



**STATE OF TENNESSEE  
DEPARTMENT OF HUMAN SERVICES**

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**BILL LEE**  
GOVERNOR

**DANIELLE W. BARNES**  
COMMISSIONER

September 23, 2019

Laurie Matta, Executive Director  
City of Clarksville  
102 Public Square  
Clarksville, Tennessee 37040-3444

Dear Ms. Matta,

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 City of Clarksville (Sponsor), Application Agreement 00-017, on August 6, 2019. Additional information was requested and provided on August 9, 2019. The purpose of this review was to determine if the Sponsor complied with the *Title 7 of the Code of Federal Regulations (CFR)* applicable parts, provider agreement, and applicable Federal and State regulations.

Based on our review of the Sponsor's records and information provided, the Sponsor had 15 feeding sites operating during the review period. The Clarksville Housing Authority - Caldwell Lane (**Caldwell Lane**), **Crow Community Center**, and **Sango Elementary** feeding sites were selected as the sample sites. In addition, we reviewed all meal counts for all sites operating during the review period which was expanded to include July 2019 as the Sponsor combined meals served during this period with the meals claimed in June 2019.

Background

SFSP Sponsors utilize meal count sheets to record the number of breakfast, lunch, supper, and supplement meals served. Meals served by participating Sponsors must meet the minimum guidelines set by the United States Department of Agriculture (USDA) and DHS to be eligible for reimbursement. The SFSP Sponsor reports the number of meals served through the DHS Tennessee Information Payment System (TIPS) for reimbursement.

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

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

### **The Sponsor provided Income Eligibility Forms with errors**

#### Condition

During our monitoring visit on August 6, 2019, we requested Income Eligibility Forms (IEFs) for participants at closed enrolled sites and non-residential camps in our sample. The Sponsor provided IEFs with errors as follows:

#### ***Caldwell Lane – Closed enrolled site***

There were three (3) participants enrolled at **Caldwell Lane** that were noted as income eligible for the reduced-price category, but the household income exceeded the income eligibility requirement. All meals served at this site were determined eligible based on needy area and enrollment of participants eligible for free and reduced-price exceeded 50 percent.

As a result, no meals were disallowed. (See Exhibit B)

#### ***Crow Community Center – Non-resident camp***

There was one (1) participant correctly classified as income eligible for the free category. The IEF provided did contain an error in the child income that would have caused the household income to the income eligible requirement for free and reduced-price.

As a result, no meals were disallowed. (See Exhibit C)

#### ***Sango Elementary – Non-resident camp***

There was one (1) participant incorrectly classified as income eligible for the free category. The household income exceeded the income eligible requirement for the free category, but the participant was eligible for the reduced-price category.

As a result, no meals were disallowed. (See Exhibit D)

#### Criteria

*Title 7 of the Code of Federal Regulations, Section 225.15 (f)* states, "The application is used to determine the eligibility of children attending camps and the eligibility of sites that are not open sites..."

The USDA SFSP Administration Guide, page 13, states, "Instead of determining the individual income eligibility of each enrolled child, a site may document its status as a closed enrolled site by using area eligibility information..."

The USDA SFSP Administration Guide, page 14, states, "... sponsors of both residential and nonresidential camps do not have to establish area eligibility. However, they must collect and maintain individual household applications. Camps are reimbursed only for those enrolled children who meet the free or reduced-price eligibility standards."

#### Recommendation

The Sponsor should ensure that Income Eligibility Forms are completed accurately and completely.

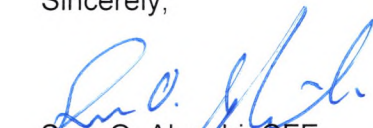
**Note:** Our observation of the meal services during the review period revealed no significant deficiencies.

### **Technical Assistance Provided**

During our monitoring visit on August 6, 2019, the Sponsor was provided technical assistance regarding the completion of Income Eligibility Forms.

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](mailto:Sean.Baker@tn.gov).

Sincerely,



Sam O. Alzoubi, CFE  
Director of Audit Services

### Exhibits

cc: Dan Carpenter, Deputy Director of Recreation, City of Clarksville  
Melissa Adkins, Program Superintendent, City of Clarksville  
Debbie Smith, Grants Analyst, City of Clarksville  
Allette Vayda, Director of Operations, Child and Adult Care Food Programs  
Debra Pasta, Program Manager, Child and Adult Care Food Program  
Elke Moore, Administrative Services Assistant 3, Child and Adult Care Food Program  
Constance Moore, Program Specialist, Child and Adult Care Food Program  
Marty Widner, Program Specialist, Child and Adult Care Food Program  
Comptroller of the Treasury, State of Tennessee

**Exhibit A**

**Sponsor: City of Clarksville**  
**Review Month/Year: June/July 2019**  
**Claim Reimbursement Total: \$54,914.59**

<b>Site Meal Service Reconciliation and Monitor Activity</b>	<b>Reported on Claim</b>	<b>Reconciled to Documentation</b>
Number of Participating Sites for Lunch	15	15
Number of 1 <sup>st</sup> Lunches Served	13,351	13,351
Number of 2 <sup>nd</sup> Lunches Served	267	267

**Exhibit B**

**Site: Caldwell Lane**

<b>Site Meal Service Reconciliation and Monitor Activity</b>	<b>Reported on Claim</b>	<b>Reconciled to Documentation</b>
Total Number of Days Food Served	29	29
Number of 1 <sup>st</sup> Lunches Served	680	680
Number of 2 <sup>nd</sup> Lunches Served	0	0

**Exhibit C**

**Site: Crow Community Center**

<b>Site Meal Service Reconciliation and Monitor Activity</b>	<b>Reported on Claim</b>	<b>Reconciled to Documentation</b>
Total Number of Days Food Served	29	29
Number of 1 <sup>st</sup> Lunches Served	657	657
Number of 2 <sup>nd</sup> Lunches Served	0	0

**Exhibit D**

**Site: Sango Elementary**

<b>Site Meal Service Reconciliation and Monitor Activity</b>	<b>Reported on Claim</b>	<b>Reconciled to Documentation</b>
Total Number of Days Food Served	29	29
Number of 1 <sup>st</sup> Lunches Served	332	332
Number of 2 <sup>nd</sup> Lunches Served	7	7

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



# 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: City of Clarksville	Agreement No. 00017	<input checked="" type="checkbox"/> SFSP <input type="checkbox"/> CACFP
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Mailing Address: 102 Public Square Clarksville, Tennessee 37040-3444

## Section B. Responsible Principal(s) and/or Individual(s)

Name and Title: Laurie Matta, Executive Director	Date of Birth: / /
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## Section C. Dates of Issuance of Monitoring Report/Corrective Action Plan

Monitoring Report: 9/23/2019	Corrective Action Plan: 9/23/2019
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## Section D. Findings

Findings:

1. The Sponsor provided Income Eligibility Forms with error

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 provided Income Eligibility Forms with error

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:

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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?):

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

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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:

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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 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'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.