



**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

February 18, 2020

William Newman, Chairman of the Board
South Central Human Resource Agency
P. O. Box 638
Fayetteville, Tennessee 37334-0638

Dear Mr. Newman,

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 South Central Human Resource Agency (Sponsor), Application Agreement number 00501, on January 7, 2019. 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 22 feeding sites operating during the review period. **Lincoln County Head Start** (Lincoln), **Marshall County Head Start II** (Marshall), **Northridge Head Start** (Northridge) and **Tullahoma Head Start** (Tullahoma) were 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 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 meal service at each of the sample sites during the month of November 2019.

Our review of the Sponsor's records for November 2019 revealed the following:

The Sponsor claimed more meals than we observed

Condition

During our monitoring visits at three sites, we observed fewer meals than the number claimed for reimbursement. Below is a summary of the discrepancies:

Date	Site	Meal Observed	No. Meals Claimed	No. Meals Observed
11/21/2019	Lincoln	PM Supplement	19	18
11/22/2019	Marshall	Lunch	13	9
11/22/2019	Northridge	Breakfast	10	9

As a result, one (1) breakfast, four (4) lunches and one (1) PM supplement claimed for reimbursement were disallowed.

(See Exhibits B, C, D)

Criteria

Title 7 of the Code of Federal Regulations, Section 225.15(c)(1) states, “Sponsors shall maintain accurate records which justify all costs and meals claimed. Failure to maintain such records may be grounds for denial of reimbursement for meals served and/or administrative costs claimed during the period covered by the records in question....”

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

Recommendation

The Sponsor should ensure that the number of meals claimed for reimbursement is based on the actual number of meals served.

Technical Assistance Provided

Technical assistance was offered however it was declined by the Sponsor.

Disallowed Meals Cost

The disallowed meals cost associated with the finding 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

Exhibits

cc: Paul Rosson, Executive Director, South Central Human Resource Agency
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 Sponsor Claim

Sponsor: South Central Human Resource Agency

Review Month/Year: November 2019

Total Reimbursement: \$52,651.22

Site Meal Service Activity and Monitor Reconciliation	Reported on Claim	Reconciled to Documentation
Number of Sites	22	22
Number of Breakfasts Served	8,152	8,151
Number of Lunches Served	8,357	8,353
Number of Supplements Served	7,627	7,626

EXHIBIT B

Verification of CACFP Individual Site Review Data

Sample Site: Lincoln

Site Meal Service Activity and Monitor Reconciliation	Reported on Claim	Reconciled to Documentation
Number of CACFP Food Service Days	15	15
Total Attendance	268	260 ¹
Number of Breakfasts Served	258	258
Number of Lunches Served	257	257
Number of Supplements Served	230	229

¹ The difference in the reported and reconciled attendance is immaterial and not included as a finding

EXHIBIT C**Verification of CACFP Individual Site Review Data****Sample Site: Marshall II**

Site Meal Service Activity and Monitor Reconciliation	Reported on Claim	Reconciled to Documentation
Number of CACFP Food Service Days	15	15
Total Attendance	215	215
Number of Breakfasts Served	205	205
Number of Lunches Served	213	209
Number of Supplements Served	186	186

EXHIBIT D**Verification of CACFP Individual Site Review Data****Sample Site: Northridge**

Site Meal Service Activity and Monitor Reconciliation	Reported on Claim	Reconciled to Documentation
Number of CACFP Food Service Days	15	15
Total Attendance	191	191
Number of Breakfasts Served	190	189
Number of Lunches Served	190	190
Number of Supplements Served	183	183

EXHIBIT E

Verification of CACFP Individual Site Review Data

Sample Site: Tullahoma

Site Meal Service Activity and Monitor Reconciliation	Reported on Claim	Reconciled to Documentation
Number of CACFP Food Service Days	15	15
Total Attendance	416	416
Number of Breakfasts Served	395	395
Number of Lunches Served	399	399
Number of Supplements Served	378	378