



**STATE OF TENNESSEE
DEPARTMENT OF HUMAN SERVICES**

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BILL LEE
GOVERNOR

DANIELLE W. BARNES
COMMISSIONER

June 24, 2020

William Northrup, Chairman of the Board
Bountiful Basket Nutrition Program, Incorporated
Levering Office Building
3250 Dickerson Pike, #103
Nashville, Tennessee 37207-2913

Dear Mr. Northrup,

The Department of Human Services (DHS) - Division of Audit Services staff conducted a limited desk review of the Child and Adult Care Food Program (CACFP) at Bountiful Basket Nutrition Program, Inc. (Sponsor), Application Agreement number 00-169, during the period of April 20, 2020 through April 30, 2020. Our scope of the review was January 2020.

Due to the outbreak and the risk that COVID19 poses to the Sponsor and our staff, the review was limited to verification, based on review of the documents obtained from Sponsor, via e-mail, mail, or other electronic transmission of documents. We were able to obtain information from the feeding sites during the unannounced site visits completed in January 2020 and from Sponsor staff via e-mail relative to the operation and administration of the CACFP.

The purpose of this review was to determine if the Sponsor complied with USDA regulations set through the COVID-19 period, taking into consideration the waivers granted to the Sponsor's operation. Also, to determine if the Sponsor complied with the applicable *Title 7 of the Code of Federal Regulations* (CFR) applicable parts, provider agreements, and applicable Federal and State regulations.

Based on our review of the Sponsor's records and information provided, the Sponsor had 52 daycare home providers operating during the review period. We utilized the Audit Services Randomizer Application to randomly select a sample of nine (9) homes and included additional homes that we visited when a meal service observation was not possible during an unannounced monitoring visit. The homes of **Cynthia Barnett, Shelia Capley, Krystal Farrar, Sharon Goodall, Linda Guthrie, Jetton Hadley, Janet Jordan, Sharon Richardson, and Priscilla Rutledge** were the sample sites for our review.

Important COVID-19 note: Due to the current outbreak and the risk that COVID-19 poses to your

organization personnel and our staff, all our staff are working from home with very limited access to the office. Therefore, we will not send a copy of this report via regular mail until further notice. Please confirm the receipt of this email as it is currently the only option for communication. If you need any assistance or have any questions, please do not hesitate to contact us via email.

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 counts 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. In addition, we observed meal services during the review period at the sample homes.

Our review of the Sponsor's records for January 2020 disclosed the following:

1. The Sponsor's day care home provider served a meal that did not meet the USDA meal pattern requirements outside of the approved serving time

Condition

During our on-site monitoring visit on January 15, 2020 at the home of **Jetton Hadley**, we observed a lunch meal service. The observed meal service was from 11:30 AM to 12:00 PM, but the approved meal service time was 12:00 PM to 1:00 PM. The observed lunch meal was served to the two (2) participants present was missing a vegetable component. The lunch meal served to the participants was a peanut butter and jelly sandwich on whole grain bread, 1% milk, and an apple.

The Sponsor did not claim meals for this meal service; therefore, no meals were disallowed.

Criteria

Title 7 of the Code of Federal Regulations, Section 226.18(d) states, "Each day care home participating in the program shall serve 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(c)(2) states, "Fluid milk, meat and meat alternatives, vegetable, fruits, and grains are required components in the lunch and supper meals."

Recommendation

The Sponsor should ensure that meals are served during the approved feeding site time and that all meals served meet the USDA meal pattern requirements.

2. A Sponsored day care home provider did not have meal count documents for the first two weeks of January 2020

Condition

During our monitoring visit at the day care home of **Cynthia Barnett** on January 16, 2020, the provider indicated that there were no daily attendance and daily meal count documents for the first two weeks of January 2020 [January 1, through January 14, 2020] due to “a lot of sickness”.

Based on review of the meal count document provided by the Sponsor, the documents stamped as received “JAN 21 REC'D” which is 5 days after our on-site visit to the the day care home of **Cynthia Barnett**. Therefore, it appears that the Sponsor paid for meals with document completed after our on-site visit which does not agree with the provider’s comment for the first two weeks of January 2020 “a lot of sickness”

According the documents provided for the first two weeks of January 2020, the Sponsor claimed 35 Breakfast meals, 35 lunch meals, and 35 supplements for which will be disallowed. See table below:

Day	Meals Claimed for Reimbursement		
	Breakfast	Lunch	Supplement
January 2, 2020	5	5	5
January 3, 2020	5	5	5
January 6, 2020	5	5	5
January 7, 2020	5	5	5
January 8, 2020	5	5	5
January 13, 2020	5	5	5
January 14, 2020	5	5	5
Total	35	35	35

Criteria

Title 7 of the Code of Federal Regulations, Section 226.18(e) states, “Each day care home must maintain on file documentation of each child’s enrollment and must maintain daily records of the number of children in attendance and the number of meals, by type, served to enrolled children....”

Title 7 of the Code of Federal Regulations, Section 226.18(g) states, “Each day care home shall comply with the recordkeeping requirements established in §226.10(d) and in this section. Failure to maintain such records shall be grounds for the denial of reimbursement.”

Recommendation

The Sponsor should ensure that day care homes claim meals for reimbursement based on proper supporting documents and maintain the documents for at least three years of the date of service.

3. The Sponsor did not complete monitoring of its feeding sites as required

Condition

During our entrance conference with the Sponsor on April 8, 2020, we requested documentation of monitoring for the previous 12 months for the sample sites. The Sponsor provided monitoring forms for **Cynthia Barnett, Shelia Capley, Jetton Hadley, Janet Jordan, Sharon Richardson**

and **Priscilla Rutledge** that did not provide evidence that the homes were monitored as required. The monitoring forms contained issues as follows:

- There were two (2) announced monitoring visits conducted at the home of **Cynthia Barnett** on March 22, 2019 and January 24, 2020, and one (1) unannounced visit conducted on August 30, 2019. We could only determine that one (1) unannounced visit was conducted in the previous 12 months.
- There one (1) unannounced visit conducted on July 24, 2019 at the home of **Shelia Capley**, and two (2) monitoring visits that were not marked as either announced or unannounced conducted on March 3, 2019 and November 18, 2019. We could only determine that one (1) unannounced visit was conducted in the previous 12 months.
- There were two (2) announced monitoring visits conducted at the home of **Jetton Hadley** on June 20, 2019 and January 17, 2020, and one (1) unannounced visit conducted on February 1, 2019. Only one (1) unannounced visit was conducted in the previous 12 months.
- There one (1) unannounced visit conducted on March 8, 2019 at the home of **Janet Jordan** and two (2) monitoring visits that were not marked as either announced or unannounced conducted on July 23, 2019 and November 18, 2019. We could only determine that one (1) unannounced visit was conducted in the previous 12 months.
- There were two (2) announced monitoring visits conducted at the home of **Sharon Richardson** on October 8, 2019 and November 11, 2019, and one (1) unannounced visit conducted on May 21, 2019. Only one (1) unannounced visit was conducted in the previous 12 months.
- There were two (2) announced monitoring visits conducted at the home of **Priscilla Rutledge** on June 24, 2019 and January 20, 2020, and one (1) unannounced visit conducted on September 25, 2019. Only one (1) unannounced visit was conducted in the previous 12 months.

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.”

Recommendation

The Sponsor should ensure that the required monitoring is completed timely and as required.

Meals Observation

Our observations during the meal services at the homes of **Cynthia Barnett, Shelia Capley, Krystal Farrar, Sharon Goodall, Linda Guthrie, Janet Jordan, Sharon Richardson, and Priscilla Rutledge** during the review period revealed no significant deficiencies.

Technical Assistance Provided

Technical assistance was provided regarding monitoring requirements, providers meetings all components at meals and the importance of serving within the approved time frame.

Disallowed Meals Cost

Based on the review, we determined that the Sponsor's noncompliance with the applicable Federal and State regulations that govern the CACFP resulted in a total disallowed cost of \$159.60.

Corrective Action

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

- Log into the Tennessee Information Payment System (TIPS) and revise the claim submitted for January 2020, which contains the verified claim data from the enclosed exhibit. ***Please note that, if the claim is revised,*** TIPS will automatically deduct the overpayment from your next CACFP claim for reimbursement. **OR**
- If you are no longer participating in the CACFP program, remit a check payable to the ***Tennessee Department of Human Services*** in the amount noted in the report for recovery of the amounts disallowed in this report. ***Please return the attached billing notice with your check;*** and
- 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

Please note that the amount of disallowed cost is subject to an interest charge. The interest charge will be waived if your revised claim is completed within 30 days from the date of this report. If the revised claim is not completed by the 30-day deadline, an interest charge may be billed to your institution. Please mail your check and the billing notice to:

Child and Adult Care Food Program
Fiscal Services
James K. Polk Building, 16th Floor
505 Deaderick Street
Nashville, Tennessee 37243

In accordance with the federal regulation found at 7 CFR Part 226.6 (k), your institution may

appeal the amount of disallowed cost identified in this monitoring report. The procedures for submitting an appeal are enclosed. The appeal must be submitted to:

Tennessee Department of Human Services
Appeals and Hearings Division, Clerk's Office
P.O. Box 198996
Nashville, TN 37219

If the Institution decides to appeal the amount of disallowed administrative and meal cost, all appeal procedures must be followed as failure to do so may result in the denial of your request for an appeal.

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: Cotrenia Bridges, Executive Director, Bountiful Basket Nutrition Program, Inc.
Allette Vayda, Director of Operations, Child and Adult Care Food Programs
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 Day Care Homes Meals Program Data (Tier I Only)

Sponsor: Bountiful Basket Nutrition Program, Inc.

Review Month/Year: January 2020

Total Amount Paid to Sponsor for Reported Meals: \$29,522.03

Home Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Days of CACFP Food Service	21	21
Total Number of Homes	52	52
Number of Breakfasts Served	5,823	5,788
Number of Lunches Served	6,192	6,157
Number of PM Supplements Served	6,595	6,560
Number of Suppers Served	594	594

Exhibit B

Day Care Home Site Program Data (Tier I)

Name of Home/Tier Type: Cynthia Barnett

Sponsor Reimbursement Paid to the Home: \$433.20

Home Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Days of CACFP Food Service	19	12
Total Attendance	95	60
Number of Breakfasts Served	95	60
Number of Lunches Served	95	60
Number of Supplements Served	95	60

Exhibit C

Day Care Home Site Program Data (Tier I)

Name of Home/Tier Type: Shelia Capley

Sponsor Reimbursement Paid to the Home: \$464.41

Home Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Days of CACFP Food Service	21	21
Total Attendance	109	109
Number of Breakfasts Served	100	100
Number of Lunches Served	101	101
Number of Supplements Served	108	108

Exhibit D

Day Care Home Site Program Data (Tier I)

Name of Home/Tier Type: Krystal Farrar

Sponsor Reimbursement Paid to the Home: \$742.87

Home Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Days of CACFP Food Service	21	21
Total Attendance	168	168
Number of Breakfasts Served	155	155
Number of Lunches Served	168	168
Number of Supplements Served	160	160

Exhibit E

Day Care Home Site Program Data (Tier I)

Name of Home/Tier Type: Sharon Goodall

Sponsor Reimbursement Paid to the Home: \$985.91

Home Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Days of CACFP Food Service	21	21
Total Attendance	227	227
Number of Breakfasts Served	190	190
Number of Lunches Served	227	227
Number of Supplements Served	227	227

Exhibit F

Day Care Home Site Program Data (Tier I)

Name of Home/Tier Type: Linda Guthrie

Sponsor Reimbursement Paid to the Home: \$350.36

Home Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Days of CACFP Food Service	21	21
Total Attendance	78	78
Number of Breakfasts Served	74	74
Number of Lunches Served	78	78
Number of Supplements Served	78	78

Exhibit G**Day Care Home Site Program Data (Tier I)****Name of Home/Tier Type: Jetton Hadley****Sponsor Reimbursement Paid to the Home: \$346.60**

Home Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Days of CACFP Food Service	21	21
Total Attendance	82	82
Number of Breakfasts Served	82	82
Number of Lunches Served	74	74
Number of Supplements Served	72	72

Exhibit H**Day Care Home Site Program Data (Tier I)****Name of Home/Tier Type: Janet Jordan****Sponsor Reimbursement Paid to the Home: \$1,081.06**

Home Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Days of CACFP Food Service	21	21
Total Attendance	241	241
Number of Breakfasts Served	237	237
Number of Lunches Served	241	241
Number of Supplements Served	224	224

Exhibit I

Day Care Home Site Program Data (Tier I)

Name of Home/Tier Type: Sharon Richardson
Sponsor Reimbursement Paid to the Home: \$187.16

Home Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Days of CACFP Food Service	17	17
Total Attendance	41	41
Number of Breakfasts Served	41	41
Number of Lunches Served	41	41
Number of Supplements Served	41	41

Exhibit J

Day Care Home Site Program Data (Tier I)

Name of Home/Tier Type: Priscilla Rutledge
Sponsor Reimbursement Paid to the Home: \$480.48

Home Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Days of CACFP Food Service	21	21
Total Attendance	84	84
Number of Lunches Served	84	84
Number of Supplements Served	84	84
Number of Suppers Served	84	84



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June 24, 2020

William Northrup, Chairman of the Board
Bountiful Basket Nutrition Program, Incorporated
Levering Office Building
3250 Dickerson Pike, #103
Nashville, Tennessee 37207-2913

Note: If you are no longer participating in the CACFP, remit a check payable to the Tennessee Department of Human Services in the amounts disallowed in this report to the address below. Please return the attached billing notice with your check.

If you plan to continue participating in the CACFP, log into the Tennessee Information Payment System (TIPS) and revise the claim submitted for January 2020, which contains the verified claim data from the enclosed exhibit.

Institution Name:	Bountiful Basket Nutrition Program, Incorporated
Institution Address:	Levering Office Building 3250 Dickerson Pike, #103 Nashville, Tennessee 37207-2913
Agreement Numbers:	00-169
Amount Due:	\$159.60
Due Date:	July 27, 2020

Please remit a check or money order payable to the Tennessee Department of Human Services in the amount noted above by the due date to:

Tennessee Department of Human Services
Fiscal Services 16th Floor
James K. Polk Building
505 Deaderick Street
Nashville, Tennessee 37243

Please note that the disallowed meal cost/overpayment of the CACFP is subject to an interest charge. The interest charge will be waived if the payment is received by the due date. If payment is not received by the end of 5th day of the due date, an interest charge may be added to the original amount due and will be billed to your entity.

If you have any questions regarding this notice, please feel free to contact Allette Vayda, Director of Operations at (615) 313-3769 or Allette.Vayda@tn.gov.

Thank you for your attention