



**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 6, 2020

Kevan Dunn, Chairman of the Board
Community Child Care, Incorporated
129 West Fowlkes Street, Suite 1270
Franklin, Tennessee 37064-1205

Dear Mr. Dunn,

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 Community Childcare, Inc. (Sponsor), Application Agreement number 00-227, on February 26, 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.

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 on December 3, 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:

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

Condition

Based on our review of the menus provided by the Sponsor for December 2019, the menus provided did not meet the USDA meal pattern requirements.

There was a menu provided for lunch on December 9, 2019 that listed baked chicken, mac and cheese, green peas, whole grain wheat bread, and milk as being served. This meal was missing a second vegetable or fruit component and was not reimbursable.

As a result, 39 lunches claimed for reimbursement were disallowed. (See Exhibit)

There was a menu provided for supplement on December 06 and December 13, 2019 that listed Vanilla wafers and 100 % Grape juice. Vanilla wafers are a grain-based dessert and the meal was missing a second creditable component and was not reimbursable.

Due to the new the 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 226.17(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(c)(2) states, "Fluid milk, meat and meat alternatives, vegetable, fruits, and grains are required components in the lunch and supper meals."

Title 7 of the Code of Federal Regulations, Section 226.20(c)(3) states, "Serve two of the following five components: Fluid milk, meat and meat alternates, vegetables, fruits, and grains. Fruit juice, vegetable juice, and milk may comprise only one component of the snack...."

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."

Recommendation

The Sponsor should ensure that menus meet the USDA meal pattern requirements.

2. The Sponsor provided menus that did not name specific components

Condition

During our monitoring visit on February 26, 2020, we requested menus to support claimed meals for the review period. The Sponsor provided menus that did not list the specific type of milk served to participants for meals served December 2 – 6, 2019. The menus did list the specific type of milk served to participants for the remainder of meals for the month.

There were no meals disallowed as it was observed the correct milk type was provided to each age group and receipts were sufficient to identify the type of milk purchased.

Note: The Sponsor was provided technical assistance regarding listing specific milk types served to participants during our monitoring visit on December 2, 2019. The Sponsor made changes to the menus going forward and no additional corrective action is required.

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.... Menus and any other nutritional records required by the State agency shall be maintained to document compliance with such requirements.”

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....”

The USDA policy memorandum, CACFP 17-2017 Documenting Meals in the Child and Adult Care Food Program, states, “CACFP centers and day care homes are required to demonstrate that they are serving meals that meet the meal pattern requirements. Centers and day care homes must keep records of menus....”

The USDA policy memorandum, CACFP 17-2016 Nutrition Requirements for Fluid Milk and Fluid Milk Substitutions in the Child and Adult Care Food Program, states, “In order to ensure compliance with the milk requirements outlined in 7 CFR 226.20(a)(1) and this memorandum, centers and day care homes must document the type of milk served on their menu. This includes listing the fat content (e.g. whole, low-fat or 1%, and fat-free or skim) and if the milk is flavored. It is the responsibility of the State agency or sponsor, as applicable, to further ensure that the correct type of milk is being served when conducting reviews.”

Recommendation

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

Technical Assistance Provided

During our monitoring visit on December 3, 2019, the Sponsor requested and was provided technical assistance regarding the updated “And Justice for All” poster, listing specific milk types on menus, determining classification for free, reduced-price, and paid meals, and training requirements. Additionally, we provided technical assistance regarding grain ounce-equivalent requirements.

During our monitoring visit on February 26, 2020, the Sponsor requested and was provided technical assistance regarding milk substitutions.

Note: Our observation of the lunch meal service on December 3, 2019, revealed no significant deficiencies.

Disallowed Meals Cost

The disallowed meal cost associated with the findings above is 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

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, CFE
Director of Audit Services

Exhibit

cc:

Tara Blue, Executive Director, Community Child Care, Inc.
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: Community Child Care, Inc.
Review Month/Year: December 2019
Total Meal Reimbursement Received: \$2,184.26

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Days of CACFP Food Service	15	15
Total Attendance	569	569
Number of Breakfasts Served	505	505
Number of Lunches Served	564	525
Number of Supplements Served	509	509
Number of Participants in Free Category	21	21
Number of Participants in Reduced-Price Category	5	5
Number of Participants in Paid Category	18	18
Total Number of Participants	44	44