



**STATE OF TENNESSEE
DEPARTMENT OF HUMAN SERVICES**

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BILL LEE
GOVERNOR

DANIELLE W. BARNES
COMMISSIONER

March 11, 2020

Jesse Worney, Board Chair
New Beginnings International Ministry
5093 Smith Springs Parkway
Antioch, Tennessee 37013

Dear Mr. Worney,

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 New Beginnings International Ministries (Sponsor), Application Agreement number 00-054, on January 27, 2020. Additional information was requested and provided on February 3, 2020. A fiscal review was performed on January 28, 2020 – January 29, 2020. Additional information was requested on February 07, 2020 and received on February 18, 2020. The purpose of this review was to determine if the Sponsor complied with the *Title 7 of the Code of Federal Regulations* (CFR) applicable parts, provider agreement, and applicable Federal and State regulations.

Based on our review of the Sponsor's records and information provided, the Sponsor had 34 feeding sites operating during the review period. McFerrin Community Center (McFerrin), NYBA, Southeast Community Center (Southeast), Stratford STEM Magnet School (Stratford), Stronger Than My Father, Thurgood Marshall Middle School (Thurgood Marshall), and US Taekwondo Academy Inc (Taekwondo) were selected as the sample sites.

The fiscal review of the Sponsor's records was from October 2019 through December 2019.

Background

CACFP Sponsors utilize meal count sheets to record the number of breakfasts, 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 both a snack and supper meal service at Stronger Than My Father on December 2, 2019, McFerrin on December 4 and Stratford on December 12, 2019. We observed a snack meal service at Taekwondo on December 3, 2019, Thurgood Marshall on December 5, 2019, and NYBA on December 22, 2019. We observed a supper meal service at Southeast on December 3, 2019. We also attempted to observe supper meal services at Cane Ridge High School on December 10, 2019, and Kirkpatrick Community Center on December 11, 2019, and a snack meal service at Hermitage Community Center on December 19, 2019; however, these sites did not provide meal services on these dates

Our review of the Sponsor’s records for December 2019 disclosed the following:

1. The Sponsor reported meal counts incorrectly

Condition

Based on our review of the Claim for Reimbursement for the December 2019, the Sponsor reported 2,591 lunch meals, 25,268 supper meals, and 31,107 supplements served. However, based on our review of available documents, we found there were discrepancies as follows:

Site & Site Number	Meal Type	Number Reported	Number Reconciled	Difference	Exhibit
McFerrin -0066	Lunch	177	175	-2	B
	Supplement	701	756	+55	
	Supper	520	572	+52	
NYBA 0077	Supplement	2,197	2,200	+3	C
	Supper	1,483	1,482	-1	
Southeast -0202	Supplement	750	731	-19	D
	Supper	750	730	-20	
Stratford -0057	Supplement	1,495	1,492	-3	E
	Supper	1,495	1,492	-3	
Stronger Than My Father-0130	Supplement	1,491	1,589	+98	F
	Supper	1,491	1,589	+98	
Thurgood Marshall - 0151	Supplement	955	1,067	+112	G
	Supper	955	1,067	+112	
Taekwondo -134	Supplement	1,548	1,639	+91	H

As a result, two (2) lunch meals were overreported, and 238 supper meals and 337 supplements were underreported. (See Exhibits)

This is a repeat finding from a previous report dated February 28, 2019.

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 that claims for reimbursement are completed correctly and based on accurate supporting documents.

2. The Sponsor claimed more meals than we observed during our monitoring visits

Condition

The Sponsor claimed more meals than we observed during our on-site monitoring visits at the sample sites. The summary of the meals observed at the feeding sites visited compared to what was claimed as served, and the meals disallowed are as follows:

Site & Site Number	Date Observed	Meal Type	Number Reported	Number Observed	Difference	Exhibit
McFerrin - 0066	12/4/19	Supplement	40	27	-13	B
		Supper	40	27	-13	
Southeast - 0202	12/3/19	Supper	61	32	-29	D
Stratford - 0057	12/12/19	Supplement	95	43	-52	E
		Supper	95	43	-52	
Stronger Than My Father- 0130	12/2/19	Supplement	98	95	-3	F
		Supper	98	95	-3	
Taekwondo - 134	12/5/19	Supplement	89	78	-11	H

As a result, 79 supplements and 97 supper meals claimed for reimbursement were disallowed. (See Exhibits)

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 that only meals served with the required components are claimed for reimbursement.

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

Condition

Stronger Than My Father- Site 0130 - *sample site*

We observed a supper meal service at Stronger Than My Father, on December 2, 2019. The meal served included 1% milk, flamed-broil beef cheeseburgers, whole grain bun, and orange. There was no vegetable component served as required.

As a result, 95 supper meals claimed for reimbursement were disallowed. (See Exhibit F)

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)."

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 menus meet the USDA meal pattern requirements.

4. The Sponsor reported meals in excess of attendance

Condition

During our on-site monitoring visit on January 27, 2019, we requested documentation of meal counts and attendance for the sample feeding sites during the review period. Based on the documentation provided by the Sponsor, we concluded there were meals claimed in excess of attendance at feeding sites.

The meals claimed over attendance are as follows:

Site & Site Number	Meal Type	Date	Meals Reported	Attendance Documented	Meals Over Attendance	Exhibit
NYBA - 0077	Supplement	12/22/19	49	0	-49	C
Stratford - 0057	Supplement	12/10/19	137	128	-9	E
	Supper	12/10/19	137	128	-9	
Taekwondo -134	Supplement	12/4/19	101	99	-2	H
		12/5/19	98	96	-2	
		12/6/19	93	91	-2	
		12/11/19	83	79	-4	
		12/13/19	76	75	-1	

		12/16/19	87	86	-1	
		12/17/19	89	88	-1	
		12/18/19	84	79	-5	
		12/19/19	89	81	-8	
		12/20/19	71	69	-2	

As a result, 86 supplements and nine (9) supper meals claimed for reimbursement were disallowed. (See Exhibits)

Criteria

Title 7 of the Code of Federal Regulation, 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 that claims for reimbursement are completed correctly and that only meals served to eligible participants in attendance are claimed for reimbursement.

5. The Sponsor claimed more meals for reimbursement than were available to serve

Condition

During our monitoring visit on January 27, 2020, we requested meal counts documentation that supporting the claim for the review period. The Sponsor provided production logs as evidence of the number of meals available for service. Based on our review of these documents, we noted there were more meals claimed than were documented as delivered.

The meals claimed over available meals documented are as follows:

McFerrin - Site 0066– *sample site*

Date	Meal Type	Number Reported/Claimed	Number Delivered	Difference
12/17/2019	Supplement	41	40	-1
12/25/2019	Supplement	13	0	-13
12/25/2019	Supper	13	0	-13
12/27/19	Lunch	26	20	-6
12/27/19	Supplement	25	20	-5
12/31/2019	Supplement	30	37	-7

As a result, 26 supplements, 6 lunch meals, and 13 suppers claimed for reimbursement were disallowed. (See Exhibit B)

Southeast - Site 0202- *sample site*

Date	Meal Type	Number Reported/Claimed	Number Delivered	Difference
12/2/2019	Supplement	89	75	-14
	Supper	89	75	-14
12/4/2019	Supplement	72	60	-12
	Supper	72	60	-12
12/6/2019	Supplement	82	75	-7
	Supper	82	75	-7

As a result, 33 supplements and 33 supper meals claimed for reimbursement were disallowed. (See Exhibit D)

Stratford - Site 0057- *sample site*

Date	Meal Type	Number Reported/Claimed	Number Delivered	Difference
12/17/2019	Supplement	52	0	-52
	Supper	52	0	-52
12/19/2019	Supplement	127	125	-2
	Supper	127	125	-2
12/20/2019	Supplement	71	0	-71
	Supper	71	0	-71

As a result, 125 supplements and 125 supper meals claimed for reimbursement were disallowed. (See Exhibit E)

Thurgood Marshall - Site 0151- *sample site*

Date	Meal Type	Number Reported/Claimed	Number Delivered	Difference
12/16/2019	Supplement	122	95	-27
	Supper	122	95	-27
12/17/2019	Supplement	122	95	-27
	Supper	122	95	-27
12/18/2019	Supplement	122	95	-27
	Supper	122	95	-27
12/19/2019	Supplement	122	95	-27
	Supper	122	95	-27

As a result, 108 supplements and 108 supper meals claimed for reimbursement were disallowed. (See Exhibit G)

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 that meal counts do not exceed the number of meals delivered or available at sites.

6. The Sponsor reported the number of operational days for feeding sites incorrectly

Condition

The Sponsor reported the number of operation days for the following sites:

Site & Site Number	Days Reported	Days Verified	Exhibit
McFerrin -0066	19	21	B
Stratford -0057	12	14	E
Stronger Than My Father-0130	19	17	F
Thurgood Marshall -0151	14	15	G
Taekwondo -134	18	19	H

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 that all participants are recorded as present only for their actual days of attendance.

7. The Sponsor served meals outside of the approved serving time

Condition

McFerrin - Site 0066 – *sample site*

During our monitoring visit on December 4, 2019, at McFerrin, an observed supper was served outside of the TIPS approved time. The observed meal service was from 4:30 pm to 4:45 pm, but the TIPS approved meal service time was 4:45 pm to 5:00 pm.

No meals were not disallowed due to the observed meals being creditable.

Stratford - Site 0057 – *sample site*

During our monitoring visit on December 12, 2019, at Stratford, an observed supplement was served outside of the TIPS approved time. The observed meal service was from 2:30 pm to 2:46 pm, but the TIPS approved meal service time was 2:15 pm to 2:30 pm.

No meals were not disallowed due to the observed meals being creditable.

This is a repeat finding from a previous report dated February 28, 2019.

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 226.17 (m)(1) states, “When school is in session, the snack must be served after the child's school day. With State agency approval, the snack may be served at any time on weekends and vacations during the regular school year...”

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. With State agency approval, any one meal may be served (breakfast, lunch, or supper) per day on weekends and vacations during the regular school year...”

Recommendation

The Sponsor should ensure that meals are served during the approved feeding site time.

8. The Sponsor did not provide documentation of CACFP and Civil Rights training for key staff as required

Condition

During our on-site monitoring visit on January 27, 2020, we requested and reviewed training documentation for the sample sites. The forms provided for **CACFP** training dated May 8, 2019, and Civil Rights training dated September 3, 2019, did not contain the printed name or signature for the site supervisor listed for Taekwondo.

Criteria

Title 7 of the Code of Federal Regulations, Section 226.17(d) states, “Each sponsoring organization must provide adequate supervisory and operational personnel for the effective management and monitoring of the program at all facilities it sponsors...At minimum, Program assistance must include: (2) Training on Program duties and responsibilities to key staff from all sponsored facilities prior to the beginning of Program operations. 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, claim submission and review procedures, recordkeeping requirements and reimbursement system"

Recommendation

The Sponsor should ensure that all key staff providing CACFP services have received CACFP and Civil Rights training annually.

9. The Sponsor did not have a menu posted at a feeding site for an observed meal

Condition

During our monitoring visit at Stratford on December 12, 2019, and Thurgood Marshall on December 5, 2019, there was no menu posted.

This is a repeat finding from a previous report dated February 28, 2019.

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 served.

10. Late charges fees were paid using CACFP program funds

Condition

The Sponsors' financial records show lease payments made to Central Pike Business Center (CPBP) for November 2019 and December 2019 included late fee charges of \$580.00. Check 1238 posted to the general ledger on November 13, 2019, totaling \$3,190.00 included \$290.00 in late fees, and check 1325, posted to the general ledger on December 13, 2019, totaling \$3,190.00 included \$290.00 in late fees. There were no credit amounts recorded to CACFP account code 50160 - Kitchen Lease, to indicate the late fees have been credited back to the CACFP program.

This resulted in an unallowable cost of \$580.00.

An additional request was made to the Sponsors on February 7, 2020, to provide supporting documents to validate the expense totals recorded to general ledger CACFP account code 50100-50110 - Food & Drink. On February 18, 2020, the Sponsors provided three (3) Sam's Club credit card statements for the review period of October 2019 through December 2019. The credit card statements show payments made towards the balance during October 2019 through December 2019 included late charges of \$79.98. There were no credit amounts

recorded to CACFP account code 50100-50110 - Food & Drink, to indicate the late fees have been credited back to the CACFP program.

This resulted in an unallowable cost of \$79.98.

Credit Card Statement Month	General Ledger Posting Date	Expense Total	Total Late Fees & Statement Posting Date
October 2019	10/17/19	\$3,000.00	\$39.99 - 10/13/19
November 2019	11/19/19	\$7,000.00	\$39.99 - 11/12/19
December 2019	12/05/19	\$2,500.00	\$0.00
Total	-	\$12,500.00	\$79.98

Criteria

FNS Instruction 796-2, Rev. 4, Section VIII (I) (22) (b) (9) titled Unallowable Cost states "Cost to failure to pay debt timely (interest and late charges)."

Recommendation

The Sponsor should implement procedures to ensure that vendors are paid by the due date to prevent late charges.

The Sponsor should transfer non-CACFP funds in the amount of \$659.98 into the CACFP account to cover the unallowable administrative cost.

11. The Sponsor's gas receipts could not be reconciled to the Sponsor's ATM cash withdrawals amounts

Condition

The Sponsors' financial records show three (3) ATM withdrawals were recorded to the general ledger totaling \$760.00 in account code 50140 - Gasoline; on October 02, 2019, October 7, 2019, and November 18, 2019. A request was made to the Sponsor on January 29, 2019, and February 7, 2020, to provide supporting documents to validate the expense totals recorded to the general ledger for the ATM cash withdrawals. On January 29, 2020, the Sponsors provided all of their gas receipts for the entire month of October 2019 and November 2019, and on February 10, 2020, the Sponsor stated: "We have given all the gas receipts and gas mileage records to you, gas is distributed also twice per week". The Sponsor did not provide an explanation or support documentation of which gas receipts specifically relate to the ATM cash withdrawals totals per our second request. Therefore, we were unable to reconcile the receipts given to the ATM cash withdrawal totals recorded to general ledger account code 50140 - Gasoline; due to the gas receipts having different dates and amounts that did coincide with the ATM withdrawal dates. The Sponsor was unable to provide any supporting documents to show how they are keeping track of the total amount of cash being distributed to their delivery truck drivers when an ATM cash withdrawal is made.

General Ledger Post Date & ATM Withdrawal Date	Expense Total
10/02/19	\$280.00
10/17/19	\$180.00
11/16/19	\$300.00
Total	\$760.00

Criteria

FNS Instruction 796-2, Rev. 4, Section VIII (A) titled Cost Principles states

Institutions are responsible for accounting for costs correctly and for maintaining records and sufficient supporting documentation to demonstrate that costs claimed have been incurred, are allocable to the Program, and comply with State agency financial management requirements, this Instruction, and applicable Program regulations and policies. Costs that are not properly documented and recorded pursuant to U.S. GAAP, State agency financial management requirements, 7 CFR Part 226 and other applicable regulations, 2 CFR Part 225 or 2 CFR Part 230, as applicable, and this Instruction are unallowable.

Title 7 of the Code of Federal Regulations, Section 226.6 states,

Performance Standard 3 - Program accountability. The renewing institution must have internal controls and other management systems in effect to ensure fiscal accountability and to ensure that the Program operates in accordance with the requirements of this part. To demonstrate Program accountability, the renewing institution must document that it meets the following criteria:

... (2) Fiscal Accountability, Has a financial system with management controls specified in writing. For sponsoring organizations, these written operational policies must assure: (i) Fiscal integrity and accountability for all funds and property received, held, and disbursed; (ii) The integrity and accountability of all expenses incurred; (iii) That claims are processed accurately and in a timely manner; (iv) That funds and property are properly safeguarded and used, and expenses incurred, for authorized Program purposes; and (v) That a system of safeguards and controls is in place to prevent and detect improper financial activities by employees; (3) Recordkeeping. Maintains appropriate records to document compliance with Program requirements, including budgets, accounting records, approved budget amendments, and, if a sponsoring organization, management plans and appropriate records on facility operations;...

Recommendation

The Sponsor should implement internal control procedures to have drivers sign for the receipt of cash for gas purchases. These receipts along with the actual gas receipts should be attached to the ATM cash withdrawal to ensure supporting documentation for gas purchases and proper accounting for ATM cash withdrawals.

12. The Sponsor has not established written operational policies and procedures

Condition

Based on our inquiry with the Sponsor on January 29, 2019, we noted that there were no written operational policies and procedures. According to the Sponsor's Management Plan approved by the State on September 16, 2019, the Sponsor is required per Section III B. Fiscal Accountability, to have a financial system with management controls specified in writing and written operational policies that pertain to the following:

- Fiscal Integrity and accountability for all funds and property received, held and disbursed
- The Integrity and accountability for all expenses incurred
- The claims will be processed accurately and in a timely manner
- That all funds and property will be properly safeguarded and used, and expenses incurred, for authorized CACFP purposes
- That a system of safeguard and controls in place to prevent and detect improper financial activities by employees...

Criteria

Title 7 of the Code of Federal Regulations, Section 226.6 states,

Performance Standard 3 - Program accountability. The renewing institution must have internal controls and other management systems in effect to ensure fiscal accountability and to ensure that the Program operates in accordance with the requirements of this part. To demonstrate Program accountability, the renewing institution must document that it meets the following criteria:

... (2) Fiscal Accountability, Has a financial system with management controls specified in writing. For sponsoring organizations, these written operational policies must assure: (i) Fiscal integrity and accountability for all funds and property received, held, and disbursed; (ii) The integrity and accountability of all expenses incurred; (iii) That claims are processed accurately and in a timely manner; (iv) That funds and property are properly safeguarded and used, and expenses incurred, for authorized Program purposes; and (v) That a system of safeguards and controls is in place to prevent and detect improper financial activities by employees; (3) Recordkeeping. Maintains appropriate records to document compliance with Program requirements, including budgets, accounting records, approved budget amendments, and, if a sponsoring organization, management plans and appropriate records on facility operations;...

Recommendation

The Sponsor should establish and implement operational policies and procedures to comply with state and federal regulations.

13. Timesheets were not signed by the employee and/or supervisor for December 2019

Condition

Based on our review of the timesheets provided for the thirteen (13) employees selected for review for the test month of December 2019; we noted the following:

- Thirteen (13) employee timesheets for the period of 11/23/19-12/06/19 were not signed/certified with the employees' signature.
- Thirteen (13) employee timesheets for the period of 12/07/19-12/20/19 were not signed/certified with the employees' signature.
- Twelve (12) employee timesheets for the period of 12/07/19-12/20/19 were not signed/certified with the supervisor's signature.

Criteria

FNS 796.2 Revision 4, Section VIII(l)(23)(c)(4), titled Documentation Requirements states, "In all cases, time and attendance and time distribution reports must be completed by the employee and signed and certified as true and correct by the employee and a responsible supervisory official having firsthand knowledge of the activities performed by the employee during the period covered by the reports"

Recommendation

The Sponsor should ensure time and attendance reports are signed by the employee and a responsible supervisory official before payroll payments are distributed.

14. The Sponsor did not have written compensation policy for every element of compensation charged to the CACFP program

Condition

Based on our inquiry with the Sponsor on January 29, 2019, we were informed there are no written compensation policies and procedures to include:

- Rates of Pay
- Hours Worked (including breaks and meal periods)
- Payment Schedule for regular compensation, overtime, compensatory time and holiday pay
- Payroll deductions; Federal, State, and Local Employment Tax and Social Security
- Timesheet completion, submission and approval process
- Employment classifications for 1099 employees

Criteria

Title 7 of the Code of Federal Regulations, Section 226.6 Performance Standard 2-Administrative capability states,

"The renewing institution must be administratively capable. Appropriate and effective management practices must be in effect to ensure that the Program operates in accordance

with this part. To demonstrate administrative capability, the renewing institution must document that it meets the following criteria...has Program policies and procedures in writing that assign Program responsibilities and duties..."

FNS 796.2 Revision 4, Section VIII(1)(23)(c)(1) titled Documentation Requirements states,

Institutions must establish and maintain a written compensation policy for every element of compensation charged to the Program. At a minimum, the written compensation policy must apply to any individual or group of individuals employed by the institution and identify: (a) Rates of pay; (b) Hours of work, including breaks and meal periods; and (c) The institution's policy and payment schedule for regular compensation, overtime, compensatory time, holiday pay, benefits, awards, severance pay and payroll tax withholding. The timing and frequency of the institution's payments to its employees will follow a routine schedule as directed by its human resource policy. For example, it may compensate employees weekly, bi-weekly, or monthly...

Recommendation

The Sponsor should establish and implement written compensation guidelines to comply with state and federal regulations.

15. The Sponsor was not in compliance with the approved Management Plan and Viability, Capability, and Accountability Checklist (VCA)

Condition

Based on our inquiry with the Sponsor on January 29, 2020, we noted that the Sponsor has not established written bylaws for the Board of Directors. According to the Sponsor Management Plan approved on September 9, 2019, in Section III: Program Accountability (A.2.) ask the question "Does your institution have by-laws available for the state agency to review upon request?"...The Sponsor stated "Yes."

Also, the Sponsor's VCA Checklist provided to the State on September 9, 2019, in Section IV. Performance Standard 2: Administrative Capability (#26) ask the question, "Do the by-laws, or similar document, grant program oversight responsibility to the governing board/officers?" ...The Sponsor stated "Yes." However, the Sponsor did not provide a copy of the by-laws, or a similar document to show the board of director's responsibilities as an independent active board of directors and how often they are required to meet.

Criteria

Title 7 of the Code of Federal Regulations, Section 226.6 Management Plan states "Sponsoring organizations must submit a complete management plan that includes: (A) Detailed information on the organization's management and administrative structure;"

USDA – CACFP, Guidance for Management Plans and Budgets, Page 18, titled Monitoring the Management Plan states,

The State agency will use a sponsoring organization's management plan throughout the year as a living document that can be referred to for information about the sponsoring

organization's ongoing activity, and certainly during a review to ensure the institution is operating according to its plan. Administrative functions outlined in the management will be evaluated as part of a Program review to determine compliance with requirements outlined in the Monitoring Handbook for State Agencies CACFP Handbook. Rereading the management plan prior to the review is critical for informing the State agency monitors of what procedures they should find at the sponsorship. When the monitor knows what to expect, they will more easily recognize variations in operation outside what the sponsoring organization stated in its management plan and what the State agency had approved.

Recommendation

The Sponsor should ensure that they are compliant with their policies and procedures and any legal documents submitted to the State.

Observations

There was evidence on several of the documents used to support the Claim for Reimbursement of block claiming. The number of meals claimed did not agree to the number of participants in attendance or meals available for consumption based on production records. The Sponsor provided meal count forms for two of the sample sites that consistently reported the same number of supper meals and supplements served each day of the week. Additionally, the same number of meals served for multiple meal services during the month were reported at multiple sites.

Follow up

We will follow up on with unannounced visits feeding sites and obtain and review the supporting documents for meals claimed for reimbursement. We will issue a separate report detailing the result of the follow up.

Technical Assistance Provided

The Sponsor requested technical assistance regarding ounce grain equivalence and the new and "And Justice for All" poster; technical assistance was provided on December 3, 2019, via email. The Sponsor also requested technical assistance regarding regulations and requirements for having an employee handbook. This request was forwarded to Program specialists for further assistance on February 3, 2020.

Unallowable Administrative Cost

Based on our review, we determined that the Sponsor paid \$659.98 in unallowable cost with CACFP funds. The Sponsor should transfer non-CACFP funds in the amount of \$659.98 into the CACFP account to cover the unallowable administrative cost.

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 \$1,024.67.

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 December 2019, 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 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

Sam O. Alzoubi, CFE
Director of Audit Services

Exhibits

cc: Brandon Williams, Director, New Beginnings International Ministry
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: New Beginnings International Ministries

Review Month/Year: December 2019

Total Reimbursement: \$130,856.28

Site Meal Service Reconciliation and Monitor Activity	Reported Claim	on	Reconciled to Documentation
Total Days of CACFP Food Service	19		21
Number of Sites	34		34
Total Attendance	31,107		31,619
Number of Lunch Served	2,591		2,583
Number of Supplements Served	31,107		30,987
Number of Suppers Served	25,268		25,026

Exhibit B

At-Risk Afterschool Site Data

Site: McFerrin Community Center

Month: December 2019

Site Meal Service Reconciliation and Monitor Activity	Reported Claim	on	Reconciled to Documentation
Total Days of CACFP Food Service	19		21
Total Attendance	701		954
Number of Lunch Served	177		169
Number of Supplements Served	701		717
Number of Suppers Served	520		546

Exhibit C**At-Risk Afterschool Site Data****Site: NYBA****Month: December 2019**

Site Meal Service Reconciliation and Monitor Activity	Reported Claim	on	Reconciled to Documentation
Total Days of CACFP Food Service	18		18
Total Attendance	2,197		2,155
Number of Supplements Served	2,197		2,151
Number of Suppers Served	1,483		1,482

Exhibit D**At-Risk Afterschool Site Data****Site: Southeast Community Center****Month: December 2019**

Site Meal Service Reconciliation and Monitor Activity	Reported Claim	on	Reconciled to Documentation
Total Days of CACFP Food Service	10		10
Total Attendance	750		704
Number of Supplements Served	750		698
Number of Suppers Served	750		668

Exhibit E**At-Risk Afterschool Site Data****Site: Stratford STEM Magnet School****Month: December 2019**

Site Meal Service Reconciliation and Monitor Activity	Reported Claim	on	Reconciled to Documentation
Total Days of CACFP Food Service	12		14
Total Attendance	1,495		1,479
Number of Supplements Served	1,495		1,306
Number of Suppers Served	1,495		1,306

Exhibit F**At-Risk Afterschool Site Data****Site: Stronger Than My Father****Month: December 2019**

Site Meal Service Reconciliation and Monitor Activity	Reported Claim	on	Reconciled to Documentation
Total Days of CACFP Food Service	19		17
Total Attendance	1,491		1,599
Number of Supplements Served	1,491		1,586
Number of Suppers Served	1,491		1,491

Exhibit G**At-Risk Afterschool Site Data****Site: Thurgood Marshall Middle School****Month: December 2019**

Site Meal Service Reconciliation and Monitor Activity	Reported Claim	on	Reconciled to Documentation
Total Days of CACFP Food Service	14		15
Total Attendance	955		1,122
Number of Supplements Served	955		959
Number of Suppers Served	955		959

Exhibit H**At-Risk Afterschool Site Data****Site: US Taekwondo Academy, Inc****Month: December 2019**

Site Meal Service Reconciliation and Monitor Activity	Reported Claim	on	Reconciled to Documentation
Total Days of CACFP Food Service	18		19
Total Attendance	1,548		1,633
Number of Supplements Served	1,548		1,600



**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

March 11, 2020

Jesse Worney, Board Chair
New Beginnings International Ministry
5093 Smith Springs Parkway
Antioch, TN 37013

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 to participate in the CACFP, log into the Tennessee Information Payment System (TIPS) and revise the claim submitted for December 2019, which contains the verified claim data from the enclosed exhibits.

Institution Name:	New Beginnings International Ministry
Institution Address:	5093 Smith Springs Parkway Antioch, TN 37013
Agreement Numbers:	00-054
Amount Due:	\$1,024.67
Due Date:	April 13, 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:

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

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