



**STATE OF TENNESSEE  
DEPARTMENT OF HUMAN SERVICES**

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**BILL LEE**  
GOVERNOR

**DANIELLE W. BARNES**  
COMMISSIONER

April 13, 2020

Mary Wedgeworth, Board Chair  
Telamon Corporation  
4713 Papermill Drive Suite 203  
Knoxville, TN 37909-1924

Dear Ms. Wedgeworth,

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 Telamon Corporation (Sponsor), Application Agreement number 00518 on March 5, 2020. Additional information was requested and provided on March 10, 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 two (2) feeding sites operating during the review period. The Greene County Head Start Center was selected as the sample.

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 lunch meal service at the Greene County Head Start Center on January 8, 2020.

**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.

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

**1. The Sponsor provided infant menus that did not meet the USDA meal pattern requirements**

Condition

**Greene County Head Start**

Based on our review of the infant menus provided by the Sponsor for January 2020, the infant menus provided did not meet the USDA meal pattern requirements. The infant menus provided had deficiencies as follows:

Infant: AD, 10 Months

<b>Date</b>	<b>Menu</b>	<b>Missing Component</b>	<b>Meal</b>
1/6/2020	Infant Formula, french toast, applesauce	Cereal/meat/meat alternative	Breakfast
1/8/2020	Infant Formula, waffle, applesauce	Cereal/meat/meat alternative	Breakfast
1/15/2020	Infant Formula, pancake, applesauce	Cereal/meat/meat alternative	Breakfast
1/21/2020	Infant Formula, waffle, spiced apples	Cereal/meat/meat alternative	Breakfast

Due to the new CACFP infant meal patterns requirements and emphasis on providing technical assistance during the implementation process, there were no meals disallowed.

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)(1)* states, "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."

*Section 226.20(b)(4)(ii)(A)* states that at 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 8 ounces of

yogurt; and 0 to 2 tablespoons of vegetable, fruit, or portions of both. Fruit juices and vegetable juices must not be served.”

*Title 7 of the Code of Federal Regulations, Section 226.14 (b)* states, “ In the event that the State agency finds that an institution which prepares its own meals is failing to meet the meal requirements of 226.20, the State agency need not disallow payment or collect an overpayment arising out of such failure if the institution takes such other action as, in the opinion of the State agency, will have a corrective effect.”.

#### Recommendation

The Sponsor should ensure that all meals claimed for reimbursement meet the meal patterns established by the USDA, and menus should be reviewed to ensure they contain all required meal components to be eligible as a reimbursable meal.

## **2. The Sponsor did not complete monitoring of its feeding sites as required**

#### Condition

Monitoring forms for **Greene County Head Start** were incomplete. The documentation provided showed the Sponsor is conducting monitoring, however there were no meals observed during those monitoring visits. One monitoring form did not indicate the year or specify if the monitoring visit was an announced or unannounced visit.

#### Criteria

*Title 7 of the Code of Federal Regulations, Section 226.16(d)(4)* details the requirements for Sponsor monitoring including: review elements, reconciliation of meal counts, and the frequency and type of required facility reviews.

*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 the forms are completely filled out.

#### **Technical Assistance Provided**

Technical assistance regarding the infant menu deficiencies was provided. We provided assistance regarding the new CACFP meal pattern requirements during the visit and follow up email to the Sponsor.

#### **Corrective Action**

The Sponsor should 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](mailto: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, 15<sup>th</sup> Floor  
505 Deaderick Street  
Nashville, Tennessee 37243  
[Allette.Vayda@tn.gov](mailto: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](mailto:Sean.Baker@tn.gov).

Sincerely,

*Sam O. Alzoubi*

Sam O. Alzoubi, CFE  
Director of Audit Services

Exhibits

cc: Suzanne Orozco, Executive Director, Telamon Corporation  
Zach McKinnis, MIS Coordinator, Telamon Corporation  
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**

**Verification of CACFP Affiliated Center Claim**

**Sponsor: Telamon Corporation**

**Review Month/Year: January 2020**

**Total Meal Reimbursement Received: \$5,413.77**

<b>Site Meal Service Reconciliation and Monitor Activity</b>	<b>Reported on Claim</b>	<b>Reconciled to Documentation</b>
Total Days of CACFP Food Service	19	19
Number of Breakfast meals	952	952
Number of Lunch meals	1,004	1,004

**Exhibit B**

**Verification of Sponsored Center Claim**

**Sample Site: Greene County Head Start**

**Month: January 2020**

<b>Site Meal Service Reconciliation and Monitor Activity</b>	<b>Reported on Claim</b>	<b>Reconciled to Documentation</b>
Total CACFP Food Service Days	19	19
Total Attendance	235	235
Number of Breakfast meals	220	220
Number of Lunch meals	233	233