



**STATE OF TENNESSEE
DEPARTMENT OF HUMAN SERVICES**

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BILL LEE
GOVERNOR

TONY MATHEWS
COMMISSIONER

December 10, 2020

Gregory Allen, Board Chair
Youth Encouragement Services, Incorporated
521 McIver Street
Nashville, Tennessee 37211-2322

Dear Mr. Allen,

The Department of Human Services (DHS) - Audit Services Division staff conducted an unannounced on-site monitoring review of the Summer Food Services Program (SFSP) at Youth Encouragement Services, Inc. (Sponsor), Application Agreement 00-699 beginning on August 12, 2020. We communicated preliminary findings on September 30, 2020 and information was not available to complete our review. Program staff provided the requested information on October 21, 2020. We requested and were provided additional information from the Sponsor on November 17, 2020. Our scope of the review was for reimbursement made to the Sponsor for June and 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 review of the documents obtained from Sponsor, via e-mail, 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.

Based on our review of the Sponsor's records and information provided, the Sponsor had two routes (2) mobile feeding site routes operating during the review period and provided feeding to participants at residences along the routes at eight (8) active mobile feeding sites. The two routes were YES Lindsley which included the Lindsley Mobile 1: 1st Ave. South & Carrol St. (**Lindsley Mobile 1**), Lindsley Mobile 2: University Court (**Lindsley Mobile 2**), Lindsley Mobile 3: Charles

E. Davis Blvd (**Lindsley Mobile 3**) feeding sties, and YES Mclver which included **YES Mclver**, Mclver Mobile 1: 416 Benita Drive (**Mclver Mobile 1**), Mclver mobile 2: 270 Tampa Drive (**Mclver mobile 2**), Mclver Mobile 3: Morten Avenue (**Mclver Mobile 3**), and Mclver Mobile 4: Providence Park Lane (**Mclver Mobile 4**).

Important COVID-19 note: Due the current outbreak and the risk that COVID19 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

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

We inspected meal counts sheets for June and July 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 attempted to observe meal services during unannounced on-site visits during the review period.

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

1. The Sponsor reported the number of meals claimed for reimbursement incorrectly

Condition

During our entrance conference with the Sponsor on August 12, 2020, we requested and reviewed meal count sheets to support the Claim for Reimbursement for sites operating during the review period. Based on the meal counts provided, we noted that the number of meals claimed for reimbursement were reported incorrectly.

The discrepancies were noted as follows:

June 2020

Site	Meal Type	Meals Claimed	Meals Documented	Difference	Exhibit
YES Mclver	Supplement	238	252	-14	B
	Supper	238	252	-14	
Lindsley Mobile 3	Supplement	400	378	+22	E
	Supper	400	278	+22	

As a result, eight (8) supper meals and eight (8) supplements claimed for reimbursement were overreported. (See Exhibits)

Additionally, there were one (1) supper meal and one (1) supplement underreported at **Lindsley Mobile 3** for July 2020. This error was noted as immaterial and the meals were not included in determining the disallowed costs.

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."

The USDA SFSP Administration Guidance for Sponsors, 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 claims for reimbursement are completed correctly and based on accurate supporting documents.

2. The Sponsor provided daily meal count sheets with errors

Condition

During our entrance conference with the Sponsor on August 12, 2020, we requested and were provided the meal count sheets for June and July 2020. Based on our review of the supporting documents for the claims for reimbursement, we note that the Sponsor provided a meal count sheet for a supper served at **Lindsley Mobile 2** dated June 3, 2020 that documented 34 suppers served. However, there were only 22 suppers marked as served at point-of-service on the meal count sheet.

As a result, 12 suppers claimed for reimbursement were disallowed. (See Exhibit D)

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 the meal counts are signed by the site supervisor each day and that meals are recorded at the point-of-service and only those meals are reported and claimed.

Technical Assistance Provided

The Sponsor was provided technical assistance regarding administrative and monitoring requirements. The USDA SFSP Administrative Guidance for Sponsors, Sponsor Monitor’s Guide, and State Agency Monitoring Guide were provided.

Disallowed Meals Cost

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

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 15th Floor
505 Deaderick Street
Nashville, Tennessee 37243
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.

Sincerely,

Sam O. Alzoubi

Sam O. Alzoubi, CFE
Director of Audit Services

Exhibits

cc: Viva Price, Director, Youth Encouragement Services, Inc.
Samantha Johnson, Operations Manager, Youth Encouragement Services, Inc.
Allette Vayda, Director of Operations, Summer Food Service Program
Debra Pasta, Program Manager, Summer Food Service Program
Elke Moore, Administrative Services Assistant 3, Summer Food Service Program
Constance Moore, Program Specialist, Summer Food Service Program
Marty Widner, Program Specialist, Summer Food Service Program
Comptroller of the Treasury, State of Tennessee

Sponsor of SFSP Program Data June 2020**Exhibit A****Sponsor: Youth Encouragement Services, Inc.****Review Month/Year: June 2020****Claim Reimbursement Total: \$9,357.12**

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Number of Participating Sites for Supplements	7	7
Number of Participating Sites for Suppers	7	7
Number of Supplements Served	1,824	1,816
Number of Suppers Served	1,824	1,804

SFSP Sample Sites Data for June 2020 (Exhibits B - H)**Exhibit B****Site: YES McIver- Site 0004**

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Number of Supplements Served	238	252
Number of Suppers Served	238	252

Exhibit C**Site: Lindsley Mobile: 1st Ave. South & Carrol St. – Site 2020**

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Number of Supplements Served	310	310
Number of Suppers Served	310	310

Exhibit D**Site: Lindsley Mobile 2: University Court – Site 2021**

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Number of Supplements Served	587	587
Number of Suppers Served	587	575

Exhibit E**Site: Lindsley Mobile 3: Charles E. Davis Blvd – Site 2022**

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Number of Supplements Served	400	378
Number of Suppers Served	400	378

Exhibit F**Site: Mclver Mobile 1: 416 Benita Drive – Site 2023**

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Number of Supplements Served	85	85
Number of Suppers Served	85	85

Exhibit G**Site: Mclver Mobile 2: 270 Tampa Drive – Site 2024**

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Number of Supplements Served	119	119
Number of Suppers Served	119	119

Exhibit H

Site: Mclver Mobile 3: Morten Avenue – Site 2025

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Number of Supplements Served	85	85
Number of Suppers Served	85	85

Sponsor of SFSP Program Data July 2020

Exhibit I

Sponsor: Youth Encouragement Services, Inc.

Review Month/Year: July 2020

Claim Reimbursement Total: \$11,383.47

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Number of Participating Sites for Supplement	7	7
Number of Participating Sites for Suppers	7	7
Number of Supplements Served	2,219	2,219 ¹
Number of Suppers Served	2,219	2,219 ¹

¹The difference in the reported and verified is immaterial and was not included in calculating the disallowed costs

SFSP Sample Sites Data for July 2020

There were no material errors noted for sites operated in July 2020 and no exhibits are required.