



**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

April 14, 2020

William Zagorski, Owner
American Senior Care Centers
1808 Eighth Avenue South
Nashville, Tennessee 37203-5012

Dear Mr. Zagorski,

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 American Senior Care Centers (Sponsor), Application Agreement number 00-147, on February 27, 2020. Additional information was requested and provided on February 28, 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 three feeding sites operating during the review period. The Centennial Adultcare Center - Mt. Juliet (**Mount Juliet**) and Centennial Adultcare Center - Murfreesboro (**Murfreesboro**) centers were selected as the sample.

Invoices, attendance, and meal counts were also reviewed at the Centennial Aultcare Center located in Nashville due to expenditures being combined for all three centers.

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 **Murfreesboro** on December 3, 2019 and a lunch meal service at **Mount Juliet** on December 5, 2019.

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 December 2019 disclosed the following:

The Sponsor provided menus that contained grain-based desserts as a component

Condition

Based on our review of the menus provided by the Sponsor for the test month, the menus provided did not meet the USDA meal pattern requirements. The menus provided for supplements listed a grain-based dessert was served.

The supplement menus containing a grain-based dessert are as follows:

Date	Menu	Number of Meals
December 3, 2019	Fruit cocktail, vanilla wafers	57
December 17, 2019	Cottage cheese, jelly, vanilla wafers	53

Due to grain-based desserts being a requirement introduced on the updated CACFP meal pattern 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 226.20(a)(4)(iii) states, "Grain-based desserts do not count towards meeting the grains requirement."

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."

Condition

The Sponsor should ensure menus meet the meal patterns established by the USDA.

Technical Assistance Provided

During our monitoring visit on February 27, 2020, the Sponsor requested and was provided technical assistance regarding grain-based desserts, the USDA food buying guide, and the CACFP crediting handbook.

Corrective Action

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

- Prepare and submit a corrective action plan to address the deficiency 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

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:

Molly Zagorski, Administrative Assistant, American Senior Care Centers
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 Affiliated Centers Program Data

Sponsor: American Senior Care Centers

Review Month/Year: December 2019

Total Reimbursement: \$6,442.23

Site Meal Service Reconciliation and Monitor Activity¹	Reported on Claim	Reconciled to Documentation
Total Number of Centers	3	3
Total CACFP Food Service Days	21	21
Total Attendance	1,403	1,403
Number of Breakfast meals	857	857
Number of Lunch meals	1,344	1,344
Number of Supplements	999	999
Number of Participants in Free Category	82	82
Number of Participants in Reduced-Price Category	16	16
Number of Participants in Paid Category	14	14
Total Number of Participants	112	112

¹ Claim was entered and calculated as 'Total Meals' in TIPS and all centers were combined