



**STATE OF TENNESSEE
DEPARTMENT OF HUMAN SERVICES**

CITIZENS PLAZA BUILDING
400 DEADERICK STREET
NASHVILLE, TENNESSEE 37243-1403

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

BILL HASLAM
GOVERNOR

DANIELLE W. BARNES
COMMISSIONER

CERTIFIED MAIL RECEIPT # 70153010000175365545

March 21, 2017

James Donnelly, CEO
Richard Fletcher, Board Chair
Backfield in Motion, Inc.
920 Woodland Street
Nashville, Tennessee 37206

**RE: Notice of Serious Deficiency for the Child and Adult Care Food Program (CACFP)
Agreement Number 00-605 and Demand for Overpayment.**

Dear Mr. Donnelly & Mr. Fletcher:

The Department of Human Services Audit Services staff conducted an on-site unannounced review of the Child and Adult Care Food Program (CACFP) at Backfield in Motion, Inc. (Sponsor), Application Agreement number 00-605, on February 2, 2017. An unannounced site visit to the Litton Center was conducted on February 1, 2017. Additional information was requested and received on February 3, 2017 to complete the review.

We reviewed the sponsor's records of reimbursements and expenditures for the period of December 2016. The purpose of this review was to determine if the Sponsor complied with Title 7 of the Code of Federal Regulations (CFR) applicable parts, application agreement, and applicable Federal and State regulations.

Background

CACFP sponsors utilize meal count sheets to record the number of meals served for breakfast, lunch, supper and supplement meals served. The CACFP sponsor will report the number of meals served through the department's Tennessee Information Payment System (TIPS) system to seek 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. In addition, we observed a meal service during our site visit.

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The following findings were indicated by the monitoring review: (1) insufficient quantities of milk were purchased; (2) menus did not contain all required components; (3) a refrigerator was not kept at the appropriate temperature and (4) children did not take all components during the observed meal service

SERIOUS DEFICIENCY DETERMINATION

Based on the monitoring review, the Department has determined that Backfield in Motion, Inc. is seriously deficient in its operation of the CACFP. In addition, the Department has identified James Donnelly, CEO and Richard Fletcher, Board Chair as responsible for the serious deficiencies in light of their responsibility for the overall management of Backfield in Motion, Inc.'s CACFP.

If Backfield in Motion, Inc. does not fully and permanently correct all of the serious deficiencies and submit documentation of the corrective action by the due date, the Department will:

- Propose to terminate Backfield in Motion, Inc.'s, agreement to participate in the CACFP;
- Propose to disqualify Backfield in Motion, Inc. from future CACFP participation; and
- Propose to disqualify James Donnelly, CEO and Richard Fletcher, Board Chair from future CACFP participation.

In addition, if Backfield in Motion, Inc. voluntarily terminates its CACFP agreement after receiving this letter, the Department will propose to disqualify Backfield in Motion, Inc. and James Donnelly, CEO and Richard Fletcher, Board Chair from future CACFP participation. If disqualified, Backfield in Motion, Inc. and James Donnelly, CEO and Richard Fletcher, Board Chair will be placed on the National Disqualified List ("NDL"). While on the NDL, Backfield in Motion, Inc. will not be able to participate in the CACFP as an institution or facility. James Donnelly, CEO and Richard Fletcher, Board Chair will not be able to serve as a principal in any institution or facility or as a day care home provider in the CACFP.

Institutions and individuals remain on the NDL until the United States Department of Agriculture's Food and Nutrition Service, in consultation with the Department, determines that the serious deficiencies have been corrected, or until seven years after their disqualification. However, if any debt relating to the serious deficiencies has not been repaid, they will remain on the list until the debt has been repaid.

The authorization for this action is found in Paragraph 1.e. of your FY 2016 CACFP Provider Agreement and in the CACFP regulations at 7 C.F.R. § 226.6(c)(3). You may not appeal a finding of serious deficiency.

SERIOUS DEFICIENCIES AND REQUIRED CORRECTIVE ACTION

The following paragraphs detail each serious deficiency.

Serious Deficiency 1: Insufficient quantities of milk were purchased.

Condition

Based on the number of meals served with milk, as a required component, a total of 481 half pints were needed. However, the Sponsor could not document the purchase of milk for the month of December, and no month-end milk inventory was utilized. The lack of supporting documentation for the milk purchases resulted in a shortage of 481 half pints. The sponsor only claimed 450 supper meals served. As a result, reimbursement for 450 supper meals claimed were disallowed for $(450 \times 3.3900) = \$1,525.50$. (See Exhibit A)

Criteria

The CACFP regulations at 7 C.F.R § 226.14(b) states that, “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. However, the State agency shall not disregard any overpayments or waive collection action arising from the findings of Federal audits.”

The CACFP regulations at 7 C.F.R § 226.20 (c)(2) states, “Fluid milk, meat and meat alternates, vegetables, fruits, and grains are required components in the lunch and supper meals. ...”

Recommendation

The sponsor should purchase enough milk that provides each participant with eight ounces of milk for meals claimed for reimbursement. The Sponsor may consider the option to provide meals with offer versus serve which allow participants to decline milk and select another component, if preferred.

ADDITIONAL FINDINGS

Additional Finding 1: Menus did not contain all required components.

Condition

A supper meal consists of one serving of meat or meat alternate, two servings of fruit and/or vegetables, one serving of bread/grains, and one serving of fluid milk. The menus provided for the Litton Center listed the following:

- On Friday, December 1, the listed meal of chicken tenders, mixed vegetables, peaches and 1% chocolate milk did not include a bread/grain component.
- On Monday, December 5, the menu listed Hot Pockets, corn, apples and 1% milk for supper. Neither the sponsor nor the distributor could provide a CN label or other documentation to show the pocket sandwich met the requirements regarding meat/meat alternate and bread/grain components.
- On Tuesday, December 6, the listed meal of chicken tenders and chips, mixed vegetables, peaches, and 1% milk did not include a bread/grain component.
- On Thursday, December 8, the menu listed Hot Pockets, corn, sliced apples and 1% milk for supper. Neither the sponsor nor the distributor could provide a CN label or other documentation to show the pocket sandwich met the requirements regarding meat/meat alternate and bread/grain components.
- On Friday, December 9, the listed meal of fish and chips, blueberries, carrots, and 1% milk did not list a bread/grain component. However, Second Harvest, who provides prepackaged meal tray packs to Litton Center, sent confirmation this meal includes 1 slice pound cake, which meets the bread/grain component.
- On Monday, December 12, the menu listed Hot Pockets, corn, apples and 1% milk for supper. Neither the sponsor nor the distributor could provide a CN label or other documentation to show the pocket sandwich met the requirements regarding meat/meat alternate and bread/grain components.
- On Tuesday, December 13, the listed meal of chicken tenders and chips, mixed vegetables, peaches, and 1% milk did not include a bread/grain component.
- On Wednesday, December 14, the menu listed Hot Pockets, mixed vegetables, apples and 1% milk for supper. Neither the sponsor nor the distributor could provide a CN label or other documentation to show the pocket sandwich met the requirements regarding meat/meat alternate and bread/grain components.
- On Thursday, December 15, the menu listed Hot Pockets, corn, sliced apples and 1% milk for supper. Neither the sponsor nor the distributor could provide a CN label or other documentation to show the pocket sandwich met the requirements regarding meat/meat alternate and bread/grain components.

There were no meals disallowed in this Finding, since all meals were disallowed in Serious Deficiency 1.

Criteria

The CACFP regulations at 7 C.F.R § 226.17a(l) states, “Meal pattern requirements for at-risk afterschool snacks and at-risk afterschool meals. 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 menus contain all required meal components.

Additional Finding 2: A refrigerator was not kept at the appropriate temperature. One of the two refrigerators had a temperature reading of 45 degrees Fahrenheit. This refrigerator was positioned beside the oven used to heat meals for service.

Criteria

The CACFP regulations at 7 C.F.R § 226.20(l) states, “Institutions and facilities must ensure that in storing, preparing, and serving food proper sanitation and health standards are met which conform with all applicable State and local laws and regulations. Institutions and facilities must ensure that adequate facilities are available to store food or hold meals,”

The United States Department of Agriculture (USDA) Refrigeration and Food Safety Guide, page 2, states, “Refrigerators should be set to maintain a temperature of 40 °F or below. Some refrigerators have built-in thermometers to measure their internal temperature. For those refrigerators without this feature, keep an appliance thermometer in the refrigerator to monitor the temperature. This can be critical in the event of a power outage. When the power goes back on, if the refrigerator is still 40 °F, the food is safe. Foods held at temperatures above 40 °F for more than 2 hours should not be consumed.”

Recommendation

The Sponsor should ensure that the temperature of the refrigerator be monitored to ensure stored food, that will be provided to children, is not spoiled.

Additional Finding 3: Children did not take all components during the observed meal service. During our observation of meal service, we noted that children walked through a service line where they were offered a pre-packaged dinner, cereal bar, milk and water. Five children were observed taking water but not milk.

Criteria

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The CACFP regulations at 7 C.F.R § 226.17a(1) 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 serve all required components for each meal claimed. The Sponsor may utilize offer vs. serve. Utilizing offer vs. serve would reduce wasting of food or drink items that children do not want.

Backfield in Motion, Inc. must submit a Corrective Action Plan (“CAP”), which details how the Institution will ensure the correction of the serious deficiencies and additional findings described above. The CAP must include information regarding what procedures were implemented to address the serious deficiencies, who is responsible for addressing the serious deficiencies, when was the procedure implemented to address the serious deficiencies, and how the institution will ensure the continued implementation of the corrective action. A blank CAP is enclosed for your use.

OVERPAYMENT-RIGHT TO APPEAL

Disallowed Meals Cost

Based on our 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 \$1,525.50, which the institution owes the Department. **The procedures for submitting an appeal regarding the amount of overpayment are enclosed. Please note that the appeal must be in writing and must be received by our Department no later than fifteen (15) calendar days from your receipt of this letter.** 7 C.F.R. § 226.6(k). 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 overpayment, all appeal procedures must be followed as failure to do so may result in the denial of your request for an appeal.

In accordance with the CACFP regulations at 7 C.F.R. § 226.14(a), in part, the State agency must assess interest 30 days from the initial request for repayment. For information about applied interest rates please visit the following website:

http://www.fiscal.treasury.gov/fsreports/rpt/cvfr/historical_rates.htm

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SUMMARY

The Department has determined that Backfield in Motion, Inc. is seriously deficient in its operation of the CACFP and that James Donnelly, CEO and Richard Fletcher, Board Chair are responsible for the serious deficiencies.

You may not appeal the serious deficiency determination itself. If the Department proposes to terminate Backfield in Motion, Inc.'s CACFP agreement, or propose to disqualify Backfield in Motion, Inc. and the responsible individuals, you will be able to appeal those actions and you will be advised of your appeal rights and the appeal procedures at that time.

Backfield in Motion, Inc. may continue to participate in the CACFP during the corrective action period. The Department will pay any valid claims for reimbursement submitted by Backfield in Motion, Inc. for the corrective action period. As always, you must submit claims within sixty (60) calendar days of the last day of the month covered by the claim. The Department will deny any portion of a claim we determine is invalid. If the Department denies payment of any portion of a claim submitted for the corrective action period, that action would be appealable.

To provide for the full and permanent correction of the serious deficiencies and findings, please complete the following actions within fifteen (15) days of your receipt of this notice:

1. Login to (TIPS) the Tennessee Information Payment System and submit a revised claim for December 2016.
2. Remit a check payable to the Department in the amount of \$1,525.50.
3. Complete and return the enclosed corrective action plan to address in full the monitoring review to:

**Tennessee Department of Human Services
Allette Vayda-CACFP/SFSP Unit
Citizens Plaza – 8th Floor
400 Deaderick Street
Nashville, Tennessee 37243-1403.**

If the Department does not receive the corrective action plan by the deadline date, or the Department determines that the corrective action plan does not provide for the full and permanent correction of the serious deficiencies and findings, the Department will propose to terminate the Institution's CACFP Provider Agreement and to disqualify you and the Institution from future CACFP participation by issuing a Notice of Proposed Termination and Disqualification.

We appreciate the assistance provided during this review. If you have any questions regarding this report, please contact Jackie Yokley, Audit Director 2, at 615-837-5035 or Jackie.D.Yokley@tn.gov.

James Donnelly, CEO
Richard Fletcher, Board Chair
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Sincerely,

A handwritten signature in black ink, appearing to read 'Allette Vayda', with a long horizontal flourish extending to the right.

Allette Vayda
Director, CACFP & SFSP

AV/ba

Enclosures

Exhibit A:

Sponsor: Backfield in Motion, Inc.

Review Month/Year: December 2016

Total Meal Reimbursement Received: \$1,525.50

Site Meal Service Activity and Monitor Reconciliation	Reported on Claim	Reconciled Meals to Meal Counts Sheets
Total Number of Days Food Served	9	11 ¹
Number of Suppers Served	450	0 ²
Number of Participants in Free Category	103	103
Number of Participants in Reduced Category	NA	NA
Number of Participants in Paid Category	NA	NA
Total Number of Participants	103	103
Total Amount of Eligible Food Costs	XXXXXXXXXX	\$401.36
Total Amount of Eligible Food and Non-Food Costs	XXXXXXXXXX	\$1,017.38

¹The difference in reported and verified days of service is immaterial and not included in this report as a finding

²Disallowed 450 supper meals served due to milk shortage (450 x 3.3900) = \$1,525.50. (Finding 1)

Exhibit B:

Summary of Disallowed Meals Cost Totals

Month	Questioned Costs
December 2016	\$1,525.50
Total Disallowed Meals Cost	\$1,525.50

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;

Appeal Procedures for Child and Adult Care Food Program-Institutions
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- (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 Intent to Terminate, 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.

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.

**CORRECTIVE ACTION PLAN FOR
MONITORING FINDINGS FOR
CHILD AND ADULT CARE FOOD PROGRAM (CACFP)
TENNESSEE DEPARTMENT OF HUMAN SERVICES (TDHS)**

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 Date of Birth on the first page; enter your name, title and date of signature on the last page. Sign your name in ink. **Please return ALL pages of the completed Corrective Action Plan form.**

Section A. Institution Information

Name of Institution Backfield in Motion, Inc.	CACFP Agreement No. 00-605
Mailing Address: 920 Woodland Street Nashville, Tennessee 37206	

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

Name and Title: James Donnelly, CEO Richard Fletcher, Board Chair	<u>Date of Birth (s):</u>
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Section C. Dates of Issuance of Monitoring Report/Corrective Action Plan

SD Report: March 21, 2017	Corrective Action Plan: March 21, 2017
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Section D. Findings

Findings: 1. Insufficient quantities of milk were purchased 2. Menus did not contain all required components 3. A refrigerator was not kept at the appropriate temperature 4. Children did not take all components during the observed meal service
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The following measures will be completed within **30 business days** of my institution's receipt of this corrective action plan:

Measure No. 1: Insufficient quantities of milk were purchased

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: Menus did not contain all required components

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: A refrigerator was not kept at the appropriate temperature

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: Children did not take all components during the 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:

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.

Printed Name of Authorized Institution Official

Position

Signature of Authorized Institution Official

Date

Signature of Authorized TDHS Official

Date