



**STATE OF TENNESSEE
DEPARTMENT OF HUMAN SERVICES**

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July 9, 2019

Calvin Johnson, Director of School Operations
Shelby County School System
1212 Vollintine Avenue
Memphis, Tennessee 38107-2826

Dear Mr. Johnson,

The Department of Human Services (DHS) - Division of Audit Services staff conducted an unannounced on-site monitoring review of the Child and Adult Care Food Program (CACFP) at Shelby County School System (Sponsor), Application Agreement number 00069 on April 29-May 3, 2019. The purpose of this review was to determine if the Sponsor complied with *Title 7 of the Code of Federal Regulations* (CFR) applicable parts, provider agreement, and applicable Federal and State regulations.

Background

CACFP Sponsors utilize meal count sheets to record the number of breakfast, lunch, supper, and supplement meals served. Meals served by participating Sponsors must meet the minimum guidelines set by the United States Department of Agriculture (USDA) and DHS to be eligible for reimbursement. The CACFP Sponsor reports the number of meals served through the DHS Tennessee Information Payment System (TIPS) for reimbursement.

We inspected meal count sheets for our test period and reconciled the meals claimed to the meals reported as served for each meal service. We also assessed compliance with civil rights requirements and observed select meal services at the sample feeding sites.

Three types of programs were evaluated during our test month of November 2018- Childcare Centers, Head Start Programs, and At- Risk Sites. Our sample included one Childcare Center, twelve Head Start Programs, and twenty At- Risk Sites.

Our review of the three programs operated by the Sponsor for the review period disclosed the following:

Child Care Center

Based on our review of the Sponsor's records and information provided, there was one Child Care Center in operation during the review month of November 2018, **Johnnie B. Watson Daycare 0932**. Records were reconciled for this site. We observed a lunch meal service on November 13, 2018.

Our review of the Sponsor's records for the Child Care Center for November 2018 disclosed the following:

1. The Sponsor reported the number of participants in the free category incorrectly

Condition

Based on our review of the Claim for Reimbursement for the test month, the Sponsor reported 37 participants in the free category, zero participants in the reduced-price category, and zero participants in the paid category. However, based on our review of the records available, we found there were 32 participants in the free category, zero participants in the reduced-price category, and zero participants in the paid category. The difference was based on the following:

There were five participants reported in the free category who were listed and counted twice on the attendance roster. This is a reporting error. As a result, the Sponsor over reported the free category by five.

Criteria

Title 7 of the Code of Federal Regulations, Section 226.10(c) states, "...In submitting a Claim for Reimbursement, each institution shall certify that the claim is correct and that records are available to support that claim..."

Recommendation

The Sponsor should ensure the number of participants is reported accurately and based on supporting documentation.

2. The Sponsor provided a menu that did not meet USDA meal pattern requirements

Condition

Based on our review of the menus provided by the Sponsor for the test month, one lunch menu did not meet the USDA meal pattern requirements. The lunch menu provided for November 27, 2018, listed roasted turkey with gravy, turnip greens, sweet potatoes, chilled fruit cocktail, and milk. The menu did not list a grain component. The Sponsor documented 11 lunch meals served.

As a result, 11 lunch meals claimed for reimbursement were disallowed.

Criteria

Title 7 of the Code of Federal Regulations, Section 226.20(c)(2) states, "Fluid milk, meat and meat alternatives, vegetable, fruits, and grains are required components in the lunch and supper meals."

Title 7 of the Code of Federal Regulations, Section 226.17(b)(4) states, "Each child care center participating in the Program shall claim only the meal types specified in its approved application in accordance with the meal pattern requirements specified in §226.20..."

Recommendation

The Sponsor should ensure menus meet the meal patterns established by the USDA.

3. The Sponsor provided infant menus that did not meet USDA meal pattern requirements

Condition

Based on a review of the infant menus provided by the Sponsor for the test month, USDA meal patterns were not met. The infant menus provided listed the following deficiencies.

Infant CF, 6 months

Date(s)	Missing Component	Type and number served
11/01, 11/02, 11/19, 11/20, 11/28, 11/29, 11/30	IFIC/ Meat/ Meat Alternate	7 Lunch Meals
11/02, 11/06, 11/07, 11/08, 11/09, 11/13, 11/14, 11/19, 11/20, 11/28, 11/29, 11/30	Fruit/Vegetable	12 P.M. Supplements

Infant KM, 7 months

Date(s)	Missing Component	Type and number served
11/07	IFIC/ Meat/ Meat Alternate	1 Lunch Meal
11/06, 11/07, 11/09	Fruit/Vegetable	3 P.M. Supplements

Infant KC, 8 months

Date(s)	Missing Component	Type and number served
11/01, 11/15, 11/19, 11/26, 11/27, 11/29	IFIC/ Meat/ Meat Alternate	6 Lunch Meals (meals are disallowed)
11/06, 11/13, 11/15, 11/19, 11/26, 11/27, 11/29	Fruit/Vegetable	7 P.M. Supplements
11/01	Bread/ Cracker/ IFIC	1 P.M. Supplement

Infant TG, 7 months

Date(s)	Missing Component	Type and number served
11/01, 11/02, 11/08, 11/09, 11/19, 11/20, 11/26, 11/29, 11/30	IFIC/ Meat/ Meat Alternate	9 Lunch meals
11/02, 11/05, 11/06, 11/08, 11/09, 11/13, 11/15, 11/19, 11/20, 11/26, 11/29, 11/30	Fruit/Vegetable	12 P.M. Supplements
11/01	Bread/ Cracker/ IFIC	1 P.M. Supplement

Infant KP, 10 months

Date(s)	Missing Component	Type and number served
11/01, 11/29	IFIC/ Meat/ Meat Alternate	2 Lunch meals (meals are disallowed)
11/05, 11/06, 11/07, 11/09, 11/14, 11/29	Fruit/Vegetable	6 P.M. Supplements

Infant SL, 11 months

Date(s)	Missing Component	Type and number served
11/06, 11/07, 11/08, 11/09, 11/13, 11/16	Fruit/Vegetable	6 P.M. Supplements
11/01	IFIC/ Meat/ Meat Alternate	1 Lunch meal (meal disallowed)
11/01	Bread/ Cracker/ IFIC	1 P.M. Supplement

Infant JR, 11 months

Date(s)	Missing Component	Type and number served
11/01	IFIC/ Meat/ Meat Alternate	1 Lunch meals (meal disallowed)
11/01	Bread/ Cracker/ IFIC	1 P.M. Supplement

As a result, 10 lunch meals claimed for reimbursement were disallowed.

Due to the new CACFP meal pattern requirements and emphasis on providing technical assistance during the implementation process, there were no meals disallowed for meal pattern requirements effective October 2017. The meals detailed above as disallowed are in accordance with requirements prior to October 2017.

Criteria

Title 7 of the Code of Federal Regulations, Section 226.17(b)(4) states, "Each child care center participating in the Program shall claim only the meal types specified in its approved application in accordance with the meal pattern requirements specified in §226.20 ..."

Title 7 of the Code of Federal Regulations, Section 226.20 (b) states in part, "... Infant meals-(1) Feeding infants. Foods in reimbursable meals served to infants ages birth through 11 months must be of a texture and a consistency that are appropriate for the age and development of the infant being fed. Foods must also be served during a span of time consistent with the infant's eating habits."

Title 7 of the Code of Federal Regulations, Section 226.20 (4)(2)(a) states in part, "...Infant meals must have, at a minimum, each of the food components indicated, in the amount that is appropriate for the infant's age.... Breakfast, lunch, or supper. Six to 8 fluid ounces of breastmilk or iron-fortified infant formula, or portions of both; and 0 to 4 tablespoons of iron-fortified dry infant cereal, meat, fish, poultry, whole egg, cooked dry beans, or cooked dry peas; or 0 to 2 ounces (weight) of cheese; or 0 to 4 ounces (volume) of cottage cheese; or 0 to 4 ounces of yogurt; and 0 to 2 tablespoons of vegetable, fruit, or portions of both. Fruit juices and vegetable juices must not be served. Snack. Two to 4 fluid ounces of breastmilk or iron-fortified infant formula; and 0 to 1/2 slice bread; or 0-2 crackers; or 0-4 tablespoons infant cereal or ready-to-

eat cereals; and 0 to 2 tablespoons of vegetable or fruit, or portions of both. Fruit juices and vegetable juices must not be served. A serving of grains must be whole grain-rich, enriched meal, or enriched flour."

Recommendation

The Sponsor should ensure the infant menus meet the meal patterns established by the USDA.

4. The Sponsor did not complete monitoring as required for the sponsored child care center

Condition

The monitoring documentation for the sponsored child care center revealed the following deficiencies:

Johnnie B. Watson Day Care

Monitoring was documented as completed 2/01/18 (unannounced), 10/24/18 (unannounced) and 04/20/18 (unannounced). The 2/01/18 monitoring visit form does not have a 5-day reconciliation completed. The 10/24/18 monitoring visit form does not have the 5-day reconciliation completed for the lunch and supplements. Only the breakfast meal was completed. The 04/20/18 monitoring form does not have the 5-day reconciliation completed for the lunch and snack. Only the breakfast meal was done. Each meal service must be reconciled.

Criteria

Title 7 of the Code of Federal Regulations, Section 226.16(d)(4)(ii) states " Reconciliation of meal counts. Reviews must examine the meal counts recorded by the facility for five consecutive days during the current and/or prior claiming period. For each day examined, reviewers must use enrollment and attendance records (except in those outside-school-hours care centers, at-risk afterschool care centers, and emergency shelters where enrollment records are not required) to determine the number of participants in care during each meal service and attempt to reconcile those numbers to the numbers of breakfasts, lunches, suppers, and/or snacks recorded in the facility's meal count for that day. Based on that comparison, reviewers must determine whether the meal counts were accurate."

Recommendation

The Sponsor should ensure monitoring stipulations are met and the monitoring forms are completed in their entirety.

5. The Sponsor's CACFP training documentation for the sponsored child care center did not include key staff on the attendance roster

Condition

According to the training roster, the site supervisor listed in TIPS was not listed as being trained. It is mandatory that key staff attend annual training. If the site supervisor has changed, it should be updated in TIPS.

Criteria

Title 7 of the Code of Federal Regulations, Section 226.16 (c)(3) states, "Additional mandatory training sessions for key staff from all sponsored child care and adult day care facilities not less frequently than annually. At a minimum, such training must include instruction, appropriate to the level of staff experience and duties, on the Program's meal patterns, meal counts, claims submission and review procedures, recordkeeping requirements, and reimbursement system. Attendance by key staff, as defined by the State agency, is mandatory;"

Recommendation

The Sponsor should ensure that key staff from each sponsored facility receives training.

Note: Our observation of the lunch meal service on November 13, 2018, revealed no deficiencies.

Head Start

Based on our review of the Sponsor's records and information provided, the Sponsor had 75 head start (HS) feeding sites in operation during the review period. Twelve sites, **Belle Forest #1 0938, Berclair 0941, Bethel Grove 0943, Cherokee #1 0986, Doubletree 1009, Newberry Elem 1657, Oak Forest #1 1142, Oakshire 1094, Peabody 107, Riverview Elem 1658, Snowden 1074, and Wellstation 1120** were selected as sample sites and site visits were conducted in November 2018.

Our review of the Sponsor's records for November 2018 disclosed the following:

6. The Sponsor reported meal counts incorrectly

Condition

Based on our review of the Claim for Reimbursement for the test month for Shelby County School System's Head Start program, the Sponsor reported 41,584 supplements served. However, based on our review of available documents, we found there were 41,541 supplements served, prior to any meal disallowances. The difference is based on the following:

Site	Meal	Claimed	Validated	Difference
Bell Forest #1	Supplement	533	501	-32
Berclair	Supplement	531	530	-1
Cherokee #1	Supplement	473	472	-1
Doubletree	Supplement	775	772	-3
Newberry Elem	Supplement	275	274	-1
Oakforest #1	Supplement	696	693	-3
Peabody	Supplement	283	281	-2
Riverview Elem	Supplement	179	178	-1
Wellstation	Supplement	771	772	+1

As a result, 43 supplements claimed for reimbursment were over reported.

Criteria

Title 7 of the Code of Federal Regulations, Section 226.10(c) states, "...In submitting a Claim for Reimbursement, each institution shall certify that the claim is correct and that records are available to support that claim..."

Recommendation

The Sponsor should ensure claims for reimbursement are completed correctly and based on accurate supporting documents.

7. The Sponsor reported an incorrect number of meals from observed meal services

Condition

During the site visits in the month of November 2018, the monitor observed meal services at all of the head start site visits. The monitor informed the site of the number of meals eligible for reimbursement at the end of each visit. However, the Sponsor's documentation revealed a different number of meals had been claimed at some of the sites. The monitor noted the following differences:

Site	Date	Meal	Claimed	Observed	Difference
Belle Forest #1	11/08/18	Supplement	20	42	+22
Berclair	11/06/18	Supplement	34	35	+1
Cherokee #1	11/06/18	Supplement	30	34	+4
Doubletree	11/05/18	Supplement	48	51	+3
Oak Forest #1	11/15/18	Supplement	34	38	+4
Wellstation	11/13/18	Supplement	53	55	+2

As a result, 36 supplements were underreported.

Criteria

Title 7 of the Code of Federal Regulations, Section 226.10 (c) states in part "...In submitting a Claim for Reimbursement, each institution shall certify that the claim is correct and that records are available to support that claim..."

Recommendation

The Sponsor should ensure the meals reported agree with the actual meals served during the approved meal service time.

8. The Sponsor reported the number of attendance days incorrectly

Condition

The Sponsor reported attendance incorrectly for the following sites:

The claim for reimbursement for the test month of November 2018 reported 6,493 attendance days total for the 12 sample sites. However, our review of the Sponsor's documentation verified 6,453 attendance days. The difference is based on the following:

- The Sponsor reported 686 participant days for **Belle Forest #1**. However, we found there were 685 participant days.
- The Sponsor reported 577 participant days for **Berclair**. However, we found there were 576 participant days.
- The Sponsor reported 529 participant days for **Bethel Grove**. However, we found there were 530 participant days.
- The Sponsor reported 537 participant days for **Cherokee #1**. However, we found there were 535 participant days.
- The Sponsor reported 836 participant days for **Doubletree**. However, we found there were 837 participant days.
- The Sponsor reported 295 participant days for **Newberry Elem**. However, we found there were 282 participant days.
- The Sponsor reported 806 participant days for **Oak Forest**. However, we found there were 810 participant days.
- The Sponsor reported 551 participant days for **Oakshire**. However, we found there were 552 participant days.
- The Sponsor reported 205 participant days for **Riverview Elem**. However, we found there were 195 participant days.
- The Sponsor reported 898 participant days for **Wellstation**. However, we found there were 878 participant days.

This is a repeat finding from the report dated July 14, 2017.

Criteria

Title 7 of the Code of Federal Regulations, Section 226.10(c) states, "...In submitting a Claim for Reimbursement, each institution shall certify that the claim is correct and that records are available to support that claim..."

Recommendation

The Sponsor should ensure all participants are accurately recorded and reported for the days of attendance.

9. The Sponsor did not complete monitoring as required for sponsored Head Start sites

Condition

The monitoring documentation for the Head Start sample sites revealed the following deficiencies:

Berclair

Monitoring was documented as being completed on 4/19/18 unannounced, 9/04/18 unannounced, and 3/01/19 unannounced. During the monitoring visit on 4/19/18, all classrooms were not monitored according to the documentation provided. The five-day meal count reconciliation only included the classroom monitored. This resulted in an inaccurate meal count and five-day meal count reconciliation being completed for the visit.

Oak Forest #1

Monitoring was documented as being completed on 11/30/18 unannounced, 9/10/18 unannounced, and 3/21/18 unannounced. During the monitoring visit on 3/21/18, all classrooms were not monitored according to the documentation provided. The five-day meal count reconciliation only included the classroom monitored. This resulted in an inaccurate meal count and five-day meal count reconciliation being completed for the visit.

Cherokee #1

Monitoring was documented as being completed on 4/24/18 unannounced, 10/23/18 unannounced, and 1/15/19 unannounced. During the monitoring visit on 4/24/18, all classrooms were not monitored according to the documentation provided. The five-day meal count reconciliation only included the classroom monitored. This resulted in an inaccurate meal count and five-day meal count reconciliation being completed for the visit.

Bethel Grove

Monitoring was documented as being completed on 04/03/18 (unannounced), 10/23/18 (unannounced), and 01/15/19 (unannounced). During the monitoring visit on 04/03/18, all classrooms were not monitored according to the documentation provided. The five-day meal count reconciliation only included the classroom monitored. This resulted in an inaccurate meal count and five-day meal count reconciliation being completed for the visit.

Snowden

Monitoring was documented as being completed on 04/18/18 (unannounced), 11/06/18 (unannounced), and 02/13/19 (unannounced). Six months elapsed between the 04/18/18 and 11/06/18 more than six months elapsed. Additionally, there was no five day reconciliation completed by the Sponsor for the monitoring visit documented on 11/06/18.

Peabody

Monitoring was documented as being completed on 02/15/18 (unannounced) and 09/12/18 (unannounced). There were only two monitoring visits conducted in the previous 12 months. Additionally, six months elapsed between the two documented visits and another six months

has elapsed since the last documented monitoring visit.

Oakshire

Monitoring was documented as being completed on 12/14/17 (unannounced), 09/21/18 (unannounced), and 01/10/19 (unannounced). Six months elapsed between the 12/14/17 and 09/21/18 monitoring visits. Additionally, during the monitoring visit conducted on 12/14/17, all classrooms were not monitored according to the documentation provided. This resulted in an inaccurate meal count and five-day meal count reconciliation being completed for the visit.

Riverview Elem

Monitoring was documented as being completed on 01/08/18 (unannounced) and 08/29/18 (unannounced). There were only two monitoring visits conducted in the previous 12 months. Additionally, six months elapsed between the two documented visits, and another six months has elapsed since the last documented monitoring visit. On the monitoring visit documented on 01/08/18, there was no five-day reconciliation completed by the Sponsor.

Newberry Elementary

Monitoring was documented as being completed on 11/27/17 unannounced, 09/21/18 unannounced, and 2/28/19 unannounced. Six months elapsed between the 11/27/17 and the 09/21/18 monitoring visits. Additionally, on the monitoring conducted on 11/27/17, only three days were completed on the five-day meal reconciliation completed by the Sponsor.

Criteria

Title 7 of the Code of Federal Regulations, Section 226.16(d)(4)(iii) states, "Sponsoring organizations must review each facility three times each year, except as described in paragraph (d)(4)(iv) of this section. In addition: (A) At least two of the three reviews must be unannounced; (B) At least one unannounced review must include observation of a meal service; (C) At least one review must be made during each new facility's first four weeks of Program operations; and (D) Not more than six months may elapse between reviews."

Title 7 of the Code of Federal Regulations, Section 226.16(d)(4)(ii) states " Reconciliation of meal counts. Reviews must examine the meal counts recorded by the facility for five consecutive days during the current and/or prior claiming period. For each day examined, reviewers must use enrollment and attendance records (except in those outside-school-hours care centers, at-risk afterschool care centers, and emergency shelters where enrollment records are not required) to determine the number of participants in care during each meal service and attempt to reconcile those numbers to the numbers of breakfasts, lunches, suppers, and/or snacks recorded in the facility's meal count for that day. Based on that comparison, reviewers must determine whether the meal counts were accurate."

Recommendation

The Sponsor should ensure monitoring stipulations are met and the monitoring forms are completed in their entirety and ensure the monitoring plans are followed according to the management plan.

10. Participants at Sponsored sites had missing or expired enrollment information

Condition

Based on our review of the Sponsor's available records, we noted that there were participants' files that missing or expired enrollment information at the following sites:

Wellstation

There was one participant whose enrollment information was not dated, and there was one participant with an enrollment form that was not completed in its entirety with the required information.

Riverview Elem

There was one participant who did not have enrollment information on file.

Cherokee #1

There was one participant whose enrollment information was not dated.

Doubletree

There was one participant whose enrollment information was dated more than one year ago.

Criteria

Title 7 of the Code of Federal Regulations, Section 226.17(b)(8) states in part, "...In addition, Head Start participants need only have a Head Start statement of income eligibility, or a statement of Head Start enrollment from an authorized Head Start representative, to be eligible for free meal benefits under the CACFP. Such documentation of enrollment must be updated annually, signed by a parent or legal guardian, and include information on each child's normal days and hours of care and the meals normally received while in care."

Recommendation

The Sponsor should ensure enrollment information is on file for all participants and the enrollment information is completed accurately and updated annually.

11. Standard meal pattern requirements were not met during meal observations

Condition

Belle Forest #1

During the observation of a supplement service on November 08, 2018 the menu consisted of Belly Bears and 100% juice. There were two participants in one classroom who did not take both components. The site was informed those meals were not reimbursable and should not be claimed. As a result, two supplement meals were disallowed.

Snowden

During the observation of supplement service on November 13, 2018, the menu consisted of whole grain cereal and milk. There were four participants who did not receive milk with their supplement. The reasons given were: a food allergy, congestion, and a participant just did not want the milk. Technical assistance was given to the site on providing an acceptable

substitution. The site was also informed the meals could not be claimed for reimbursement. No associated meal cost was disallowed due to the Sponsor not claiming the insufficient meals.

Criteria

Title 7 of the Code of Federal Regulations, Section 226.17(b)(4) states, "Each child care center participating in the Program shall claim only the meal types specified in its approved application in accordance with the meal pattern requirements specified in §226.20 ..."

Recommendation

The Sponsor should ensure all prepared and served meals meets the meal patterns established by the USDA.

12. The number of operational days was reported for one site incorrectly

Condition

The Sponsor reported 16 days of operation for **Oak Forest**, however, according to the documentation provided the site operated 15 days.

Criteria

Title 7 of the Code of Federal Regulations, Section 226.10(c) states, "...In submitting a Claim for Reimbursement, each institution shall certify that the claim is correct and that records are available to support that claim..."

Recommendation

The Sponsor should ensure the number of operational days is reported accurately and based on supporting documentation.

Note: Our site visits to **Berclair, Bethel Grove, Cherokee #1, Doubletree, Newberry Elem, Oak Forest #1, Oakshire, Peabody, Riverview, and Wellstation** revealed no significant deficiencies.

At-Risk

There were 170 At- Risk Sites in operation during the test month of November 2018. Twenty sites, **Arrow Academy 0999, Aurora Collegiate Academy 1177, Bert Ferguson CC 1998, Binghampton Christian Academy 1003, Bluff City High School 1980, Bolton High School 2008, Cunningham CC 1275, Davis CC 1283, Douglass Community Center 1669, First Baptist Church 1305, Gaisman CC 0948, Glenview CC 1719, Grahamwood Elementary-Chinese Aftercare 1674, Hickoryhill CC 0966, Kingsbury High 1274, Kirby Middle School 1051, Leadership Prep 1027, Libertas School of Memphis 1653, New Hickory Hill MBC 1673, and Robert R. Church Elementary ELOP 1197**, were selected as sample sites. In addition, we conducted a follow-up visit at **Binghampton Hampton Christian Academy 1003** on April 25, 2019.

In addition, we attempted a meal service observation at **Havenview Middle 1971, Ed Rice CC 1707, Dexter Middle 1052, and NCC- Chickasaw 1273**. Although TIPS showed these sites

were in operation, they were closed and no claim for reimbursement was submitted for the test month.

Our review of the Sponsor's records for November 2018 disclosed the following:

13. The Sponsor reported meal counts incorrectly

Condition

Based on our review of the Claim for Reimbursement for the test month for Shelby County School System, the Sponsor reported 44,365 supplements and 110,069 supper meals served. However, based on our review of available documents, we found there were 44,365 supplements and 110,078 supper meals served, prior to any meal disallowances. The difference is based on the following:

The Sponsor reported 807 supper meals served for the **Douglass Community Center**. However, we found that there were 816 supper meals.

As a result, nine (9) supper meals were underreported.

Criteria

Title 7 of the Code of Federal Regulations, Section 226.10(c) states, "... In submitting a Claim for Reimbursement, each institution shall certify that the claim is correct and that records are available to support that claim...."

Recommendation

The Sponsor should ensure claims for reimbursement are completed correctly and based on accurate supporting documents.

This is a repeat finding from the report dated July 14, 2017.

14. The Sponsor reported an incorrect number of meals from an observed meal service

Condition

On November 26, 2018, a DHS program monitor observed a supplement at **Glenview CC**. The monitor observed 16 supplements served during the approved meal service from 4:30 pm until 5:00 pm. However, the Sponsor reported a total of 35 supplements being served.

As a result, the cost reimbursement for 19 supplements claimed for reimbursement was disallowed.

Criteria

Title 7 of the Code of Federal Regulations, Section 226.10 (c) states in part "...In submitting a Claim for Reimbursement, each institution shall certify that the claim is correct and that records are available to support that claim...."

Recommendation

The Sponsor should ensure the meals reported agree with the actual meals served during the approved meal service time.

15. The Sponsor reported the number of attendance days incorrectly

Condition

The claim for reimbursement for the test month of November 2018 reported 10,395 attendance days total for the 20 sample sites. However, our review of the Sponsor's documentation verified 10,414 attendance days. The difference is based on the following:

- The Sponsor reported 516 participant days for **Bert Ferguson CC**. However, we found there were 520 participant days.
- The Sponsor reported 326 participant days for **First Baptist Church**. However, we found there were 338 participant days.
- The Sponsor reported 431 participant days for **Kingsbury High**. However, we found there were 434 participant days.

Criteria

Title 7 of the Code of Federal Regulations, Section 226.10(c) states, "...In submitting a Claim for Reimbursement, each institution shall certify that the claim is correct and that records are available to support that claim."

Recommendation

The Sponsor should ensure attendance for participants is reported and recorded accurately and based on supporting documentation.

16. The Sponsor did not complete monitoring as required for sponsored at-risk sites

Condition

The monitoring documentation for the sample sites revealed the following deficiencies:

Arrow Academy

Monitoring was documented as being completed 05/09/18 (unannounced), 10/30/18 (unannounced) and 11/28/18 (unannounced). The Sponsor did not complete five previous operating days on any of the 5 day reconciliations; only one meal type reconciled on 05/09/18 and 11/28/18.

Aurora Collegiate Academy

Monitoring was documented as being completed 05/03/18(unannounced), 08/23/18 (unannounced), and 02/20/19(unannounced). Sponsor did not complete five previous operating days on any of the 5 day reconciliations.

Bert Ferguson CC

Monitoring was documented as being completed 07/02/18(SFSP Site Review) and 10/08/18(unannounced). Only one meal type reconciled on 10/08/18. More than six months elapsed since the last review dated 10/08/18.

Binghampton Christian Academy

Monitoring was documented as being completed 03/27/18 (unannounced), 6/11/18 (SFSP Site Review), 02/05/19 (unannounced), and 02/26/19 (not specified). On the 5 day reconciliation, only two days completed and monitor included observation day on the form dated 2/26/19. Only one day completed for 5 day reconciliation on the form dated 2/05/19. More than six months elapsed between reviews dated 06/11/18 and 02/05/19.

Bluff City High School

Monitoring was documented as being completed 11/28/18 (unannounced), 02/25/19 (unannounced), and 03/05/19 (unannounced). First, visit not completed within the first four weeks of operation. Only one meal type reconciled on 5 day reconciliation for all three dates listed. The Sponsor did not complete five previous operating days on any of the 5 day reconciliations.

Bolton High School

Monitoring was documented as being completed 12/12/18 (unannounced) and 02/01/19(unannounced). The Sponsor did not complete five previous operating days on any of the 5 day reconciliations.

Cunningham CC

Monitoring was documented as being completed 03/01/18 (unannounced), 04/16/18 (unannounced), and 06/25/18(SFSP Site Review). More than six months elapsed since the last review dated 06/25/18.

Davis CC

Monitoring was documented as being completed 07/12/18(SFSP Site Review), 12/04/18(unannounced), and 02/14/19(unannounced). Only one meal type reconciled on form dated 12/04/18. The Sponsor did not complete five previous operating days on any of the 5 day reconciliations.

Douglass Community Center

Monitoring was documented as being completed 04/09/18 (unannounced), 05/07/18 (unannounced), 6/20/18 (SFSP Site Review) and 02/19/19 (unannounced). Only one meal type reconciled on form dated 02/19/19 and 04/09/18. The Sponsor did not complete five previous operating days of the 5 day reconciliation on 2/19/19.

First Baptist Church

Monitoring was documented as being completed 05/03/18 (unannounced), 06/04/18(SFSP Site Review), and 02/04/19 (unannounced). Only one meal type reconciled on form dated 05/03/18. The Sponsor did not complete 5 day reconciliation on 02/04/19.

Gaisman CC

Monitoring was documented as being completed 03/19/18 (unannounced), 05/08/18 (unannounced), 06/26/18 (SFSP), 01/24/19 (unannounced), and 03/04/19 (unannounced). More than six months elapsed between 6/26/18 and 1/24/19 monitoring. Only one meal type reconcile on form dated 05/08/18. The Sponsor did not complete five previous operating days of the 5 day reconciliation on 03/19/18, 01/24/19, and 03/04/19.

Glenview CC

Monitoring was documented as being completed 10/11/18 (unannounced), 01/10/19 (unannounced) and 02/25/19 (unannounced). The Sponsor did not complete five previous operating days of the 5 day reconciliation on 1/10/19 and 2/25/19.

Grahamwood Elementary- Chinese Aftercare

Monitoring was documented as being completed 02/07/18 (unannounced), 02/14/18 (unannounced), and 02/12/19 (unannounced). More than six months elapsed between reviews dated 02/14/18 and 02/12/19. Sponsor included day of meal observation on 5 day reconciliation forms dated 02/14/18 and 02/12/19.

Hickoryhill CC

Monitoring was documented as being completed 06/25/18(SFSP Site Review), 10/30/18 (unannounced), and 11/07/18(regular visit not specified if announced or unannounced). Only one meal reconciled on form dated 10/30/18. The Sponsor did not complete five previous operating days for 5 day reconciliation on 11/7/18.

Kingsbury High

Monitoring was documented as being completed 03/07/18(unannounced) and 10/31/18 (not specified). Only one meal type reconciled on form dated 03/07/18. More than six months elapsed between reviews. Sponsor provided only two monitoring reviews.

Kirby Middle School

Monitoring was documented as being completed 08/20/18 (unannounced). Sponsor provided only one monitoring review. More than six months elapsed since the last review. The sponsor did not complete five previous operating days on the 5 day reconciliation.

Leadership Prep

Monitoring was documented as being completed 02/14/18 (unannounced), 05/18/18 (unannounced) and 11/15/18 (follow-up not specified if announced or unannounced). Only one meal type reconciled on form dated 02/14/18. Sponsor included an observed meal in 5 day

reconciliation on form dated 02/14/18. The Sponsor did not complete five previous operating days on any of the 5 day reconciliations provided.

Libertas School of Memphis

Monitoring was documented as being completed 11/15/18 (unannounced), 01/16/19 (unannounced) and 02/25/19 (unannounced). The Sponsor did not complete five previous operating days of the 5 day reconciliation on 01/16/19 and 02/25/19. Sponsor included an observed meal in 5 day reconciliation on form dated 01/16/19.

New Hickory Hill MBC

Monitoring was documented as being completed 02/18/18(unannounced), 06/14/18(SFSP Site Review), 12/13/18(unannounced), and 03/07/19(unannounced). The Sponsor did not complete five previous operating days on any of the 5 day reconciliations.

Observation: Sponsor did not follow the approved monitoring plan for CACFP. State monitors requested SFSP monitoring guides for sites that participated in both programs to review if more than six months elapsed between reviews. Additionally, the arrival and/or departure times of the monitors were not noted on all forms.

Criteria

Title 7 of the Code of Federal Regulations, Section 226.16(d)(4)(iii) states, "Sponsoring organizations must review each facility three times each year, except as described in paragraph (d)(4)(iv) of this section. In addition: (A) At least two of the three reviews must be unannounced; (B) At least one unannounced review must include observation of a meal service; (C) At least one review must be made during each new facility's first four weeks of Program operations; and (D) Not more than six months may elapse between reviews."

Title 7 of the Code of Federal Regulations, Section 226.16(d)(4)(ii) states, "Reviews must examine the meal counts recorded by the facility for five consecutive days during the current and/or prior claiming period. For each day examined, reviewers must use enrollment and attendance records..."

Recommendation

The Sponsor should ensure monitoring stipulations are met and the monitoring forms are completed in their entirety and ensure the monitoring plans are followed according to the management plan.

This is a repeat finding from the report dated July 14, 2017.

17. The At-Risk Site provided supplements that were taken off-site

Condition

During our monitoring visit at **Kingsbury High** on November 7, 2018 participants were taking items out of the tutoring area (library). Only 15 participants stayed in the tutoring area with the supplement.

The daily meal count sheet for **Kingsbury High** for this date indicated 15 supplements served and claimed for reimbursement.

Criteria

The USDA At-Risk Afterschool Meals Guide revised December 2016 page16, states "There is no requirement that all children receiving meals participate in the scheduled activities, but children should remain on site while consuming the meal."

The USDA policy memorandum, CACFP 10-2017 Taking Food Components Offsite in the At-Risk Afterschool Component of CACFP states, "Similar to all Child Nutrition Programs, meals served in the CACFP are intended to be consumed in settings where organized groups of eligible children and adults are gathered to eat. This means that meals must be consumed on-site in order for the meal to be reimbursable."

Recommendation

The Sponsor should ensure site staff is trained in the requirements of the program to ensure that all meals are consumed at the approved feeding site.

18. Meals were served outside of the Sponsor's approved meal service time

Condition

Meals were served outside of the approved meal service time during meal observations at some feeding sites. The following feeding sites served meals outside of the approved meal service time:

Bluff City High School

- The approved supper meal service time was 3:15 p.m.-3:45 p.m. A monitor arrived on November 7, 2018, at approximately 3:00 p.m. Staff served 14 supper meals from 3:45 p.m.-3:56 p.m. No meals were disallowed due to the meals served were observed.

Cunningham CC

- The approved meal service time for supplement was 5:30 p.m. - 6:00 p.m. A monitor arrived on November 26, 2018, at approximately 5:28 p.m. and departed at 6:05 p.m. Staff stated supplements were served from 4 p.m. - 4:30 p.m. the Sponsor did not claim the supplement service on November 26, 2019. As a result, no meals were disallowed.

Davis CC

- The approved meal service time for supplement was 3 p.m.-3:30 p.m. and supper meal service was 4:30 p.m. to 5:00 p.m. A monitor arrived on November 15, 2018, at approximately 2:30 p.m. and observed supper meals being served beginning at 4:15 p.m. No meals were disallowed due to meals served were observed.

Criteria

Title 7 of the Code of Federal Regulations, Section 226.17(b)(4) states, "Each child care center participating in the Program shall claim only the meal types specified in its approved application in accordance with the meal pattern requirements specified in §226.20...."

Recommendation

The Sponsor should ensure meals are served during the approved meal service time.

19. Standard meal pattern requirements were not met during a meal observation

Condition

Standard meal pattern requirements were not met during meal observations at the following At-Risk Sites:

Aurora Collegiate Academy

- During the observation of supplement service on November 8, 2018, the supplement consisted of Cool Ranch Doritos only. No other component was provided. Therefore the cost reimbursement of supplements on November 8, 2018, was not allowed.

Bert Ferguson CC

- During the observation of supplement service on November 6, 2018, the supplement meal consisted of cheese and Whole Grain Crackers. Ten participants received both meal components. Three participants did not receive both components, therefore those three supplements were not allowed for cost reimbursement.

Binghampton Christian Academy

- During the observation of the supplement on November 27, 2018, 58 participants received 100% vegetable juice and Doritos. Three participants did not receive both components, therefore those three supplements were not allowed for cost reimbursement.

Davis CC

- During the observation of supplement and supper meals on November 15, 2018, the supplement consisted of Cheez-it's only. No other component was provided for the supplement. Therefore the cost reimbursement for supplements was not allowed.

The Sponsor was notified of the missing components during the site visits and did not request reimbursement for disallowed meals.

Criteria

Title 7 of the Code of Federal Regulations, Section 226.17(b)(4) states, "Each child care center participating in the Program shall claim only the meal types specified in its approved application in accordance with the meal pattern requirements specified in §226.20 ..."

Recommendation

The Sponsor should ensure all prepared and served meals meet all the meal patterns established by the USDA.

20. The Sponsor did not have a menu posted at the site for an observed meal, or the menu did not reflect the components being served

Condition

The Sponsor did not have a current menu posted at the following sites:

- During our monitoring visit on November 16, 2018, at **Arrow Academy** the supper meals served did not match the menu posted.
- During our monitoring visit on November 15, 2018, at **Davis CC** there was no menu posted for the observed supplement and supper meal service.
- During our follow up visit at **Binghampton Christian Academy** on April 25, 2019. There was no menu posted for the observed supplement.

Criteria

Food & Nutrition Service (FNS) 796-2, Rev. 4, states, "Menu records that identify the meal components served to participants must be maintained. Menu records must be updated to reflect changes to planned menus so that the menu records reflect the actual meal components and foods service to participants."

The USDA Monitoring Handbook for State Agencies, page 29, states, "Institutions must serve meals according to the posted menus and document substitutions..."

Recommendation

The Sponsor should ensure the menu is posted for each meal service and reflect the meal components being served.

21. The Sponsor did not have a current health inspection

Condition

The documentation provided for the health inspection report was dated October 7, 2017, at **Leadership Prep** on November 26, 2018. However, on May 1, 2019, the Sponsor provided an updated health inspection dated April 18, 2019. The health inspection was not current and up to date during the meal service observation.

Criteria

Title 7 of the Code of Federal Regulations, Section 226.6 (b)(2)(vii)(c)(5)(iii) states institutions must, "...Have a food service that complies with applicable State and local health and sanitation requirements:..."

Recommendation

The Sponsor should comply with applicable State and local health and sanitation standards as required by the CACFP and maintain documentation on file.

22. The Sponsor did not have a current feeding site list in TIPS

Condition

Program Monitors attempted meal observations at the feeding sites listed and the feeding sites were not in operations:

Havenview Middle 1971

- Program Monitor arrived at the site on November 2, 2018, to attempt a meal observation. Per staff, no meals were being served at the site. According to the approved site list in TIPS, the site was in operation.

Ed Rice Community Center 1707

- Program Monitor arrived at the site on November 5, 2018, to attempt a meal observation. Per staff, no meals were being served at the site. According to the approved site list in TIPS, the site was in operation.

Dexter Middle 1052

- Program Monitor arrived at the site on November 6, 2018, to attempt a meal observation. Per staff, no meals were being served at the site. According to the approved site list in TIPS, the site was in operation.

NCC-Chickasaw 1273

- Program Monitor arrived at the site on November 26, 2018, to attempt a meal observation. Per staff, no meals were being served at the site. According to the approved site list in TIPS, the site was in operation.

According to the Claim for Reimbursement Summary, no meals were claimed for either of the sites attempted for a meal observation.

Criteria

Title 7 of the Code of Federal Regulations, Section 226.17a At-risk afterschool care center provisions (f)(2)(h)Changes to participating centers. Independent at-risk afterschool care centers or sponsors of at-risk afterschool care centers must advise the State agency of any substantive changes to the afterschool care program.

Recommendation

The Sponsor should ensure site applications are accurate and reflect the actual sites in operation. If sites are not in operation, the site applications should be updated.

23. The Sponsor reported the days of operation incorrectly for one site

Condition

Based on our review of the Claim for Reimbursement for the test month, the Sponsor reported 19 days of operation for **Leadership Prep**. However, we found that there were 18 days of operation.

Criteria

Title 7 of the Code of Federal Regulations, Section 226.10(c) states, "...In submitting a Claim for Reimbursement, each institution shall certify that the claim is correct and that records are available to support that claim."

Recommendation

The Sponsor should ensure the correct days of operation are submitted on the claim for reimbursement.

24. The Sponsor did not adequately maintain financial records for the CACFP Head Start and Child Care Center programs

Condition

The Sponsor did not record expense transactions for the CACFP Head start and Child Care Center programs in its general ledger accounts established for these programs. Our review disclosed that the Sponsor uses an automated inventory system to determine the cost of food and supplies delivered to its CACFP At-Risk, Head start, and Child Care Center sites. Expense transactions are only being recorded in the general ledger accounts for CACFP At-Risk program.

This is a repeat finding in a previous report dated July 14, 2017.

Criteria

FNS Instruction 796-2, Rev. 4, Page 94(3) Financial states "Institutions must record the receipt and expenditure of all Program funds, Program income and other income in accordance with U.S. GAAP, this Instruction, Department regulations and the State agency financial management system. Any Program expenses paid for in cash should be of a nominal amount and clearly documented."

Recommendation

The Sponsor should maintain a financial management system that adequately discloses CACFP programs revenue and expenses.

Note: Our site visits to **Arrow Academy, Bolton High School, Douglass Community Center, First Baptist Church, Gaisman CC, Glenview CC, Grahamwood Elementary- Chinese Aftercare, Hickoryhill CC, Kirby Middle School, Leadership Prep, Libertas School of Memphis, New Hickory Hill MBC, and Robert R. Church** revealed no significant deficiencies. Our follow-up visit at **Binghampton Christian Academy** on April 25, 2019, revealed no deficiencies for the supplement observed.

Technical Assistance Provided

The Sponsor was provided technical assistance regarding ensuring monitoring plans are followed and monitoring documentation is completed accurately infant menu requirements, and properly claiming meals observed by the monitors.

Disallowed Meal Cost

The disallowed meal cost associated with the findings for the Child Care Center, Head Start sites, and At-Risk sites is below the DHS threshold for repayment.

Corrective Action

The Sponsor must complete the following actions within 30 days from the date of this report:

- Prepare and submit a corrective action plan to address the deficiencies identified in this report. The corrective action plan template is attached. Please return the corrective action plan to:

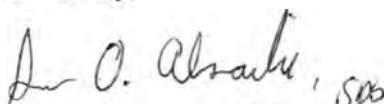
AuditServices.CAPS.DHS@tn.gov

If you have questions relative to the corrective action plan please contact:

Allette Vayda, Director of Operations
Child and Adult Care Food Program
James K. Polk Building, 15th Floor
505 Deaderick Street
Nashville, Tennessee 37243
Allette.Vayda@tn.gov
(615) 313-3769

We appreciate the assistance provided during this review. If you have any questions regarding this report, please contact Sean Baker, Audit Director 2, at 615-313-4727 or Sean.Baker@tn.gov.

Sincerely,


Sam O. Alzoubi, CFE
Director of Audit Services

Exhibits

cc: Phyllis Glover, Interim Director of Nutrition Services, Shelby County School System
Jacqueline Robinson-Tate, Area Mgr.-Special Program, Shelby County School System
Allette Vayda, Director of Operations, Child and Adult Care Food Program
Debra Pasta, Program Manager, Child and Adult Care Food Program
Elke Moore, Administrative Services Assistant 3, Child and Adult Care Food Program
Constance Moore, Program Specialist, Child, and Adult Care Food Program
Marty Widner, Program Specialist, Child, and Adult Care Food Program
Comptroller of the Treasury, State of Tennessee

EXHIBIT A

Sponsor of CACFP Child Care Center Program Data

Sponsor: Shelby County School System

Review Month/Year: November 2018

Total Reimbursement: \$1,704.83

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Days of CACFP Food Service	18	18
Total Attendance	305	305
Percentage of Free or Reduced-price Category	XXXXXX	100%
Number of Breakfasts Served	298	298
Number of Lunches Served	304	283
Number of Supplements Served	103	103
Number of Participants in Free Category	37	32
Number of Participants in Reduced-Price Category	0	0
Number of Participants in Paid Category	0	0
Total Number of Participants	37	32

Exhibit B

Sponsor of CACFP Head Start Meals Program Data

Sponsor: Shelby County School System

Review Month/Year: November 2018

Total Reimbursement: \$37,841.44

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Days of CACFP Food Service	16	16
Number of Sites	75	75
Total Sample Sites' Attendance	6,493	6,453
Number of Supplement Meals Served	41,584	41,575

Exhibit C

Head Start Site Meals Data

Sample Site: Belle Forest #1 0938

Month: November 2018

Site Meal Service Activity and Monitor Reconciliation	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	16	16
Total Attendance	686	685
Number of Supplement Meals Served	533	521

Exhibit D

Head Start Site Meals Data

Sample Site: Berclair 0941

Month: November 2018

Site Meal Service Activity and Monitor Reconciliation	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	16	16
Total Attendance	577	576
Number of Supplement Meals Served	531	531

Exhibit E

Head Start Site Meals Data

Sample Site: Bethel Grove 0943

Month: November 2018

Site Meal Service Activity and Monitor Reconciliation	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	16	16
Total Attendance	529	530
Number of Supplement Meals Served	479	479

Exhibit F

Head Start Site Meals Data

Sample Site: Cherokee #1 0986

Month: November 2018

Site Meal Service Activity and Monitor Reconciliation	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	16	16
Total Attendance	537	535
Number of Supplement Meals Served	473	476

Exhibit G

Head Start Site Meals Data

Sample Site: Doubletree 1009

Month: November 2018

Site Meal Service Activity and Monitor Reconciliation	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	16	16
Total Attendance	836	837
Number of Supplement Meals Served	775	775

Exhibit H

Head Start Site Meals Data

Sample Site: Newberry Elem 1657

Month: November 2018

Site Meal Service Activity and Monitor Reconciliation	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	16	16
Total Attendance	295	282
Number of Supplement Meals Served	275	274

Exhibit I

Head Start Site Meals Data

Sample Site: Oak Forest #1 1142

Month: November 2018

Site Meal Service Activity and Monitor Reconciliation	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	16	15
Total Attendance	806	810
Number of Supplement Meals Served	696	697

Exhibit J

Head Start Site Meals Data

Sample Site: Oakshire 1094

Month: November 2018

Site Meal Service Activity and Monitor Reconciliation	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	16	16
Total Attendance	551	552
Number of Supplement Meals Served	496	496

Exhibit K

Head Start Site Meals Data

Sample Site: Peabody 1071

Month: November 2018

Site Meal Service Activity and Monitor Reconciliation	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	16	16
Total Attendance	293	293
Number of Supplement Meals Served	283	281

Exhibit L

Head Start Site Meals Data

Sample Site: Riverview Elem 1658

Month: November 2018

Site Meal Service Activity and Monitor Reconciliation	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	16	16
Total Attendance	205	195
Number of Supplement Meals Served	179	178

Exhibit M

Head Start Site Meals Data

Sample Site: Snowden 1074

Month: November 2018

Site Meal Service Activity and Monitor Reconciliation	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	16	16
Total Attendance	280	280
Number of Supplement Meals Served	271	271

Exhibit N

Head Start Site Meals Data

Sample Site: Wellstation 1120
Month: November 2018

Site Meal Service Activity and Monitor Reconciliation	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	16	16
Total Attendance	898	878
Number of Supplement Meals Served	771	774

Exhibit O

Sponsor of CACFP At Risk Meals Program Data

Sponsor: Shelby County School System
Review Month/Year: November 2018
Total Reimbursement: \$430,566.76

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Days of CACFP Food Service	19	19
Number of Sites	170	170
Total Sample Sites' Attendance	10,395	10,414
Number of Supper Meals Served	110,069	110,078
Number of Supplements Served	44,365	44,346

Exhibit P

At Risk Site Meals Data

Sample Site: Arrow Academy 0999
Month: November 2018

Site Meal Service Activity and Monitor Reconciliation	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	15	15
Total Attendance	285	285
Number of Supper Meals Served	273	273
Number of Supplements Served	285	285

Exhibit Q

At Risk Site Meals Data

Sample Site: Aurora Collegiate Academy 1177

Month: November 2018

Site Meal Service Activity and Monitor Reconciliation	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	9	9
Total Attendance	720	720
Number of Supplements Served	720	720

Exhibit R

At Risk Site Meals Data

Sample Site: Bert Ferguson CC 1998

Month: November 2018

Site Meal Service Activity and Monitor Reconciliation	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	16	16
Total Attendance	516	520
Number of Supper Meals Served	399	399
Number of Supplements Served	384	384

Exhibit S

At Risk Site Meals Data

Sample Site: Binghampton Christian Academy 1003

Month: November 2018

Site Meal Service Activity and Monitor Reconciliation	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	10	10
Total Attendance	688	688
Number of Supplements Served	688	688

Exhibit T

At Risk Site Meals Data

Sample Site: Bluff City High School 1980

Month: November 2018

Site Meal Service Activity and Monitor Reconciliation	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	10	10
Total Attendance	500	500
Number of Supper Meals Served	438	438

Exhibit U

At Risk Site Meals Data

Sample Site: Bolton High School 2008

Month: November 2018

Site Meal Service Activity and Monitor Reconciliation	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	12	12
Total Attendance	195	195
Number of Supper Meals Served	183	183

Exhibit V

At Risk Site Meals Data

Sample Site: Cunningham CC 1275

Month: November 2018

Site Meal Service Activity and Monitor Reconciliation	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	14	14
Total Attendance	810	810
Number of Supplements Served	810	810

Exhibit W

At Risk Site Meals Data

Sample Site: Davis CC 1283
Month: November 2018

Site Meal Service Activity and Monitor Reconciliation	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	8	8
Total Attendance	237	237
Number of Supper Meals Served	214	214
Number of Supplements Served	207	207

Exhibit X

At Risk Site Meals Data

Sample Site: Douglass Community Center 1669
Month: November 2018

Site Meal Service Activity and Monitor Reconciliation	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	15	15
Total Attendance	824	824
Number of Supper Meals Served	807	816
Number of Supplements Served	824	824

Exhibit Y

At Risk Site Meals Data

Sample Site: First Baptist Church 1305
Month: November 2018

Site Meal Service Activity and Monitor Reconciliation	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	13	13
Total Attendance	326	338
Number of Supper Meals Served	326	326
Number of Supplements Served	310	310

Exhibit Z

At Risk Site Meals Data

Sample Site: Gaisman CC 0948

Month: November 2018

Site Meal Service Activity and Monitor Reconciliation	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	18	18
Total Attendance	610	610
Number of Supper Meals Served	608	608
Number of Supplements Served	610	610

Exhibit AA

At Risk Site Meals Data

Sample Site: Glenview CC 1719

Month: November 2018

Site Meal Service Activity and Monitor Reconciliation	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	18	18
Total Attendance	630	630
Number of Supplements Served	630	611

Exhibit BB

At Risk Site Meals Data

Sample Site: Grahamwood Elementary-Chinese Aftercare 1674

Month: November 2018

Site Meal Service Activity and Monitor Reconciliation	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	17	17
Total Attendance	244	244
Number of Supplements Served	244	244

Exhibit CC

At Risk Site Meals Data

Sample Site: Hickoryhill CC 0966

Month: November 2018

Site Meal Service Activity and Monitor Reconciliation	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	19	19
Total Attendance	950	950
Number of Supper Meals Served	937	937
Number of Supplements Served	914	914

Exhibit DD

At Risk Site Meals Data

Sample Site: Kingsbury High 1274

Month: November 2018

Site Meal Service Activity and Monitor Reconciliation	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	12	12
Total Attendance	431	434
Number of Supper Meals Served	416	416
Number of Supplements Served	431	431

Exhibit EE

At Risk Site Meals Data

Sample Site: Kirby Middle School 1051

Month: November 2018

Site Meal Service Activity and Monitor Reconciliation	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	8	8
Total Attendance	849	849
Number of Supper Meals Served	849	849

Exhibit FF

At Risk Site Meals Data

Sample Site: Leadership Prep 1027

Month: November 2018

Site Meal Service Activity and Monitor Reconciliation	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	19	18
Total Attendance	640	640
Number of Supper Meals Served	573	573
Number of Supplements Served	634	634

Exhibit GG

At Risk Site Meals Data

Sample Site: Libertas School of Memphis 1653

Month: November 2018

Site Meal Service Activity and Monitor Reconciliation	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	17	17
Total Attendance	516	516
Number of Supper Meals Served	478	478

Exhibit HH

At Risk Site Meals Data

Sample Site: New Hickory Hill MBC 1673

Month: November 2018

Site Meal Service Activity and Monitor Reconciliation	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	11	11
Total Attendance	117	117
Number of Supper Meals Served	117	117

Exhibit II

At Risk Site Meals Data

Sample Site: Robert R. Church Elementary ELOP 1197
Month: November 2018

Site Meal Service Activity and Monitor Reconciliation	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	18	18
Total Attendance	307	307
Number of Supper Meals Served	299	299



Corrective Action Plan for Monitoring Findings

Instructions: Please print in ink or type the information to complete this document. Enter the date of birth for each Responsible Principal and/or Individual in Section B. Attach the additional documentation requested. Enter your name, title and date of signature on the last page. Please sign your name in ink.

Please return ALL pages of the completed Corrective Action Plan form.

Section A. Institution Information

Name of Sponsor/Agency/Site: Shelby County School System	Agreement No. 00069	<input type="checkbox"/> SFSP <input checked="" type="checkbox"/> CACFP
--	------------------------	--

Mailing Address: 1212 Vollintine Avenue Memphis, Tennessee 38107-2826

Section B. Responsible Principal(s) and/or Individual(s)

Name and Title: Calvin Johnson, Director of School Operations	Date of Birth: / /
---	--------------------

Section C. Dates of Issuance of Monitoring Report/Corrective Action Plan

Monitoring Report: 7/9/2019	Corrective Action Plan: 7/9/2019
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Section D. Findings

Findings:

1. The Sponsor reported the number of participants in the free category incorrectly
2. The Sponsor provided a menu that did not meet USDA meal pattern requirements
3. The Sponsor provided infant menus that did not meet USDA meal patten requirements
4. The Sponsor did not complete monitoring as required for the sponsored child care center
5. The Sponsor's CACFP training documentation for the sponsored child care center did not include key staff on the attendance roster
6. The Sponsor reported meal counts incorrectly
7. The Sponsor reported an incorrect number of meals from observed meal services
8. The Sponsor reported the number of attendance days incorrectly
9. The Sponsor did not complete monitoring as required for sponsored Head Start sites
10. Participants at Sponsored sites had missing or expired enrollment information
11. Standard meal pattern requirements were not met during meal observations
12. The number of operational days was reported for one site incorrectly
13. The Sponsor reported meal counts incorrectly
14. The Sponsor reported an incorrect number of meals from an observed meal service
15. The Sponsor reported the number of attendance days incorrectly
16. The Sponsor did not complete monitoring as required for sponsored at-risk sites
17. The At-Risk Site provided supplements that were taken off-site
18. Meals were served outside of the Sponsor's approved meal service time
19. Standard meal pattern requirements were not met during a meal observation
20. The Sponsor did not have a menu posted at the site for an observed meal, or the menu did not reflect the components being served
21. The Sponsor did not have a current health inspection
22. The Sponsor did not have a current feeding site list in TIPS
23. The Sponsor reported the days of operation incorrectly for one site
24. The Sponsor did not adequately maintain financial records for the CACFP Head Start and Child Care Center programs

The following measures will be completed within **30 calendar days** of my institution's receipt of this corrective action plan:

Measure No. 1: The Sponsor reported the number of participants in the free category incorrectly

The finding will be fully and permanently corrected.

Identify the name(s) and position title(s) of the employee(s) who will be responsible for ensuring that the finding is fully and permanently corrected:

Name: _____ Position Title: _____

Name: _____ Position Title: _____

Describe below the **step-by-step** procedures that will be implemented to correct the finding:

When will the procedures for addressing the finding be implemented? Provide a timeline below for implementing the procedures (i.e., will the procedures be done daily, weekly, monthly, or annually, and when will they begin?):

Where will the Corrective Action Plan documentation be retained? Please identify below:

How will new and current staff be informed of the new policies and procedures to address the finding (e.g., Handbook, training, etc.)? Please describe below:

Measure No.2: The Sponsor provided a menu that did not meet USDA meal pattern requirements

The finding will be fully and permanently corrected.
Identify the name(s) and position title(s) of the employee(s) who will be responsible for ensuring that the finding is fully and permanently corrected:

Name: _____ Position Title: _____

Name:

Position Title:

Describe below the **step-by-step** procedures that will be implemented to correct the finding:

When will the procedures for addressing the finding be implemented? Provide a timeline below for implementing the procedures (i.e., will the procedures be done daily, weekly, monthly, or annually, and when will they begin?):

Where will the Corrective Action Plan documentation be retained? Please identify below:

How will new and current staff be informed of the new policies and procedures to address the finding (e.g., Handbook, training, etc.)? Please describe below:

Measure No. 3: The Sponsor provided infant menus that did not meet USDA meal pattern requirements

The finding will be fully and permanently corrected.

Identify the name(s) and position title(s) of the employee(s) who will be responsible for ensuring that the finding is fully and permanently corrected:

Name: _____ Position Title: _____

Name: _____ Position Title: _____

Describe below the **step-by-step** procedures that will be implemented to correct the finding:

When will the procedures for addressing the finding be implemented? Provide a timeline below for implementing the procedures (i.e., will the procedures be done daily, weekly, monthly, or annually, and when will they begin?):

Where will the Corrective Action Plan documentation be retained? Please identify below:

How will new and current staff be informed of the new policies and procedures to address the finding (e.g., Handbook, training, etc.)? Please describe below:

Measure No. 4: The Sponsor did not complete monitoring as required for the sponsored child care center

The finding will be fully and permanently corrected.

Identify the name(s) and position title(s) of the employee(s) who will be responsible for ensuring that the finding is fully and permanently corrected:

Name: _____ Position Title: _____

Name: _____ Position Title: _____

Describe below the **step-by-step** procedures that will be implemented to correct the finding:

When will the procedures for addressing the finding be implemented? Provide a timeline below for implementing the procedures (i.e., will the procedures be done daily, weekly, monthly, or annually, and when will they begin?):

Where will the Corrective Action Plan documentation be retained? Please identify below:

How will new and current staff be informed of the new policies and procedures to address the finding (e.g., Handbook, training, etc.)? Please describe below:

Measure No. 5: The Sponsor's CACFP training documentation for the sponsored child care center did not include key staff on the attendance roster

The finding will be fully and permanently corrected.
Identify the name(s) and position title(s) of the employee(s) who will be responsible for ensuring that the finding is fully and permanently corrected:

Name: _____ Position Title: _____

Name: _____ Position Title: _____

Describe below the **step-by-step** procedures that will be implemented to correct the finding:

When will the procedures for addressing the finding be implemented? Provide a timeline below for implementing the procedures (i.e., will the procedures be done daily, weekly, monthly, or annually, and when will they begin?):

Where will the Corrective Action Plan documentation be retained? Please identify below:

How will new and current staff be informed of the new policies and procedures to address the finding (e.g., Handbook, training, etc.)? Please describe below:

Measure No.6: The Sponsor reported meal counts incorrectly

The finding will be fully and permanently corrected.

Identify the name(s) and position title(s) of the employee(s) who will be responsible for ensuring that the finding is fully and permanently corrected:

Name:

Position Title:

Name:

Position Title:

Describe below the **step-by-step** procedures that will be implemented to correct the finding:

When will the procedures for addressing the finding be implemented? Provide a timeline below for implementing the procedures (i.e., will the procedures be done daily, weekly, monthly, or annually, and when will they begin?):

Where will the Corrective Action Plan documentation be retained? Please identify below:

How will new and current staff be informed of the new policies and procedures to address the finding (e.g., Handbook, training, etc.)? Please describe below:

Measure No. 7: The Sponsor reported an incorrect number of meals from observed meal services

The finding will be fully and permanently corrected.
Identify the name(s) and position title(s) of the employee(s) who will be responsible for ensuring that the finding is fully and permanently corrected:

Name:

Position Title:

Name:

Position Title:

Describe below the **step-by-step** procedures that will be implemented to correct the finding:

When will the procedures for addressing the finding be implemented? Provide a timeline below for implementing the procedures (i.e., will the procedures be done daily, weekly, monthly, or annually, and when will they begin?):

Where will the Corrective Action Plan documentation be retained? Please identify below:

How will new and current staff be informed of the new policies and procedures to address the finding (e.g., Handbook, training, etc.)? Please describe below:

Measure No. 8: The Sponsor reported the number of attendance days incorrectly

The finding will be fully and permanently corrected.

Identify the name(s) and position title(s) of the employee(s) who will be responsible for ensuring that the finding is fully and permanently corrected:

Name:

Position Title:

Name:

Position Title:

Describe below the **step-by-step** procedures that will be implemented to correct the finding:

When will the procedures for addressing the finding be implemented? Provide a timeline below for implementing the procedures (i.e., will the procedures be done daily, weekly, monthly, or annually, and when will they begin?):

Where will the Corrective Action Plan documentation be retained? Please identify below:

How will new and current staff be informed of the new policies and procedures to address the finding (e.g., Handbook, training, etc.)? Please describe below:

Measure No. 9: The Sponsor did not complete monitoring as required for sponsored Head Start sites

The finding will be fully and permanently corrected.

Identify the name(s) and position title(s) of the employee(s) who will be responsible for ensuring that the finding is fully and permanently corrected:

Name:

Position Title:

Name:

Position Title:

Describe below the **step-by-step** procedures that will be implemented to correct the finding:

When will the procedures for addressing the finding be implemented? Provide a timeline below for implementing the procedures (i.e., will the procedures be done daily, weekly, monthly, or annually, and when will they begin?):

Where will the Corrective Action Plan documentation be retained? Please identify below:

How will new and current staff be informed of the new policies and procedures to address the finding (e.g., Handbook, training, etc.)? Please describe below:

Measure No. 10: Participants at Sponsored sites had missing or expired enrollment information

The finding will be fully and permanently corrected.

Identify the name(s) and position title(s) of the employee(s) who will be responsible for ensuring that the finding is fully and permanently corrected:

Name: _____ Position Title: _____

Name: _____ Position Title: _____

Describe below the **step-by-step** procedures that will be implemented to correct the finding:

When will the procedures for addressing the finding be implemented? Provide a timeline below for implementing the procedures (i.e., will the procedures be done daily, weekly, monthly, or annually, and when will they begin?):

Where will the Corrective Action Plan documentation be retained? Please identify below:

How will new and current staff be informed of the new policies and procedures to address the finding (e.g., Handbook, training, etc.)? Please describe below:

Measure No.11: Standard meal pattern requirements were not met during meal observations

The finding will be fully and permanently corrected.

Identify the name(s) and position title(s) of the employee(s) who will be responsible for ensuring that the finding is fully and permanently corrected:

Name: _____ Position Title: _____

Name: _____ Position Title: _____

Describe below the **step-by-step** procedures that will be implemented to correct the finding:

When will the procedures for addressing the finding be implemented? Provide a timeline below for implementing the procedures (i.e., will the procedures be done daily, weekly, monthly, or annually, and when will they begin?):

Where will the Corrective Action Plan documentation be retained? Please identify below:

How will new and current staff be informed of the new policies and procedures to address the finding (e.g., Handbook, training, etc.)? Please describe below:

Measure No. 12: The number of operational days was reported for one site incorrectly

The finding will be fully and permanently corrected.

Identify the name(s) and position title(s) of the employee(s) who will be responsible for ensuring that the finding is fully and permanently corrected:

Name:

Position Title:

Name:

Position Title:

Describe below the **step-by-step** procedures that will be implemented to correct the finding:

When will the procedures for addressing the finding be implemented? Provide a timeline below for implementing the procedures (i.e., will the procedures be done daily, weekly, monthly, or annually, and when will they begin?):

Where will the Corrective Action Plan documentation be retained? Please identify below:

How will new and current staff be informed of the new policies and procedures to address the finding (e.g., Handbook, training, etc.)? Please describe below:

Measure No. 13: The Sponsor reported meal counts incorrectly

The finding will be fully and permanently corrected.
Identify the name(s) and position title(s) of the employee(s) who will be responsible for ensuring that the finding is fully and permanently corrected:

Name:

Position Title:

Name:

Position Title:

Describe below the **step-by-step** procedures that will be implemented to correct the finding:

When will the procedures for addressing the finding be implemented? Provide a timeline below for implementing the procedures (i.e., will the procedures be done daily, weekly, monthly, or annually, and when will they begin?):

Where will the Corrective Action Plan documentation be retained? Please identify below:

How will new and current staff be informed of the new policies and procedures to address the finding (e.g., Handbook, training, etc.)? Please describe below:

Measure No. 14: The Sponsor reported an incorrect number of meals from an observed meal service

The finding will be fully and permanently corrected.

Identify the name(s) and position title(s) of the employee(s) who will be responsible for ensuring that the finding is fully and permanently corrected:

Name:

Position Title:

Name:

Position Title:

Describe below the **step-by-step** procedures that will be implemented to correct the finding:

When will the procedures for addressing the finding be implemented? Provide a timeline below for implementing the procedures (i.e., will the procedures be done daily, weekly, monthly, or annually, and when will they begin?):

Where will the Corrective Action Plan documentation be retained? Please identify below:

How will new and current staff be informed of the new policies and procedures to address the finding (e.g., Handbook, training, etc.)? Please describe below:

Measure No. 15: The Sponsor reported the number of attendance days incorrectly

The finding will be fully and permanently corrected.

Identify the name(s) and position title(s) of the employee(s) who will be responsible for ensuring that the finding is fully and permanently corrected:

Name: _____ Position Title: _____

Name: _____ Position Title: _____

Describe below the **step-by-step** procedures that will be implemented to correct the finding:

When will the procedures for addressing the finding be implemented? Provide a timeline below for implementing the procedures (i.e., will the procedures be done daily, weekly, monthly, or annually, and when will they begin?):

Where will the Corrective Action Plan documentation be retained? Please identify below:

How will new and current staff be informed of the new policies and procedures to address the finding (e.g., Handbook, training, etc.)? Please describe below:

Measure No. 16: The Sponsor did not complete monitoring as required for sponsored at-risk sites

The finding will be fully and permanently corrected.

Identify the name(s) and position title(s) of the employee(s) who will be responsible for ensuring that the finding is fully and permanently corrected:

Name: _____ Position Title: _____

Name: _____ Position Title: _____

Describe below the **step-by-step** procedures that will be implemented to correct the finding:

When will the procedures for addressing the finding be implemented? Provide a timeline below for implementing the procedures (i.e., will the procedures be done daily, weekly, monthly, or annually, and when will they begin?):

Where will the Corrective Action Plan documentation be retained? Please identify below:

How will new and current staff be informed of the new policies and procedures to address the finding (e.g., Handbook, training, etc.)? Please describe below:

Measure No. 17: The At-Risk Site provided supplements that were taken off-site

The finding will be fully and permanently corrected.
Identify the name(s) and position title(s) of the employee(s) who will be responsible for ensuring that the finding is fully and permanently corrected:

Name: Position Title:

Name: Position Title:

Describe below the **step-by-step** procedures that will be implemented to correct the finding:

When will the procedures for addressing the finding be implemented? Provide a timeline below for implementing the procedures (i.e., will the procedures be done daily, weekly, monthly, or annually, and when will they begin?):

Where will the Corrective Action Plan documentation be retained? Please identify below:

How will new and current staff be informed of the new policies and procedures to address the finding (e.g., Handbook, training, etc.)? Please describe below:

Measure No. 18: Meals were served outside of the Sponsor's approved meal service time

The finding will be fully and permanently corrected.
Identify the name(s) and position title(s) of the employee(s) who will be responsible for ensuring that the finding is fully and permanently corrected:

Name: _____ Position Title: _____

Name: _____ Position Title: _____

Describe below the **step-by-step** procedures that will be implemented to correct the finding:

When will the procedures for addressing the finding be implemented? Provide a timeline below for implementing the procedures (i.e., will the procedures be done daily, weekly, monthly, or annually, and when will they begin?):

Where will the Corrective Action Plan documentation be retained? Please identify below:

How will new and current staff be informed of the new policies and procedures to address the finding (e.g., Handbook, training, etc.)? Please describe below:

Measure No. 19: Standard meal pattern requirements were not met during a meal observation

The finding will be fully and permanently corrected.

Identify the name(s) and position title(s) of the employee(s) who will be responsible for ensuring that the finding is fully and permanently corrected:

Name:

Position Title:

Name:

Position Title:

Describe below the **step-by-step** procedures that will be implemented to correct the finding:

When will the procedures for addressing the finding be implemented? Provide a timeline below for implementing the procedures (i.e., will the procedures be done daily, weekly, monthly, or annually, and when will they begin?):

Where will the Corrective Action Plan documentation be retained? Please identify below:

How will new and current staff be informed of the new policies and procedures to address the finding (e.g., Handbook, training, etc.)? Please describe below:

Measure No. 20: The Sponsor did not have a menu posted at the site for an observed meal, or the menu did not reflect the components being served

The finding will be fully and permanently corrected.

Identify the name(s) and position title(s) of the employee(s) who will be responsible for ensuring that the finding is fully and permanently corrected:

Name: _____ Position Title: _____

Name: _____ Position Title: _____

Describe below the **step-by-step** procedures that will be implemented to correct the finding:

When will the procedures for addressing the finding be implemented? Provide a timeline below for implementing the procedures (i.e., will the procedures be done daily, weekly, monthly, or annually, and when will they begin?):

Where will the Corrective Action Plan documentation be retained? Please identify below:

How will new and current staff be informed of the new policies and procedures to address the finding (e.g., Handbook, training, etc.)? Please describe below:

Measure No. 21: The Sponsor did not have a current health inspection

The finding will be fully and permanently corrected.

Identify the name(s) and position title(s) of the employee(s) who will be responsible for ensuring that the finding is fully and permanently corrected:

Name: _____ Position Title: _____

Name: _____ Position Title: _____

Describe below the **step-by-step** procedures that will be implemented to correct the finding:

When will the procedures for addressing the finding be implemented? Provide a timeline below for implementing the procedures (i.e., will the procedures be done daily, weekly, monthly, or annually, and when will they begin?):

Where will the Corrective Action Plan documentation be retained? Please identify below:

How will new and current staff be informed of the new policies and procedures to address the finding (e.g., Handbook, training, etc.)? Please describe below:

Measure No. 22: The Sponsor did not have a current feeding site list in TIPS

The finding will be fully and permanently corrected.

Identify the name(s) and position title(s) of the employee(s) who will be responsible for ensuring that the finding is fully and permanently corrected:

Name: _____ Position Title: _____

Name: _____ Position Title: _____

Describe below the **step-by-step** procedures that will be implemented to correct the finding:

When will the procedures for addressing the finding be implemented? Provide a timeline below for implementing the procedures (i.e., will the procedures be done daily, weekly, monthly, or annually, and when will they begin?):

Where will the Corrective Action Plan documentation be retained? Please identify below:

How will new and current staff be informed of the new policies and procedures to address the finding (e.g., Handbook, training, etc.)? Please describe below:

Measure No. 23: The Sponsor reported the days of operation incorrectly for one site

The finding will be fully and permanently corrected.

Identify the name(s) and position title(s) of the employee(s) who will be responsible for ensuring that the finding is fully and permanently corrected:

Name:

Position Title:

Name:

Position Title:

Describe below the **step-by-step** procedures that will be implemented to correct the finding:

When will the procedures for addressing the finding be implemented? Provide a timeline below for implementing the procedures (i.e., will the procedures be done daily, weekly, monthly, or annually, and when will they begin?):

Where will the Corrective Action Plan documentation be retained? Please identify below:

How will new and current staff be informed of the new policies and procedures to address the finding (e.g., Handbook, training, etc.)? Please describe below:

Measure No. 24: The Sponsor did not adequately maintain financial records for the CACFP Head Start and Child Care Center programs

The finding will be fully and permanently corrected.
Identify the name(s) and position title(s) of the employee(s) who will be responsible for ensuring that the finding is fully and permanently corrected:

Name:

Position Title:

Name:

Position Title:

Describe below the **step-by-step** procedures that will be implemented to correct the finding:

When will the procedures for addressing the finding be implemented? Provide a timeline below for implementing the procedures (i.e., will the procedures be done daily, weekly, monthly, or annually, and when will they begin?):

Where will the Corrective Action Plan documentation be retained? Please identify below:

How will new and current staff be informed of the new policies and procedures to address the finding (e.g., Handbook, training, etc.)? Please describe below:

I certify by my signature below that I am authorized by the institution to sign this document. As an authorized representative of the institution, I fully understand the corrective measures identified above and agree to fully implement these measures within the required time frame. I also understand that failure to fully and permanently correct the findings in my institution's CACFP or SFSP will result in its termination from the program, and the placement of the institution and its responsible principals on the National Disqualified List maintained by the U.S. Department of Agriculture.

Printed Name of Authorized Institution Official:

Position:

Signature of Authorized Institution Official: _____

Date: / /

Signature of Authorized TDHS Official: _____

Date: / /

APPEAL PROCEDURES FOR CHILD AND ADULT CARE INSTITUTIONS AND SPONSORING AGENCIES

Appeal Procedures

1. Pursuant to 7 CFR §226.6(k)(4), the TN Department of Human Services (TDHS) must provide administrative review procedures to institutions and responsible principals and responsible individuals as follows:

- (a) Annually to all institutions;
- (b) To an institution and to each responsible principal and responsible individual when the State agency takes any action subject to an administrative review as described in 7 CFR §226.6(k)(2); and
- (c) Any other time upon request.

2. Pursuant to 7 CFR 226.6(k)(3) and (k)(9), some administrative actions are not subject to administrative review. Those actions are listed in paragraph 2.(a). Other administrative actions may be administratively appealed. Those actions are listed in paragraph 2.(b) and (c). All institutions and sponsoring agencies may appeal any adverse administrative action listed in paragraph 2.(b) which are taken by the TDHS by requesting a fair hearing to appear in person to refute the action, or by requesting a review of written information in lieu of a fair hearing.

- (a) Pursuant to 7 CFR Part 226.6 (k)(3) TDHS is prohibited from offering administrative reviews of the following actions:
 - (i) FNS decisions on claim deadline exceptions and requests for upward adjustments to a claim.
 - (ii) Determination of serious deficiency.
 - (iii) State agency determination that corrective action is inadequate.
 - (iv) Disqualification and placement on State agency list and National disqualified list.
 - (v) Termination.
 - (vi) State agency or FNS decision regarding removal from the National disqualified list.
 - (vii) State agency's refusal to consider an application submitted by an institution or facility on the National disqualified list.

- (b) Pursuant to 7 CFR Part 226.6(k)(9), an abbreviated appeal process is available for the following actions. TDHS must limit the administrative review to a review of written submissions by the TDHS and institutions or sponsoring agencies concerning the accuracy of the State agency's determination if the application was denied, or the State agency proposes to terminate the institution's agreement because:
 - (viii) The information submitted on the application was false;
 - (ix) The institution, one of its sponsored facilities, or one of the principals of the institution or its facilities is on the national disqualified list;
 - (x) The institution, one of its sponsored facilities, or one of the principals of the institution or its facilities is ineligible to participate in any other publicly funded program by reason of violation of the requirements of the program;

- (xi) The institution, one of its sponsored facilities, or one of the principals of the institution or its facilities has been convicted for any activity that indicates a lack of business integrity;

(c) Administrative review is also available if the State agency notifies the institution and responsible principal or responsible individual of the following actions: proposed disqualification of a responsible principal or responsible individual, denial of a budget, denial of a line item within a budget, downward adjustment of the amount approved in a budget, suspension of an institution's participation, denial of start-up or expansion funds, denial of a request for advanced payment, recovery of an advance in excess of a claim, denial of a claim for reimbursement (except for late submission), decision not to forward an exception request for payment of a late claim, overpayment demand, denial of a new or renewing institution's application for participation, denial of sponsored facility application, notice of proposed termination, claim denial, claim deadline exceptions and requests for upward adjustments to a claim, or any other action affecting an institutions participation or claim for payment.

3. All appeal requests must be presented in writing to the TDHS Division of Appeals and Hearings not later than 15 calendar days after the date the institution or sponsoring agency receives the notice of adverse administrative action.
4. The date of an institution's or sponsoring agency's receipt of a notice of suspension and/or proposed termination and disqualification will be governed by the federal regulation at 7 CFR Part 226.2. The notice must specify the action being proposed or taken and the basis for the action, and is considered to be received by the institution or day care home when it is delivered, sent by facsimile, or sent by email. If the notice is undeliverable, it is considered to be received by the institution, responsible principal or responsible individual, or day care home five days after being sent to the addressee's last known mailing address, facsimile number, or email address.
5. The TDHS Division of Appeals and Hearings will acknowledge the receipt of the appeal request within 10 calendar days of the receipt of the institution's or sponsoring agency's request for review. The written request for review should state if a fair hearing is requested or if a review of written information in lieu of a fair hearing is requested. If the appeal request from the institution or sponsoring agency does not specifically request a hearing, a review of written information in lieu of a hearing will occur. If a fair hearing is requested and the institution or sponsoring agency's representative fails to appear, the right to a personal appearance is waived.
6. If an institution or sponsoring agency does not request a fair hearing or a review of written information in lieu of the hearing within 15 calendar days from the date the institution or sponsoring agency receives a Notice of Proposed Termination, the TDHS will issue a letter advising the institution or sponsoring agency that it is terminated from the CACFP effective on the 16th calendar day following the institution's or sponsoring agency's receipt of the notice, and that the responsible principals and individuals of the institution or sponsoring agency are disqualified from participation.
7. To be considered for a fair hearing or for a review of written information in lieu of a fair

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hearing, all written documents must be submitted to the TDHS Division of Appeals and Hearings not later than 30 days after receipt of the notice of adverse administrative action.

8. The action of the TDHS must remain in effect during the administrative review. The effect of this requirement on particular actions by TDHS is as follows:

(i) *Overpayment demand.* During the period of the administrative review, TDHS is prohibited from taking action to collect or offset the overpayment. However TDHS must assess interest beginning with the initial demand for remittance of the overpayment and continuing through the period of administrative review unless the administrative review official overturns the TDHS's action.

(ii) *Recovery of advances.* During the administrative review, TDHS must continue its efforts to recover advances in excess of the claim for reimbursement for the applicable period. The recovery may be through a demand for full repayment or an adjustment of subsequent payments.

(iii) *Program payments.* The availability of Program payments during an administrative review of the denial of a new institution's application, denial of a renewing institution's application, proposed termination of a participating institution's agreement, and suspension of an institution are addressed in paragraphs (c)(1)(iii)(D), (c)(2)(iii)(D), (c)(3)(iii)(D), (c)(5)(i)(D), and (c)(5)(ii)(E), respectively, of 7 CFR §226.6.

9. The institution or sponsoring agency must refute the charges contained in the notice during the fair hearing or in the written information that is provided in lieu of the hearing.

10. The institution and the responsible principals and responsible individuals may retain legal counsel, or may be represented by another person.

11. If a fair hearing is requested, the institution or sponsoring agency will be notified in writing of the time, date and place of the fair hearing at least 10 calendar days in advance.

12. Any information which supports an adverse administrative action taken by the TDHS shall be available to the institution or sponsoring agency for inspection from the date of the receipt of the request for a fair hearing or a review of written information in lieu of the hearing.

13. In accordance with 7 CFR Part 226.6 (k)(8), the TDHS Division of Appeals and Hearings must conduct the administrative review of the proposed disqualification of the responsible principals and responsible individuals as part of the administrative review of the application denial, proposed termination, and/or proposed disqualification of the institution with which the responsible principals or responsible individuals are associated. However, at the administrative review official's discretion, separate administrative reviews may be held if the institution does not request an administrative review or if either the institution or the responsible principal or responsible individual demonstrates that their interests conflict.

14. The procedures contained in the Uniform Administrative Procedures Act found at TCA 4-5-301 et seq. shall be followed in rendering a decision on all appeals. The decision of the hearing officer is the final administrative determination to be afforded to the institution or sponsoring agency, and shall be rendered in a timely manner not to exceed 60 calendar days from the date of the receipt of the request for a fair hearing.

15. The processing limits for administrative appeals MUST be met. In the event a continuance is requested by a party, one continuance may be granted at the Hearing Official's discretion. This

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continuance shall not be for a period longer than ten (10) calendar days unless there are exceptional circumstances. Exceptional circumstances must be detailed in the order of continuance and the order must contain a date certain for the hearing, to be set as soon as possible. A report of pending CACFP desk review and fair hearing requests will be generated and reviewed daily by the Clerk's Office and the Legal Director for Appeals and Hearings who will monitor the dates for timeliness. In the event a decision has not been rendered within forty-five (45) calendar days of the date of receipt of the request for fair hearing or desk review, the Legal Director for Appeals and Hearings or their back-up shall notify the hearing official to take appropriate action.

16. All requests for a fair hearing or for a review of written information in lieu of a hearing must be submitted to:

Tennessee Department of Human Services
Division of Appeals and Hearings
PO Box 198996, Clerk's Office
Nashville, TN 37219-8996
Fax: (615) 248-7013 or (866) 355-6136
E-mail: AppealsClerksOffice.DHS@tn.gov

17. If a termination action is upheld by the hearing officer, the TDHS will issue a letter to the institution or sponsoring agency and its responsible principals and individuals advising that the termination and disqualification are effective on the date of the ruling issued by the hearing officer. The agency maintains searchable records of all administrative reviews and their dispositions for a period of five (5) years.

18. As required by 7 CFR Part 226.6 (c)(7), each disqualified institution, sponsoring agency, principal and individual will be placed on the National Disqualified List maintained by the U.S. Department of Agriculture (USDA). Once included on the National Disqualified List, an institution, sponsoring agency, principal and individual shall remain on the list until such time as the USDA, in consultation with the TDHS, determines that the serious deficiencies that led to their placement on the list have been corrected, or until seven years have elapsed since they were disqualified from participation. However, if the institution, sponsoring agency, principal or individual has failed to repay debts owed under the program, they will remain on the list until the debt has been paid.