



**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

**TONY MATHEWS**  
COMMISSIONER

January 12, 2021

Marneicia Watson, Board Chair  
Global Children Services, Inc.  
5235 Martin Edwards Place  
Memphis, Tennessee 38116-9113

Dear Ms. Watson:

The Department of Human Services (DHS) - Division of Audit Services staff conducted a limited desk review of the Summer Food Service Program (SFSP) for Global Children Services, Inc., Application Agreement number 00593, during the period of October 21, 2020, through November 23, 2020. Our scope of the review was for reimbursement made to the Sponsor for July 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 a review of the documents obtained from the Sponsor via e-mail, mail, or other electronic transmissions of documents. We also obtained confirmation from the 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.

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.

Background

We inspected meal count sheets for our test period and reconciled the meals claimed for reimbursement to the meals reported as served for each meal service. We also reviewed documentation of the Sponsor's financial transactions including, but not limited to, purchases of food.

Based on our review of the Sponsor’s records and information provided, the Sponsor was approved for nine (9) feeding sites all of which were listed as operating during the review period. Three feeding sites were selected as the sample for desk reviews. We reviewed documentation for all sites in operation.

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

We inspected meal 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 conducted site desk reviews in July 2020 for **0010 Cane Creek Apartments, 0009 Thompson Courts Apartments, and 0003 Global Children Services Walnut Grove.**

Our review of the Sponsor’s records for July 2020 disclosed the following:

**1. The Sponsor overstated the number of meals eligible for reimbursement based on the point of service meal count sheets**

Condition

The Sponsor claimed meals as served for which the meal count sheets indicated fewer meals were served. Meals must be marked at the actual point of service to ensure an accurate count is taken. Meals were also disallowed due to no point of service being completed at all. Below is a summary of the overstated meals:

<b>Name of Site</b>	<b>Number of Meals Disallowed</b>	<b>Dates meals were disallowed</b>
<b>0011 Chickasaw Gardens Apartments</b>	1 Supplement	7/28/20
<b>0003 Global Children Services Walnut Grove</b>	1 Lunch meal	7/24/20
<b>0009 Thompson Courts Apartments</b>	6 Supplements	7/28/20
<b>0006 Whitehaven View Apartments</b>	25 Supplements	7/14/20

As a result, one lunch meal and 32 Supplements claimed for reimbursement were disallowed.

Criteria

The USDA Administration Guide Summer Food Service Program, page 112 states, “Only complete meals served to eligible children can be claimed for reimbursement. Therefore, meals must be counted at the actual point of service, i.e., meals are counted as they are served, to ensure that an accurate count of meals served is obtained and reported...”

### Recommendation

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

### **2. The meal count documentation provided during the desk review did not coincide with the meal count documentation provided during the sponsor review**

#### Condition

During the site desk review for **0010 Cane Creek Apartments** completed on July 9, 2020, the meal counts for the previous five days of operation were requested for the completion of the 5-day reconciliation. The number of meals submitted by the Sponsor on the day of the desk review did not reconcile with the number of meals reported during the sponsor review. The following differences were noted:

<b>Meal Count provided during desk review</b>	<b>Meal Count provided during Sponsor review</b>	<b>Disallowed Meals</b>	<b>Date</b>
75 Lunch Meals 75 Supplements	77 Lunch Meals 77 Supplements	2 Lunch Meals 2 Supplements	July 02, 2020
75 Lunch Meals 75 Supplements	95 Lunch Meals 95 Supplements	20 Lunch Meals 20 Supplements	July 06, 2020

As a result, 22 lunch meals and 22 supplements claimed for reimbursement were disallowed.

#### 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..."

### Recommendation

The Sponsor should ensure that the claims for reimbursement are completed accurately and based on proper supporting documentation.

### **3. The Sponsor did not comply with monitoring requirements**

#### Condition

Our review of the Sponsor's monitoring documentation revealed the following deficiencies:

The Sponsor did not complete monitoring visits during the first week of operation at several sponsored sites. Though the Sponsor provided first week monitoring visit forms completed for all sites, several were dated prior to the start of the meal service operation. These sites included: **0010 Cane Creek Apartments** dated May 7, 2020, **0011 Chickasaw Gardens Apartments** dated May 8, 2020, **0004 Global Children Services Whitehaven** dated May 7, 2020, **0006 Whitehaven View Apartments** dated May 7, 2020, and **0012 Winbranch Apartments** dated May 8, 2020. All sites were approved in TIPS to begin serving meals on May 26, 2020.

#### Criteria

Title 7 of the Code of Federal Regulations, Section 7 *CFR* 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."

#### Recommendation

The Sponsor should ensure monitoring visits are conducted in accordance with guidelines set by the USDA.

### **4. The Sponsor did not comply with the Racial/Ethnic data collection requirement**

#### Condition

The Sponsor provided racial and ethnic data collection documentation that was completed prior to the start of the meal service operation at each site. Each form was dated as being completed on May 8, 2020. However, the meal services began on May 26, 2020, for all sites based on the approved TIPS applications. Additionally, the number of participants was recorded as a range of numbers instead of an exact number. The Sponsor must count the participating children at least once during each site's operation.

#### 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 Administration Guide Summer Food Service Program, page 122, states, "The sponsor also must collect ethnic/racial category data each year by ethnic/racial category for each site under the sponsor's jurisdiction. Sponsors of residential camps must collect and maintain this information separately for each session of the camp. For all other sites, the sponsor must count the participating children at least once during the site's operation. The sponsor may use visual identification to determine a participant's racial/ethnic category. For collection purposes, a participant may be included in the group to which he or she appears to belong, identifies with, or is regarded as a member of by the community."

#### Recommendation

The Sponsor should ensure all sites in operation have the racial and ethnic data information completed as required and that the information is correct.

### **5. The Sponsor's training documentation was not adequate**

#### Condition

The Sponsor submitted training documentation for administrative and site personnel dated prior to program operations. However, the Sponsor's documentation did not list all the required training topics.

Per the training agenda submitted by the Sponsor, the following required topics were not covered: The purpose of the program, site eligibility, and the duties of the monitor.

#### Criteria

*Title 7 of the Code of Federal Regulations, Section 225.15 (d) (1) states, "Each sponsor shall hold Program training sessions for its administrative and site personnel and shall allow no site to operate until personnel have attended at least one of these training sessions...Training of site personnel shall, at a minimum, include: the purpose of the Program; site eligibility; recordkeeping; site operations; meal pattern requirements; and the duties of a monitor. Each sponsor shall ensure that its administrative personnel attend State agency training provided to sponsors, and sponsors shall provide training throughout the summer to ensure that administrative personnel are thoroughly knowledgeable in all required areas of Program administration and operation and are provided with sufficient information to enable them to carry out their Program responsibilities. Each site shall have present at each meal service at least one person who has received this training."*

#### Recommendation

The Sponsor should ensure training contains all of the required topics and documentation of the training is maintained.

### **6. The Sponsor did not maintain signed delivery receipts**

#### Condition

The Sponsor did not maintain signed delivery receipts for any of the sites in operation receiving meals from the central kitchen. The kitchen did provide production records that documented the number of meals prepared daily for each site. We were able to reconcile from these production records that meals produced supported meal count documentation. However, there was no documentation signed by the site personnel stating how many meals were delivered.

#### Criteria

The USDA Administration Guide Summer Food Service Program, page 139, states, "...Site personnel must be sure that they record all required counts. These counts should include the number of: Meals delivered or prepared, by type (breakfast, snack, lunch, supper). A designated member of the site staff must verify the adequacy and number of meals delivered by checking the meals when they are delivered to the site. Vended programs must support this information with a signed delivery receipt. Programs with a central kitchen should also support this information with a signed delivery receipt for good program management..."

#### Recommendation

The Sponsor should ensure signed delivery receipts are completed and maintained for each of the sites receiving meals from a central kitchen.

### **7. The timesheets provided do not reconcile with the paystubs**

#### Condition

During our review, documentation supporting the payroll expenses was requested from the Sponsor. This documentation included pay stubs and payroll timesheets. When comparing the number of hours worked on the timesheets to the number of hours listed on the paystubs, each hourly employee had conflicting numbers on the two forms of documentation. As a result, we were unable to determine the cost of payroll for the test month.

### Criteria

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

The USDA Administration Guide Summer Food Service Program, page 142 states, "Labor costs include compensation by sponsors for labor that is required to prepare and serve meals, to supervise children during the meal service, and to clean up after the meal service. These costs may include wages, salaries, employee benefits, and the share of taxes paid by the sponsor. Sponsors must keep accurate time and attendance records for all labor costs that are attributed to the SFSP."

### Recommendation

The Sponsor should review payroll documentation and ensure the information is complete and accurate.

### **Technical Assistance**

Technical assistance was provided to the Sponsor regarding delivery ticket recordkeeping requirements.

### **Disallowed Meals Cost**

Based on the review, we determined the Sponsor's noncompliance with the applicable Federal and State regulations that govern the SFSP resulted in a total disallowed cost of \$148.29 for the review month.

### **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 July 2020 which contains the verified claim data from the enclosed exhibits. ***Please note that, if the claim is revised, TIPS will automatically deduct the overpayment from your next SFSP claim for reimbursement. OR***
- 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  
Child and Adult Care Food 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:

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

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

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

If the Institution decides to appeal the amount of disallowed administrative and meal 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

Exhibit

cc: Daphne Booker, Executive Director, Global Children Services, Inc.  
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**

**Summary of Total Claimed and Reconciled Meals**

**Sponsor: Global Children Services, Inc.**

**Review Month/Year: July 2020**

**Claim Reimbursement Total: \$50,407.39**

<b>Site Meal Service Activity</b>	<b>Reported on Claim</b>	<b>Reconciled Meals to Meal Counts Sheets</b>
Total Number of Days Food Served	22	22
Number of Participating Sites for Lunch Meals	9	9
Number of Participating Sites for Supplements	9	9
Number of Lunch Meals Served	9,826	9,803
Number of Supplements Served	9,826	9,772

**Exhibit B**

**Sponsor: Global Children Services, Inc.**

**Site: 0010 Cane Creek Apartments**

**Review Month/Year: July 2020**

<b>Site Meal Service Activity and Monitor Reconciliation</b>	<b>Reported on Claim</b>	<b>Reconciled Meals to Meal Counts Sheets</b>
Total Number of Days Food Served	22	22
Number of Lunch Meals Served	2,101	2,079
Number of Supplements Served	2,101	2,079



**Exhibit C**

**Sponsor: Global Children Services, Inc.**  
**Site: 0011 Chickasaw Gardens Apartments**  
**Review Month/Year: July 2020**

<b>Site Meal Service Activity and Monitor Reconciliation</b>	<b>Reported on Claim</b>	<b>Reconciled Meals to Meal Counts Sheets</b>
Total Number of Days Food Served	22	22
Number of Lunch Meals Served	1,189	1,189
Number of Supplements Served	1,189	1,188

**Exhibit D**

**Sponsor: Global Children Services, Inc.**  
**Site: 0005 GCS Sponsor DDLA**  
**Review Month/Year: July 2020**

<b>Site Meal Service Activity and Monitor Reconciliation</b>	<b>Reported on Claim</b>	<b>Reconciled Meals to Meal Counts Sheets</b>
Total Number of Days Food Served	22	22
Number of Lunch Meals Served	538	538
Number of Supplements Served	538	538

**Exhibit E**

**Sponsor: Global Children Services, Inc.**  
**Site: 0003 Global Children Services Walnut Grove**  
**Review Month/Year: July 2020**

<b>Site Meal Service Activity and Monitor Reconciliation</b>	<b>Reported on Claim</b>	<b>Reconciled Meals to Meal Counts Sheets</b>
Total Number of Days Food Served	22	22
Number of Lunch Meals Served	868	867
Number of Supplements Served	868	868

**Exhibit F**

**Sponsor: Global Children Services, Inc.**  
**Site: 0004 Global Children Services Whitehaven**  
**Review Month/Year: July 2020**

<b>Site Meal Service Activity and Monitor Reconciliation</b>	<b>Reported on Claim</b>	<b>Reconciled Meals to Meal Counts Sheets</b>
Total Number of Days Food Served	22	22
Number of Lunch Meals Served	2,080	2,080
Number of Supplements Served	2,080	2,080

**Exhibit G**

**Sponsor: Global Children Services, Inc.**  
**Site: 0008 Hillview Apartments**  
**Review Month/Year: July 2020**

<b>Site Meal Service Activity and Monitor Reconciliation</b>	<b>Reported on Claim</b>	<b>Reconciled Meals to Meal Counts Sheets</b>
Total Number of Days Food Served	22	22
Number of Lunch Meals Served	645	645
Number of Supplements Served	645	645

**Exhibit H**

**Sponsor: Global Children Services, Inc.**  
**Site: 0009 Thompson Courts Apartments**  
**Review Month/Year: July 2020**

<b>Site Meal Service Activity and Monitor Reconciliation</b>	<b>Reported on Claim</b>	<b>Reconciled Meals to Meal Counts Sheets</b>
Total Number of Days Food Served	22	22
Number of Lunch Meals Served	892	892
Number of Supplements Served	892	886

**Exhibit I**

**Sponsor: Global Children Services, Inc.**  
**Site: 0006 Whitehaven View Apartments**  
**Review Month/Year: July 2020**

<b>Site Meal Service Activity and Monitor Reconciliation</b>	<b>Reported on Claim</b>	<b>Reconciled Meals to Meal Counts Sheets</b>
Total Number of Days Food Served	22	22
Number of Lunch Meals Served	527	527
Number of Supplements Served	527	502

**Exhibit J**

**Sponsor: Global Children Services, Inc.**  
**Site: 0012 Winbranch Apartments**  
**Review Month/Year: July 2020**

<b>Site Meal Service Activity and Monitor Reconciliation</b>	<b>Reported on Claim</b>	<b>Reconciled Meals to Meal Counts Sheets</b>
Total Number of Days Food Served	22	22
Number of Lunch Meals Served	986	986
Number of Supplements Served	986	986

**Overpayment Summary**

<b>July Disallowed Meals</b>	<b>X Meal Rate</b>	<b>Total Disallowed</b>
23 Lunch Meals	\$4.1525	\$95.5075
54 Supplement Meals	\$0.9775	\$52.7850
<b>Total Overpayment</b>		<b>\$148.29</b>



**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

**TONY MATHEWS**  
COMMISSIONER

**Billing Notice**

January 12, 2021

Marneicia Watson, Board Chair  
Global Children Services, Inc.  
5235 Martin Edwards Place  
Memphis, Tennessee 38116-9113

This billing notice is based on the disallowed meal cost noted in the monitoring report of the Summer Food Service program (SFSP) due to noncompliance with the applicable Federal and State regulations that govern the SFSP.

Amount Due: \$148.29  
Due Date: February 16, 2021  
Date of the Monitoring Report: January 12, 2021  
Agreement/Contract Number: 00593

**Note1:** Please remit a check payable to the Tennessee Department of Human Services in the disallowed meals cost amount noted in the monitoring report by the due date to the address below:

Tennessee Department of Human Services  
Fiscal Services 16<sup>th</sup> Floor  
James K. Polk Building  
505 Deaderick Street  
Nashville, Tennessee 37243

**Note 2:** Log into the Tennessee Information Payment System (TIPS) and revise the claim for reimbursement that was submitted for July 2020. Use the reconciled claim data of the exhibits enclosed in the monitoring report.

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