



**STATE OF TENNESSEE
DEPARTMENT OF HUMAN SERVICES**

JAMES K. POLK BUILDING
505 DEADERICK STREET
NASHVILLE, TENNESSEE 37243-1403

TELEPHONE: 615-313-4700 FAX: 615-741-4165
TTY: 1-800-270-1349
www.tn.gov/humanservices

BILL LEE
GOVERNOR

DANIELLE W. BARNES
COMMISSIONER

August 24, 2020

Deborah Clarke-Patterson, Chairman of Board
Deliverance Outreach Temple Church
851 Garrettsburg Road
Clarksville, Tennessee 37052-3213

Dear Ms. Clarke-Patterson,

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 Deliverance Outreach Temple Church, Application Agreement number 00-022, beginning on March 30, 2020. Additional information was requested on several occasions and our final document request was completed on August 7, 2020 to complete the review. Our scope of the review was for reimbursement made to the Sponsor for February 2020.

Based on our review of the Sponsor's records and information provided, the Sponsor had eight (8) at-risk feeding sites operating during the review period. The **Ebenezer AME Church**, **Kenwood High**, and **Lincoln Homes** sites were selected as the sample.

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.

Important COVID-19 note: Due the current outbreak and the risk that COVID19 poses to your organization personnel and our staff, all our staff are working from home with no or 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 option to communicate to you. 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 a supper meal service at **Kenwood High** on February 19, 2020. We attempted to observe supper meal services at **Ebenezer AME Church** and **Lincoln Homes** on February 19, 2020. We also attempted a follow-up visit at **Lincoln Homes** on March 12, 2020.

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

1. The Sponsor provided a meal that did not meet USDA meal pattern requirements during an observed meal

Condition

We observed a supper meal service at **Kenwood High** on February 19, 2020. The meal served included chicken nuggets, 1% milk, corn, celery sticks and whole grain roll. The vegetable component was not the correct serving size for the age group 12-18.

As a result, 34 supper meals claimed for reimbursement were disallowed. (See Exhibit C)

Criteria

Title 7 of the Code of Federal Regulations, Section 226.17a (l) states, "At-risk afterschool snacks must meet the meal pattern requirements for snacks in §226.20(b)(6) and/or (c)(4); at-risk afterschool meals must meet the meal pattern requirements for meals in §226.20(b)(6) and/or (c)(1), (c)(2), or (c)(3)."

Recommendation

The Sponsor should ensure that meals served have components and portion sizes that meet the USDA meal pattern requirements.

2. The Sponsor did not serve meals at approved at-risk sites during attempted monitoring visits

Condition

During our monitoring visits on February 19, 2020, at **Ebenezer AME Church** and **Lincoln Homes** we attempted to observe supper meal services. We attempted a site visit at **Ebenezer AME Church** during the TIPS approved meal service times 4:15 – 4:45 pm and at **Lincoln Homes** during the approved times 5:00 – 5:30 pm. The sites were not in operation and no meals were observed.

The Sponsor stated **Ebenezer AME Church** was no longer operational and the site was closed in TIPS. The Sponsor stated **Lincoln Homes** was operational and the location for feeding at the site was not visited.

We returned to **Lincoln Homes** on March 12, 2020, to confirm the site was operational and there was no feeding observed. The Sponsor stated due to preparations for spring break the rotation for feeding sites had been changed.

Note: No meals were disallowed due to the Sponsor did not claim meals for these sites on the dates of our attempted monitoring visits.

Criteria

Title 7 of the Code of Federal Regulations, Section 226.17a(h) states, "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."

Title 7 of the Code of Federal Regulations, Section 226.17a(m)(2) states, "When school is in session, the meal must be served after the child's school day..."

Recommendation

The Sponsor should ensure that meals are served during the approved feeding times at approved sites.

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

Condition

During our entrance conference on March 30, 2020, we requested monitoring documents for the sample sites for the previous 12 months. The Sponsor provided monitoring forms dated November 4, 2019 for **Ebenezer AME Church**, November 5, 2019 for **Kenwood High** and November 6, 2019 for **Lincoln Homes**. Monitoring forms provided for **Ebenezer AME Church**, **Kenwood High**, and **Lincoln Homes** were not provided as support that three monitoring visits were completed in the previous 12 months as required and that no more than six months had lapsed between visits.

Additionally, the monitoring forms provided for **Ebenezer AME Church**, **Kenwood High**, and **Lincoln Homes** did not provide evidence that the five-day reconciliation was completed.

Criteria

Title 7 of the Code of Federal Regulations, Section 226.16(d)(4)(i) states, "Reviews must examine the meal counts recorded by the facility for five consecutive days during the current and/or prior claiming period..."

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...."

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."

This is a repeat finding from a previous report dated April 4, 2018

Recommendation

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

Observation

A five-day reconciliation of meals and attendance was completed for the sample sites from the date of our monitoring visits. Based on the number of meals observed at **Kenwood High**, the Sponsor meal counts, and attendance were not consistent. We observed 34 participants in attendance that were served supper meals. The average numbers for attendance and supper meals served for the previous five days was 293.

Technical Assistance Provided

During our monitoring visit at **Kenwood High** on February 20, 2020, technical assistance regarding USDA meal patterns and the updated And Justice for All poster.

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 \$124.01.

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 February 2020 which contains the verified claim data from the enclosed exhibits. ***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 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 meals 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: Stephanie Grant, Executive Director, Deliverance Outreach Temple Church
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 At-Risk Afterschool Meals Program Data for the Sampled Sites

Sponsor: Deliverance Outreach Temple Church

Review Month/Year: February 2020

Total Reimbursement: \$46,199.35

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Days of CACFP Food Service	18	18
Number of Sites	7	7
Number of Supplements Served	458	458
Number of Suppers Served	12,548	12,514

Exhibit B

At-Risk Afterschool Site Data

Site: Ebenezer AME Church

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Days of CACFP Food Service	6	6
Total Attendance	316	316
Number of Suppers Served	316	316

Exhibit C

At-Risk Afterschool Site Data

Site: Kenwood High

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Days of CACFP Food Service	14	14
Total Attendance	3,282	3,282
Number of Suppers Served	3,282	3,248

Exhibit D

At-Risk Afterschool Site Data

Site: Lincoln Homes

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Days of CACFP Food Service	18	18
Total Attendance	1,014	1,014
Number of Suppers Served	1,014	1,014



**STATE OF TENNESSEE
DEPARTMENT OF HUMAN SERVICES**

JAMES K. POLK BUILDING
505 DEADERICK STREET
NASHVILLE, TENNESSEE 37243-1403

TELEPHONE: 615-313-4700 FAX: 615-741-4165
TTY: 1-800-270-1349
www.tn.gov/humanservices

BILL LEE
GOVERNOR

DANIELLE W. BARNES
COMMISSIONER

August 24, 2020

Deborah Clarke-Patterson, Chairman of Board
Deliverance Outreach Temple Church
851 Garrettsburg Road.
Clarksville, Tennessee 37042-3213

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 continue participating in the CACFP, log into the Tennessee Information Payment System (TIPS) and revise the claim submitted for February 2020 which contains the verified claim data from the enclosed exhibits.

Institution Name:	Deliverance Outreach Temple
Institution Address:	851 Garrettsburg Rd, Clarksville, TN 37042-3213
Agreement Numbers:	00-022
Amount Due:	\$124.01
Due Date:	September 25, 2020

Based on the monitoring report issued, by the Audit Services Division within the Tennessee Department of Human Services, the Community and Social Services- Food Programs- CACFP & SFSP management has agreed with the findings which require your institution to reimburse the Department of Human Services the disallowed cost noted in the report

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:

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

Please note that the disallowed meals 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