



**STATE OF TENNESSEE  
DEPARTMENT OF HUMAN SERVICES**

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**BILL LEE**  
GOVERNOR

**DANIELLE W. BARNES**  
COMMISSIONER

May 26, 2020

Rubin Campbell, Owner  
Campbell's Learning Academy  
4933 Fairley Road  
Memphis, Tennessee 38109-6713

Dear Mr. Campbell,

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 Campbell's Learning Academy (Sponsor), Application Agreement number 00193, during the period of March 19, 2020, through April 13, 2020. Our scope of the review was for reimbursement made to the Sponsor for December 2019.

Due to the outbreak and the risk that COVID19 poses to the Sponsor and our staff, the review was limited to verification, based on a review of the documents obtained from Sponsor, via e-mail, mail, or another electronic transmission of documents. We also, obtained confirmation from the feeding sites and Sponsor staff via telephone or e-mail relative to the operation and administration of the CACFP.

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 to 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 our method of communicating with 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 count 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 on December 11, 2019.

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

## **1. The Sponsor reported the number of free, reduced-price and paid participants incorrectly**

### Condition

Based on our review of the Claim for Reimbursement for December 2019, we noted the Sponsor reported 42 participants in the free category, zero participants in the reduced-price category, and 19 participants in the paid category. However, our review of the records available verified 37 participants in the free category, zero participants in the reduced-price category, and 17 participants in the paid category. The difference was based on the following:

The Sponsor over reported the number of participants in the free category by five and over reported the number of participants in the paid category by two.

There were 61 participants reported on the Claim for Reimbursement. However, based on our review of the Sponsor's records, we found there were 54 participants enrolled in the program

***This is a repeat finding from a previous report dated December 8, 2017.***

### Criteria

*Title 7 of the Code of Federal Regulations* Section 226.10 (c) states "... In submitting a Claim for Reimbursement, each institution shall certify the claim is correct and that records are available to support that claim..."

### Recommendation

The Sponsor should ensure the correct number of participants are reported and based on the number of enrolled participants.

## **2. The Sponsor did not provide evidence of sufficient quantities of milk being purchased**

### Condition

Based on the number of meals served with milk as a component, the Sponsor required 9,612 ounces of milk. However, based on our review of the receipts provided by the Sponsor, we were able to verify the purchase of 8,704 ounces of milk. This resulted in a shortage of 908 ounces.

As a result, 114 supplements claimed for reimbursement were disallowed.

***This is a repeat finding from a previous report dated December 8, 2017.***

### Criteria

*Title 7 of the Code of Federal Regulations, Section 226.20(c)(1)* states, in part, "Fluid milk, vegetables or fruit, or portions of both, and grains are required components of the breakfast meal."

*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 maintain all receipts for food purchases to provide evidence of the required amount of milk was purchased and served.

### **3. The Sponsor reported the number of participant days incorrectly**

#### Condition

Our review of the Claim for Reimbursement noted the Sponsor reported 985 participant days. However, based on our review of the Sponsor's records we noted 893 participant days.

*This is a repeat finding from a previous report dated December 8, 2017.*

#### Criteria

*Title 7 of the Code of Federal Regulations* Section 226.10 (c) states "... In submitting a Claim for Reimbursement, each institution shall certify the claim is correct and that records are available to support that claim..."

#### Recommendation

The Sponsor should ensure the attendance is recorded and reported accurately. Appropriate documentation should be maintained to support the claim.

### **4. The Sponsor's menus do not support the requirement that one whole grain-rich grain must be served each day**

#### Condition

In accordance with the revised meal pattern requirements effective October 1, 2017; at least one serving of grain per day must be whole grain-rich. The menu provided did not indicate which item was whole grain-rich for multiple days during our review period.

There were no meals disallowed due to time given to Sponsors to conform to meal pattern changes effective October 2017, and technical assistance was provided.

#### Criteria

*Title 7 of the Code of Federal Regulations, Section 226.20 (4)(a)* states, "At least one serving per day, across all eating occasions of bread, cereals, and grains, must be whole grain-rich. Whole grain-rich foods contain at least 50 percent whole grains and the remaining grains in the food are enriched, and must meet the whole grain-rich criteria specified in FNS guidance."

#### Recommendation

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

### **5. The menu did not list specific cereals served**

#### Condition

Our review of the breakfast menu provided listed "cereal" as being served on multiple days during the review period. The specific type of sugar served was not detailed. As a result, we were unable to determine the sugar content in the cereal served.

There were no meals disallowed due to the technical assistance provided.

#### Criteria

*Title 7 of the Code of Federal Regulations, Section 226.20(a)(4)(ii)* states, "... Breakfast cereals must contain no more than 6 grams of sugar per dry ounce (no more than 21.2 grams sucrose and other sugars per 100 grams of dry cereal) .."

The USDA Monitoring Handbook for State Agencies, page 24, states, “Daily records of menus must contain a listing of the food items served in each meal type to ensure that the CACFP meal pattern requirements were met.”

#### Recommendation

The Sponsor should ensure the menu lists the specific items served for each component.

### **6. The Sponsor did not have an adequate financial management system in place**

#### Condition

The Sponsor did not have an adequate financial management system in place. The Sponsor did not provide documentation of a general ledger or other record management system for the review month. The Sponsor did provide a bank statement, however, all financial transactions related to the food program were not captured on the statement.

#### Criteria

*Title 7 of the Code of Federal Regulations, Section 226.7(b)* states, “...State agencies or FNSRO's, where applicable, shall also have a system in place for monitoring and reviewing the institutions' documentation of their nonprofit status to ensure that all Program reimbursement funds are used: (1) Solely for the conduct of the foodservice operation; or (2) to improve such food service operations, principally for the benefit of the participants.”

#### Recommendation

The Sponsor should implement and maintain an adequate financial management system.

**Note:** Our observation of the lunch meal service on December 11, 2019, revealed no significant deficiencies.

#### **Technical Assistance**

Technical assistance was provided regarding USDA menu requirements and the maintenance of an adequate financial management system.

#### **Disallowed Meal Cost**

The disallowed meal costs associated with the findings above are below the DHS threshold for repayment.

#### **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 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, CFE  
Director of Audit Services

Exhibit

cc: Barbara Mackey, Director, Campbell's Learning Academy  
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**

**Verification of CACFP Independent Center Claim**

**Name of Agency: Campbell's Learning Academy**

**Review Month/Year: December 2019**

**Total Meal Reimbursement Received: \$3,157.56**

<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	20	20
Total Attendance	985	893
Percentage of Participants in the Free or Reduced-price Category (For Proprietary Center Only)	XXXXX	69%
Number of Breakfasts Served	606	606
Number of Lunches Served	652	652
Number of P.M. Supplements Served	870	757
Number of Participants in Free Category	42	37
Number of Participants in Reduced-Price Category	0	0
Number of Participants in Paid Category	19	17
Total Number of Participants	61	54