete the nonprogram revenue calculator found at <a href="http://www.tn.gov/education/article/snp-revenue-from-non-program-foods">http://www.tn.gov/education/article/snp-revenue-from-non-program-foods</a>  Attach a completed calculator to demonstrate compliance.

**Site - Level Findings: Memphis Rise Academy (8264)**

1400 - Food Safety	V-1400	The SFA's food safety plan was not implemented. The employees transporting breakfast food from the preparation area opened the exterior doors to the eighth grade building with their gloves on and then began serving ready-to-eat foods. The food safety plan requires employees to wash hands and change gloves anytime contamination of a glove might have occurred, specifically after touching	Retrain cafeteria staff on the hand washing and glove usage SOP.  Attach an agenda and signed roster of trainees as documentation that this training has occurred.
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		equipment (such as doors) that has not been cleaned or sanitized.	
400 - Meal Components and Quantities - Breakfast	V-0400	The production records from the review period did not properly indicate how substitutions contributed to the meal pattern. 7 CFR 220.8 requires production records to show how the meals offered contribute to the required food components and food quantities for each age/grade group every day. When the planned menu item ran out, a notation was written that another item was pulled from stock. However, the product used was not specifically identified.	Retrain cafeteria staff how to properly complete production records when food is substituted for the planned menu items.  Attach an agenda and signed roster of trainees as documentation that this training has occurred. Also, attach a breakfast production record that properly documents a substituted food.
400 - Meal Components and Quantities - Lunch	V-0400	The production records from the review period did not properly indicate how substitutions contributed to the meal pattern. 7 CFR 210.10 requires production records to show how the meals offered contribute to the required food components and food quantities for each age/grade group every day. When the planned menu item ran out, a notation was written that another item was pulled from stock. However, the product used was not specifically identified.	Retrain cafeteria staff how to properly complete production records when food is substituted for the planned menu items.  Attach an agenda and signed roster of trainees as documentation that this training has occurred. Also, attach a lunch production record that properly documents a substituted food.
500 - Offer versus Serve	V-0500	Offer versus Serve was not implemented correctly. On the day of review, the	Retrain cafeteria staff on offer versus serve.  Attach an agenda and signed roster of trainees as

		<p>cashier in the eighth grade building was forcing students to take milk at breakfast. Under OVS, the student must select three food items, including at least 1/2 cup of fruit or vegetables, to have a reimbursable breakfast.</p>	<p>documentation that this training has occurred.</p>
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