



**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

September 25, 2019

Gregory Cullum, Board Chair  
YMCA of Metropolitan Chattanooga  
301 West 6<sup>th</sup> Street  
Chattanooga, Tennessee 37402-1108

Dear Mr. Cullum,

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 YMCA of Metropolitan Chattanooga (Sponsor), Application Agreement 00-082, on July 31, 2019. Information was requested and provided on August 7, 2019. We conducted a conference call with a representative of YMCA of Metropolitan Chattanooga on September 19, 2019 to provide and discuss the disallowance of meals that were not supported by documentation provided by the Sponsor. We offered technical assistance and training and we will upon a request from the Sponsor. A summary on the draft findings were emailed to the representative on September 23, 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 111 feeding sites operating during the review period. The Alpine Crest Elementary (**Alpine Crest**), Barger Elementary (**Barger**), Battery Heights Apartments (**Battery Heights**), Dalewood Middle School (**Dalewood**), **CGLA**, Cleveland Middle School (**Cleveland Middle**), Dayton City School (**Dayton**), Green Pond Baptist Church (**Green Pond**), Greenwood Scattered Homes (**Greenwood**), Hardy Elementary School (**Hardy**), **Inner City Ministries**, JA Henry Branch YMCA (**Henry Branch**), Jefferson Heights Apartments (**Jefferson Heights**), Northside Neighborhood House (**Northside**), Renaissance Presbyterian Church (**Renaissance**), Roy Nelms Park (**Roy Nelms**), Soddy Daisy Community Library (**Soddy Daisy**), **St. Elmo Park**, and Villages at Alton Park (**Alton Park**) were selected as sample sites. In addition, we reviewed all meal counts for all sites operating during the review period.

Background

SFSP Sponsors utilize meal count sheets to record the number of breakfast, lunch, supper, and supplement meals served. Meals served by participating Sponsors must meet the minimum

guidelines set by the United States Department of Agriculture (USDA) and DHS to be eligible for reimbursement. The SFSP Sponsor reports the number of meals served through the DHS Tennessee Information Payment System (TIPS) for reimbursement.

We inspected meal count 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 the review period at the sample sites.

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

**1. The Sponsor did not provide meal count forms to support the Claim for Reimbursement**

Condition

During our monitoring visit on July 31, 2019, we requested daily meal count forms for all feeding sites to support the June 2019 Claim for Reimbursement. The Sponsor did not provide the requested daily meal count forms that document the point of service of the meals claimed as served. Instead, the Sponsor provided a consolidate forms showing the total number of meals delivered and total number of meals served per day. These forms did not meet the daily meal count forms and did not show the point of service count, as required by the USDA Administration Guide for the SFSP.

Several of these forms used to support the Claim for Reimbursement showed the appearance of block claiming and the number of meals claimed did not agree to the number on these forms.

These concerns were noted in the prior monitoring report dated September 4, 2018, and our concern continue that without point of service count, the Sponsor would not properly and accurately capture the number of meals served and eligible for reimbursement. As we noted in the findings below, the Sponsor inaccurate accounting for the meals served resulted in disallowance of cost reimbursement that was not supported.

Also, the Sponsor provided consolidated meal count forms that are duplicates for lunch meals and PM supplements reported for the following feeding sites:

<b>Dates</b>	<b>Site</b>	<b>Error(s)</b>
6/10-6/14/19	Veterans Park	Duplicate lunch meal count sheets Meal count sheet not signed
6/18/19,6/20/19 6/25/19 and6/27/19	Boys & Girls Highland Park	Duplicate lunch and pm supplement meal count sheets
6/4/19 and 6/7/19	Boys & Girls East Lake	Duplicate lunch and pm supplement meal count sheets

These meal count forms had the same daily meal count numbers and we only reconciled with the claimed meals using one set of meal count records.

## Criteria

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

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

*Title 7 of the Code of Federal Regulations, Section 225.15 (c)(1)* states, "Sponsors shall maintain accurate records justifying all meals claimed and documenting that all Program funds were spent only on allowable Child Nutrition Program costs. Failure to maintain such records may be grounds for denial of reimbursement for meals served and/or administrative costs claimed during the period covered by the records in question..."

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

## Recommendation

The Sponsor should ensure that the proper point of service count forms are utilized are completed accurately for each feeding site at each meal service claimed for reimbursement, as required.

### **2. The Sponsor improperly claimed meals for reimbursement and the reported number of meals claimed served were incorrect**

#### Condition

During our monitoring visit on July 31, 2019, we requested meal count forms for all active feed sites that support the Claim for Reimbursement for June 2019. Based on our review of the provided documents for each feeding site, we identified the following deficiencies:

#### ***Battery Heights - sample site***

The Claim for Reimbursement for **Battery Heights** for June 2019, reported 222 lunch meals served. However, based on our review of the Sponsor's records, we noted there were 196 lunch meals documented prior to any meal disallowances.

As a result, 26 lunch meals claimed for reimbursement were over-reported and disallowed. (See Exhibit D)

#### ***Bayberry Apartments***

The Claim for Reimbursement for **Bayberry Apartments** for June 2019, reported 754 lunch meals served. However, based on our review of the Sponsor's records, we noted there were 677 lunch meals documented prior to any meal disallowances.

As a result, 77 lunch meals claimed for reimbursement were over-reported and disallowed. (See Exhibit U)

### ***Boyd Buchanan School***

The Claim for Reimbursement for **Boyd Buchanan School** for June 2019, reported 554 1<sup>st</sup> lunch meals and 670 1<sup>st</sup> supplements served. However, based on our review of the Sponsor's records, we noted that there were 444 1<sup>st</sup> lunch meals and 672 1<sup>st</sup> supplements documented prior to any meal disallowances.

As a result, 110 1<sup>st</sup> lunch meals claimed for reimbursement were over-reported and disallowed, and two (2) 1<sup>st</sup> supplements were underreported. (See Exhibit V)

### ***Boys & Girls Club East Lake***

The Claim for Reimbursement for **Boys & Girls Club East Lake** for June 2019, reported 1,320 lunch meals and 1,320 supplements served. However, based on our review of the Sponsor's records, we noted that there were 1,000 lunch meals and 1,000 supplements documented prior to any meal disallowances.

As a result, 320 lunch meals and 320 supplements claimed for reimbursement were over-reported and disallowed. (See Exhibit W)

### ***Boys & Girls Club Highland Park***

The Claim for Reimbursement for **Boys & Girls Club Highland Park** for June 2019, reported 2,065 lunch meals and 2,065 supplements served. However, based on our review of the Sponsor's records, we noted there were 1,770 lunch meals and 1,720 supplements documented prior to any meal disallowances.

As a result, 295 lunch meals and 345 supplements claimed for reimbursement were over-reported and disallowed. (See Exhibit X)

### ***Camp Ocoee***

The Claim for Reimbursement for **Camp Ocoee** for June 2019, reported 2,309 breakfast meals and 1,967 lunch meals served. However, based on our review of the Sponsor's records, we noted that the forms did not report the number of meals delivered each day but reported the number of meals served. Therefore we were unable to reconcile the number of meals delivered to the number of meals served. (See Exhibit Y)

### ***Camp Zoe I***

The Claim for Reimbursement for **Camp Zoe I** for June 2019, reported 262 breakfast meals and 198 lunch meals served. However, based on our review of the Sponsor's records, we noted that there were 202 breakfast meals and 173 lunch meals documented prior to any meal disallowances.

As a result, 60 breakfast meals and 25 lunch meals claimed for reimbursement were over-reported and disallowed. (See Exhibit Z)

### ***Camp Zoe II***

The Claim for Reimbursement for **Camp Zoe II** for June 2019, reported 667 breakfast meals and 618 lunch meals served. However, based on our review of the Sponsor's records, we noted that there were 613 breakfast meals and 564 lunch meals documented prior to any meal disallowances.

As a result, 54 breakfast meals and 54 lunch meals claimed for reimbursement were over-reported and disallowed. (See Exhibit AA)

### ***Caruthers Park***

The Claim for Reimbursement for **Caruthers Park** for June 2019, reported 239 lunch meals served. However, based on our review of the Sponsor's records, we noted that there were 220 lunch meals served prior to any meal disallowances.

As a result, 19 lunch meals were claimed for reimbursement were over-reported and disallowed. (See Exhibit BB)

### ***CGLA - sample site***

The Claim for Reimbursement for **CGLA** for June 2019, reported 1,348 1<sup>st</sup> breakfast meals, 27 2<sup>nd</sup> breakfast meals, 1,519 1<sup>st</sup> lunch meals, and 30 2<sup>nd</sup> lunch meals served. However, based on our review of the Sponsor's records, we noted that there were 1,328 1<sup>st</sup> breakfast meals and 1,519 1<sup>st</sup> lunch meals documented prior to any meal disallowances.

As a result, 20 1<sup>st</sup> breakfast meals claimed for reimbursement were over-reported and disallowed. (See Exhibit E)

### ***Cleveland Family YMCA***

The Claim for Reimbursement for **Cleveland Family YMCA** for June 2019, reported 1,220 breakfast meals and 2,393 lunch meals served. However, based on our review of the Sponsor's records, we noted that there were 1,010 breakfast meals and 2,020 lunch meals served prior to any meal disallowances.

As a result, 210 breakfast meals and 373 lunch meals claimed for reimbursement were over-reported and disallowed. (See Exhibit CC)

As an example of the Sponsor's claiming concerns, below is detail of the Sponsor's claim vs. our reconciliation based on the consolidated count forms for **Cleveland Family YMCA**, see exhibit 1 below showing accounting for meals delivered and served for June 3, 2019 through June 7, 2019:

Week	Breakfast	Lunch
6/3 - 6/7	60	100
	50	90
	50	90
	50	90
	50	90
6/10 - 6/14	50	90
	50	90
	50	115
	50	150
	50	115
6/17 - 6/21	50	100
	50	100
	50	100
	50	100
	50	100
6/24 - 6/24	50	100
	50	100
	50	100
	50	100
	50	100
<b>Total per forms</b>	<b>1010</b>	<b>2020</b>
<b>Claimed</b>	<b>1220</b>	<b>2393</b>
<b>Over Claimed</b>	<b>210</b>	<b>373</b>

**Dalewood** - sample site

The Claim for Reimbursement for **Dalewood** for June 2019, reported 242 1<sup>st</sup> breakfast meals, five (5) 2<sup>nd</sup> breakfast meals, 272 1<sup>st</sup> lunch meals, and five (5) 2<sup>nd</sup> lunch meals served. However, based on our review of the Sponsor's records, we noted that there were 223 1<sup>st</sup> breakfast meals and 255 1<sup>st</sup> lunch meals documented prior to any meal disallowances.

As a result, 19 1<sup>st</sup> breakfast meals and 17 1<sup>st</sup> lunch meals claimed for reimbursement were over-reported and disallowed. (See Exhibit G)

### ***Downtown YMCA***

The Claim for Reimbursement for **Downtown YMCA** for June 2019, reported 1,138 breakfast meals and 1,576 lunch meals served. However, based on our review of the Sponsor's records, we noted that there were 972 breakfast meals and 1,377 lunch meals documented prior to any meal disallowances.

As a result, 166 breakfast meals and 199 lunch meals claimed for reimbursement were over-reported and disallowed. (See Exhibit DD)

### ***East Lake Academy***

The Claim for Reimbursement for **East Lake Academy** for June 2019, reported 61 1<sup>st</sup> breakfast meals, one (1) 2<sup>nd</sup> breakfast meal, 62 1<sup>st</sup> lunch meals, and one (1) 2<sup>nd</sup> lunch meal served. However, based on our review of the Sponsor's records, we noted that there were 29 1<sup>st</sup> breakfast meals and 28 1<sup>st</sup> lunch meals documented prior to any meal disallowances.

As a result, 32 1<sup>st</sup> breakfast meals, and 34 1<sup>st</sup> lunch meals claimed for reimbursement were over-reported and disallowed. (See Exhibit EE)

### ***East Lake Court***

The Claim for Reimbursement for **East Lake Court** for June 2019, reported 184 breakfast meals and 269 lunch meals served. However, based on our review of the Sponsor's records, we noted that there were 151 breakfast meals and 230 lunch meals documented prior to any meal disallowances.

As a result, 33 breakfast meals and 39 lunch meals claimed for reimbursement were over-reported and disallowed. (See Exhibit FF)

### ***East Ridge High School***

The Claim for Reimbursement for **East Ridge High School** for June 2019, reported 320 1<sup>st</sup> breakfast meals, six (6) 2<sup>nd</sup> breakfast meals, 849 1<sup>st</sup> lunch meals, and 17 2<sup>nd</sup> lunch meals served. However, based on our review of the Sponsor's records, we noted that there were 291 1<sup>st</sup> breakfast meals and 755 1<sup>st</sup> lunch meals documented prior to any meal disallowances.

As a result, 29 1<sup>st</sup> breakfast meals, 94 1<sup>st</sup> lunch meals claimed for reimbursement were over-reported and disallowed. (See Exhibit GG)

### ***Emma Wheeler Homes***

The Claim for Reimbursement for **Emma Wheeler Homes** for June 2019, reported 624 breakfast meals and 815 lunch meals served. However, based on our review of the Sponsor's records, we noted that there were 552 breakfast meals and 691 lunch meals documented prior to any meal disallowances.

As a result, 72 breakfast meals and 124 lunch meals claimed for reimbursement were over-reported and disallowed. (See Exhibit HH)

### ***Ft. Negley Park***

The Claim for Reimbursement for **Ft. Negley Park** for June 2019, reported 101 lunch meals served. However, based on our review of the Sponsor's records, we noted that there were 89 lunch meals documented prior to any meal disallowances.

As a result, 12 lunch meals claimed for reimbursement were over-reported and disallowed. (See Exhibit II)

### ***Girls Inc. Elementary***

The Claim for Reimbursement for **Girls Inc. Elementary** for June 2019, reported 1,134 1<sup>st</sup> lunch meals, 23 2<sup>nd</sup> lunch meals, 1,097 first supplements, and 22 2<sup>nd</sup> supplements served. However, based on our review of the Sponsor's records, we noted that there were 1,199 1<sup>st</sup> lunch meals and 1,097 1<sup>st</sup> supplements, documented prior to any meal disallowances.

As a result, 65 1<sup>st</sup> lunch meals were underreported. (See Exhibit JJ)

### ***Granite Heights Apartments***

The Claim for Reimbursement for **Granite Heights Apartments** for June 2019, reported 217 lunch meals served. However, based on our review of the Sponsor's records, we noted that there were 186 lunch meals documented prior to any meal disallowances.

As a result, 31 lunch meals claimed for reimbursement were over-reported and disallowed. (See Exhibit KK)

### ***Green Pond - sample site***

The Claim for Reimbursement for **Green Pond Baptist Church** for June 2019, reported 200 lunch meals served. However, based on our review of the Sponsor's records, we noted that there were 190 lunch meals documented prior to any meal disallowances.

As a result, 10 lunch meals claimed for reimbursement were over-reported and disallowed. (See Exhibit I)

### ***Greenwood – sample site***

The Claim for Reimbursement for **Greenwood** for June 2019, reported 194 1<sup>st</sup> breakfast meals, zero (0) 2<sup>nd</sup> breakfast, and 259 1<sup>st</sup> lunch meals, and five (5) 2<sup>nd</sup> lunch meals served. However, based on our review of the Sponsor's records, we noted that there were 186 1<sup>st</sup> breakfast meals and 248 1<sup>st</sup> lunch meals, documented prior to any meal disallowances.

As a result, eight (8) 1<sup>st</sup> breakfast meals and 11 1<sup>st</sup> lunch meals claimed for reimbursement were over-reported and disallowed. (See Exhibit J)

### ***Hamilton YMCA***

The Claim for Reimbursement for **Hamilton YMCA** for June 2019, reported 1,409 1<sup>st</sup> lunch meals, 28 2<sup>nd</sup> lunch meals, 2,060 1<sup>st</sup> supplements, and 29 2<sup>nd</sup> supplements served. However, based on our review of the Sponsor's records, we noted that there were 1,292 1<sup>st</sup> lunch meals and 1,848 1<sup>st</sup> supplements documented prior to any meal disallowances.



As a result, 117 1<sup>st</sup> lunch meals and, 212 1<sup>st</sup> supplements claimed for reimbursement were over-reported and disallowed. (See Exhibit LL)

***Hardy Elementary School - sample site***

The Claim for Reimbursement for **Hardy Elementary School** for June 2019, reported 541 1<sup>st</sup> breakfast meals, 11 2<sup>nd</sup> breakfast meals, 239 1<sup>st</sup> lunch meals, and 5 (5) 2<sup>nd</sup> lunch meals served. However, based on our review of the Sponsor's records, we found there were 520 1<sup>st</sup> breakfast meals and 1<sup>st</sup> lunch meals documented prior to any meal disallowances.

As a result, 21 1<sup>st</sup> breakfast meals, and 49 1<sup>st</sup> lunch meals claimed for reimbursement were over-reported and disallowed. (See Exhibit K)

***Highland Park Commons***

The Claim for Reimbursement for **Highland Park Commons** for June 2019, reported 297 1<sup>st</sup> lunch meals and six (6) 2<sup>nd</sup> lunch meals served. However, based on our review of the Sponsor's records, we noted that there were 289 1<sup>st</sup> lunch meals documented prior to any meal disallowances.

As a result, eight (8) 1<sup>st</sup> lunch meals claimed for reimbursement were over-reported and disallowed. (See Exhibit MM)

***Inner City Ministries - sample site***

The Claim for Reimbursement for **Inner City Ministries** for June 2019, reported 495 1<sup>st</sup> breakfast meals, ten (10) 2<sup>nd</sup> breakfast meals, 938 1<sup>st</sup> lunch meals, and ten (10) 2<sup>nd</sup> lunch meals served. However, based on our review of the Sponsor's records, we noted that there were 500 1<sup>st</sup> breakfast meals and 938 1<sup>st</sup> lunch meals documented prior to any meal disallowances.

As a result, five (5) 1<sup>st</sup> breakfast meals were underreported. (See Exhibit L)

***Henry Branch - sample site***

The Claim for Reimbursement for **Henry Branch** for June 2019, reported 288 1<sup>st</sup> breakfast meals, 291 1<sup>st</sup> lunch meals, and four (4) 2<sup>nd</sup> lunch meals served. However, based on our review of the Sponsor's records, we noted that there were 289 1<sup>st</sup> breakfast meals, 292 1<sup>st</sup> lunch meals documented prior to any meal disallowances.

As a result, one (1) 1<sup>st</sup> breakfast meal and one (1) 1<sup>st</sup> lunch meal were underreported. (See Exhibit M)

***Jefferson Heights - sample site***

The Claim for Reimbursement for **Jefferson Heights** for June 2019, reported 481 lunch meals served. However, based on our review of the Sponsor's records, we noted that there were 423 lunch meals documented prior to any meal disallowances.

As a result, 58 lunch meals claimed for reimbursement were over-reported and disallowed. (See Exhibit N)

### ***Maple Hills Apartments***

The Claim for Reimbursement for **Maple Hills Apartments** for June 2019, reported 321 lunch meals served. However, based on our review of the Sponsor's records, we noted that there were 286 lunch meals documented prior to any meal disallowances.

As a result, 35 lunch meals claimed for reimbursement were over-reported and disallowed. (See Exhibit NN)

### ***Museum Center at 5 Points***

The Claim for Reimbursement for **Museum Center at 5 Points** for June 2019, reported 309 lunch meals served. However, based on our review of the Sponsor's records, we noted that there were 253 lunch meals documented prior to any meal disallowances.

As a result, 56 lunch meals claimed for reimbursement were over-reported and disallowed. (See Exhibit OO)

### ***North River YMCA***

The Claim for Reimbursement for **North River YMCA** for June 2019, reported 412 1<sup>st</sup> breakfast meals, eight (8) 2<sup>nd</sup> breakfast meals, 783 1<sup>st</sup> lunch meals, and 16 2<sup>nd</sup> lunch meals served. However, based on our review of the Sponsor's records, we noted that there were 372 1<sup>st</sup> breakfast meals and 690 1<sup>st</sup> lunch meals, documented prior to any meal disallowances.

As a result, 40 1<sup>st</sup> breakfast meals and, 93 1<sup>st</sup> lunch meals claimed for reimbursement were over-reported and disallowed. (See Exhibit PP)

### ***Oak at Camden***

The Claim for Reimbursement for **Oak at Camden** for June 2019, reported 77 1<sup>st</sup> lunch meals and two (2) 2<sup>nd</sup> lunch meals served. However, based on our review of the Sponsor's records, we noted that there were 58 1<sup>st</sup> lunch meals documented prior to any meal disallowances.

As a result, 19 1<sup>st</sup> lunch meals claimed for reimbursement were over-reported and disallowed. (See Exhibit QQ)

### ***Open Air Academy***

The Claim for Reimbursement for **Open Air Academy** for June 2019, reported 335 1<sup>st</sup> breakfast meals, seven (7) 2<sup>nd</sup> breakfast meals, 376 1<sup>st</sup> lunch meals, and eight (8) 2<sup>nd</sup> lunch meals served. However, based on our review of the Sponsor's records, we noted that there were 335 1<sup>st</sup> breakfast meals and 365 1<sup>st</sup> lunch meals documented prior to any meal disallowances.

As a result, 11 1<sup>st</sup> lunch meals claimed for reimbursement were over-reported and disallowed. (See Exhibit RR)

### ***Park City Park***

The Claim for Reimbursement for **Park City Park** for June 2019, reported 319 1<sup>st</sup> lunch meals and six (6) 2<sup>nd</sup> lunch meals served. However, based on our review of the Sponsor's records, we noted that there were 253 1<sup>st</sup> lunch meals documented prior to any meal disallowances.

As a result, 66 1<sup>st</sup> lunch meals claimed for reimbursement were over-reported and disallowed. (See Exhibit SS)

***Rhea County High School***

The Claim for Reimbursement for **Rhea County High School** for June 2019, reported 987 1<sup>st</sup> breakfast meals, six (6) 2<sup>nd</sup> breakfast meals, 3,018 1<sup>st</sup> lunch meals, and 60 2<sup>nd</sup> lunch meals served. However, based on our review of the Sponsor's records, we noted that there were 987 1<sup>st</sup> breakfast meals and 3,012 1<sup>st</sup> lunch meals documented prior to any meal disallowances.

As a result, six (6) 1<sup>st</sup> lunch meals claimed for reimbursement were over-reported and disallowed. (See Exhibit TT)

***Splash Pad***

The Claim for Reimbursement for **Splash Pad** for June 2019, reported 248 1<sup>st</sup> lunch meals and five (5) 2<sup>nd</sup> lunch meals served. However, based on our review of the Sponsor's records, we noted that there were 173 1<sup>st</sup> lunch meals documented prior to any meal disallowances.

As a result, 75 1<sup>st</sup> lunch meals claimed for reimbursement were over-reported and disallowed. (See Exhibit UU)

***Spring City Elementary***

The Claim for Reimbursement for **Spring City Elementary** for June 2019, reported 320 1<sup>st</sup> breakfast meals, six (6) 2<sup>nd</sup> breakfast meals, 307 1<sup>st</sup> lunch meals, and six (6) 2<sup>nd</sup> lunch meals served. However, based on our review of the Sponsor's records, we noted that there were 318 1<sup>st</sup> breakfast meals and 307 1<sup>st</sup> lunch meals, documented prior to any meal disallowances.

As a result, two (2) 1<sup>st</sup> breakfast meals claimed for reimbursement were over-reported and disallowed. (See Exhibit VV)

***Veterans Park***

The Claim for Reimbursement for **Veterans Park** for June 2019, reported 71 lunch meals served. However, based on our review of the Sponsor's records, we noted that there were 46 lunch meals documented prior to any meal disallowances.

As a result, 25 lunch meals claimed for reimbursement were over-reported and disallowed. (See Exhibit WW)

***Watkins Street Park***

The Claim for Reimbursement for **Watkins Street Park** for June 2019, reported 165 lunch meals served. However, based on our review of the Sponsor's records, we noted that there were 162 lunch meals documented prior to any meal disallowances.

As a result, three (3) lunch meals claimed for reimbursement were over-reported and disallowed. (See Exhibit XX)

## **Wolftever Creek Elementary School**

The Claim for Reimbursement for **Wolftever Creek Elementary School** for June 2019, reported 568 1<sup>st</sup> breakfast meals, 11 2<sup>nd</sup> breakfast meals, 538 1<sup>st</sup> lunch meals, and 11 2<sup>nd</sup> lunch meals served. However, based on our review of the Sponsor's records, we noted that there were 568 1<sup>st</sup> breakfast meals and 539 1<sup>st</sup> lunch meals documented prior to any meal disallowances.

As a result, one (1) 1<sup>st</sup> lunch meal served was underreported. (See Exhibit YY)

**Note: please note that we did not disallow in our conclusion on 2<sup>nd</sup> meals or 2<sup>nd</sup> supplements since TIPS cap the number of 2<sup>nd</sup> meals allowed for reimbursement. The disallowance is only based on 1<sup>st</sup> meals or 1<sup>st</sup> supplements claimed without proper supporting documentation.**

***This is a repeat finding from the monitoring report dated September 4, 2018***

### Criteria

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

*Title 7 of the Code of Federal Regulations, Section 225.15(c)(1) states, "Sponsors shall maintain accurate records justifying all meals claimed and documenting that all Program funds were spent only on allowable Child Nutrition Program costs. Failure to maintain such records may be grounds for denial of reimbursement for meals served and/or administrative costs claimed during the period covered by the records in question. The sponsor's records shall be available at all times for inspection and audit by representatives of the Secretary, the Comptroller General of the United States, and the State agency for a period of three years following the date of submission of the final claim for reimbursement for the fiscal year."*

### Recommendation

The Sponsor should ensure that claims for reimbursement are completed based on proper supporting meal count documentation. The Sponsor should also utilize the proper daily meal count forms to meal served at the point of service.

### **3. The Sponsor claimed a number of meals other than we observed**

#### Condition

The Sponsor claimed a different number of meals than we observed during our on-site monitoring visits. Below is a summary of the feeding sites visited and the number of meals disallowed.

<b>Date</b>	<b>Site</b>	<b>Meal Type</b>	<b>Meals Claimed</b>	<b>Meals Observed</b>	<b>Adjusted Meals</b>	<b>Exhibit</b>
6/12/19	Barger	Breakfast	37	42	+ 5	C
6/13/19	Cleveland Middle	Lunch	27	22	- 5	F
6/6/19	Dalewood	Lunch	26 1 <sup>st</sup>	9 1 <sup>st</sup>	- 17	G
			5 2 <sup>nd</sup>	0 2 <sup>nd</sup>	- 5	

6/18/19	Green Pond Baptist	Lunch	10	12	+ 2	I
6/12/19	Jefferson Heights	Lunch	18	10	- 8	N
6/14/19	St. Elmo Park	Lunch	0	14	+ 14	S
6/6/19	Villages at Alton Park	Lunch	1	4	+ 3	T

The Sponsor underreported the number of breakfasts served by five (5) and over-reported the number of 1<sup>st</sup> lunches by 11 and 2<sup>nd</sup> lunches by five (5) meals.

***This is a repeat finding from the monitoring report dated September 4, 2018***

Criteria

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

*Title 7 of the Code of Federal Regulations, Section 225.15 (c)(1) states, "Sponsors shall maintain accurate records justifying all meals claimed and documenting that all Program funds were spent only on allowable Child Nutrition Program costs. Failure to maintain such records may be grounds for denial of reimbursement for meals served and/or administrative costs claimed during the period covered by the records in question..."*

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

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

Recommendation

The Sponsor should ensure that point of service meal counts are taken at the time of the meal service and properly complete the claim for reimbursement.

**4. The Sponsor served meals outside the approved meal service time**

Condition

The Sponsor did not comply with the approved meal service time. We attempted to observe a lunch meal service at **Camp Zoe II** on June 10, 2019. We arrived at the site at 1:20 pm and the approved meal service time was 1:30 pm to 2:30 pm. The participants were outside playing and the feeding site supervisor informed us that the meal had already been served. The Sponsor reported 65 lunch meals served. We were unable to verify the actual number of meals served.

As a result, 65 lunch meals claimed for reimbursement were disallowed. (See Exhibit AA)

***This is a repeat finding from the monitoring report dated September 4, 2018***

Criteria

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

The USDA SFSP Administration Guide, page 60, states sponsors must “Serve meals during the meal service times submitted on the Site Information Sheet and approved by the State agency. The State agency must approve any changes in meal service times.

Recommendation

The Sponsor should ensure that all meals are served within the approved meal serving time.

**5. The Sponsor did not have a menu posted for observed meals**

Condition

During our on-site monitoring visits to **Soddy Daisy** on June 17, 2019, and **Dayton and Green Pond** on June 18, 2019 we noted that there was no menu posted at these feeding sites.

Criteria

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

The USDA SFSP State Agency Monitor Guide, page 32, states, “Daily records of menus must be reviewed to ensure that meal pattern requirements were met... Menu substitutions must be recorded to reflect actual foods served to Program participants.”

Recommendation

The Sponsor should ensure the current menu is posted at all feeding sites.

**6. The Sponsor provided meals that did not match the posted menus during monitoring site visits**

Condition

The Sponsor provided menus for the review period that did not match the meal documented as served during our monitoring at the following feeding sites:

Date	Site	Menu	Meal Served
6/12/19	Barger	Pillsbury Cinnamon Cream cheese, mini bagel, pear, milk	Apple cinnamon granola bar, banana, milk
6/10/19	Battery Heights	Ham sandwich with spinach,	Soy Butter sandwich, pear,

		pear, pretzels, milk	carrots, cheese stick, graham crackers, milk
6/13/19	Cleveland Middle	Black bean wrap with spring mix, salsa cup, tostitos, kiwi, milk	Black bean wrap, salsa cup, tostitos, fruit cup, milk
6/11/19	Greenwood	Chicken and cranberry flatbread, carrots, strawberries, baked lays, milk	Chicken wrap, carrots, apple, baked chip, milk
6/12/19	Jefferson Heights	Chicken wrap with Broccoli, apple, animal crackers, milk	Chicken wrap with spinach, strawberries, graham crackers and milk
6/11/19	Northside	Chicken and cranberry flatbread, carrots, strawberries, baked lays, milk	Chicken and cranberry flatbread, carrots, pear, baked lays, milk

The meals observed met the meal pattern requirements; therefore, there were no meals were disallowed.

Criteria

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

The USDA SFSP State Agency Monitor Guide, page 32, states, “Daily records of menus must be reviewed to ensure that meal pattern requirements were met... Menu substitutions must be recorded to reflect actual foods served to Program participants.”

Recommendation

The Sponsor should ensure that the menu reflects the correct items served each day.

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

Condition

During our monitoring visit on July 31, 2019, we requested racial and ethnic data for feeding sties operating during the review period. The Sponsor did not provide racial and ethnic data for the **Dayton** feeding site.

Criteria

*Title 7 of the Code of Federal Regulations, Section 225.7 (g)(1)* states, “Each State agency shall comply with all requirements of title VI of the Civil Rights Act of 1964, title IX of the Education Amendments of 1972, section 504 of the Rehabilitation Act of 1973, the Age Discrimination Act of 1975, and the Department's regulations concerning nondiscrimination (7 CFR parts 15, 15a and 15b), including requirements for racial and ethnic participation data collection, public notification of the nondiscrimination policy, and reviews to assure compliance with such policy, to the end that no person shall, on the grounds of race, color, national origin, sex, age, or disability, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under, the Program.”

The USDA SFSP State Agency Monitor Guide, page 40, states, “The State agency must ensure that racial/ethnic data has been collected and consolidated onto a form which reports the categories of participating children at each site....”

The USDA SFSP Administration Guide, page 122, states, “Each year, every sponsor must determine the number of potentially eligible participants by racial/ethnic category for the area served. This information may be obtained from census data or public school enrollment data.”

#### Recommendation

The Sponsor should ensure that racial and ethnic data is recorded at least once at all sites and maintained as required.

### **8. The Sponsor did not conduct monitoring of its feeding sites as required**

#### Condition

During our monitoring visit on July 31, 2019, we requested documentation of monitoring conducted by the Sponsor during SFSP operations. The first four week monitoring forms were not signed by a Sponsor representative for Cleveland Middle, **Soddy Daisy** and **Alton Park**.

#### Criteria

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

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

#### Recommendation

The Sponsor should ensure that monitoring is completed within the required timeframe as required for each site and that the monitoring forms are signed by the agency representative.

### **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 \$12,649.30

### **Corrective Action**

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

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



- Remit a check payable to the **Tennessee Department of Human Services** in the amount noted in the report for recovery of the amounts disallowed in this report. **Please return the attached billing notice with your check**; and
- Prepare and submit a corrective action plan to address the deficiencies identified in this report. The corrective action plan template is attached. Please return the corrective action plan to:

[AuditServices.CAPS.DHS@tn.gov](mailto: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 15<sup>th</sup> Floor  
505 Deaderick Street  
Nashville, Tennessee 37243  
[Allette.Vayda@tn.gov](mailto:Allette.Vayda@tn.gov)  
(615) 313-3769

Please mail your check and the billing notice to:

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

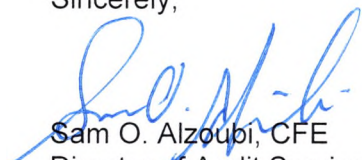
In accordance with the federal regulation found at *7 CFR Part 225.13*, your institution may appeal the amount of disallowed cost identified in this monitoring report. The procedures for submitting an appeal are enclosed. The appeal must be submitted to:

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

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

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

Sincerely,

  
Sam O. Alzoubi, CFE  
Director of Audit Services

## Exhibits

cc: Laura Horne, Senior Program Director, YMCA of Metropolitan Chattanooga  
Meredith Snyder, Program Director, YMCA of Metropolitan Chattanooga  
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**

**SFSP Sponsor Program Data**

**Sponsor: YMCA of Metropolitan Chattanooga**

**Review Month/Year: June 2019**

**Claim Reimbursement Total: \$305,621.86**

<b>Site Meal Service Reconciliation and Monitor Activity</b>	<b>Reported on Claim</b>	<b>Reconciled to Documentation</b>
Number of Participating Sites for Breakfast	65	65
Number of Participating Sites for Lunch	109	109
Number of Participating Sites for PM Snacks	7	7
Number of 1 <sup>st</sup> Breakfasts Served	32,179	31424
Number of 2 <sup>nd</sup> Breakfasts Served	644	644
Number of 1 <sup>st</sup> Lunches Served	53,991	51491
Number of 2 <sup>nd</sup> Lunches Served	1,080	1080
Number of 1 <sup>st</sup> Snacks Served	8,428	7,553
Number of 2 <sup>nd</sup> Snacks Served	115	115

**SFSP Sample Sites Data – (Exhibits B – T)**

**Exhibit B**

**Sample Site: Alpine Crest 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	16	16
Number of 1 <sup>st</sup> Breakfasts Served	363	363
Number of 2 <sup>nd</sup> Breakfasts Served	2	2
Number of 1 <sup>st</sup> Lunches Served	376	376
Number of 2 <sup>nd</sup> Lunches Served	3	3

## Exhibit C

### Sample Site: Barger Elementary

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	20	20
Number of 1 <sup>st</sup> Breakfasts Served	598	603
Number of 2 <sup>nd</sup> Breakfasts Served	11	11
Number of 1 <sup>st</sup> Lunches Served	663	663
Number of 2 <sup>nd</sup> Lunches Served	5	5

## Exhibit D

### Sample Site: Battery Heights

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	19	19
Number of Lunches Served	222	196

## Exhibit E

### Sample Site: CGLA

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	16	16
Number of 1 <sup>st</sup> Breakfasts Served	1,348	1,328
Number of 2 <sup>nd</sup> Breakfasts Served	27	27
Number of 1 <sup>st</sup> Lunches Served	1,519	1,519
Number of 2 <sup>nd</sup> Lunches Served	30	30

**Exhibit F****Site: Cleveland Middle School**

<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	15	15
Number of 1 <sup>st</sup> Breakfasts Served	412	412
Number of 2 <sup>nd</sup> Breakfasts Served	8	8
Number of 1 <sup>st</sup> Lunches Served	429	424
Number of 2 <sup>nd</sup> Lunches Served	9	9

**Exhibit G****Sample Site: Dalewood**

<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	15	15
Number of 1 <sup>st</sup> Breakfasts Served	242	223
Number of 2 <sup>nd</sup> Breakfasts Served	5	5
Number of 1 <sup>st</sup> Lunches Served	272	238
Number of 2 <sup>nd</sup> Lunches Served	5	5

**Exhibit H****Sample Site: Dayton City School**

<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	16	16
Number of 1 <sup>st</sup> Breakfasts Served	355	355
Number of 2 <sup>nd</sup> Breakfasts Served	7	7
Number of 1 <sup>st</sup> Lunches Served	397	397
Number of 2 <sup>nd</sup> Lunches Served	8	8

## Exhibit I

### Sample Site: Green Pond

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	20	20
Number of Lunches Served	200	192

## Exhibit J

### Sample Site: Greenwood

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	22	22
Number of 1 <sup>st</sup> Breakfasts Served	194	186
Number of 2 <sup>nd</sup> Breakfasts Served	0	0
Number of 1 <sup>st</sup> Lunches Served	259	248
Number of 2 <sup>nd</sup> Lunches Served	5	5

## Exhibit K

### Sample Site: Hardy Elementary School

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Number of Days Food Served	19	19
Number of 1 <sup>st</sup> Breakfasts Served	541	520
Number of 2 <sup>nd</sup> Breakfasts Served	11	11
Number of 1 <sup>st</sup> Lunches Served	239	190
Number of 2 <sup>nd</sup> Lunches Served	5	5

**Exhibit L**

**Sample Site: Inner City Ministries**

<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	20	20
Number of 1 <sup>st</sup> Breakfasts Served	495	500
Number of 2 <sup>nd</sup> Breakfasts Served	10	10
Number of 1 <sup>st</sup> Lunches Served	938	938
Number of 2 <sup>nd</sup> Lunches Served	10	10

**Exhibit M**

**Sample Site: James A. Henry YMCA**

<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	20	20
Number of 1 <sup>st</sup> Breakfasts Served	288	289
Number of 2 <sup>nd</sup> Breakfasts Served	0	0
Number of 1 <sup>st</sup> Lunches Served	291	292
Number of 2 <sup>nd</sup> Lunches Served	4	4

**Exhibit N**

**Sample Site: Jefferson Heights Park**

<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	24	24
Number of Lunches Served	481	415

**Exhibit O**

**Sample Site: Northside Neighborhood House**

<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	15	15
Number of 1 <sup>st</sup> Lunches Served	740	740
Number of 2 <sup>nd</sup> Lunches Served	15	15
Number of 1 <sup>st</sup> Snacks Served	787	787
Number of 2 <sup>nd</sup> Snacks Served	16	16

**Exhibit P**

**Sample Site: Renaissance Presbyterian Church**

<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	20	20
Number of 1 <sup>st</sup> Breakfasts Served	403	403
Number of 2 <sup>nd</sup> Breakfasts Served	8	8
Number of 1 <sup>st</sup> Lunches Served	494	494
Number of 2 <sup>nd</sup> Lunches Served	10	10

**Exhibit Q**

**Sample Site: Roy Nelms Park**

<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	24	24
Number of Lunches Served	64	64



**Exhibit R**

**Sample Site: Soddy Daisy Community Library**

<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	20	20
Number of Lunches Served	174	174

**Exhibit S**

**Sample Site: St. Elmo Park**

<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	24	24
Number of Lunches Served	184	198

**Exhibit T**

**Site: Villages at Alton Park**

<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	24	24
Number of Lunches Served	178	181

**SFSP Non-Sample Sites with Errors Data – (Exhibits U – YY)**

**Exhibit U**

**Site: Bayberry Apartments**

<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	24	24
Number of Lunches Served	754	677

**Exhibit V**

**Site: Boyd Buchanan School**

<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	19	19
Number of 1 <sup>st</sup> Lunches Served	554	444
Number of 2 <sup>nd</sup> Lunches Served	11	11
Number of 1 <sup>st</sup> Snacks Served	670	672
Number of 2 <sup>nd</sup> Snacks Served	0	0

**Exhibit W**

**Site: Boys & Girls Club East Lake**

<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	8	8
Number of Lunches Served	1,320	1,000
Number of Snacks Served	1,320	1,000

**Exhibit X**

**Site: Boys & Girls Club Highland Park**

<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	8	8
Number of Lunches Served	2,065	1,770
Number of Snacks Served	2,065	1,720

**Exhibit Y**

**Site: Camp Ocoee**

<b>Site Meal Service Reconciliation and Monitor Activity</b>	<b>Reported on Claim</b>	<b>Reconciled to Documentation (see finding 2 above)</b>
Total Number of Days Food Served	12	12
Number of Breakfasts Served	2,309	2309
Number of Lunches Served	1,967	1967

**Exhibit Z**

**Site: Camp Zoe I**

<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	12	12
Number of Breakfasts Served	262	202
Number of Lunches Served	198	173

**Exhibit AA**

**Site: Camp Zoe II**

<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	11	11
Number of Breakfasts Served	667	613
Number of Lunches Served	618	499

**Exhibit BB**

**Site: Caruthers Park**

<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	24	24
Number of Lunches Served	239	220

**Exhibit CC****Site: Cleveland Family YMCA**

<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	20	20
Number of Breakfasts Served	1,220	1,010
Number of Lunches Served	2,393	2,020

**Exhibit DD****Site: Downtown YMCA**

<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	20	20
Number of Breakfasts Served	1,138	972
Number of Lunches Served	1,576	1,377

**Exhibit EE****Site: East Lake Academy**

<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	8	8
Number of 1 <sup>st</sup> Breakfasts Served	61	29
Number of 2 <sup>nd</sup> Breakfasts Served	1	1
Number of 1 <sup>st</sup> Lunches Served	62	28
Number of 2 <sup>nd</sup> Lunches Served	1	1

**Exhibit FF**

**Site: East Lake Court**

<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	20	20
Number of Breakfasts Served	184	151
Number of Lunches Served	269	230

**Exhibit GG**

**Site: East Ridge High School**

<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	12	12
Number of 1 <sup>st</sup> Breakfasts Served	320	291
Number of 2 <sup>nd</sup> Breakfasts Served	6	6
Number of 1 <sup>st</sup> Lunches Served	849	755
Number of 2 <sup>nd</sup> Lunches Served	17	17

**Exhibit HH**

**Site: Emma Wheeler Homes**

<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	24	24
Number of Breakfasts Served	624	552
Number of Lunches Served	815	691

**Exhibit II**

**Site: Ft. Negley Park**

<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	24	24
Number of Lunches Served	101	89

**Exhibit JJ****Site: Girls Inc. 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	15	15
Number of 1 <sup>st</sup> Lunches Served	1,134	1,199
Number of 2 <sup>nd</sup> Lunches Served	23	23
Number of 1 <sup>st</sup> Supplements Served	1,097	1,097
Number of 2 <sup>nd</sup> Supplements Served	22	22

**Exhibit KK****Site: Granite Heights Apartments**

<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	24	24
Number of Lunches Served	217	186

**Exhibit LL****Site: Hamilton YMCA**

<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	19	19
Number of 1 <sup>st</sup> Lunches Served	1,409	1,292
Number of 2 <sup>nd</sup> Lunches Served	28	28
Number of 1 <sup>st</sup> Supplements Served	2,060	1,848
Number of 2 <sup>nd</sup> Supplements Served	29	29

**Exhibit MM****Site: Highland Park Commons**

<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	24	24
Number of 1 <sup>st</sup> Lunches Served	297	289
Number of 2 <sup>nd</sup> Lunches Served	6	6

**Exhibit NN****Site: Maple Hills Apartments**

<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	24	24
Number of Lunches Served	321	286

**Exhibit OO****Site: Museum Center at 5 Points**

<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	15	15
Number of Lunches Served	309	253

**Exhibit PP****Site: North River YMCA**

<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	20	20
Number of 1 <sup>st</sup> Breakfasts Served	412	372
Number of 2 <sup>nd</sup> Breakfasts Served	8	8
Number of 1 <sup>st</sup> Lunches Served	783	690
Number of 2 <sup>nd</sup> Lunches Served	16	16

**Exhibit QQ****Site: Oak at Camden**

<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	24	24
Number of 1 <sup>st</sup> Lunches Served	77	58
Number of 2 <sup>nd</sup> Lunches Served	2	2

**Exhibit RR****Site: Open Air Academy**

<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	17	17
Number of 1 <sup>st</sup> Breakfasts Served	335	335
Number of 2 <sup>nd</sup> Breakfasts Served	7	7
Number of 1 <sup>st</sup> Lunches Served	376	365
Number of 2 <sup>nd</sup> Lunches Served	8	8

**Exhibit SS****Site: Park City Park**

<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	24	24
Number of 1 <sup>st</sup> Lunches Served	319	253
Number of 2 <sup>nd</sup> Lunches Served	6	6



**Exhibit TT**

**Site: Rhea County High School**

<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	20	20
Number of 1 <sup>st</sup> Breakfasts Served	987	987
Number of 2 <sup>nd</sup> Breakfasts Served	6	6
Number of 1 <sup>st</sup> Lunches Served	3,018	3,012
Number of 2 <sup>nd</sup> Lunches Served	60	60

**Exhibit UU**

**Site: Splash Pad**

<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	10	10
Number of 1 <sup>st</sup> Lunches Served	248	173
Number of 2 <sup>nd</sup> Lunches Served	5	5

**Exhibit VV**

**Site: Spring City 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	20	20
Number of 1 <sup>st</sup> Breakfasts Served	320	318
Number of 2 <sup>nd</sup> Breakfasts Served	6	6
Number of 1 <sup>st</sup> Lunches Served	307	307
Number of 2 <sup>nd</sup> Lunches Served	6	6

**Exhibit WW**

**Site: Veterans Park**

<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	15	15
Number of Lunches Served	71	46

**Exhibit XX**

**Site: Watkins Street Park**

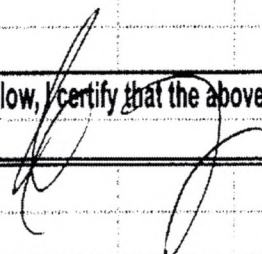
<b>Site Meal Service Reconciliation and Monitor Activity</b>	<b>Reported on Claim</b>	<b>Reconciled to Documentation</b>
Total Number of Days Food Served	24	24
Number of Lunches Served	165	162

**Exhibit YY**

**Site: Wolftever Creek Elementary School**

<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	16	16
Number of 1 <sup>st</sup> Breakfasts Served	568	568
Number of 2 <sup>nd</sup> Breakfasts Served	11	11
Number of 1 <sup>st</sup> Lunches Served	538	539
Number of 2 <sup>nd</sup> Lunches Served	11	11

Exhibit 1

DAILY MEAL SERVICE COUNT FORM							
Site Name: <u>Cleveland Family YMCA</u>				Meal Type: <u>Breakfast / Lunch</u>			
Address: <u>210 Urbana Rd. (Conf.) W RR2</u>				Telephone: _____			
Site Supervisor's Name: _____				Dates: <u>6/2/19 - 6/7/19</u>			
	3	4	5	6	7		
	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday	Total Meals Served
Meals Delivered	60/100	90/90	90/90	90/90	90/90		720/420
# first meals served	60/100	90/90	90/90	90/90	90/90		720/420
# second meals served							
# meals to adults							
Incomplete/Spoiled							
# of meals to be served as first for the next day							
Comments:	<u>KA/TE</u>	<u>KA/TE</u>	<u>KA/TE</u>	<u>KA/TE</u>	<u>KA/TE</u>		
By signing below, I certify that the above information is true and accurate:							
Signature: 				Date: <u>6/2/19</u>			



**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](http://www.tn.gov/humanservices)

**BILL LEE**  
GOVERNOR

**DANIELLE W. BARNES**  
COMMISSIONER

September 25, 2019

Greg Cullum, Board Chair  
YMCA of Metropolitan Chattanooga  
301 West 6<sup>th</sup> Street  
Chattanooga, Tennessee 37402

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

Institution Name:	YMCA of Metropolitan Chattanooga
Institution Address:	301 West 6 <sup>th</sup> Street, Chattanooga, TN 37402-1108
Agreement Numbers:	00-082
Amount Due:	\$12,649.30
Due Date:	October 25, 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, 16<sup>th</sup> 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](mailto:Allette.Vayda@tn.gov).

Thank you for your attention



# 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: YMCA of Metropolitan Chattanooga	Agreement No. 00082	<input checked="" type="checkbox"/> SFSP <input type="checkbox"/> CACFP
---	---------------------	--

Mailing Address: 301 West 6th Street Chattanooga, Tennessee 37402-1108

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

Name and Title: Gregory Cullum, Board Chair	Date of Birth: / /
---	--------------------

## Section C. Dates of Issuance of Monitoring Report/Corrective Action Plan

Monitoring Report: 9/25/2019	Corrective Action Plan: 9/25/2019
------------------------------	-----------------------------------

## Section D. Findings

Findings:

1. The Sponsor did not provide meal count forms to support the Claim for Reimbursement
2. The Sponsor improperly claimed meals for reimbursement and the reported number of meals claimed served were incorrect
3. The Sponsor claimed a number of meals other than we observed
4. The Sponsor served meals outside the approved meal service time
5. The Sponsor did not have a menu posted for observed meals
6. The Sponsor provided meals that did not match the posted menus during monitoring site visits
7. The Sponsor did not maintain racial and ethnic data as required
8. The Sponsor did not conduct monitoring of its feeding sites as required

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 did not provide meal count forms to support the Claim for Reimbursement**

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 improperly claimed meals for reimbursement and the reported number of meals claimed served were incorrect**

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 claimed a number of meals other than we observed**

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 served meals outside the approved meal service time**

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 did not have a menu posted for observed meals**

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 provided meals that did not match the posted menus during monitoring site visits**

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 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 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. 8: The Sponsor did not conduct monitoring of its feeding sites 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:

---

---

---

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

---

---

---

---

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