



**STATE OF TENNESSEE
DEPARTMENT OF HUMAN SERVICES**

CITIZENS PLAZA BUILDING
400 DEADERICK STREET
NASHVILLE, TENNESSEE 37243-1403

TELEPHONE: 615-313-4700 FAX: 615-741-4165
TTY: 1-800-270-1349
www.tn.gov/humanservices

BILL HASLAM
GOVERNOR

DANIELLE W. BARNES
COMMISSIONER

Certified Mail - Return Receipt # 7017066000035706804

September 10, 2018

Aleshia Johnson, Executive Director
Greater Faith Temple Church of God in Christ
618 9th Street
Clarksville, Tennessee 37040-3022

RE: Notice of Serious Deficiency for Summer Food Services Program (SFSP) Agreement Number 00-673 and Demand for Overpayment

Dear Ms. Johnson,

The Department of Human Services (DHS) – Division of Audit Services staff conducted an unannounced on-site monitoring review of the Summer Food Services Program (SFSP) at Greater Faith Temple Church of God in Christ (Sponsor), Application Agreement 00-673, on August 1, 2018. Additional information was requested and provided on August 3, 2018. 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 ten feeding sites operating during the review period. **Chapel Street** and **Lincoln Homes** feeding sites were selected as the sample.

Background

SFSP Sponsors utilize meal count sheets to record the number of breakfast, lunch, supper, and supplements 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 SFSP Sponsor reports the number of meals served through the DHS Tennessee Information Payment System (TIPS) to seek 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 meal services during our site visits throughout the review period.

SERIOUS DEFICIENCY DETERMINATION

Based on the monitoring review, the Department has determined that Greater Faith Temple Church of God in Christ is seriously deficient in its operation of the SFSP. In addition, the Department has identified Aleshia Johnson, Executive Director as responsible for the serious deficiencies in light of their responsibility for the overall management of Greater Faith Temple Church of God in Christ's SFSP.

If Greater Faith Temple Church of God in Christ does not fully and permanently correct all of the serious deficiencies and submit documentation of the corrective action by the due date, the Department will:

- Propose to terminate Greater Faith Temple Church of God in Christ's, agreement to participate in the SFSP.

The authorization for this action is found in Paragraph 2.m. of your SFSP Provider Agreement and in the SFSP regulations at 7 C.F.R. § 225.11(c). You may not appeal a finding of serious deficiency.

SERIOUS DEFICIENCIES AND REQUIRED CORRECTIVE ACTION

The following paragraphs detail each serious deficiency and the corrective action required.

Our review of the Sponsor's records for June 2018 disclosed the following:

1. The Sponsor reported the number of meals as served incorrectly

Condition

Amber Point

The Claim for Reimbursement for **Amber Point** for the test month reported 105 breakfast meals and 267 lunch meals served. However, based on our review of the Sponsor's records, we found that there were 111 breakfast meals and 268 lunch meals served prior to any meal disallowances.

As a result, six breakfast meals and one lunch meal claimed were underreported. (See Exhibit B)

Chapel Street - sample site

The Claim for Reimbursement for **Chapel Street** for the test month reported 560 lunch meals served. However, based on our review of the Sponsor's records, we found that there were 561 lunch meals served prior to any meal disallowances.

As a result, one lunch meal claimed was underreported. (See Exhibit C)

Crossland Place

The Claim for Reimbursement for **Crossland Place** for the test month reported 337 lunch meals served. However, based on our review of the Sponsor's records, we found that there were 327 lunch meals served prior to any meal disallowances.

As a result, 10 lunch meals claimed were overreported. (See Exhibit D)

Cumberland Manor

The Claim for Reimbursement for **Cumberland Manor** for the test month reported 660 lunch meals served. However, based on our review of the Sponsor's records, we found that there were meals 664 lunch meals served prior to any meal disallowances.

As a result, four lunch meals claimed were underreported. (See Exhibit F)

Eagle Crest

The Claim for Reimbursement for **Eagle Crest** for the test month reported 223 lunch meals served. However, based on our review of the Sponsor's records, we found that there were meals 213 lunch meals served prior to any meal disallowances.

As a result, ten lunch meals claimed were overreported. (See Exhibit G)

Greater Faith

The Claim for Reimbursement for **Greater Faith** for the test month reported 234 breakfast meals served and 269 lunch meals served. However, based on our review of the Sponsor's records, we found that there were 219 breakfast meals served and 244 lunch meals served prior to any meal disallowances.

As a result, 15 breakfast meals and 25 lunch meals claimed were overreported. (See Exhibit H)

Lincoln Homes - sample site

The Claim for Reimbursement for **Lincoln Homes** for the test month reported 644 lunch meals served. However, based on our review of the Sponsor's records, we found that there were 650 lunch meals served prior to any meal disallowances.

As a result, six lunch meals claimed were underreported. (See Exhibit J)

Criteria

Title 7 of the Code of Federal Regulations, Section 225.9 (d) (5) states, "... In submitting a claim for reimbursement, each sponsor shall certify that the claim is correct and that records are available to support this claim...."

Recommendation

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

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

This is a Serious Deficiency

Condition

The Sponsor provided menus that did not meet USDA meal pattern requirements. The menus had errors as follows:

The lunch menus for June 5, 12, 19, and 26, 2018, listed turkey wrap, cheese, carrots, fruits snacks, and 1% milk. Fruit snacks (8oz of naturally & artificially flavored liquid) are not a creditable as fruit component.

Site	Meals Disallowed	Exhibit
Amber Point	35	B
Chapel Street	135	C
Crossland Place I	54	D
Crossland Place II	52	E
Cumberland Manor	157	F
Eagle Crest	66	G
Greater Faith Temple	41	H
Greenwood	177	I
Lincoln Homes	133	J
Summitt Heights	199	K

The lunch menus for June 20 and 27, 2018, listed corn dog, carrots, mustard & ketchup, fruit snacks, and 1% milk. Fruit snacks (8oz of naturally & artificially flavored liquid) are not a creditable as fruit component.

Site	Meals Disallowed	Exhibit
Amber Point	68	B
Chapel Street	74	C
Crossland Place I	57	D
Crossland Place II	60	E
Cumberland Manor	81	F
Eagle Crest	34	G
Greater Faith Temple	25	H
Greenwood	92	I
Lincoln Homes	72	J
Summitt Heights	117	K

As a result, 1,729 lunch meals claimed were disallowed.

Criteria

Title 7 of the Code of Federal Regulations, Section 225.16 (d) states, “The meal requirements for the Program are designed to provide nutritious and well-balanced meals to each child. Sponsors shall ensure that meals served meet all of the requirements....”

Recommendation

The Sponsor should ensure that all meals served meet the meal pattern determined by the USDA.

Note: Our observations of the breakfast meal served at **Lincoln Homes** and the lunch meal served at **Chapel Street** on June 8, 2018, revealed no deficiencies.

OVERPAYMENT - RIGHT TO APPEAL

Disallowed Cost

Based on the review, we determined that the Sponsor's noncompliance with the applicable Federal and State regulations that govern the SFSP resulted in a total disallowed cost of \$6,962.93.

The procedures for submitting an appeal regarding the amount of overpayment are enclosed. Please note that the appeal must be in writing and must be received by our Department no later than ten (10) calendar days from your receipt of this letter. 7 C.F.R. § 225.13(a). The appeal must be submitted to:

Tennessee Department of Human Services
Appeals and Hearings Division, Clerk's Office
P.O. Box 198996
Nashville, TN 37219

If the Institution decides to appeal the amount of overpayment, all appeal procedures must be followed as failure to do so may result in the denial of your request for an appeal.

SUMMARY

The Department has determined that Greater Faith Temple Church of God in Christ is seriously deficient in its operation of the SFSP and that identified Aleshia Johnson, Executive Director is responsible for the serious deficiencies.

You may not appeal the serious deficiency determination itself. If the Department proposes to terminate Greater Faith Temple Church of God in Christ's SFSP agreement, you will be able to appeal those actions and you will be advised of your appeal rights and the appeal procedures at that time.

To provide for the full and permanent correction of the serious deficiencies and findings, please complete the following actions within thirty (30) days of your receipt of this notice:

1. Login to (TIPS) the Tennessee Information Payment System and submit a revised claim for June 2018.
2. Remit a check payable to the *Tennessee Department of Human Services* in the amount noted in the report for recovery of the amounts disallowed in this report. ***Please return the attached billing notice with your check;*** and
3. Complete and return the enclosed corrective action plan to address the findings of the monitoring review to:

Tennessee Department of Human Services
Allette Vayda - SFSP/SFSP Unit
Citizens Plaza - 8th Floor
400 Deaderick Street
Nashville, Tennessee 37243-1403.

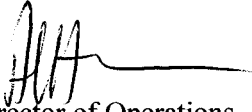
If the Department does not receive the corrective action plan by the deadline date, or the Department determines that the corrective action plan does not provide for the full and permanent correction of the serious deficiencies and findings, the Department will propose to terminate the Sponsor's SFSP Provider

Agreement and to disqualify you and the Sponsor from future SFSP participation by issuing a Notice of Proposed Termination.

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,

Allette Vayda



Director of Operations- Food Programs

Exhibits

cc: Anthony Crockett, Assistant Director, Greater Faith Temple Church of God in Christ
Debra Pasta, Program Manager, Summer Food Service Program
Elke Moore, Administrative Services Assistant 3, Summer Food Service Program
Constance Moore, Program Specialist, Summer Food Service Program
Marty Widner, Program Specialist, Summer Food Service Program
Comptroller of the Treasury, State of Tennessee

Exhibit A

Sponsor: Greater Faith Temple Church of God in Christ

Review Month/Year: June 2018

Claim Reimbursement Total: \$21,533.08

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Number of Participating Sites for Breakfast	3	3
Number of Participating Sites for Lunch	10	10
Number of 1 st Breakfasts Served	414	405
Number of 2 nd Breakfasts Served	0	0
Number of 1 st Lunches Served	5,246	3,484
Number of 2 nd Lunches Served	8	0
Total Amount of Food Costs	XXXXXXXX	
Total Amount of Eligible Food and Nonfood Costs	XXXXXXXX	

Exhibit B

Site: Amber Point

Review Month/Year: June 2018

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	14	14
Number of 1 st Breakfasts Served	105	111
Number of 1 st Lunches Served	267	165

Exhibit C

Site: Chapel Street – sample site

Review Month/Year: June 2018

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	14	14
Number of 1 st Lunches Served	560	352

Exhibit D

Site: Crossland Place I

Review Month/Year: June 2018

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	14	14
Number of 1 st Lunches Served	337	217
Number of 2 nd Lunches Served	1	0

Exhibit E

Site: Crossland Place II

Review Month/Year: June 2018

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	14	14
Number of 1 st Lunches Served	271	159

Exhibit F

Site: Cumberland Manor

Review Month/Year: June 2018

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	14	14
Number of 1 st Lunches Served	660	426

Exhibit G

Site: Eagle Crest

Review Month/Year: June 2018

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	14	14
Number of 1 st Lunches Served	223	113

Exhibit H

Site: Greater Faith Temple

Review Month/Year: June 2018

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	17	17
Number of 1 st Breakfasts Served	234	219
Number of 1 st Lunches Served	269	178

Exhibit I

Site: Greenwood

Review Month/Year: June 2018

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	14	14
Number of 1 st Lunches Served	975	710
Number of 2 nd Lunches Served	4	0

Exhibit J

Site: Lincoln Homes – sample site

Review Month/Year: June 2018

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	14	14
Number of 1 st Breakfasts Served	75	75
Number of 1 st Lunches Served	644	445

Exhibit K

Site: Summit Heights

Review Month/Year: June 2018

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	14	14
Number of 1 st Lunches Served	1,040	727
Number of 2 nd Lunches Served	3	0



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COMMISSIONER

September 10, 2018

Aleshia Johnson, Board Chairman
Greater Faith Temple Church of God in Christ
618 9th Street
Clarksville, Tennessee 37040-3022

Notice of payment due to findings disclosed in the monitoring report for Summer Food Service Program (SFSP)

Institution Name:	Greater Faith Temple Church of God in Christ
Institution Address:	618 9 th Street Clarksville, Tennessee 37040-3022
Agreement Numbers:	00-673
Amount Due:	\$6,962.93
Due Date:	October 10, 2018

Based on the monitoring report issued, by the Audit Services Division within the Tennessee Department of Human Services, the Community and Social Services- Food Programs- CACFP & SFSP management has agreed with the findings which require your institution to reimburse the Department of Human Services the disallowed cost noted in the report.

Please remit a check or money order payable to the **Tennessee Department of Human Services** in the amount noted above by the due date to:

**Fiscal Services 11th Floor
Citizens Plaza Building
400 Deaderick Street
Nashville, Tennessee 37243-1403
Tennessee Department of Human Services**

If you have any questions regarding this notice, please feel free to contact Allette Vayda, Director of Operations at (615) 313-3769 or Allette.Vayda@tn.gov.

Thank you for your attention

**CORRECTIVE ACTION PLAN
SUMMER FOOD SERVICE PROGRAM (SFSP)
TENNESSEE DEPARTMENT OF HUMAN SERVICES (TDHS)**

Instructions: Please print in ink or type the information to complete this document. Enter the date of birth for each Responsible Principal and/or Individual in Section B. Attach the additional documentation requested. Enter your Date of Birth on the first page; enter your name, title and date of signature on the last page. Sign your name in ink. **Please return ALL pages of the completed Corrective Action Plan form.**

Section A. Sponsor Information	
Name of Institution Greater Faith Temple Church of God in Christ	SFSP Agreement No. 00-673
Mailing Address: 618 9 th Street Clarksville, Tennessee 37040	
Section B. Responsible Principal(s) and/or Individual(s)	
Name and Title: Aleshia Johnson, Executive Director	Date of Birth (s):
Section C. Dates of Issuance of Monitoring Report/Corrective Action Plan	
SD Report: September 10, 2018	Corrective Action Plan: September 10, 2018
Section D. Findings	
Findings:	
<ol style="list-style-type: none"> 1. The Sponsor reported the number of meals as served incorrectly 2. The Sponsor provided menus that did not meet the USDA meal pattern requirements 	

The following measures will be completed within **30 business days** of my institution's receipt of this corrective action plan:

Measure No. 1: The Sponsor reported the number of meals as served incorrectly

The finding will be fully and permanently corrected.

Identify the name(s) and position title(s) of the employee(s) who will be responsible for ensuring that the finding is fully and permanently corrected:

Name: _____ Position Title: _____

Name: _____ Position Title: _____

Describe below the **step-by-step** procedures that will be implemented to correct the finding:

When will the procedures for addressing the finding be implemented? Provide a timeline below for implementing the procedures (i.e., will the procedures be done daily, weekly, monthly, or annually, and when will they begin?):

Where will the Corrective Action Plan documentation be retained? Please identify below:

How will new and current staff be informed of the new policies and procedures to address the finding (e.g., Handbook, training, etc.)? Please describe below:

Measure No. 2: The Sponsor provided menus that did not meet the USDA meal pattern requirements

The finding will be fully and permanently corrected.
Identify the name(s) and position title(s) of the employee(s) who will be responsible for ensuring that the finding is fully and permanently corrected:

Name: _____ Position Title: _____

Name: _____ Position Title: _____

Describe below the **step-by-step** procedures that will be implemented to correct the finding:

When will the procedures for addressing the finding be implemented? Provide a timeline below for implementing the procedures (i.e., will the procedures be done daily, weekly, monthly, or annually, and when will they begin?):

Where will the Corrective Action Plan documentation be retained? Please identify below:

How will new and current staff be informed of the new policies and procedures to address the finding (e.g., Handbook, training, etc.)? Please describe below:

I certify by my signature below that I am authorized by the institution to sign this document. As an authorized representative of the institution, I fully understand the corrective measures identified above and agree to fully implement these measures within the required time frame.

Printed Name of Authorized Sponsor Official

Position

Signature of Authorized Sponsor Official

Date

Signature of Authorized TDHS Official

Date

SUMMER FOOD SERVICE PROGRAM SPONSOR APPEAL PROCEDURES

7 C.F.R. § 225.13 governs appeals in the Summer Food Service Program and the maximum time limit for processing appeals is nineteen (19) calendar days for the Summer Food Service Program as follows:

1. The Department shall notify the appellant (Sponsor) in writing of the grounds upon which the Department has based the action. The Department's notice of action shall be sent by certified mail, return receipt requested, and shall also state that the sponsor or food service management company has the right to appeal the Department's action.
2. Appealable actions are outlined in 7 C.F.R. § 225.13(a) and are: A denial of an application for participation; a denial of a sponsor's request for an advance payment; a denial of a sponsor's claim for reimbursement (except for late submission under 7 CFR § 225.9(d)(6)); the Department's refusal to forward to FNS an exception request by the sponsor for payment of a late claim or a request for an upward adjustment to a claim, a claim against a sponsor for remittance of a payment, the termination of the sponsor or a site, a denial of a sponsor's application for a site, a denial of a food service management company's application for a site; of a food service management company's registration, if applicable.
3. The time period allowed for filing the appeal where actions are appealable as specified in 7 C.F.R. § 225.13(a) is ten (10) calendar days from the date on which the notice of action sent by certified mail return receipt requested is received.
4. The appeal must be in writing and must conform to the requirements outlined in 7 C.F.R. § 225.13(b) (4), which are set forth in number (6) below.
5. The address to file an appeal is as follows:

**Tennessee Department of Human Services
Appeals and Hearings Division, Clerk's Office
P.O. Box 198996
Nashville, TN 37219-8996
Toll Free. (866) 757-8209
Local (615) 744-3900
Fax. (866) 355-6136
AppealsClerksOffice.DHS@tn.gov**

6. The appellant is allowed to refute the charges in the notice of action in person, or by filing written documentation with the review official. If the appeal letter does not specifically request a hearing, a review of written documentation in lieu of a hearing will occur. To be considered, written documentation must be submitted by the appellant within seven (7) calendar days of submitting the appeal. An appellant is allowed the

opportunity to review information upon which the action described in the notice of action was based.

7. If the appellant requested a hearing in the appeal letter, the appellant shall be given at least five (5) calendar days advance written notice by certified mail, return receipt requested, of the date, time, and place of hearing.
8. If the appellant requested a hearing in the appeal letter, the hearing will be conducted within fourteen (14) calendar days of the receipt of the appeal. However, the hearing will not be held before the appellant's written documentation is received where the appellant has requested to submit the written documentation. The appellant may retain legal counsel or may be represented by another person. If the appellant institution or sponsoring agency is a corporation, partnership or other legally created entity, then the sponsoring institution or agency must be represented by an attorney. Otherwise, the individual representing the agency will have limited participation in the hearing. If the appellant institution or sponsoring agency is a natural person (not a corporation, partnership or other artificial entity), he/she may retain an attorney, represent themselves or be represented by another person. Failure of the appellant's representative to appear at a scheduled hearing shall constitute the appellant's waiver of the right to a personal appearance before the review official, unless the review official agrees to reschedule the hearing. A representative of the State agency shall be allowed to attend the hearing to respond to the appellant's testimony and written information and to answer questions from the review official. The review officer shall be independent of the original decision-making process.
9. Within five (5) working days after receiving the written documentation, and where a hearing was not requested in the appeal letter, the administrative review official, based on a full review of the administrative record, will inform the appellant, by certified mail, return receipt requested, of the official's determination.
10. Within five (5) working days after the hearing has been held, when a hearing was requested in the appeal letter, the hearing official, based on a full review of the administrative record, will inform the appellant, by certified mail, return receipt requested, of the official's determination.
11. 7 CFR. § 225.13(11) requires the Program's administrative action to remain in effect during the appeal process.
12. Participating sponsors and sites may continue to operate during an appeal of a termination.
13. Reimbursement shall be paid for meals served during the appeal process if the administrative review determination overturns the Program's administrative action that was appealed.

14. If the sponsor or site has been terminated for the reason of imminent dangers to the health or welfare of children, the operation shall not be allowed to continue during the appeal process and this reason shall be specified in the notice of action.
15. The review official will make a determination based on information provided by the State agency and the appellant, and on Program regulations.
16. The determination made by the hearing official is the final administrative determination provided under 7 225.13(12), and will become the Final Order and set forth the time limits for seeking judicial review.

