



**STATE OF TENNESSEE
DEPARTMENT OF HUMAN SERVICES**

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BILL HASLAM
GOVERNOR

DANIELLE W. BARNES
COMMISSIONER

Certified Mail - Return Receipt # 70163010000073326463

September 26, 2018

Howard Thompson, Board Chair
Demetrius Ramsey, Executive Director
Bradley-Cleveland Community Services Agency
PO Box 3297
Cleveland, Tennessee 37320-3297

Dear Mr. Thompson,

The Department of Human Services (DHS) – Division of Audit Services staff conducted an unannounced on-site monitoring review of the Summer Food Services Program (SFSP) at Bradley Cleveland Community Services Agency (Sponsor), Application Agreement number 00-013, on August 13, 2018. The purpose of this review was to determine if the Sponsor complied with the *Title 7 of the Code of Federal Regulations* (CFR) applicable parts, Sponsor agreement, and applicable Federal and State regulations.

Based on our review of the Sponsor's records and information provided, the Sponsor had 49 feeding sites operating during the review period. Charleston Elementary, Charleston Public Park, Cherokee Hills Apartments, Christian Fellowship Center, Cleveland Public Library, First United Methodist Child Development Center, Soccer Camp, and United Christian Academy feeding sites were selected as the sample.

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) to seek reimbursement. We inspected meal counts sheets for our test period and reconciled the meals claimed to the meals reported as served for each meal service. We also assessed compliance with civil rights requirements. In addition, we observed meal services during our unannounced on-site visits throughout the review period.

SERIOUS DEFICIENCY DETERMINATION

Based on the monitoring review, the Department has determined that Bradley Cleveland Community Services Agency is seriously deficient in its operation of the SFSP. In addition, the Department has identified Howard Thompson, Board Chair and Demetrius Ramsey, Executive Director as responsible for the serious deficiencies in light of their responsibility for the overall management of Bradley Cleveland Community Services Agency's SFSP.

If Bradley Cleveland Community Services Agency does not fully and permanently correct all of the serious deficiencies and submit documentation of the corrective action by the due date, the Department will:

- Propose to terminate Bradley Cleveland Community Services Agency's, agreement to participate in the SFSP.

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

SERIOUS DEFICIENCIES AND REQUIRED CORRECTIVE ACTION

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

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

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

This is a Serious Deficiency

Condition

2nd Street Church of Christ

The Claim for Reimbursement for feeding site **2nd Street Church of Christ** for the test month reported 85 1st supper meals, and two (2) 2nd supper meals as served. However, based on our review of the Sponsor's records, we noted that there were 85 1st supper meals and zero 2nd supper meals as served, prior to any meal disallowances.

As a result, two 2nd supper meals were over reported. (See Exhibit B)

Big City University (Bradley County Schools)

The Claim for Reimbursement for feeding site **Big City University (Bradley County Schools)** for the test month reported 750 breakfast meals and 875 lunch meals as served. However, based on our review of the Sponsor's records, we noted that there were 420 breakfast meals as served and 875 lunch meals as served, prior to any meal disallowances.

As a result, 330 breakfast meals were over reported. (See Exhibit C)

Boys & Girls Club (Cleveland State)

The Claim for Reimbursement for feeding site **Boys & Girls Club (Cleveland State)** for the test month reported 473 lunch meals and 485 supplements as served. However, based on our review of

the Sponsor's records, we noted that there were 466 lunch meals and 478 supplements as served, prior to any meal disallowances.

As a result, seven lunch meals and seven supplements were over reported. (See Exhibit F)

Boys & Girls Club (Blythe Unit)

The Claim for Reimbursement for feeding site **Boys & Girls Club (Blythe Unit)** for the test month reported 761 1st lunch meals and four 2nd lunch meals, and 766 1st supplements and four 2nd supplements as served. However, based on our review of the Sponsor's records, we noted that there were 763 1st lunch meals and zero 2nd lunch meals, and 826 1st supplements and zero 2nd supplements as served, prior to any meal disallowances.

As a result, two (2) 1st lunch meals and 60 1st supplements were under reported, and four (4) 2nd lunches and four (4) 2nd supplements were over reported. (See Exhibit G)

Boys & Girls Club (Benton Unit)

The Claim for Reimbursement for feeding site **Boys & Girls Club (Benton Unit)** for the test month reported 1,850 1st lunch meals and five 2nd lunch meals, and 1,800 1st supplements and 36 2nd supplements as served. However, based on our review of the Sponsor's records, we noted that there were 1,375 1st lunch meals and zero 2nd meals, and 1,401 1st supplements and zero 2nd meals as served, prior to any meal disallowances.

As a result, 475 1st lunch meals and five 2nd lunch meals and 399 1st supplements and 36 2nd supplements were over reported. (See Exhibit H)

Boys & Girls Club (Painter Unit)

The Claim for Reimbursement for feeding site **Boys & Girls Club (Painter Unit)** for the test month reported 529 1st lunch meals and 30 2nd lunches, and 376 1st supplements and 15 2nd supplements as served. However, based on our review of the Sponsor's records, we noted that there were 277 1st lunch meals and zero 2nd lunch meals, and 237 1st supplements and zero 2nd supplements as served, prior to any meal disallowances.

As a result, 252 1st lunch meals and 11 2nd lunch meals and 139 1st supplements and eight 2nd supplements were over reported. (See Exhibit I)

Boys & Girls Club (Jacobs Unit)

The Claim for Reimbursement for feeding site **Boys & Girls Club (Jacobs Unit)** for the test month reported 800 lunch meals and 800 supplements served. However, based on our review of the Sponsor's records, we noted that there were 1,195 lunch meals and 1,195 supplements as served, prior to any meal disallowances.

As a result, 395 lunch meals and 395 supplements were under reported. (See Exhibit K)

Center Point Baptist Church

The Claim for Reimbursement for feeding site **Center Point Baptist Church** for the test month reported 60 breakfast meals, 60 lunch meals, and 320 supper meals as served. However, based on

our review of the Sponsor's records, we noted that there were 60 breakfast meals, 60 lunch meals, and 300 supper meals as served, prior to any meal disallowances.

As a result, 20 supper meals were over reported. (See Exhibit M)

Charleston Elementary School – sample site

The Claim for Reimbursement for feeding site **Charleston Elementary School** for the test month reported 449 lunch meals served. However, based on our review of the Sponsor's records, we noted that there were 447 lunch meals served prior to any meal disallowances.

As a result, two (2) lunch meals were over reported. (See Exhibit N)

Charleston Public Park – sample site

The Claim for Reimbursement for feeding site **Charleston Public Park** for the test month reported 322 lunch meals served. However, based on our review of the Sponsor's records, we noted that there were 318 lunch meals served prior to any meal disallowances.

As a result, four (4) lunch meals were over reported. (See Exhibit O)

Cherokee Hills Apartments - sample site

The Claim for Reimbursement for feeding site **Cherokee Hills Apartments** for the test month reported 632 1st lunch meals and 28 2nd lunch meals, and 540 1st supplements and 19 2nd supplements as served. However, based on our review of the Sponsor's records, we noted that there were 476 1st lunch meals and 28 2nd lunch meals, and 376 1st supplements and 19 2nd supplements as served. Second meals reimbursed are capped in TIPS by two percent (2%) of the first meals claimed. The number of meals reported and reconciled was greater than the two percent (2%); therefore, no second meals were disallowed.

As a result, 156 1st lunch meals and 164 1st supplements were over reported. (See Exhibit P)

Church of God Sanctified

The Claim for Reimbursement for feeding site **Church of God Sanctified** for the test month reported 141 1st supper meals and three 2nd supper meals as served. However, based on our review of the Sponsor's records, we noted that there were 141 1st supper meals and zero 2nd suppers as served, prior to any meal disallowances.

As a result, three 2nd supper meals were over reported. (See Exhibit R)

Cleveland Public Library - sample site

The Claim for Reimbursement for feeding site **Cleveland Public Library** for the test month reported 177 lunch meals, 123 supplements, and 155 supper meals as served. However, based on our review of the Sponsor's records, we noted that there were 167 lunch meals, 21 supplements, and 81 supper meals as served, prior to any meal disallowances.

As a result, 10 lunch meals, 102 supplements, and 74 supper meals were over reported. (See Exhibit T)

First United Methodist Child Development Center – sample site

The Claim for Reimbursement for feeding site **First United Methodist Child Development Center** for the test month reported 707 lunch meals and 752 supplements as served. However, based on our review of the Sponsor's records, we noted that there were 489 lunch meals and 634 supplements as served, prior to any meal disallowances.

As a result, 218 lunch meals and 118 supplements were over reported. (See Exhibit W)

First United Methodist Summer Buddies

The Claim for Reimbursement for feeding site **First United Methodist Summer Buddies** for the test month reported 270 breakfast meals, and 245 1st lunch meals and three 2nd lunch meals as served. However, based on our review of the Sponsor's records, we noted that there were 270 breakfast meals, 215 1st lunch meals, and zero 2nd lunches as served, prior to any meal disallowances.

As a result, 30 1st lunch meals, and three 2nd lunch meals were over reported. (See Exhibit X)

Jones Wrestling Center

The Claim for Reimbursement for feeding site **Jones Wrestling Center** for the test month reported 500 breakfast meals and 500 lunch meals as served. However, based on our review of the Sponsor's records, we noted that there were 448 breakfast meals and 448 lunch meals as served.

As a result, 52 breakfast meals and 52 lunch meals were over reported. (See Exhibit AA)

New Covenant Church of God

The Claim for Reimbursement for feeding site **New Covenant Church of God** for the test month reported 23 breakfast meals and 22 supper meals as served. However, based on our review of the Sponsor's records, we noted that there were 16 breakfast meals and 20 supper meals as served, prior to any meal disallowances.

As a result, seven breakfast meals and two supper meals were over reported. (See Exhibit DD)

Polk County Baptist Association Children's Camp

The Claim for Reimbursement for feeding site **Polk County Baptist Association Children's Camp** for the test month reported 640 breakfast meals, and 639 supplements as served. However, based on our review of the Sponsor's records, we noted that there were 558 breakfast meals and 583 supplements as served, prior to any meal disallowances.

As a result, 82 breakfast meals and 56 supplements were over reported. (See Exhibit FF)

Polk County Baptist Association (FLIP)

The Claim for Reimbursement for feeding site **Polk County Baptist Association (FLIP)** for the test month reported 271 1st lunch meals and five 2nd lunch meals as served. However, based on our review of the Sponsor's records, we noted that there were 274 1st lunch meals and zero 2nd lunch meals as served, prior to any meal disallowances.

As a result, three 1st lunch meals were under reported and five 2nd lunch meals were over reported. (See Exhibit GG)

Samples Memorial Baptist Church

The Claim for Reimbursement for feeding site **Samples Memorial Baptist Church** for the test month reported 486 1st supper meals and 10 2nd suppers as served. However, based on our review of the Sponsor's records, we noted that there were 486 1st supper meals and six 2nd suppers as served, prior to any meal disallowances.

As a result, four 2nd supper meals were over reported. (See Exhibit II)

Soccer Camp – sample site

The Claim for Reimbursement for feeding site **Soccer Camp** for the test month reported 120 breakfast meals and 380 lunch meals as served. However, based on our review of the Sponsor's records and our observation, we noted that there were 110 breakfast meals and 380 lunch meals as served, prior to any meal disallowances.

As a result, 10 breakfast meals were over reported. (See Exhibit JJ)

South Cleveland Community Center

The Claim for Reimbursement for feeding site **South Cleveland Community Center** for the test month reported 701 breakfast meals and 873 lunch meals as served. However, based on our review of the Sponsor's records, we noted that there were 657 breakfast meals and 812 lunch meals as served, prior to any meal disallowances.

As a result, 44 breakfast meals and 61 lunch meals were over reported. (See Exhibit KK)

United Christian Academy – sample site

The Claim for Reimbursement for feeding site **United Christian Academy** for the test month reported 1,472 breakfast meals and 980 lunch meals as served. However, based on our review of the Sponsor's records, we noted that there were 1,360 breakfast meals and 1,366 lunch meals as served, prior to any meal disallowances.

As a result, 112 breakfast meals were over reported and 386 lunch meals served were under reported. (See Exhibit OO)

Valley View Baptist

The Claim for Reimbursement for feeding site **Valley View Baptist** for the test month reported 250 supper meals as served. However, based on our review of the Sponsor's records, we noted that there were 300 supper meals as served, prior to any meal disallowances.

As a result, 50 supper meals were under reported. (See Exhibit QQ)

Westwood Baptist Music Camp

The Claim for Reimbursement for feeding site **Westwood Baptist Music Camp** for the test month reported 275 supper meals as served. However, based on our review of the Sponsor’s records, we noted that there were 273 supper meals as served, prior to any meal disallowances.

As a result, two supper meals were over reported. (See Exhibit RR)

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 of meals served and/or administrative costs claimed during the period covered by the records in question....”

Recommendation

The Sponsor should ensure that claims for reimbursement are completed based on proper supporting documents.

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

Condition

The Sponsor provided menus that did not meet the USDA meal pattern requirements. The lunch menu dated June 11, 2018, listed PBJ sandwich, carrots, orange juice, and milk. We observed lunch meals served at **Charleston Elementary** and **Charleston Public Park** on this date, and determined the PBJ sandwich did not have sufficient protein to meet the meat/meat alternate requirement.

Based on review of the Sponsor’s menus, we determined that the following lunch meals are disallowed:

Site	Lunches Disallowed	Exhibit
Boys and Girls Club (Cleveland State)	24	F
Boys and Girls Club (Blythe Unit)	49	G
Boys and Girls Club (Benton Unit)	68	H
Boys and Girls Club(Painter Unit)	13	I
Boys and Girls Club (Jacobs Unit)	50	K
Charleston Elementary	23	N
Charleston Public Park	13	O
Cherokee Hills Apartments	13	P
First United Methodist CDC	27	W
Polk Co. Baptist FLIP	23	GG
South Cleveland Community Center	62	KK
Soccer Camp	95	JJ
United Christian Academy	46	OO
Aim High Tennis Camp	20	SS

As a result, 526 lunches were disallowed.

Criteria

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 of meals served and/or administrative costs claimed during the period covered by the records in question....”

Title 7 of the Code of Federal Regulations Section 225.16 (d) (1) (2) (3) states, “Sponsors shall ensure that meals served meet all of the meal pattern requirements.”

Recommendation

The Sponsor should ensure all meals served and claimed for reimbursement include all required components to meet the USDA meal pattern requirements.

3. The Sponsor did not provide documentation supporting claimed for meals served

This is a Serious Deficiency

Condition

The Sponsor did not provide us with daily meal count records to support the Claim for Reimbursement for the following feeding sites. Therefore, meals were disallowed as follows:

Site	Meal(s)	1 st Meals Disallowed	2 nd Meals Disallowed	Exhibit
Big City University (Bradley County Schools)	Lunch	875	0	C
Boys and Girls (Teen Center)	Lunch	1,055	21	D
	Snack	1093	0	D
Boys and Girls (Tucker Unit)	Lunch	2,875	58	E
	Snack	2830	0	E
Boys and Girls (Powers Unit)	Lunch	676	6	J
	Snack	676	6	J
Christian Fellowship Center (sample site)	Lunch	434	9	Q
	Snack	410	8	Q
	Supper	80	0	Q
Cleveland High Summer School	Breakfast	645	10	S
	Lunch	692	12	S
College Hill Recreation Center	Lunch	1,390	0	U
	Snack	1,390	0	U
Durkee Road Preschool Daycare	Lunch	770	0	V
	PM Snack	777	0	V
First United Methodist Summer Buddies	Breakfast	270	0	X
Horizon Square Apartments	Breakfast	490	10	Y

	Lunch	543	20	Y
LEAF Academy	Lunch	1,055	0	BB
Ms. Nancy's Preschool and Day Care	Breakfast	1,240	0	CC
	Lunch	1,360	0	CC
Overcoming Faith Christian Center	Snack	280	0	EE
Summer Camp for At Risk Kids	Breakfast	225	0	MM
	Lunch	225	0	MM
TCA Basketball Camp	Lunch	240	0	NN
TN Christian Basketball Camp	Lunch	240	0	NN
United Christian Academy	Lunch	50	0	OO
Unity Center	Lunch	1,520	0	PP

As a result, 2,870 1st breakfasts and 20 2nd breakfasts were disallowed, 14,000 1st lunches and 126 2nd lunches were disallowed, 7,456 1st supplements and 14 2nd supplements were disallowed, and 80 suppers were disallowed.

Criteria

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 Administrative 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. ..."

Recommendation

The Sponsor should ensure meal counts supporting the claims for reimbursement are maintained and available up request by authorized officials.

4. **The Sponsor provided meal count sheets that were not signed and/or dated by feeding site supervisor**

Condition

Meal count sheets were missing the site supervisor's signature and/or date. Meals were disallowed for insufficient documentation as follows:

Site	Dates	Meal Type	No. Disallowed	Exhibit
Boys and Girls (Cleveland State)	6/14/18	Snack	25	F

Boys and Girls (Blythe Unit)	6/6/18; 6/18-22/2018	Lunch	300	G
Boys and Girls (Blythe Unit)	6/4/18; 6/6/18; 6/18-22/2018	Snack	328	G
Boys and Girls (Painter Unit)	6/7/18; 6/14/18	Lunch	55	I
Boys and Girls (Jacobs Unit)	6/4/18	Snack	50	K
Candies Creek Baptist	6/29/18	Supper	159 1 st 6 2 nd	L
Center Point Baptist	6/16/18	Breakfast	60	M
Center Point Baptist	6/16/18	Lunch	60	M
Charleston Elementary	6/5/18	Lunch	22	N
Cherokee Hills Apts	6/12/18; 6/25/18	Snack	30	P
Price Memorial Church	6/26/18	Supper	25	HH
South Cleveland Community Center	6/15/18; 6/27/18	Breakfast	87	KK

As a result, 147 breakfasts, 437 lunches, 433 supplements, and 184 1st suppers and six 2nd suppers were disallowed.

Criteria

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. ... Sponsors should collect these site records at least every week. They may have their monitors pick up site reports on designated days, or the site supervisors may be asked to mail the records to the sponsor’s office. When they collect the site records, sponsors should check for the site supervisor’s signature. ...”

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 questionable and unreliable meal count sheets

This is a Serious Deficiency

The Sponsor provided a daily meal count sheet for feeding site **Price Memorial Church** for supper on June 19, 2018 after the monitor observed a sign posted on June 14, 2018 which stated “Summer Food Program is no longer operating here.”

The Sponsor provided daily meal count sheets for feeding site **Soccer Camp** for breakfast June 12 - 14, 2018 after the site supervisor stated to the monitor that breakfast meal service ended on June 11, 2018 due to lack of demand.

The Sponsor provided daily meal count sheets for feeding site **United Christian Academy** for breakfast and lunch on June 4 - 8, 2018, June 18 - 22, 2018 and June 25 - 29, 2018 that appeared questionable.

Because several of the meals count sheets appeared questionable, we could not verify the accuracy of these meal count sheets and the number of meals actually served. Therefore, we could not reasonably rely on the Sponsor's records in determining the completeness and accuracy of the claim for reimbursement.

Criteria

Title 7 of the Code of Federal Regulations, 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....."

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

Recommendation

The Sponsor should maintain proper, accurate, and reliable meals count sheets to support the claims for reimbursement.

6. The Sponsor did not prepare or order meals on the basis of participation

Condition

During our on-site monitoring visit at **Cherokee Hills Apartments** on June 13, 2018, we observed eight participants in attendance. However, 25 meals were delivered. The site supervisor stated the same number of meals was delivered each day. Furthermore, the site supervisor requested the Sponsor not send meals for our observed meal because an excess of food had accumulated from previous days.

Criteria

Title 7 of the Code of Federal Regulations 7 CFR Section 225.15 (b)(3) states, "Sponsors shall adjust the number of meals ordered or prepared with the objective of providing only one meal per child whenever the number of children attending the site is below the approved level."

Title 7 of the Code of Federal Regulations 7 CFR Section 225.15 (b)(4) states, "The State agency shall disallow all claims for second meals if it determines that the Sponsor failed to plan and prepare or order meals with the objective of providing only one meal per child at each meal services."

Recommendation

The Sponsor should ensure meals provided to sites are planned and delivered with the goal of providing one meal per child, based on attendance patterns reported by feeding sites supervisor.

7. **The Sponsor did not provide documentation that the monitoring reviews were conducted as required**

Condition

The Sponsor did not conduct the monitoring reviews during the first week of operation at the **First United Methodist Church Child Development Center** feeding site. Additionally, the Sponsor did not adequately document completion of monitoring reviews at **Charleston Elementary, Charleston Public Park, Cherokee Hills Apartments, Christian Fellowship Center, Soccer Camp, and United Christian Academy**. The documentation provided left it unclear whether monitoring had occurred.

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 shall ensure that all monitoring is completed as required and properly documented.

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

Condition

The Sponsor did not complete the racial/ethnic data form for **Christian Fellowship Center** and the form provided for **Charleston Public Park** and **United Christian Academy** were incomplete.

Criteria

The USDA SFSP Administration Guide, page 122, states, “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 must ensure that racial and ethnic data is maintained for each SFSP feeding site.

9. **The “And Justice for All” poster was not posted at a site**

Condition

During our on-site monitoring visit at **Charleston Public Park** on June 11, 2018, the feeding site did not have the “And Justice for All” poster posted.

Criteria

The USDA SFSP Administration Guide, 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 must ensure that all sites display the “And Justice For All” poster in a prominent location.

Technical Assistance Provided

The Sponsor requested technical assistance via email on June 19, 2018 concerning meal patterns. We promptly provided assistance on meal pattern guidelines and resources via email that same day.

OVERPAYMENT - RIGHT TO APPEAL

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 \$78,337.83.

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

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

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

SUMMARY

The Department has determined that Bradley Cleveland Community Services Agency is seriously deficient in its operation of the SFSP and that Howard Thompson, Board Chair and Demetrius Ramsey, Executive Director are responsible for the serious deficiencies.

You may not appeal the serious deficiency determination itself. If the Department proposes to terminate Bradley Cleveland Community Services Agency’s SFSP agreement, you will be able to appeal those actions and you will be advised of your appeal rights and the appeal procedures at that time.

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

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

AuditServices.CAPS.DHS@tn.gov

or

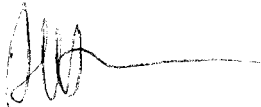
Tennessee Department of Human Services
Allette Vayda - SFSP/SFSP Unit
Citizens Plaza - 8th Floor
400 Deaderick Street
Nashville, Tennessee 37243-1403.

If the Department does not receive the corrective action plan by the deadline date, or the Department determines that the corrective action plan does not provide for the full and permanent correction of the serious deficiencies and findings, the Department will propose to terminate the Sponsor's SFSP Provider Agreement and to disqualify you and the Sponsor from future SFSP participation by issuing a Notice of Proposed Termination.

We appreciate the assistance provided during this review. If you have any questions regarding this report, please contact Sean Baker, Audit Director 2, at 615-313-4727 or Sean.Baker@tn.gov.

Sincerely,

Allette Vayda



Director of Operations- Food Programs

Exhibits

Cc: Debra Pasta, Program Manager, Summer Food Service Program
Elke Moore, Administrative Assistant 3, Summer Food Service Program
Constance Moore, Program Specialist, Summer Food Service Program
Marty Widner, Program Specialist, Summer Food Service Program
Comptroller of the Treasury, State of Tennessee

Exhibit A**Sponsor: Bradley Cleveland Community Services Agency****Review Month/Year: June 2018****Claim Reimbursement Total: \$145,477.03**

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Number of Participating Sites for Breakfast	16	11
Number of Participating Sites for Lunch	35	22
Number of Participating Sites for PM Snacks	18	14
Number of Participating Sites for Supper	16	15
Total Amount of Food Costs	XXXXXXXX	
Total Amount of Eligible Food and Nonfood Costs	XXXXXXXX	

Exhibit B**Site: 2nd Street Church of Christ****Review Month/Year: June 2018**

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	3	3
Number of 1 st Suppers Served	85	85
Number of 2 nd Suppers Served	2	0

Exhibit C**Site: Big City University (Bradley County Schools)****Review Month/Year: June 2018**

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	12	12
Number of 1 st Breakfasts Served	750	420
Number of 1 st Lunches Served	875	0

Exhibit D**Site: Boys and Girls Club (Teen Center)****Review Month/Year: June 2018**

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	20	0
Number of 1 st Lunches Served	1,055	0
Number of 2 nd Lunches Served	21	0
Number of 1 st Snacks Served	1,093	0

Exhibit E**Site: Boys and Girls Club (Tucker Unit)****Review Month/Year: June 2018**

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	20	0
Number of 1 st Lunches Served	2,875	0
Number of 2 nd Lunches Served	58	0
Number of 1 st Snacks Served	2,830	0

Exhibit F**Site: Boys and Girls Club (Cleveland State)****Review Month/Year: June 2018**

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	20	20
Number of 1 st Lunches Served	473	442
Number of 1 st Snacks Served	485	453

Exhibit G**Site: Boys and Girls Club (Blythe Unit)****Review Month/Year: June 2018**

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	20	20
Number of 1 st Lunches Served	761	414
Number of 2 nd Lunches Served	4	0
Number of 1 st Snacks Served	766	498
Number of 2 nd Snacks Served	4	0

Exhibit H**Site: Boys and Girls Club (Benton Unit)****Review Month/Year: June 2018**

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	20	20
Number of 1 st Lunches Served	1,850	1,307
Number of 2 nd Lunches Served	5	0
Number of 1 st Snacks Served	1,800	1,401
Number of 2 nd Snacks Served	36	0

Exhibit I**Site: Boys and Girls Club (Painter)****Review Month/Year: June 2018**

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	20	20
Number of 1 st Lunches Served	529	209
Number of 2 nd Lunches Served	11	0
Number of 1 st Snacks Served	376	237
Number of 2 nd Snacks Served	8	0

Exhibit J**Site: Boys and Girls Club (Powers)****Review Month/Year: June 2018**

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	20	0
Number of 1 st Lunches Served	676	0
Number of 2 nd Lunches Served	6	0
Number of 1 st Snacks Served	676	0
Number of 2 nd Snacks Served	6	0

Exhibit K**Site: Boys and Girls Club (Jacobs Unit)****Review Month/Year: June 2018**

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	20	20
Number of 1 st Lunches Served	800	1,145
Number of 1 st Snacks Served	800	1,145

Exhibit L**Site: Candies Creek Baptist Church****Review Month/Year: June 2018**

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	5	5
Number of 1 st Suppers Served	815	656
Number of 2 nd Suppers Served	10	4

Exhibit M**Site: Center Point Baptist Church****Review Month/Year: June 2018**

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	7	7
Number of 1 st Breakfasts Served	60	0
Number of 1 st Lunches Served	60	0
Number of 1 st Suppers Served	320	300

Exhibit N**Sample Site: Charleston Elementary School****Review Month/Year: June 2018**

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	20	20
Number of 1 st Lunches Served	449	377

Exhibit O**Sample Site: Charleston Public Park****Review Month/Year: June 2018**

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	20	20
Number of 1 st Lunches Served	322	305

Exhibit P**Sample Site: Cherokee Hills Apts.****Review Month/Year: June 2018**

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	20	20
Number of 1 st Lunches Served	632	463
Number of 2 nd Lunches Served	13	13 ¹
Number of 1 st Snacks Served	540	346
Number of 2 nd Snacks Served	11	11 ¹

¹Maximum allowed and paid out by TIPS for 2nd meals is 2% of 1st meals. The number of meals reimbursed may be less than the reconciled number reported

Exhibit Q**Sample Site: Christian Fellowship Center****Review Month/Year: June 2018**

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	19	0
Number of 1 st Lunches Served	434	0
Number of 2 nd Lunches Served	9	0
Number of 1 st Suppers Served	80	0
Number of 1 st Snacks Served	410	0
Number of 2 nd Snacks Served	8	0

Exhibit R**Site: Church of God Sanctified****Review Month/Year: June 2018**

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	3	3
Number of 1 st Suppers Served	141	141
Number of 2 nd Suppers Served	3	0

Exhibit S**Site: Cleveland High School Summer School****Review Month/Year: June 2018**

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	12	0
Number of 1 st Breakfasts Served	645	0
Number of 2 nd Breakfasts Served	10	0
Number of 1 st Lunches Served	692	0
Number of 2 nd Lunches Served	12	0

Exhibit T**Sample Site: Cleveland Public Library****Review Month/Year: June 2018**

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	4	4
Number of 1 st Lunches Served	177	167
Number of 1 st Suppers Served	155	81
Number of 1 st Snacks Served	123	21

Exhibit U**Site: College Hill Recreation Center****Review Month/Year: June 2018**

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	20	0
Number of 1 st Lunches Served	1,390	0
Number of 1 st Snacks Served	1,390	0

Exhibit V**Site: Durkee Road Preschool Daycare****Review Month/Year: June 2018**

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	20	0
Number of 1 st Lunches Served	770	0
Number of 1 st Snacks Served	777	0

Exhibit W**Sample Site: First United Methodist Child Development Center****Review Month/Year: June 2018**

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	20	20
Number of 1 st Lunches Served	707	462
Number of 1 st Snacks Served	752	634

Exhibit X**Site: First United Methodist Summer Buddies****Review Month/Year: June 2018**

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	9	9
Number of 1 st Breakfasts Served	270	0
Number of 1 st Lunches Served	245	215
Number of 2 nd Lunches Served	3	0
Number of 1 st Snacks Served	0	0 ²
Number of 2 nd Snacks Served	0	0 ²

²Meals claimed were breakfast and lunch, but received deliveries of lunch and PM snack. This site was not approved to serve snacks and snacks were not claimed

Exhibit Y

Site: Horizon Square Apartments

Review Month/Year: June 2018

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	20	0
Number of 1 st Breakfasts Served	490	0
Number of 2 nd Breakfasts Served	10	0
Number of 1 st Lunches Served	543	0
Number of 2 nd Lunches Served	20	0

Exhibit AA

Site: Jones Wrestling Center

Review Month/Year: June 2018

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	10	10
Number of 1 st Breakfasts Served	500	448
Number of 1 st Lunches Served	500	448

Exhibit BB

Site: LEAF Academy

Review Month/Year: June 2018

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	20	0
Number of 1 st Lunches Served	1,055	0

Exhibit CC

Site: Ms. Nancy's Preschool and Daycare

Review Month/Year: June 2018

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	20	0
Number of 1 st Breakfasts Served	1,240	0
Number of 1 st Lunches Served	1,360	0

Exhibit DD

Site: New Covenant Church of God

Review Month/Year: June 2018

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	3	3
Number of 1 st Breakfasts Served	23	16
Number of 1 st Suppers Served	22	20

Exhibit EE

Site: Overcoming Faith Christian Center Phase 2

Review Month/Year: June 2018

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	8	8
Number of 1 st Breakfasts Served	80	80
Number of 1 st Suppers Served	280	280
Number of 1 st Snacks Served	280	0

Exhibit FF

Site: Polk County Baptist Association Children's Camp

Review Month/Year: June 2018

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	4	4
Number of 1 st Breakfasts Served	640	558
Number of 1 st Snacks Served	639	583

Exhibit GG

Site: Polk County Baptist Association FLIP

Review Month/Year: June 2018

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	12	12
Number of 1 st Lunches Served	271	251
Number of 2 nd Lunches Served	5	0

Exhibit HH

Site: Price Memorial Church

Review Month/Year: June 2018

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	4	4
Number of 1 st Suppers Served	100	75

Exhibit II

Site: Samples Memorial Baptist Church

Review Month/Year: June 2018

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	5	5
Number of 1 st Suppers Served	486	486
Number of 2 nd Suppers Served	10	6

Exhibit JJ

Sample Site: Soccer Camp

Review Month/Year: June 2018

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	4	4
Number of 1 st Breakfasts Served	120	110
Number of 1 st Lunches Served	380	285

Exhibit KK

Site: South Cleveland Community Center

Review Month/Year: June 2018

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	20	20
Number of 1 st Breakfasts Served	701	570
Number of 1 st Lunches Served	873	750

Exhibit MM

Site: Summer Camp for At Risk Kids

Review Month/Year: June 2018

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	5	0
Number of 1 st Breakfasts Served	225	0
Number of 1 st Lunches Served	225	0

Exhibit NN**Site: TCA Basketball Camp****Review Month/Year: June 2018**

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	4	0
Number of 1 st Lunches Served	240	0

Exhibit OO**Sample Site: United Christian Academy****Review Month/Year: June 2018**

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	20	20
Number of 1 st Breakfasts Served	1,472	1,360
Number of 1 st Lunches Served	980	1,270

Exhibit PP**Site: Unity Center****Review Month/Year: June 2018**

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	15	0
Number of 1 st Lunches Served	1,520	0

Exhibit QQ**Site: Valley View Baptist****Review Month/Year: June 2018**

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	5	5
Number of 1 st Suppers Served	250	300

Exhibit RR

Site: Westwood Baptist Music Camp

Review Month/Year: June 2018

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	5	5
Number of 1 st Suppers Served	275	273

Exhibit SS

Site: Aim High Tennis Camp

Review Month/Year: June 2018

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	8	8
Number of 1 st Lunches Served	160	140

Exhibit QQ

Site: Valley View Baptist

Review Month/Year: June 2018

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	5	5
Number of 1 st Suppers Served	250	300

Exhibit RR

Site: Westwood Baptist Music Camp

Review Month/Year: June 2018

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	5	5
Number of 1 st Suppers Served	275	273

Exhibit SS**Site: Aim High Tennis Camp****Review Month/Year: June 2018**

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	8	8
Number of 1 st Lunches Served	160	140

Exhibit TT**Sample Site: Benton Elementary****Review Month/Year: June 2018**

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	4	4
Number of 1 st Breakfasts Served	105	105
Number of 1 st Lunches Served	140	140

Exhibit UU**Site: First United Methodist VBS****Review Month/Year: June 2018**

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	4	4
Number of 1 st Lunches Served	440	440

Exhibit VV**Site: Green Chapel Youth Group****Review Month/Year: June 2018**

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	4	4
Number of 1 st Suppers Served	100	100
Number of 1 st Snacks Served	100	100

Exhibit WW**Site: International Worship Center****Review Month/Year: June 2018**

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	6	6
Number of 1 st Suppers Served	750	750

Exhibit XX**Site: Shiloh Baptist Church****Review Month/Year: June 2018**

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	5	5
Number of 1 st Suppers Served	253	253

Exhibit YY**Sample Site: South Polk Elementary****Review Month/Year: June 2018**

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	4	4
Number of 1 st Breakfasts Served	120	120
Number of 1 st Lunches Served	120	120

Exhibit ZZ**Site: White Oak Baptist Church****Review Month/Year: June 2018**

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	5	5
Number of 1 st Suppers Served	400	400
Number of 1 st Snacks Served	320	320



**STATE OF TENNESSEE
DEPARTMENT OF HUMAN SERVICES**

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

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

BILL HASLAM

GOVERNOR

DANIELLE W. BARNES

COMMISSIONER

September 26, 2018

Howard Thompson, Board Chair
Bradley-Cleveland Community Services Agency
PO Box 3297
Cleveland, Tennessee 37320-3297

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

Institution Name:	Bradley-Cleveland Community Services Agency
Institution Address:	PO Box 3297 Cleveland, Tennessee 37320-3297
Agreement Numbers:	00-013
Amount Due:	\$78,337.83
Due Date:	October 27, 2018

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

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

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

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

Thank you for your attention

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.

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

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

Section A. Sponsor Information	
Name of Institution Bradley-Cleveland Community Services Agency	SFSP Agreement No. 00-013
Mailing Address: PO Box 3297 Cleveland, Tennessee 37320-3297	
Section B. Responsible Principal(s) and/or Individual(s)	
Name and Title: Howard Thompson, Board Chair Demetrius Ramsey, Executive Director	Date of Birth (s):
Section C. Dates of Issuance of Monitoring Report/Corrective Action Plan	
SD Report: September 26, 2018	Corrective Action Plan: September 26, 2018
Section D. Findings	
Findings:	
<ol style="list-style-type: none"> 1. The Sponsor reported the number of meals as served incorrectly 2. The Sponsor provided menus that did not meet the USDA meal pattern requirements 3. The Sponsor did not provide documentation supporting claimed for meals served 4. The Sponsor provided meal count sheets that were not signed and/or dated by feeding site supervisor 5. The Sponsor provided questionable and unreliable meal count sheets 6. The Sponsor did not prepare or order meals on the basis of participation 7. The Sponsor did not provide documentation that the monitoring reviews were conducted as required 8. The Sponsor did not maintain racial and ethnic data as required 9. The "And Justice for All" poster was not posted at a site 	

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

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

The finding will be fully and permanently corrected.

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

Name: _____ Position Title: _____

Name: _____ Position Title: _____

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

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

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

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

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

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

Name: _____ Position Title: _____

Name: _____ Position Title: _____

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

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

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

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

Measure No. 3: The Sponsor did not provide documentation supporting claimed for meals served

The finding will be fully and permanently corrected.

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

Name: _____ Position Title: _____

Name: _____ Position Title: _____

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

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

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

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

Measure No. 4: The Sponsor provided meal count sheets that were not signed and/or dated by feeding site supervisor

The finding will be fully and permanently corrected.

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

Name: _____ Position Title: _____

Name: _____ Position Title: _____

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

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

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

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

Measure No. 5: The Sponsor provided questionable and unreliable meal count sheets

The finding will be fully and permanently corrected.

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

Name: _____ Position Title: _____

Name: _____ Position Title: _____

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

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

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

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

Measure No. 6: The Sponsor did not prepare or order meals on the basis of participation

The finding will be fully and permanently corrected.

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

Name: _____ Position Title: _____

Name: _____ Position Title: _____

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

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

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

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

Measure No. 7: The Sponsor did not provide documentation that the monitoring reviews were conducted as required

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

Name: _____

Position Title: _____

Name: _____

Position Title: _____

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

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

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

Position Title: _____

What new and current staff will be informed of this finding and what procedures will be implemented to correct the finding? Please describe below:

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

Finding No. 8: The Sponsor did not maintain racial and ethnic data as required.

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

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

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

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

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

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

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

Measure No. 9: The “And Justice for All” poster was not posted at a site

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

Name: _____ Position Title: _____

Name: _____ Position Title: _____

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

Handwritten notes in the top section of the form.

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

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

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:

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

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

Name: _____ Position Title: _____

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:

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

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

Printed Name of Authorized Sponsor Official

Position

Signature of Authorized Sponsor Official

Date

Signature of Authorized TDHS Official

Date

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

Printed Name of Authorized Sponsor Official	Position
Signature of Authorized Sponsor Official	Date
Signature of Authorized TUMS Official	Date