



**STATE OF TENNESSEE  
DEPARTMENT OF HUMAN SERVICES**

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**BILL LEE**  
GOVERNOR

**DANIELLE W. BARNES**  
COMMISSIONER

October 20, 2020

Corey Paulson, Board Chair  
Boys and Girls Club Elizabethton-Carter County  
104 Hudson Drive  
Elizabethton, Tennessee 37643-2802

Dear Mr. Paulson,

The Department of Human Services (DHS) - Division of Audit Services staff conducted a limited desk review of the Summer Food Service Program (SFSP) at Boys and Girls Club Elizabethton-Carter County (Sponsor), Application Agreement 00-009, during the period of August 4, 2020 through September 17, 2020. Our scope of the review was for reimbursement made to the Sponsor for June 2020.

Due to the outbreak and the risk that COVID19 poses to the Sponsor and our staff, the review was limited to verification, based on review of the documents obtained from Sponsor, via e-mail or other electronic transmission of documents. We also obtained confirmation from the feeding sites and Sponsor staff via telephone or e-mail relative to the operation and administration of the SFSP.

The purpose of this review was to determine if the Sponsor complied with USDA regulations set through the COVID-19 period, taking into consideration the waivers granted to the Sponsor's operation. Also, to determine if the Sponsor complied with the applicable *Title 7 of the Code of Federal Regulations (CFR)* applicable parts, provider agreements, and applicable Federal and State regulations.

Background

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

We inspected meal counts sheets for our test period and reconciled the meals claimed to the meals reported as served for each meal service. We also assessed compliance with civil rights

requirements. Due to the ongoing COVID 19 pandemic, we made no site visits to observe meals directly.

**Important COVID-19 note:** Due to the current outbreak and the risk that COVID-19 poses to your organization personnel and our staff, all our staff are working from home with no or very limited access to the office. Therefore, we will not send a copy of this report via regular mail until further notice. Please confirm the receipt of this email as it is currently the option to communicate to you. If you need any assistance or have any questions, please do not hesitate to contact us via email.

Our review of the Sponsor's records for June 2020 disclosed the following:

## **1. The Sponsor reported the number of meals served incorrectly**

### Condition

Based on our review of the Claim for Reimbursement for June 2020, the Sponsor reported 452 breakfast meals and 677 lunch meals served. However, based on our review of the available documents, we noted that there were 449 breakfast meals and 677 lunch meals served, prior to any meal disallowances.

As a result, three (3) breakfast meals claimed for reimbursement were overreported and disallowed. (See Exhibit)

**This is a repeat finding from a previous report dated September 29, 2017.**

### 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 correctly and based on accurate supporting documents.

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

### Condition

The Sponsor did not provide the racial and ethnic data form for the feeding site at Boys and Girls Club Elizabethton-Carter County.

## 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 9 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 collected and maintained as required.

## **Technical Assistance Provided**

The Sponsor requested technical assistance regarding budgeting and expansion preparation. This request was forwarded to a DHS Program specialist for further assistance.

## **Disallowed Meals Cost**

Based on the review, the disallowed meals cost associated with the findings above is below the DHS threshold for repayment.

## **Corrective Action**

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

- 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  
8th Floor Citizens Plaza Building  
400 Deaderick Street  
Nashville, Tennessee 37243  
[Allette.Vayda@tn.gov](mailto:Allette.Vayda@tn.gov)

(615) 313-3769

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*

Sam O. Alzoubi, CFE  
Director of Audit Services

Exhibit

cc: Ginny Wright, Chief Executive Officer, Boys and Girls Club Elizabethton-Carter  
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**

**Sponsor: Boys and Girls Club Elizabethton-Carter County**

**Review Month/Year: June 2020**

**Claim Reimbursement Total: \$3,884.74**

<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	1	1
Number of Participating Sites for Lunch	1	1
Number of Breakfasts Served	452	449
Number of Lunches Served	677	677