



**STATE OF TENNESSEE
DEPARTMENT OF HUMAN SERVICES**

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BILL LEE
GOVERNOR

DANIELLE W. BARNES
COMMISSIONER

April 7, 2020

Dionne McGarr, Board Chair
True Joy Community Program
6524 Premier Drive
Nashville, Tennessee 37209-2917

Dear Ms. McGarr,

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 True Joy Community Program (Sponsor), Application Agreement number 00-553, 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 nineteen (19) feeding sites operating during the review period. The homes of, **Sharnell Collins**, **Cindy Groves**, **Jasma Hall-Coleman**, **Brenda Mitchell**, and **Crystal Turner** 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 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, **Jasma Hall-Coleman** on December 11, 2019, **Cindy Groves** on December 12, 2019, **Sharnell Collins** on December 18, 2019, **Crystal Turner** on December 20, 2019, and **Brenda Mitchell** December 27, 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's daycare home provider had attendance over the approved licensed capacity

Condition

During our monitoring visit on December 18, 2019 to the day care home of **Sharnell Collins**, the daycare home provider had more participants present than were approved capacity. The daycare home was an alternate approved home with a maximum allowed capacity of four (4) participants. During our monitoring visit we observed ten (10) children present. The provider stated that there were more children present than the four enrolled participants due to a holiday party.

The Sponsor closed this site in TIPS and did not claim for this home for the review period.

Criteria

Title 7 of the Code of Federal Regulations, Section 226.18(b)(5) states, "The responsibility of the day care home to promptly inform the sponsoring organization about any change in the number of children enrolled for care or in its licensing or approval status;"

Recommendation

The Sponsor should ensure that all sponsored sites are operating with attendance under the maximum capacity allowed.

2. The Sponsor reported meal counts incorrectly

Condition

Jasma Hall-Coleman – *sample home*

Based on our review of the Claim for Reimbursement for December 2019 for **Jasma Hall-Coleman**, the Sponsor reported 236 breakfast meals, 207 lunch meals, and 222 supplements served. However, based on our review of available documents, we noted that there were 236 breakfast meals, 208 lunch meals, and 221 supplements served, prior to any meal disallowances.

As a result, one (1) lunch meal was underreported and one (1) supplement claimed for reimbursement was disallowed. (See Exhibit D)

Crystal Turner – *sample home*

Based on our review of the Claim for Reimbursement for December 2019 for **Crystal Turner**, the Sponsor reported 59 breakfast meals, 4 lunch meals, 48 supper meals, and 60 supplements served. However, based on our review of available documents, we noted that there were 59 breakfast meals, 4 lunch meals, 44 supper meals, and 56 supplements served, prior to any meal disallowances.

As a result, four (4) supper meals and four (4) supplements claimed for reimbursement were disallowed. (See Exhibit F)

This is a repeat finding from a previous report dated December 5, 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 that the claim is correct and that records are available to support that claim...."

Recommendation

The Sponsor should ensure that claims for reimbursement are completed correctly and based on accurate supporting documents.

3. The Sponsor did not provide infant menus that met USDA meal pattern requirements

Condition

During our monitoring visit on February 27, 2020, we requested menus and supporting documentation for meals reported during the review period. Based on our review of the infant menus provided by the Sponsor for December 2019, the menus provided did not meet the USDA meal pattern requirements. There menu errors are as follow:

Cindy Groves- sample home

During our monitoring visit to the Sponsor on February 27, 2020, we requested menus and supporting documentation for meals reported during the review period. The Sponsor reported meals were provided for one (1) infant age ten months for **Cindy Groves**. The Sponsor did not provide menus for two (2) supplements claimed to the infant on December 12 and 13, 2019 and a menu for one (1) lunch meal claimed on December 13, 2019.

Additionally, the Sponsor provided menus for supplements served to the infant that were missing components as follows:

Date	Components Served	Missing Component(s)
12/2/19	Iron fortified formula	Grain and vegetable and/or fruit
12/11/19	Iron fortified formula and squash	Grain
12/30/19	Iron fortified formula and infant cereal oats	Vegetable and/or fruit

Due to the updated CACFP meal patterns requirements and emphasis on providing technical assistance during the implementation process, there were no meals disallowed for infant meals that did not meet the meal pattern requirements.

Jasma Hall-Coleman - sample home

The Sponsor provided enrollment and attendance records that reported there were four (4) infants in care for **Jasma Hall-Coleman** for December 2019. The Sponsor was unable to provide infant menus for two (2) infants age eleven (11) months.

There were no meals claimed by the Sponsor for these two infants for the review period. As a result, there were no meals disallowed.

Criteria

Title 7 of the Code of Federal Regulations, Section 226.18(b)(4) states, "The responsibility of the day care home to maintain records of menus, and of the number of meals, by type, served to enrolled children;"

Title 7 of the Code of Federal Regulations, Section 226.18(d) states, "Each day care home participating in the program shall serve the meal types specified in its approved application in accordance with the meal pattern requirements specified in §226.20. Menu records shall be maintained to document compliance with these requirements..."

Title 7 of the Code of Federal Regulations, Section 226.20(b)(4)(i) states, "Infant meals must have, at a minimum, each of the food components indicated, in the amount that is appropriate for the infant's age. (i) Birth through 5 months. (A) Breakfast. Four to 6 ounces of breastmilk or iron-fortified infant formula, or portions of both. (B) Lunch or supper. Four to 6 ounces of breastmilk or iron-fortified infant formula, or portions of both. (C) Snack. Four to 6 ounces of breastmilk or iron-fortified infant formula, or portions of both."

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."

Recommendation

The Sponsor will ensure that all infant menus are complete and include all required components for each day the child was present.

4. The Sponsor provided a meal that did not meet USDA meal pattern requirements during an observed meal

Condition

During our monitoring visit at **Sharnell Collins** on December 18, 2019, we observed a lunch meal service. The meal served to four (4) participants included turkey, mandarin oranges, wheat bread, and milk. There was no vegetable component served.

No meals were disallowed since the Sponsor did not claim meals for this lunch meals service for

this date.

Criteria

Title 7 of the Code of Federal Regulations, Section 226.18(d) states, "Each day care home participating in the program shall serve the meal types specified in its approved application in accordance with the meal pattern requirements specified in §226.20. Menu records shall be maintained to document compliance with these requirements. Meals shall be served at no separate charge to enrolled children."

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 ensure that menus meet the USDA meal pattern requirements.

5. The Sponsor served meals outside of the approved serving time

Condition

During our monitoring visit at **Brenda Mitchell** on December 27, 2019, we observed a lunch meal service. The observed meal service was served at 10:30 am, but the TIPS approved meal service time was 11:00 am to 12:00 pm.

No meals were disallowed since the Sponsor did not claim meals for this lunch meals for this date.

Criteria

Title 7 of the Code of Federal Regulations, Section 226.18(d) states, "Each day care home participating in the program shall serve the meal types specified in its approved application in accordance with the meal pattern requirements specified in §226.20...."

Recommendation

The Sponsor should ensure that meals are served during the approved feeding site time.

6. The Sponsor's daycare home provider did not have records available

Condition

During our monitoring visit at **Sharnell Collins** on December 18, 2019, the provider did not maintain copies of the meal counts and attendance for any prior meal services.

Criteria

Title 7 of the Code of Federal Regulations, Section 226.18(e) states, "Each day care home must maintain on file documentation of each child's enrollment and must maintain daily records of the number of children in attendance and the number of meals, by type, served to enrolled children...."

Title 7 of the Code of Federal Regulations, Section 226.18(g) states, “Each day care home shall comply with the recordkeeping requirements established in §226.10(d) and in this section. Failure to maintain such records shall be grounds for the denial of reimbursement.”

Recommendation

The Sponsor should ensure that daycare home providers record and maintain all required documents for three years.

7. The Sponsor did not have a menu posted at two daycare homes for an observed meal

Condition

During our monitoring visit at the homes of **Sharnell Collins** on December 18, 2019 and **Jasma Hall-Coleman** on December 11, 2019, there was no menu posted or available.

Criteria

Food & Nutrition Service (FNS) 796-2, Rev. 4, states, “Menu records that identify the meal components served to participants must be maintained. Menu records must be updated to reflect changes to planned menus so that the menu records reflect the actual meal components and foods service to participants.”

The USDA Monitoring Handbook for State Agencies, page 29, states, “Institutions must serve meals according to the posted menus and document substitutions....”

Recommendation

The Sponsor should ensure the menu is posted for each meal served.

8. The Sponsor’s provider did not have the “Building for the Future Poster” displayed

Condition

During our monitoring visit at the providers **Sharnell Collins** on December 18, 2019, the “Building for the Future” poster was not displayed at the home.

Criteria

The USDA Family Day Care Home Monitor Handbook, page 10 states, “A sponsor can require providers to tell parents or guardians of children enrolled in CACFP facilities about the Program and its benefits [7 CFR §226.18(b)(16)] ... An example of this type of notice is the “Building for the Future”.

Recommendation

The Sponsor should ensure the “Building for the Future” posters are displayed in compliance with civil rights and CACFP regulations.

9. The Sponsor’s provider did not distribute Women, Infants, and Children (WIC) information as required

Condition

During our monitoring visit at **Sharnell Collins** on December 18, 2019, we determined WIC program information was not distributed to the parents or guardians of the enrolled children as required.

Criteria

Title 7 of the Code of Federal Regulations, Section 226.15(o) states, "Each institution must ensure that parents of enrolled children are provided with current information on the benefits and importance of the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) and the eligibility requirements for WIC participation."

Recommendation

The Sponsor should implement internal controls ensuring the distribution of WIC program information to parents or guardians of enrolled children.

Note: Our observation of the lunch meal service at the home of **Cindy Groves** on December 12, 2019, revealed no significant deficiencies.

Observation

During our monitoring visits, the daycare homes of **Cindy Groves** and **Crystal Turner** did not maintain copies of the two most recent monitoring forms and daycare home of **Jasma Hall-Coleman** did not maintain copies of the monitoring forms nor the training certificate. The Sponsor provided these documents during our monitoring visit on February 27, 2020.

Technical Assistance Provided

During our monitoring visit on February 27, 2020, the Sponsor requested a status update on the Sponsor's unapproved unaffiliated center. We provided assistance via email on March 11, 2020 and forwarded any additional assistance requests to Program Specialists.

Disallowed Meals Cost

The disallowed meals 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

Sam O. Alzoubi, CFE
Director of Audit Services

Exhibits

cc: Felicia Hyde, Executive Director, True Joy Community Program
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 Day Care Homes Meals Program Data (Tier I Only)****Sponsor: True Joy Community Program****Review Month/Year: December 2019****Total Amount Paid to Sponsor for Reported Meals: \$6,278.21****Total Amount Paid by Sponsor to Homes for Meals: \$6,278.21****Total Sponsor Admin Paid: \$2,160.00****Total Sponsor Admin Due Based on Number of Homes: \$2,160.00****Total Admin Expenses verified for the Review Month: \$1,128.66**

Home Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Days of CACFP Food Service	25	25
Total Number of Homes	18	18
Number of Breakfasts Served	1,394	1,394
Number of Lunches Served	881	882
Number of Supplements Served	1,443	1,438
Number of Suppers Served	264	260

Exhibit B**Day Care Home Site Program Data (Tier I)****Name of Home/Tier Type: Sharnell Collins¹****Sponsor Reimbursement Paid to the Home: \$0.00****Reimbursement due based on Reported Information: \$0.00****Reimbursement due based on Verified Information: \$0.00**

Home Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Days of CACFP Food Service	0	0
Number of Breakfasts Served	0	0
Number of Lunches Served	0	0
Number of Supplements Served	0	0

¹The Sponsor did not claim for this provider

Exhibit C**Day Care Home Site Program Data (Tier I)****Name of Home/Tier Type: Cindy Groves****Sponsor Reimbursement Paid to the Home: \$413.67****Reimbursement due based on Reported Information: \$413.67****Reimbursement due based on Verified Information: \$413.67**

Home Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Days of CACFP Food Service	17	17
Number of Breakfasts Served	108	108
Number of Lunches Served	71	71
Number of Supplements Served	126	126

Exhibit D**Day Care Home Site Program Data (Tier I)****Name of Home/Tier Type: Jasma Hall-Coleman****Sponsor Reimbursement Paid to the Home: \$993.59****Reimbursement due based on Reported Information: \$993.59****Reimbursement due based on Verified Information: \$995.34**

Home Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Days of CACFP Food Service	20	20
Number of Breakfasts Served	236	236
Number of Lunches Served	207	208
Number of Supplements Served	222	221

Exhibit E**Day Care Home Site Program Data (Tier I)****Name of Home/Tier Type: Brenda Mitchell****Sponsor Reimbursement Paid to the Home: \$334.03****Reimbursement due based on Reported Information: \$334.03****Reimbursement due based on Verified Information: \$334.03**

Home Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Days of CACFP Food Service	21	21
Number of Breakfasts Served	81	81

Number of Lunches Served	68	68
Number of Supplements Served	77	77

Exhibit F

Day Care Home Site Program Data (Tier I)

Name of Home/Tier Type: Crystal Turner

Sponsor Reimbursement Paid to the Home: \$252.35

Reimbursement due based on Reported Information: \$252.35

Reimbursement due based on Verified Information: \$239.70

Home Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Days of CACFP Food Service	15	15
Number of Breakfasts Served	59	59
Number of Lunches Served	4	4
Number of Supplements Served	60	56
Number of Suppers Served	48	44