



**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

October 7, 2019

Gary Holiway, Executive Director
East Tennessee Human Resource Agency
9111 Cross Park Drive
D100
Knoxville, Tennessee 37923-4521

Dear Mr. Holiway,

The Department of Human Services (DHS) - Division of Audit Services staff conducted an unannounced on-site monitoring review of the Summer Food Service Program (SFSP) at East Tennessee Human Resource Agency (Sponsor), Application Agreement 00-027, beginning on August 19, 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 234 feeding sites operating during the review period. The A-4 Mobile Homes (**A-4**), Alcoa Elementary School (**Alcoa**), **Algood Leaps**, Algood Middle School (**Algood Middle**), **Alpha School**, Bethel Baptist (**Bethel**), Boys and Girls Club of Blount County (**Blount County**), Buffalo Valley Road Housing (**Buffalo Valley**), **Cane Creek Gym**, Cane Creek Recreation Center (**Cane Creek Recreation**), Cookeville High School (**Cookeville High**), Darwin Street Housing (**Darwin Street**), **Dogwood Park**, Fairview Elementary School- Anderson County (**Fairview Elementary**), Glenwood Elementary (**Glenwood**), Greenville Boys and Girls Club (**Greenville**), Hampton Creek Apartments (**Hampton Creek**), Harriman Boys and Girls Club (**Harriman**), Heavenly Host Lutheran Church (**Heavenly Host**), Highland Residential Services (**Highland Residential**), John Sevier Adventure Club (**John Sevier**), **Kids of the Community**, Lenoir City Boys and Girls Club (**Lenoir City**), Maryville High School (**Maryville**), Montgomery Ridge Adventure Club (**Montgomery Ridge**), New Center School (**New Center**), Oak Ridge Baptist (**Oak Ridge**), Parkview Elementary School (**Parkview**), Prescott Middle School (**Prescott**), Scott County Boys and Girls Club (**Scott County**), Scott County High School (**Scott County High**), Sevierville Primary School (**Sevierville**), Silver Hills Apartments (**Silver Hills**), Teller Village Apartments (**Teller Village**), West Elementary School (**West**), Willowbrook Elementary School (**Willowbrook**), and **YMCA** were selected as the sample. In addition, we reviewed all meal counts for all sites operating during the review period.

Background

SFSP 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 SFSP 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 meal services during our site visits throughout the review period.

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

1. The Sponsor reported the number of meals served incorrectly

Condition

During our monitoring visit on August 19, 2019 we requested meal count forms for all active sites during the review period. The Sponsor provided meal count forms with discrepancies in the number of meals counted at point-of-service and the number of meals claimed as served. The discrepancies were noted as follows:

Site	Meal Type	Meals Reported	Meals Documented	Difference	Exhibit
A-4	Lunch	497	500	+3	B
Alcoa	Breakfast	1,511	1,509	-2	C
Alcoa	Lunch	2,193	2,198	+5	C
Algood Leaps	Supplement	602	603	+1	D
Algood Middle	Breakfast	1,547	1,548	+1	E
Alpha	Breakfast	371	374	+3	F
Alpha	Lunch	482	481	-1	F
Andersonville	Lunch	295	275	-20	LL
Andersonville	Supplement	249	228	-21	LL
Bean Station	Breakfast	475	474	-1	MM
Brookwood Villa	Lunch	79	76	-3	NN
Cane Creek Park	Lunch	439	461	+22	OO
Chilhowee View	Lunch	300	322	+22	PP
Claxton Elementary	Lunch	437	433	-4	QQ
Darwin Street	Lunch	395	434	+39	MM
Deer Run	Lunch	257	248	-9	RR
Dutch Valley	Lunch	270	245	-25	SS
Dutch Valley	Supplement	298	276	-22	SS
Engrafted Word	Supper	614	619	+5	TT
Gainesboro Village	Lunch	125	121	-4	VV
Girls Inc.	Supplement	565	555	-10	WW
Glenwood	Lunch	470	474	+4	P
Glenwood	Supplement	507	527	+20	P
Grand Oaks	Lunch	561	556	-5	XX

Harriman	Breakfast	1,012	1,010	-2	S
Hickory Creek Elem	Lunch	34	35	+1	YY
Highland Park Elem	Breakfast	210	215	+5	ZZ
Highland Park Elem	Lunch	210	215	+5	ZZ
Highland Residential	Breakfast	401	391	-10	TT
Highland Residential	Lunch	401	377	-24	TT
Kids of the Community	Breakfast	1,590	1,576	-14	V
Kids of the Community	Lunch	1,384	1,381	-3	V
Kingston Elementary	Breakfast	610	604	-6	AAA
Loudon High School	Breakfast	917	911	-6	CCC
Loudon High School	Lunch	1,037	1,042	+5	CCC
Loudon Pool	Lunch	511	628	+117	DDD
New Center	Breakfast	948	996	+48	Z
New Center	Lunch	924	871	-53	Z
Oneida Elementary	Breakfast	565	559	-6	III
Pi Beta Phi Elem	Breakfast	638	643	+5	MMM
Pigeon Forge Comm	Breakfast	1,046	1,047	+1	NNN
Pigeon Forge Primary	Breakfast	764	743	-21	PPP
Pigeon Forge Primary	Lunch	712	706	-6	PPP
Scott County B&G	Lunch	1,925	1,930	+5	DD
Sevier County HS	Lunch	44	51	+7	SSS
Springdale Elementary	Lunch	175	177	+2	TTT
Trinity United	Lunch	300	303	+3	UUU
Union County HS	Lunch	819	818	-1	VVV
Warren County High	Breakfast	96	98	+2	WWW
West	Lunch	2,901	2,914	+13	III
Willowbrook	Lunch	389	289	-100	JJ
Willowbrook	Supplement	326	245	-81	JJ
Woodland ECC	Supplement	733	714	-19	ZZZ
Woodland Elem	Lunch	163	113	-50	AAAA

As a result, the three (3) breakfasts, 55 lunches, and 132 supplements were overreported, and five (5) suppers were underreported. (See Exhibits)

Note: we did not disallow in our conclusions on 2nd meals since TIPS caps the number of 2nd meals allowed for reimbursement. The disallowances in this report are only based on 1st meals claimed without proper supporting documentation.

This is a repeat finding from a previous report dated December 6, 2016.

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..."

Title 7 of the Code of Federal Regulations, Section 225.15(c)(1) states, "Sponsors shall maintain accurate records justifying all meals claimed and documenting that all Program funds were spent only on allowable Child Nutrition Program costs. 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. The sponsor's records shall be

available at all times for inspection and audit by representatives of the Secretary, the Comptroller General of the United States, and the State agency for a period of three years following the date of submission of the final claim for reimbursement for the fiscal year.”

Recommendation

The Sponsor should ensure that claims for reimbursement are completed based on based on proper supporting meal count documentation.

2. The Sponsor claimed more meals than we observed during a monitoring visit

Condition

The Sponsor claimed more meals than we observed during our on-site monitoring visits. The summary of the feeding sites visited and the number of meals disallowed is as follows:

Date	Site	Meal Type	Meals Claimed	Meals Observed	Adjusted Meals	Exhibit
6/12/19	Bethel	Supper	16	14	-2	G
6/20/19	John Sevier	Breakfast	98	74	-24	U
6/10/19	Scott County High	Lunch	10	6	-4	EE

As a result, 24 breakfasts, four (4) lunches, and two (2) suppers were disallowed. (See Exhibits)

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...”

Title 7 of the Code of Federal Regulations, Section 225.15 (c)(1) states, “Sponsors shall maintain accurate records justifying all meals claimed and documenting that all Program funds were spent only on allowable Child Nutrition Program costs. 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...”

The USDA SFSP Administration Guide, page 139, states, “All sponsors must use daily site records in order to document the number of Program meals they have served to children. The sponsor must provide all necessary record sheets to the sites. Site supervisors are then responsible for keeping the records each day. The site personnel must complete the records based on actual counts taken at each site for each meal service on each day of operation. Site personnel must be sure that they record all required counts.”

The USDA SFSP Administration Guide, page 139, states, “It is critical that site personnel and monitors understand the importance of accurate point-of service meal counts. Only complete meals served to eligible children can be claimed for reimbursement. Therefore, meals must be counted at the actual point of service...”

Recommendation

The Sponsor should ensure that point of service meal counts are taken at the time of the meal service.

3. The Sponsor provided meal count sheets with meal count errors

Condition

Andersonville Elementary

The daily meal count sheets provided for **Andersonville Elementary** did not indicate that point of service meal counts were taken for lunches and supplements served June 10-12, 2019.

As a result, 60 lunches and 60 supplements were disallowed. (See Exhibit LL)

Fairview Elementary - sample site

The daily meal count sheets provided for **Fairview Elementary** did not indicate that point of service meal counts were taken for supplements served June 3 - 6, 2019.

As a result, 81 supplements were disallowed. (See Exhibit O)

Fairview Elementary - Blount County

The daily meal count sheets provided for **Fairview Elementary- Blount County** did not indicate that point of service meal counts were taken for lunch served on June 26, 2019.

As a result, 32 lunches were disallowed. (See Exhibit UU)

Kingston Elementary

The daily meal count sheets provided for **Kingston Elementary** reported 40 breakfasts served on June 13, 2019, 27 lunches served on June 24, 2019, and 29 lunches served on June 26, 2019. However, we counted 24 breakfasts on June 13, 2019, 28 lunches on June 24, 2019, and 25 lunches on June 26, 2019.

As a result, 16 breakfasts and three (3) lunches were disallowed. (See Exhibit AAA)

Lenoir Central Park

The daily meal count sheets provided for **Lenoir Central Park** did not indicate that point of service meal counts were taken for lunch served on June 19, 2019.

As a result, three (3) lunches were disallowed. (See Exhibit BBB)

Loudon High School

The daily meal count sheets provided for **Loudon High School** reported 79 breakfasts served on June 6, 2019 and 83 breakfasts served on June 7, 2019. However, we counted 83 breakfasts on June 6, 2019 and 74 breakfasts on June 7, 2019.

As a result, five (5) breakfasts were disallowed. (See Exhibit CCC)

Loudon Pool

The daily meal count sheets provided for **Loudon Pool** reported 29 lunches served on June 17, 2019 and 32 lunches served on June 18, 2019. However, we counted 24 lunches on June 17, 2019 and 33 lunches on June 18, 2019.

As a result, four (4) lunches were disallowed. (See Exhibit DDD)

Mary Blount Friends

The daily meal count sheet provided for **Mary Blount Friends** for June 5, 2019 indicated 92 lunch meals were served but the Sponsor claimed 93 lunch meals.

As a result, one (1) lunch meal was disallowed. (See Exhibit EEE)

MCM Baptist

The daily meal count sheets provided for **MCM Baptist** did not indicate that point of service meal counts were taken for suppers served June 17-19, 2109.

As a result, 145 suppers were disallowed. (See Exhibit FFF)

Montvale Elementary

The daily meal count sheet provided for **Montvale Elementary** for June 24, 2019 indicated 51 breakfasts were served but the Sponsor claimed 52 breakfast meals.

As a result, one (1) breakfast was disallowed. (See Exhibit GGG)

Norwood Elementary

The daily meal count sheets provided for **Norwood Elementary** did not indicate that point of service meal counts were taken for lunches served June 3-6, 2019.

As a result, 79 lunches were disallowed. (See Exhibit HHH)

Oneida High School

The daily meal count sheets provided for **Oneida High School** did not indicate that point of service meal counts were not taken for lunches served on June 28, 2019.

As a result, three (3) lunches were disallowed. (See Exhibit JJJ)

Paulette Elementary

The daily meal count sheets provided for **Paulette Elementary** did not indicate that point of service meal counts were taken for breakfasts and lunches served on June 4, 2019. Additionally, the meal count sheets for breakfast indicated 30 breakfasts were served on June 10, 2019 and June 12, 2019. The meal counts tallied were 25 breakfasts for June 10, 2019 and 35 breakfasts for June 12, 2019.

As a result, 30 breakfasts and 30 lunches were disallowed. (See Exhibit KKK)

Rutledge Elementary

The daily meal count sheets provided for **Rutledge Elementary** did not indicate that point of service meal counts were taken for breakfasts or lunches served on June 27, 2019.

As a result, 10 breakfasts and 11 lunches were disallowed. (See Exhibit RRR)

Teller Village – sample site

The daily meal count sheets provided for Teller Village did not indicate that point of service meal counts were taken for lunches served June 19-21, 2019 and June 24-28, 2019. The Sponsor claimed a total of 124 lunches for this period. During our monitoring visit on June 21, 2019, we observed 15 lunch meals served that were creditable; therefore, we did not disallow for these meals.

As a result, the remaining 109 lunches were disallowed. (See Exhibit HH)

Youngs Chapel Baptist

The daily meal count sheet for **Youngs Chapel Baptist** did not indicate that point of service meal counts were taken for suppers served June 18-20, 2019.

As a result, 99 suppers were disallowed. (See Exhibit BBBB)

Criteria

The USDA Administration Guide Summer Food Service Program, pages 66 and 184, states that meals must be counted at the actual point of service, i.e., meals are counted as they are served, to ensure that an accurate count of meals served is obtained and reported.

Recommendation

The Sponsor should ensure that the site supervisor accurately records point of service meal counts on the daily meal count sheet.

4. The Sponsor provided meal count forms that were not signed and dated

Condition

Oneida Elementary

The daily meal count sheet provided for **Oneida Elementary** for June 17-21, 2019 was not signed or dated by the site supervisor.

As a result, 114 breakfasts and 90 lunches were disallowed. (See Exhibit HHH)

Oneida High School

The daily meal count sheet provided for **Oneida High School** for June 17-21, 2019 was not signed or dated by the site supervisor.

As a result, 17 lunches were disallowed. (See Exhibit JJJ)

Philadelphia Elementary

The daily meal count sheets provided for **Philadelphia Elementary** for June 3-6, 2019, June 6-10, 2019, and June 17-20, 2019 were not signed or dated by the site supervisor.

As a result, 302 lunches were disallowed. (See Exhibit LLL)

Pigeon Forge High School

The daily meal count sheet provided **Pigeon Forge High School** for June 10-13, 2019 was not signed or dated by the site supervisor.

As a result, 135 breakfasts and 135 lunches were disallowed. (See Exhibit OOO)

Winfield Elementary

The daily meal count sheet provided **Winfield Elementary** for June 3-6, 2019 was not signed or dated by the site supervisor.

As a result, 72 breakfast meals and 72 lunch meals were disallowed. (See Exhibit YYY)

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...."

Title 7 of the Code of Federal Regulations, Section 225.15 (c)(1) states, "Sponsors shall maintain accurate records justifying all meals claimed and documenting that all Program funds were spent only on allowable Child Nutrition Program costs. 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..."

The USDA SFSP Administration Guide, page 139, states, "All sponsors must use daily site records in order to document the number of Program meals they have served to children. The sponsor must provide all necessary record sheets to the sites. Site supervisors are then responsible for keeping the records each day. The site personnel must complete the records based on actual counts taken at each site for each meal service on each day of operation. Site personnel must be sure that they record all required counts."

The USDA SFSP Administration Guide, page 139, states, "It is critical that site personnel and monitors understand the importance of accurate point-of service meal counts. Only complete meals served to eligible children can be claimed for reimbursement. Therefore, meals must be counted at the actual point of service..."

The USDA SFSP Sponsor Monitor's Guide, page 16, states, "... The only basis for reporting the number of meals served is accurate daily records. These records account for all categories of meals served and are signed by the site supervisors...."

Recommendation

The Sponsor should ensure that all meal count sheets are signed and dated by the site supervisor at each site.

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

Condition

During our monitoring visit on August 19, 2019, we requested menus and supporting documentation for the sample sites. The Sponsor provided lunch menus for **Greeneville Boys and Girls Clubs** for June 7 and 21, 2019 that listed turkey and cheese sandwich with enriched bread, mandarin oranges, macaroni salad, and milk. These menus did not list a second fruit or vegetable served. There were 100 lunches reported for June 7, 2019 and 109 lunches reported for June 21, 2019.

As a result, 209 lunch meals served were disallowed. (See Exhibit Q)

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 meals served meet USDA meal pattern requirements.

6. The Sponsor reported more meals served than were available

The Sponsor reported nine (9) lunch meals served at **Lenoir Central Park** on June 24, 2019. However, the delivery ticket indicated only five (5) meals were delivered and there were no meals available from the previous day.

As a result, four (4) lunches were disallowed. (See Exhibit BBB)

7. The Sponsor did not maintain racial and ethnic data as required

Condition

The Sponsor did not complete the racial/ethnic data form for the feeding sites at Fairview Elementary and Cane Creek Recreation Center.

Criteria

The USDA SFSP Administration Guide, page 122, states that "the Sponsor must collect ethnic/racial category data each year by ethnic/racial category for each site under the sponsor's jurisdiction.

Recommendation

The Sponsor should ensure that racial/ethnic data is collected at each feeding site once during the operation of the program.

8. The Sponsor did not conduct monitoring reviews as required.

The Sponsor did not conduct the monitoring reviews during the first week and/or first four weeks of operation or did not provide monitoring forms that were signed by the Sponsor's representative for: A-4, Alcoa, Algood Middle, Alpha, Boys and Girls Club of Blount County, Buffalo Road, Cane Creek Gym, Cane Creek Recreation, Cookeville High, Darwin Street, Dogwood Park, Fairview, Glenwood, Greenville, Hampton Creek, Harriman, Heavenly Host, Highland Residential, John Sevier, Kids of the Community, Lenoir City, Maryville, Montgomery Ridge, New Center, Parkview, Prescott, Scott County Boys and Girls Club, Sevierville, Silver Hills, Teller Village, West, Willowbrook, and YMCA feeding sites.

Criteria

Title 7 of the Code of Federal Regulations, Section 225.15 (d)(2) states, "Sponsors shall visit each of their sites at least once during the first week of operation under the Program and shall promptly take such actions as are necessary to correct any deficiencies."

Title 7 of the Code of Federal Regulations, Section 225.15 (d)(3) states, "Sponsors shall review food service operations at each site at least once during the first four weeks of Program operations, and thereafter shall maintain a reasonable level of site monitoring, Sponsors shall complete a monitoring form developed by the State agency during the conduct of these reviews."

Recommendation

The Sponsor should ensure that all feeding sites are monitored as required and that all monitoring forms are completed and signed by the monitor and site personnel.

Note: Our observation of the meal services during June 2019 at the sample sites revealed no significant deficiencies.

Technical Assistance Provided

Technical assistance was offered by monitoring staff but was declined.

Disallowed Meals 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 \$7,051.93.

Corrective Action

The Sponsor must complete the following actions within 30 days from the date of this report:

- Log into the Tennessee Information Payment System (TIPS) and revise the claim submitted for June 2019, which contains the verified claim data from the enclosed exhibits
- 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

- 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
Summer Food Service Program
James K. Polk Building 15th Floor
505 Deaderick Street
Nashville, Tennessee 37243
Allette.Vayda@tn.gov
(615) 313-3769

Please mail your check and the billing notice to:

Summer Food Service Program
Fiscal Services, 16th Floor
James K. Polk Building
505 Deaderick Street
Nashville, Tennessee 37243

In accordance with the federal regulation found at 7 *CFR Part 225.13*, your institution may appeal the amount of disallowed cost identified in this monitoring report. The procedures for submitting an appeal are enclosed. 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 disallowed administrative and meals cost, all appeal procedures must be followed as failure to do so may result in the denial of your request for an appeal.

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: Veronica Stephens, Senior Program Director, East Tennessee 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

Sponsor: East Tennessee Human Resource Agency
Review Month/Year: June 2019
Claim Reimbursement Total: \$591,633.16

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Number of Participating Sites for Breakfast	89	89
Number of Participating Sites for AM Snacks	7	7
Number of Participating Sites for Lunch	200	200
Number of Participating Sites for PM Snacks	8	8
Number of Participating Sites for Supper	34	34
Number of Breakfasts Served	57,123	56,713
Number of 2 nd Breakfasts Served	391	391 ¹
Number of Lunches Served	102,583	101,360
Number of 2 nd Lunches Served	686	686 ¹
Number of Suppers Served	9,890	9,649
Number of 2 nd Suppers Served	46	46 ¹
Number of Supplements Served	6,310	6,037
Number of 2 nd Supplements Served	4	4 ¹

¹Max allowed and paid out by TIPS for 2nd meals is 2% of 1st meals. We did not conclude on 2nd meals.

SFSP Sample Sites Data – (Exhibits B-KK)

Exhibit B

Sample Site: A-4 Mobile Homes

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	20	20
Number of Lunches Served	497	500

Exhibit C

Sample Site: Alcoa Elementary School

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	16	16
Number of Breakfasts Served	1,511	1,509
Number of Lunches Served	2,193	2,198

Exhibit D

Sample Site: Algood Leaps

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	15	15
Number of Suppers Served	588	588
Number of Supplements Served	602	603

Exhibit E

Sample Site: Algood Middle School

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	15	15
Number of Breakfasts Served	1,547	1,548
Number of Lunches Served	1,688	1,688

Exhibit F

Sample Site: Alpha School

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	20	20
Number of Breakfasts Served	371	374
Number of Lunches Served	482	481

Exhibit G

Sample Site: Bethel Baptist

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	3	3
Number of Suppers Served	50	48

Exhibit H

Sample Site: Boys and Girls Club of Blount County

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	20	20
Number of Breakfasts Served	1,370	1,370
Number of Lunches Served	1,584	1,584

Exhibit I

Sample Site: Buffalo Valley Road Housing

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	20	20
Number of Lunches Served	588	588

Exhibit J**Sample Site: Cane Creek Gym**

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	19	19
Number of Lunches Served	222	222
Number of Supplements Served	411	411

Exhibit K**Sample Site: Cane Creek Recreation Center**

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	20	20
Number of Breakfasts Served	1,449	1,449
Number of Lunches Served	1,615	1,615

Exhibit L**Sample Site: Cookeville High School**

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	20	20
Number of Breakfasts Served	489	489
Number of Lunches Served	1,161	1,161

Exhibit M**Sample Site: Darwin Street Housing**

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	20	20
Number of Lunches Served	395	434

Exhibit N

Sample Site: Dogwood Park

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	20	20
Number of Lunches Served	3,395	3,395

Exhibit O

Sample Site: Fairview Elementary – Anderson County

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	14	14
Number of Lunches Served	247	247
Number of Supplements Served	247	166

Exhibit P

Sample Site: Glenwood Elementary

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	10	10
Number of Lunches Served	470	474
Number of Supplements Served	507	527

Exhibit Q

Sample Site: Greeneville Boys and Girls Club

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	20	20
Number of Breakfasts Served	1,508	1,508
Number of Lunches Served	2,181	1,972

Exhibit R

Sample Site: Hampton Creek Apartments

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	20	20
Number of Lunches Served	193	193

Exhibit S

Sample Site: Harriman Boys and Girls Club

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	20	20
Number of Breakfasts Served	1,012	1,010
Number of Lunches Served	1,313	1,313

Exhibit T

Sample Site: Highland Residential Services

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	20	20
Number of Breakfasts Served	401	391
Number of Lunches Served	401	377

Exhibit U

Sample Site: John Sevier Adventure Club

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	20	20
Number of Breakfasts Served	1,663	1,639
Number of Lunches Served	1,358	1,358

Exhibit V

Sample Site: Kids of the Community

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	15	15
Number of Breakfasts Served	1,590	1,576
Number of Lunches Served	1,384	1,381

Exhibit W

Sample Site: Lenoir City Boys and Girls Club

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	20	20
Number of Breakfasts Served	1,298	1,298
Number of Lunches Served	1,771	1,771

Exhibit X

Sample Site: Maryville High School

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	20	20
Number of Breakfasts Served	1,521	1,521
Number of Lunches Served	1,616	1,616

Exhibit Y

Sample Site: Montgomery Ridge Adventure Club

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	20	20
Number of Breakfasts Served	430	430
Number of Lunches Served	304	304

Exhibit Z

Sample Site: New Center School

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	12	12
Number of Breakfasts Served	948	996
Number of Lunches Served	924	871

Exhibit AA

Sample Site: Oak Ridge Baptist

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	4	4
Number of Suppers Served	465	465

Exhibit BB

Sample Site: Parkview Elementary School

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	4	4
Number of Lunches Served	66	66

Exhibit CC

Sample Site: Prescott Middle School

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	14	14
Number of Breakfasts Served	126	126
Number of Lunches Served	166	166

Exhibit DD

Sample Site: Scott County Boys and Girls Club

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	20	20
Number of Breakfasts Served	1,982	1,982
Number of Lunches Served	1,925	1,930

Exhibit EE

Sample Site: Scott County High School

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	10	10
Number of Breakfasts Served	108	108
Number of Lunches Served	102	98

Exhibit FF

Sample Site: Sevierville Primary School

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	20	20
Number of Breakfasts Served	1,359	1,359
Number of Lunches Served	1,034	1,034

Exhibit GG

Sample Site: Silver Hills Apartments

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	20	20
Number of Lunches Served	171	171

Exhibit HH

Sample Site: Teller Village Apartments

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	7	7
Number of Lunches Served	124	15

Exhibit II

Sample Site: West Elementary School

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	19	19
Number of Breakfasts Served	1,648	1,648
Number of Lunches Served	2,901	2,914

Exhibit JJ

Sample Site: Willowbrook Elementary School

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	13	13
Number of Lunches Served	389	289
Number of Supplements Served	326	245

Exhibit KK

Sample Site: YMCA

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	20	20
Number of Breakfasts Served	1,438	1,438
Number of Lunches Served	1,499	1,499

SFSP Non-Sample Sites with Errors Data – (Exhibits LL - BBBB)**Exhibit LL****Site: Andersonville Elementary**

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	13	13
Number of Lunches Served	295	215
Number of Supplements Served	249	168

Exhibit MM**Site: Bean Station Elementary**

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	19	19
Number of Breakfasts Served	475	474
Number of Lunches Served	473	473

Exhibit NN**Site: Brookwood Villa**

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	16	16
Number of Lunches Served	79	76

Exhibit OO**Site: Cane Creek Park**

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	20	20
Number of Lunches Served	439	461

Exhibit PP

Site: Chilhowee View Community Center

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	3	5
Number of Lunches Served	300	322

Exhibit QQ

Site: Claxton Elementary

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	12	12
Number of Lunches Served	437	433

Exhibit RR

Site: Deer Run Housing

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	20	20
Number of Lunches Served	257	248

Exhibit SS:

Site: Dutch Valley Elementary

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	13	13
Number of Lunches Served	270	245
Number of Supplements Served	298	276

Exhibit TT

Site: Engrafted Word Church

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	5	5
Number of Suppers Served	614	619

Exhibit UU

Site: Fairview Elementary- Blount County

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	20	20
Number of Breakfasts Served	733	733
Number of Lunches Served	402	370

Exhibit VV

Site: Gainesboro Village

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	19	19
Number of Lunches Served	125	121

Exhibit WW

Site: Girls Inc.

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	14	14
Number of Lunches Served	458	458
Number of Supplements Served	565	555

Exhibit XX

Site: Grand Oaks

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	15	15
Number of Lunches Served	561	556
Number of Supplements Served	508	508

Exhibit YY

Site: Hickory Creek Elementary School

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	4	4
Number of Breakfasts Served	35	35
Number of Lunches Served	34	35

Exhibit ZZ

Site: Highland Park Elementary

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	10	10
Number of Breakfasts Served	210	215
Number of Lunches Served	210	215

Exhibit AAA

Site: Kingston Elementary

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	20	20
Number of Breakfasts Served	610	588
Number of Lunches Served	694	691

Exhibit BBB**Site: Lenoir Central Park**

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	20	20
Number of Lunches Served	158	151

Exhibit CCC**Site: Loudon High School**

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	20	20
Number of Breakfasts Served	917	906
Number of Lunches Served	1,037	1,042

Exhibit DDD**Site: Loudon Pool**

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	17	17
Number of Lunches Served	511	624

Exhibit EEE**Site: Mary Blount Friends**

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	20	20
Number of Breakfasts Served	1,831	1,831
Number of Lunches Served	1,408	1,407

Exhibit FFF

Site: MCM Baptist

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	3	3
Number of Suppers Served	145	0

Exhibit GGG

Site: Montvale Elementary

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	20	20
Number of Breakfasts Served	953	952
Number of Lunches Served	877	877

Exhibit HHH

Site: Norwood Elementary

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	14	14
Number of Lunches Served	280	201
Number of Supplements Served	280	280

Exhibit III

Site: Oneida Elementary

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	19	19
Number of Breakfasts Served	565	445
Number of Lunches Served	500	410

Exhibit JJJ

Site: Oneida High School

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	20	20
Number of Breakfasts Served	16	16
Number of Lunches Served	91	71

Exhibit KKK

Site: Paulette Elementary

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	16	16
Number of Breakfasts Served	435	405
Number of Lunches Served	409	379

Exhibit LLL

Site: Philadelphia Elementary

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	18	18
Number of Lunches Served	452	150

Exhibit MMM

Site: Pi Beta Phi Elementary

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	14	14
Number of Breakfasts Served	638	643
Number of Lunches Served	610	610

Exhibit NNN

Site: Pigeon Forge Community

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	20	20
Number of Breakfasts Served	1,046	1,047
Number of Lunches Served	1,343	1,343

Exhibit OOO

Site: Pigeon Forge High School

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	12	12
Number of Breakfasts Served	414	279
Number of Lunches Served	414	279

Exhibit PPP

Site: Pigeon Forge Primary

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	16	16
Number of Breakfasts Served	764	743
Number of Lunches Served	712	706

Exhibit RRR

Site: Rutledge Elementary

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	19	19
Number of Breakfasts Served	203	193
Number of Lunches Served	184	173

Exhibit SSS

Site: Sevier County High School

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	6	6
Number of Lunches Served	44	51

Exhibit TTT

Site: Springdale Elementary

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	8	8
Number of Breakfasts Served	32	32
Number of Lunches Served	175	177

Exhibit UUU

Site: Trinity United Methodist Church

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	20	20
Number of Breakfasts Served	69	69
Number of Lunches Served	300	303

Exhibit VVV

Site: Union County High School

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	20	20
Number of Breakfasts Served	840	840
Number of Lunches Served	819	818

Exhibit WWW

Site: Warren County High School

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	18	18
Number of Breakfasts Served	96	98
Number of Lunches Served	203	203

Exhibit YYY

Site: Winfield Elementary

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	10	10
Number of Breakfasts Served	180	108
Number of Lunches Served	180	108

Exhibit ZZZ

Site: Woodland ECC

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	15	15
Number of Lunches Served	407	407
Number of Supplements Served	733	714

Exhibit AAAA

Site: Woodland Elementary

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	10	10
Number of Lunches Served	163	113
Number of Supplements Served	166	166

Exhibit BBBB

Site: Youngs Chapel Baptist

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	4	4
Number of Suppers Served	129	30

Note: There were no reporting errors for the remaining non-samples sites noted. Therefore, there are no exhibits included for these sites.



**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

October 7, 2019

Gary Holiway, Executive Director
East Tennessee Human Resource Agency
9111 Cross Park Drive
D100
Knoxville, Tennessee 37923-4521

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

Institution Name:	East Tennessee Human Resource Agency
Institution Address:	9111 Cross Park Dr, D100, Knoxville, TN 37923-4521
Agreement Numbers:	00-027
Amount Due:	\$7,051.93
Due Date:	November 7, 2019

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
James K. Polk Building, 16th Floor
505 Deaderick Street
Nashville, Tennessee 37243
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

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.