

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

August 26, 2019

Mr. Rosman Randle, Executive Director Giving Youth A Chance 476 Lipford Street Memphis, Tennessee 38112-2992

Dear Mr. Randle:

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 **Giving Youth a Chance** (Sponsor), Application Agreement number 00033, on July 16, 2019. Additional information was requested and received on August 2, 2019. The purpose of this review was to determine if the Sponsor complied with *Title 7 of the Code of Federal Regulations* (*CFR*) applicable parts, applicable agreement, and applicable Federal and State Regulations.

Based on our review of the Sponsor's records and information provided, the Sponsor was approved for 45 feeding sites of which 42 feeding sites were listed as operating during the review period. Eight feeding sites were selected as the samples. In addition, we reviewed all meal counts for all sites operating during the period.

Background

SFSP Sponsors utilize meal count sheets to record the number of breakfast, lunch, supper, and supplement (snack) 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, meals service was observed at Site 0002 Apple Tree Apartments, Site 0151 Boys and Girls Club Juice Plus Technical Training Center, Site 0148 Craigmont Boys and Girls Club, Site 0011 Ira Samelson, Jr. Boys & Girls Club, Site 0023 Porter-

Goodwill Boys Girls Club, Site 0025 Rolling Hills Apartment Complex, Site 0032 Sycamore View Boys Girls Club, and Site 0033 Tigerland Academy Summer Camp.

During June 2019, we attempt to observe meal service at the following feeding sites, however, no meal service was observed due the feeding sites were not operating during that time of the visit: Site 0017 Miracle of Redemption, Site 0030 Street Ministries--Graham, and Site 00124 Cowborettes Majorette Dance Team.

An attempted follow up visit was conducted at **Site 0002 Apple Tree Apartments**, on June 11, 2019; however, the breakfast service was discontinued as of June 10, 2019. A follow up meal observation visit was conducted at **Apple Tree Apartments** on June 25, 2019.

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

1. The Sponsor reported the number of meals claimed for reimbursement incorrectly

Condition

The Sponsor report incorrect meal count for June 2019 claim for reimbursement. The claim for reimbursement summary for June 2019 reported 7,049 breakfast meals, 835 AM supplements, 35,396 lunch meals, 28,372 PM supplements, and 1,695 supper meals. However, our review of the available records reconciled 7,099 breakfast meals, 835 AM Supplements, 35,439 lunch meals, 28,500 PM supplements and 1,690 supper meals prior to any meal disallowances. The differences were based on the following.

Breakfast Meals

Site	Reported	Verified	Difference	Exhibit
Ira Samelson, Jr. Boys & Girls Club	1,353 Breakfast meals	1,349 Breakfast meals	-4 Breakfast meals	E
Whitehaven High School	563 Breakfast meals	617 Breakfast meals	+54 Breakfast meals	PP

As a result, 50 breakfast meals were under claimed.

Lunch Meals

Site	Reported	Verified	Difference	Exhibit
Barron Court	802 Lunch	810 Lunch	+8 Lunch	L
Apartments	meals	meals	meals	
Boys and Girls	353 Lunch	374 Lunch	+21 Lunch	С
Club Juice Plus	meals	meals	meals	
Technical				
Training Center				
Memphis All	348 Lunch	368 Lunch	+20 Lunch	Z
Stars	meals	meals	meals	
Miracle of	423 Lunch	424 Lunch	+1 Lunch	BB
Redemption	meals	meals	meals	
New Hope	377 Lunch	372 Lunch	-5 Lunch	CC
Ministry	meals	meals	meals	
Summit Park	1,862 Lunch	1,860 Lunch	-2 Lunch	NN

Apartments	meals	meals	meals	

As a result, 43 lunch meals were under claimed.

PM Supplements

Site	Reported	Verified	Difference	Exhibit
Hillview Village	1,945 PM	1,942 PM	-3 PM	S
Apartments	Supplements	Supplements	Supplements	
Longview	848 PM	837 PM	-11PM	X
Heights	Supplements	Supplements	Supplements	
Apartments				
Memphis All	357 PM	388 PM	+31 PM	Z
Stars	Supplements	Supplements	Supplements	
Memphis	1,484 PM	1,487 PM	+3 PM	AA
Dangerous	Supplements	Supplements	Supplements	
Pantherettes				
Summit Park	1,866 PM	1,860 PM	-6 PM	NN
Apartments	Supplements	Supplements	Supplements	
Sycamore View	2,438 PM	2,552 PM	+114 PM	Н
Boys Girls Club	Supplements	Supplements	Supplements	

As a result, 128 PM supplements were under claimed.

Supper Meals

Site	Reported	Verified	Difference	Exhibit
Lakeview	71 Supper	66 Supper	-5 Supper	W
Counnity COGIC	meals	meals	meals	

As a result, 5 supper meals were over claimed.

Criteria

The United States Department of Agriculture (USDA) Food and Nutrition Service (FNS) Code of Federal Regulations 7 CFR Section 225.9 (d) (5) states "Claims for reimbursement shall report information in accordance with the financial management system established by the State agency, and in sufficient detail to justify the reimbursement claimed and to enable the State agency to provide the Reports of Summer Food Service Program Operations required under §225.8(b). 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 the meal counts are accurately reported and documentation is maintained to support the claim.

This is a repeat finding from monitoring report dated September 20, 2018.

2. The Sponsor provided point of service meal counts that were not taken correctly

Condition

The Sponsor did not correctly complete the daily point of service meals count sheets. Some of the numbers reported did not match what was noted on the forms. Meals that were not marked at actual point of service were disallowed. Meals that were marked on the point of service meals count sheets, but not included in the count of meals served have been added in the chart below. The meal counts reconciled have been added in the chart below.

Name of Site	Number of first meals allowed/disallowed	Dates Allowed/Disallowed	Exhibit
Carriage House Apartments	-1 PM Supplement	6/13/19	0
Cowborettes Majorette Dance Team	-1 PM Supplement	6/20/19	Р
Hillview Village Apartments	-3 Lunch meals	6/11/19	S
Hillview Village Apartments	+2 PM Supplements	6/13/19,6/18/19, 6/19/19	S
Ira Samelson, Jr. Boys & Girls Club	-1 Breakfast meals	6/6/19	Е
John D. Buckman- Boys & Girls Club	-2 PM Supplements	6/10/19,6/20/19	U
Memphis Dangerous Pantherettes	-1 PM Supplement	6/20/19	AA
New Hope Ministry	+3 Lunch meals	6/17/19	CC
Oakhaven Boys & Girls Club	-2 PM Supplement	6/5/19	FF
Porter-Goodwill Boys Girls Club	-2 Lunch meals	6/12/19	F
Wildcat's Summer Camp	-2 Lunch meals	6/12/19,6/17/19	QQ

As a result of the review, we noted that one breakfast meal, four lunch meals, and five PM supplements were disallowed.

Criteria

According to the <u>USDA FNS Summer Food Service Program 2016 Administration Guidance for Sponsors</u>, pages 139 and 184, "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. Each site must take a point-of-service meal count every day."

Recommendation

The Sponsor should ensure site personnel are accurately completing daily meal count sheets to support the claim for reimbursement prior to submission.

This is a repeat finding from monitoring report dated September 20, 2018.

3. The Sponsor served meals outside the approved meal service time

Condition

Site 0017 Miracle of Redemption

According to the Sponsor's application for feeding site 0017 Miracle of Redemption, breakfast meals and lunch meals were approved to be served from June 4, 2019-August 2, 2019 Monday-Friday. According the meal count sheets, 32 breakfast meals and 34 lunch meals were served June 3, 2019. Meals were not approved to be served on June 3, 2019.

As a result, 32 breakfast meals and 34 lunch meals were disallowed. (See Exhibit BB)

Site 0049 Whitehaven High School

According to the Sponsor's application for feeding site 0049 Whitehaven High School, breakfast meals and lunch meals were approved to be served from June 3, 2019-June 14, 2019 Monday-Friday. According the meal count sheets, 42 breakfast meals and 43 lunch meals were served June 17, 2019. Meals were not approved to be served on June 17, 2019.

As a result, 42 breakfast meals and 43 lunch meals were disallowed. (See Exhibit PP)

Criteria

The USDA FNS Code of Federal Regulations 7 CFR Section 225.16 (c) (3) and (4) states, "Meals served outside of the period of approved meal service shall not be eligible for Program payments. Any permanent or planned changes in meal service periods must be approved by the State agency.

According to the <u>USDA FNS Summer Food Service Program 2016 Administrative Guidance for Sponsors</u>, page 133, "Sponsors may claim reimbursement only for those meals that meet SFSP requirement. Reimbursement may not be claimed for... meals served outside of approved timeframes or approved dates of operation."

Recommendation

The Sponsor should ensure that site personnel serve meals during the approved meal service time and if changes are required the information should be updated through DHS Tennessee Information Payment System (TIPS).

This is a repeat finding from monitoring report dated September 20, 2018.

4. The Sponsor's site supervisor did not take point of service meal counts during a breakfast meal observation

Condition

During our meal service observation on June 7, 2019, we noted that at feeding site 0022 Apple Tree Apartments on June 7, 2019 feeding site personnel were not taking point of service meal counts for the breakfast meals observed.

No meals were disallowed because the Sponsor did not claim breakfast meals for this site.

Criteria

According to the <u>USDA FNS Summer Food Service Program 2016 Administration Guidance for Sponsors,</u> pages 139 and 184, "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. Each site must take a point-of-service meal count every day."

Recommendation

The Sponsor should ensure site supervisors are taking point of service as meals are being served to participants.

5. The Sponsor allowed meals to be consumed off-site

Condition

During our observation of a breakfast meal service at feeding site 0002 Apple Tree Apartments on June 7, 2019, we observed two breakfast meals were taken off site.

No meals were disallowed because the Sponsor did not claim breakfast meals for this feeding site.

Criteria

The United States Department of Agriculture Food and Nutrition Service Code of Federal Regulations 7 CFR Section 225.6 (e)(15) states the Sponsor shall "maintain children on site while meals are consumed;"

Recommendation

The Sponsor should ensure meals are consumed on site when required.

6. The Sponsor served second meals before all children had been served a first meal

Condition

During our observation of a lunch meal service at feeding site 0025 Rolling Hills Apartments on June 11, 2019; we observed two lunch meals served as seconds before all participants received a first meal.

Criteria

The United States Department of Agriculture Food and Nutrition Service Code of Federal Regulations 7 CFR Section 225.15 (b) (4) states, "... Second meals shall be served only after all participating children at the site's meal service have been served a meal."

Recommendation

The Sponsor should ensure site supervisors are serving all participants first prior to serving second meals.

7. The "And Justice for All" poster was not posted at a site

Condition

During our breakfast meal service observation on June 4, 2019 at Feeding Site 0023 Porter-Goodwill Boys Girls Club, we noted that the "And Justice for All" poster was not displayed.

Criteria

The <u>USDA FNS Summer Food Service Program 2016 Administration Guidance for Sponsors</u>, page 121, states "all sponsors and their sites are required to display in a prominent place at the site and in the sponsor's office, the "And Justice for All" poster developed by USDA or approved by FNS."

Recommendation

The Sponsor should ensure all sites have the "And Justice for All" poster displayed.

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

Condition

During the our lunch meal observation at feeding site 0151 Boys and Girls Club Juice Plus Technical Training Center on June 5, 2019, we noted that three lunch meals served were missing the vegetable component. The meal consisted of WG bun, shredded bbq chicken, applesauce and milk. We identified three lunch meals as ineligible for reimbursement.

No lunch meals were disallowed because the Sponsor did not claim those lunch meals on the day of meal observation.

Criteria

The United States Department of Agriculture Food and Nutrition Service Code of Federal Regulations 7 CFR Section 225.16 (d) states, "Sponsors shall ensure that meals served meet all of the (meal pattern) requirements."

The <u>USDA FNS Summer Food Service Program 2016 Administration Guidance for Sponsors</u>, page 58, states "The meal patterns establish the minimum portions of the various food components that must be served to each child in order for the participating sponsor to receive reimbursement for each meal. ... For a lunch or supper to be a reimbursable meal, it must contain: • One serving of milk (whole, low-fat, or fat-free) • Two or more servings of vegetables, fruits, or full-strength juice • One serving of a grain; and • One serving of meat or meat alternate"

Recommendation

The Sponsor should ensure all meals served meet the USDA meal pattern requirements.

9. The Sponsor reported the number of operation days incorrectly for some feeding sites

Condition

The days of operation for multiple sites were incorrect. Our review of the records indicated the following:

Site Name	Operating Days reported in TIPS	Verified Days of Operation per Meal Count Sheets
0151 Boys and Girls Club Juice Plus Technical Training Center	19	20
0032 Sycamore View Boys and Girls Club	19	20
0051 Manassas High School	11	12
0017 Miracle of Redemption	11	12
0049 Whitehaven High School	9	10

Criteria

Title 7 of the Code of Federal Regulations, Section 225.9 (d)(5) 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 review meal count sheets to ensure that operating days are correct when submitting claim for reimbursement.

10. Meals were not counted by feeding site personnel to ensure meals delivered matched the delivery ticket

Condition

Based on delivery tickets and meal counts provided, the meals did not match what was received at the sites below:

Hillview Village Apartments lunch delivery tickets dated 6/5/19 and 6/10/19 stated 120 meals delivered but per meal count sheet 150 was received.

Ira Samelson, Jr. Boys & Girls Club lunch delivery ticket dated 6/4/19 stated 100 meals delivered, but per meal count sheet 75 was received. Delivery ticket dated 6/19/19 stated 64 lunch meals delivered, but per meal count sheet 100 was received.

Miracle of Redemption delivery tickets for the month of June 2019 stated 80 breakfast and lunch meals delivered, but per meal count 50 was received.

Criteria

The <u>USDA FNS Summer Food Service Program 2016 Administration Guidance for Sponsors</u>, page 139, states "A designated member of the site staff must verify the adequacy and number of meals delivered by checking the meals when they are delivered to the site." Recommendation

Sponsor should ensure site personnel are counting the meals received and documenting the correct amount.

Technical Assistance

We provided technical assistance during the feeding sites visit regarding the correct manner to complete point of service meals count sheets, participants consuming meals on-site, serving meals as a complete unit, and serving all participants before serving any second meals.

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 \$113.68.

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. <u>Please note that, if the claim is revised</u>, TIPS will automatically deduct the overpayment from your next SFSP claim for reimbursement. <u>OR</u>
- If you are no longer participating in the SFSP program, 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 <u>Allette.Vayda@tn.gov</u> (615) 313-3769

. Please mail your check and the billing notice to:

Summer Food Service Program Fiscal Services James K. Polk Building, 16th Floor 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: Allette Vayda, Director of Operations, Summer Food Service Program
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

Summary of Total Claimed and Reconciled Meals
Sponsor: Giving Youth A Chance
Review Month/Year: June 2019

Claim Reimbursement Total: \$193,584.21

Site Meal Service Activity	Reported on Claim	Reconciled Meals to Meal Counts Sheets
Total Number of Days Food Served	20	20
Number of Participating Sites for Breakfast Meals	7	7
Number of Participating Sites for Am Supplement Meals	1	1
Number of Participating Sites for Lunch Meals	37	37
Number of Participating Sites for PM Supplement Meals	28	28
Number of Participating Sites for Supper Meals	3	3
Number of Breakfasts Meals Served	7,049	7,024
Number of AM Supplements Meals Served	835	835
Number of Lunches Meals Served	35,396	35,358
Number of PM Supplements Meals Served	28,372	28,495
Number of Suppers Meals Served	1,695	1,690

Exhibit B

Sponsor: Giving Youth A Chance

Site: Site 0002 Apple Tree Apartments (Sample)

Review Month/Year: June 2019

Site Meal Service Activity and Monitor Reconciliation	Reported on Claim	Reconciled Meals to Meal Counts Sheets	
Total Number of Days Food Served	19	19	
Number of Lunch Meals Served	438	438	
Number of PM Supplements Served	218	218	

Exhibit C

Sponsor: Giving Youth A Chance

Site: Site 0151 Boys and Girls Club Juice Plus Technical Training Center (Sample)

Review Month/Year: June 2019

Site Meal Service Activity and Monitor Reconciliation	Reported on Claim	Reconciled Meals to Meal Counts Sheets
Total Number of Days Food Served	19	20
Number of Lunch Meals Served	353	374

Exhibit D

Sponsor: Giving Youth A Chance

Site: Site 0148 Craigmont Boys and Girls Club (Sample)

Site Meal Service Activity and Monitor Reconciliation	Reported on Claim	Reconciled Meals to Meal Counts Sheets
Total Number of Days Food Served	18	18
Number of Lunch Meals Served	1,227	1,227
Number of PM Supplement Meals Served	1,281	1,281

Exhibit E

Sponsor: Giving Youth A Chance

Site: Site 0011 Ira Samelson, Jr. Boys & Girls Club (Sample)

Review Month/Year: June 2019

Site Meal Service Activity and Monitor Reconciliation	Reported on Claim	Reconciled Meals to Meal Counts Sheets
Total Number of Days Food Served	20	20
Number of Breakfast Meals Served	1,353	1,348
Number of Lunch Meals Served	1,734	1,734

Exhibit F

Sponsor: Giving Youth A Chance Site: Site 0023 Porter-Goodwill Boys Girls Club (Sample)

Review Month/Year: June 2019

Site Meal Service Activity and Monitor Reconciliation	Reported on Claim	Reconciled Meals to Meal Counts Sheets
Total Number of Days Food Served	19	19
Number of Breakfast Meals Served	1,763	1,763
Number of Lunch Meals Served	1,784	1,782

Exhibit G

Sponsor: Giving Youth A Chance

Site: Site 0025 Rolling Hills Apartment Complex (Sample)

Site Meal Service Activity and Monitor Reconciliation	Reported on Claim	Reconciled Meals Observed
Total Number of Days Food Served	19	19
Number of Lunch Meals Served	581	581

Number of PM Supplements	632	622
Served	032	632

Exhibit H

Sponsor: Giving Youth A Chance

Site: Site 0032 Sycamore View Boys Girls Club (Sample)

Review Month/Year: June 2019

Site Meal Service Activity and Monitor Reconciliation	Reported on Claim	Reconciled Meals to Meal Counts Sheets
Total Number of Days Food Served	19	20
Number of Lunch Meals Served	2,533	2,533
Number of PM Supplement Served	2,438	2,552

Exhibit I

Sponsor: Giving Youth A Chance

Site: 0033 Tigerland Academy Summer Camp (Sample)

Review Month/Year: June 2019

Site Meal Service Activity and Monitor Reconciliation	Reported on Claim	Reconciled Meals to Meal Counts Sheets
Total Number of Days Food Served	14	14
Number of Lunch Meals Served	465	465
Number of PM Supplement Served	466	466

Exhibit J

Sponsor: Giving Youth A Chance Site: 0106 Abington Apartments Review Month/Year: June 2019

Site Meal Service Activity and Monitor Reconciliation	Reported on Claim	Reconciled Meals to Meal Counts Sheets
Total Number of Days Food Served	12	12
Number of Lunch Meals Served	342	342

Exhibit K

Sponsor: Giving Youth A Chance Site: 0064 Ashton Hills Apartments Review Month/Year: June 2019

Site Meal Service Activity and Monitor Reconciliation	Reported on Claim	Reconciled Meals to Meal Counts Sheets
Total Number of Days Food Served	19	19
Number of Lunch Meals Served	885	885

Exhibit L

Sponsor: Giving Youth A Chance Site: 0147 Barron Court Apartments Review Month/Year: June 2019

Site Meal Service Activity and Monitor Reconciliation	Reported on Claim	Reconciled Meals to Meal Counts Sheets
Total Number of Days Food Served	19	19
Number of Lunch Meals Served	802	810
Number of PM Supplements Served	873	873

Exhibit M

Sponsor: Giving Youth A Chance Site: 0050 Bent Tree Apartments Review Month/Year: June 2019

Site Meal Service Activity and Monitor Reconciliation	Reported on Claim	Reconciled Meals to Meal Counts Sheets
Total Number of Days Food Served	19	19
Number of Breakfast Meals Served	1,354	1,354
Number of Lunch Meals Served	1,358	1,358

Exhibit N

Sponsor: Giving Youth A Chance

Site: 0003 Bernal E. Smith Boys & Girls Club

Review Month/Year: June 2019

Site Meal Service Activity and Monitor Reconciliation	Reported on Claim	Reconciled Meals to Meal Counts Sheets
Total Number of Days Food Served	20	20
Number of Lunch Meals Served	2,223	2,223
Number of PM Supplements Served	2,240	2,2240

Exhibit O

Sponsor: Giving Youth A Chance Site: 0006 Carriage House Apartments

Review Month/Year: June 2019

Site Meal Service Activity and Monitor Reconciliation	Reported on Claim	Reconciled Meals to Meal Counts Sheets
Total Number of Days Food Served	15	15
Number of Lunch Meals Served	740	740
Number of PM Supplements Served	741	740

Exhibit P

Sponsor: Giving Youth A Chance

Site: 0124 Cowborettes Majorette Dance Team

Site Meal Service Activity and Monitor Reconciliation	Reported on Claim	Reconciled Meals to Meal Counts Sheets
Total Number of Days Food Served	13	13
Number of Lunch Meals Served	529	529

Number of PM Supplements Served	529	528	
------------------------------------	-----	-----	--

Exhibit Q

Sponsor: Giving Youth A Chance

Site: 0042 Family Denistry Review Month/Year: June 2019

Site Meal Service Activity and Monitor Reconciliation	Reported on Claim	Reconciled Meals Observed
Total Number of Days Food Served	9	9
Number of Lunch Meals Served	258	258
Number of PM Supplements Served	270	270

Exhibit R

Sponsor: Giving Youth A Chance Site: 0010 Fountain of Living Praise Review Month/Year: June 2019

Site Meal Service Activity and Monitor Reconciliation	Reported on Claim	Reconciled Meals to Meal Counts Sheets
Total Number of Days Food Served	8	8
Number of PM Supplements Served	167	167

Exhibit S

Sponsor: Giving Youth A Chance Site: 0045 Hillview Village Apartments

Site Meal Service Activity and Monitor Reconciliation	Reported on Claim	Reconciled Meals to Meal Counts Sheets
Total Number of Days Food Served	19	19
Number of Lunch Meals Served	1,752	1,749
Number of PM Supplements Served	1,945	1,944

Exhibit T

Sponsor: Giving Youth A Chance Site: 0153 I Dance Studio Memphis Review Month/Year: June 2019

Site Meal Service Activity and Monitor Reconciliation	Reported on Claim	Reconciled Meals to Meal Counts Sheets
Total Number of Days Food Served	15	15
Number of Lunch Meals Served	1,283	1,283
Number of Pm Supplements Served	1,307	1,307

Exhibit U

Sponsor: Giving Youth A Chance

Site: 0012 John D. Buckman- Boys & Girls Club

Review Month/Year: June 2019

Site Meal Service Activity and Monitor Reconciliation	Reported on Claim	Reconciled Meals to Meal Counts Sheets
Total Number of Days Food Served	20	20
Number of PM Supplements Served	3000	2,998

Exhibit V

Sponsor: Giving Youth A Chance Site: 0139 Johnson Circle Apartments

Site Meal Service Activity and Monitor Reconciliation	Reported on Claim	Reconciled Meals to Meal Counts Sheets
Total Number of Days Food Served	16	16
Number of PM Supplements Served	151	151
Number of Supper Meals Served	137	137

Exhibit W

Sponsor: Giving Youth A Chance Site:0014 Lakeview Counnity COGIC Review Month/Year: June 2019

Site Meal Service Activity and Monitor Reconciliation	Reported on Claim	Reconciled Meals to Meal Counts Sheets
Total Number of Days Food Served	5	5
Number of Supper Meals Served	71	66

Exhibit X

Sponsor: Giving Youth A Chance

Site: 0156 Longview Heights Apartments

Review Month/Year: June 2019

Site Meal Service Activity and Monitor Reconciliation	Reported on Claim	Reconciled Meals to Meal Counts Sheets
Total Number of Days Food Served	15	15
Number of Lunch Meals Served	792	792
Number of PM Supplements Served	848	837

Exhibit Y

Sponsor: Giving Youth A Chance Site: 0051 Manassas High School Review Month/Year: June 2019

Site Meal Service Activity and Monitor Reconciliation	Reported on Claim	Reconciled Meals to Meal Counts Sheets
Total Number of Days Food Served	11	12
Number of AM Supplements Served	835	835
Number of Lunch Meals Served	935	935

Exhibit Z

Sponsor: Giving Youth A Chance Site: 0016 Memphis All Stars Review Month/Year: June 2019

Site Meal Service Activity and Monitor Reconciliation	Reported on Claim	Reconciled Meals to Meal Counts Sheets
Total Number of Days Food Served	15	15
Number of Lunch Meals Served	348	368
Number of PM Supplements Served	357	388

Exhibit AA

Sponsor: Giving Youth A Chance

Site: 0127 Memphis Dangerous Pantherettes

Review Month/Year: June 2019

Site Meal Service Activity and Monitor Reconciliation	Reported on Claim	Reconciled Meals to Meal Counts Sheets
Total Number of Days Food Served`	15	15
Number of PM Supplements Served	1,484	1,486
Number of Supper Meals Served	1,487	1,487

Exhibit BB

Sponsor: Giving Youth A Chance Site: 0017 Miracle of Redemption Review Month/Year: June 2019

Site Meal Service Activity and Monitor Reconciliation	Reported on Claim	Reconciled Meals to Meal Counts Sheets
Total Number of Days Food Served	11	12
Number of Breakfast Meals Served	387	355

Exhibit CC

Sponsor: Giving Youth A Chance Site: 0128 New Hope Ministry Review Month/Year: June 2019

Site Meal Service Activity and Monitor Reconciliation	Reported on Claim	Reconciled Meals to Meal Counts Sheets
Total Number of Days Food Served	15	15
Number of Lunch Meals Served	377	375
Number of PM Supplement Meals Served	374	374

Exhibit DD

Sponsor: Giving Youth A Chance Site: 0125 New Horizon Apartments Review Month/Year: June 2019

Site Meal Service Activity and Monitor Reconciliation	Reported on Claim	Reconciled Meals to Meal Counts Sheets
Total Number of Days Food Served	19	19
Number of Lunch Meals Served	2,800	2,800
Number of PM Supplement Meals Served	2,817	2,817

Exhibit EE

Sponsor: Giving Youth A Chance Site: 0019 New Life Holiness Church Review Month/Year: June 2019

Site Meal Service Activity and Monitor Reconciliation	Reported on Claim	Reconciled Meals to Meal Counts Sheets
Total Number of Days Food Served	20	20
Number of Breakfast Meals Served	591	591

Number of Lunch Meals Served	626	626	
------------------------------	-----	-----	--

Exhibit FF

Sponsor: Giving Youth A Chance Site: 0021 Oakhaven Boys & Girls Club

Review Month/Year: June 2019

Site Meal Service Activity and Monitor Reconciliation	Reported on Claim	Reconciled Meals to Meal Counts Sheets
Total Number of Days Food Served	20	20
Number of Lunch Meals Served	1,437	1,437
Number of PM Supplements Served	1,419	1,417

Exhibit GG

Sponsor: Giving Youth A Chance Site: 0095 Pendleton Place Apartments

Review Month/Year: June 2019

Site Meal Service Activity and Monitor Reconciliation	Reported on Claim	Reconciled Meals to Meal Counts Sheets
Total Number of Days Food Served	15	15
Number of Lunch Meals Served	319	319
Number of PM Supplements Meals Served	304	304

Exhibit HH

Sponsor: Giving Youth A Chance

Site: 0149 Project Stand Summer Enrichment

Site Meal Service Activity and Monitor Reconciliation	Reported on Claim	Reconciled Meals to Meal Counts Sheets
Total Number of Days Food Served	14	14

Number of Breakfast Meals Served	1,038	1,038	
Number of Lunch Meals Served	1,034	1,034	

Exhibit II

Sponsor: Giving Youth A Chance Site: 0099 Red Devils Enrichment Program

Review Month/Year: June 2019

Site Meal Service Activity and Monitor Reconciliation	Reported on Claim	Reconciled Meals to Meal Counts Sheets
Total Number of Days Food Served	19	19
Number of Lunch Meals Served	1,496	1,496
Number of PM Supplements Served	1.499	1,499

Exhibit JJ

Sponsor: Giving Youth A Chance

Site: 0052 Repairing The Breach Ministries

Review Month/Year: June 2019

Site Meal Service Activity and Monitor Reconciliation	Reported on Claim	Reconciled Meals Observed
Total Number of Days Food Served	19	19
Number of Lunch Meals Served	638	638

Exhibit KK

Sponsor: Giving Youth A Chance

Site: 0026 Saints Court

Site Meal Service Activity and Monitor Reconciliation	Reported on Claim	Reconciled Meals to Meal Counts Sheets
Total Number of Days Food Served	5	5
Number of Lunch Meals Served	211	211
Number of PM Supplement	211	211

	Meals Served	
1		

Exhibit LL

Sponsor: Giving Youth A Chance Site: 0030 Street Ministries--Graham Review Month/Year: June 2019

Site Meal Service Activity and Monitor Reconciliation	Reported on Claim	Reconciled Meals to Meal Counts Sheets
Total Number of Days Food Served	18	18
Number of Lunch Meals Served	815	815
Number of PM Supplement Meals Served	381	381

Exhibit MM

Sponsor: Giving Youth A Chance Site: 0150 Summer at The Vineyard Review Month/Year: June 2019

Site Meal Service Activity and Monitor Reconciliation	Reported on Claim	Reconciled Meals to Meal Counts Sheets
Total Number of Days Food Served	15	15
Number of Lunch Meals Served	303	303

Exhibit NN

Sponsor: Giving Youth A Chance Site: 0105 Summit Park Apartments Review Month/Year: June 2019

Site Meal Service Activity and Monitor Reconciliation	Reported on Claim	Reconciled Meals to Meal Counts Sheets
Total Number of Days Food Served	19	19
Number of Lunch Meals Served	1,862	1,860

24

Number of PM Supplements	1 966	1.000
Served	1,866	1,860

Exhibit OO

Sponsor: Giving Youth A Chance Site: 0154 Urban Family Ministries Review Month/Year: June 2019

Site Meal Service Activity and Monitor Reconciliation	Reported on Claim	Reconciled Meals to Meal Counts Sheets
Total Number of Days Food Served	9	9
Number of Lunch Meals Serve	186	186
Number of PM Supplements Served	179	179

Exhibit PP

Sponsor: Giving Youth A Chance Site: 0049 Whitehaven High School Review Month/Year: June 2019

Site Meal Service Activity and Monitor Reconciliation	Reported on Claim	Reconciled Meals to Meal Counts Sheets
Total Number of Days Food Served	10	10
Number of Breakfast Meals Served	563	575
Number of Lunch Meals Served	610	567

Exhibit QQ

Sponsor: Giving Youth A Chance Site: 00152 Wildcat's Summer Camp Review Month/Year: June 2019

Site Meal Service Activity and Monitor Reconciliation	Reported on Claim	Reconciled Meals to Meal Counts Sheets
Total Number of Days Food Served	14	14
Number of Lunch Meals Served	897	895
Number of PM Supplements Served	375	375



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

August 26, 2019

Mr. Rosman Randle, Executive Director Giving Youth A Chance 476 Lipford Street Memphis, Tennessee 38112-2992

Note: If you are no longer participating in the SFSP, remit a check payable to the Tennessee Department of Human Services in the amounts disallowed in this report to the address below. Please return the attached billing notice with your check.

If you continue to participating in the SFSP, 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.

Institution Name:	Giving Youth A Chance
Institution Address: 476 Lipford Street Memphis, TN 38112-2992	
Agreement Numbers:	00-033
Amount Due:	\$113.68
Due Date:	September 27, 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

AGRICULTURE CONTROL OF THE SECOND SEC

Tennessee Department of Human Services

Corrective Action Plan for Monitoring Findings

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 name, title and date of signature on the last page. Please sign your name in ink.

Please return ALL pages of the completed Corrective Action Plan form.

Section A. Institution Information

Name of Sponsor/Agency/Site: Giving Youth A	Chance	Agreement No. 00033	SFSP □ CACFP	
Mailing Address: 476 Lipford Street Memphis, T	ennessee 3811	2-2992		
Section B. Responsible Principal(s) and/or In			Date of Birth: / /	
Name and Title: Mr. Rosman Randle, Executive				
Section C. Dates of Issuance of Monitoring Report/Corrective Action Plan				
Monitoring Report: 8/26/2019	Corrective Action	on Plan: 8/26/2019		

Section D. Findings

Findings:

- 1. The Sponsor reported the number of meals claimed for reimbursement incorrectly
- 2. The Sponsor provided point of service meal counts that were not taken correctly
- 3. The Sponsor served meals outside the approved meal service time
- 4. The Sponsor's site supervisor did not take point of service meal counts during a breakfast meal observation
- 5. The Sponsor allowed meals to be consumed off-site
- 6. The Sponsor served second meals before all children had been served a first meal
- 7. The "And Justice for All: poster was not posted at a site
- 8. The Sponsor provided a meal that did not meet USDA meal pattern requirements during an observed meal
- 9. The Sponsor reported the number of operation days incorrectly for some feeding sites
- 10. Meals were not counted by feeding site personnel to ensure meals delivered matched the delivery ticket

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

Measure No. 1: The Sponsor reported the number of meals claimed for reimbursement incorrectly

The finding will be fully and permanently corrected.

Identify the name(s) and position title(s) of the employee(s) is fully and permanently corrected:	who will be responsible for ensuring that the finding
Name:	Position Title:
Name:	Position Title:
Describe below the step-by-step procedures that will be in	nplemented to correct the finding:
 	
When will the procedures for addressing the finding be imimplementing the procedures (i.e., will the procedures be will they begin?):	
	
Where will the Corrective Action Plan documentation be ref	tained? Please identify below:
	·
How will new and current staff be informed of the new police Handbook, training, etc.)? Please describe below:	ies and procedures to address the finding (e.g.,

easure No.2: The Sponsor p	rovided point of service meal counts that were not taken correctly
he finding will be fully and permentify the name(s) and position fully and permanently corrected	n title(s) of the employee(s) who will be responsible for ensuring that the finding
lame:	Position Title:
ame:	Position Title:
Describe below the step-by-ste	ep procedures that will be implemented to correct the finding:
	ddressing the finding be implemented? Provide a timeline below for i.e., will the procedures be done daily, weekly, monthly, or annually, and when
	Plan documentation be retained? Please identify below:

low will new and current staff l landbook, training, etc.)? Plea	be informed of the new policies and procedures to address the finding (e.g., ase describe below:
and the Spanner	
ne finding will be fully and pern	n title(s) of the employee(s) who will be responsible for ensuring that the finding
ame:	Position Title:
ame:	Position Title:
Describe below the step-by-ste	ep procedures that will be implemented to correct the finding:
	ddressing the finding be implemented? Provide a timeline below for (i.e., will the procedures be done daily, weekly, monthly, or annually, and when

Where will the Corrective Action Plan doo	cumentation be retained? Please identify below:
1	
How will new and current staff be informed Handbook, training, etc.)? Please described to the control of the co	ed of the new policies and procedures to address the finding (e.g., be below:
Measure No. 4: The Sponsor did condu	ct monitoring of its feeding sites as required
The finding will be fully and permanently c ldentify the name(s) and position title(s) of is fully and permanently corrected:	corrected. If the employee(s) who will be responsible for ensuring that the finding
Name:	Position Title:
Name:	Position Title:
Name:	
Name:	Position Title:

When will the procedures for addressing the finding be i implementing the procedures (i.e., will the procedures by will they begin?):	mplemented? Provide a timeline below for e done daily, weekly, monthly, or annually, and when
Where will the Corrective Action Plan documentation be	retained? Please identify below:
How will new and current staff be informed of the new portandbook, training, etc.)? Please describe below:	licies and procedures to address the finding (e.g.,
Measure No. 5: The Sponsor allowed meals to be co	nsumed off-site
The finding will be fully and permanently corrected. Identify the name(s) and position title(s) of the employee(s is fully and permanently corrected:	s) who will be responsible for ensuring that the finding
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:
where will the Corrective Action Flan documentation be retained: Flease identity 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:
iditabook, traiting, oto./. Trodoc decorbe below.
Measure No. 6: The Sponsor served second meals before all children had been served a first meal
he finding will be fully and permanently corrected.
entify the name(s) and position title(s) of the employee(s) who will be responsible for ensuring that the finding fully and permanently corrected:

Name: Position Title:

Name:	Position Title:
Describe below the sten-by-ster	procedures that will be implemented to correct the finding:
December below the Step by Step	procedures that will be implemented to correct the initiality.
-	
-	
	dressing the finding be implemented? Provide a timeline below for e., will the procedures be done daily, weekly, monthly, or annually, and when
Where will the Corrective Action	Plan documentation be retained? Please identify below:
How will new and current staff be Handbook, training, etc.)? Please	e informed of the new policies and procedures to address the finding (e.g., e describe below:
	•

Measure No. 7: The "And Justice for All" poster was not posted at a site

The finding will be fully and permanently corrected.

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:

Identify the name(s) and position title(s) of the employee(s) who will be responsible for ensuring that the finding

leasure No. 8: The Sponsor provided a during an observed meal	a meal that did not meet USDA meal pattern requirements
ne finding will be fully and permanently corentify the name(s) and position title(s) of the fully and permanently corrected:	rrected. he employee(s) who will be responsible for ensuring that the finding
ame:	Position Title:
ame:	Position Title:
escribe below the step-by-step procedur	es that will be implemented to correct the finding:
	ne finding be implemented? Provide a timeline below for procedures be done daily, weekly, monthly, or annually, and when
, , ,	

Whore will the Corrective Action [Plan desumentation he retained? Places identify helevy
Where will the Corrective Action i	Plan documentation be retained? Please identify below:
How will new and current staff be Handbook, training, etc.)? Please	informed of the new policies and procedures to address the finding (e.g.,
Handbook, training, etc.)? Flease	s describe below.
Measure No. 9: The Sponsor re	eported the number of operation days incorrectly for some feeding sites
The finding will be fully and norma	nantly corrected
The finding will be fully and perma	itle(s) of the employee(s) who will be responsible for ensuring that the finding
is fully and permanently corrected:	
is fully and permanently corrected.	
Name:	Position Title:
Name:	Position Title:
Describe below the stan-by-stan	procedures that will be implemented to correct the finding:
Describe below the step-by-step	procedures that will be implemented to correct the infallig.
NA/I	
when will the procedures for add	Iressing the finding be implemented? Provide a timeline below for

DHS staff should check the "Forms" section of the intranet to ensure the use of current versions. Forms may not be altered without prior approval.

Distribution: OIG and CACFP/SFSP as appropriate

RDA: 2341

HS-3187 (Rev. 11-16)

Page 11 of 14

will they begin?):

implementing the procedures (i.e., will the procedures be done daily, weekly, monthly, or annually, and when

Where will the Corrective Action	Plan documentation be retained? Please identify below:
,	
How will new and current staff be Handbook, training, etc.)? Pleas	e informed of the new policies and procedures to address the finding (e.g., se describe below:
Measure No. 10: Meals were n the delivery ticket	ot counted by feeding site personnel to ensure meals delivered matched
he finding will be fully and permadentify the name(s) and position fully and permanently corrected	title(s) of the employee(s) who will be responsible for ensuring that the finding
lame:	Position Title:
ame:	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 will they begin?):
here will the Corrective Action Plan documentation be retained? Please identify below:
ow will new and current staff be informed of the new policies and procedures to address the finding (e.g. andbook, 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. I also understand that failure to fully and permanently correct the findings in my institution's CACFP or SFSP will result in its termination from the program, and the placement of the institution and its responsible principals on the National Disqualified List maintained by the U.S. Department of Agriculture.

Printed Name of Authorized Institution Official:	Position:		
Signature of Authorized Institution 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 sponsors 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 Departments 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 's registration, if applicable.
- 3. The time period allowed for filing the appeal where actions are appealable as specified in 7 C.F.R. § 22513(a) is ten (10) calendars 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) calendars 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 decisionmaking 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.