



**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

June 15, 2020

Jacqueline Mann, Owner
In The Beginning Learning and Care
Post Office Box 103
Mountain City, TN 37683-1216

Dear Ms. Mann,

The Department of Human Services (DHS) - Division of Audit Services staff conducted a limited desk review of the Child and Adult Care Food Program (CACFP) at In The Beginning Learning and Care (Sponsor), Application Agreement number 00321, during the period of April 2, 2020 through April 29, 2020. Our scope of the review was for reimbursement made to the Sponsor for February 2020.

Due to the outbreak and the risk that COVID-19 poses to the Sponsor and our staff, the review was limited to verification, based on review of the documents obtained from the Sponsor, via e-mail, mail, or other electronic transmission of documents.

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

CACFP 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 CACFP Sponsor reports the number of meals served through the DHS Tennessee Information Payment System (TIPS) for reimbursement.

We inspected meal count sheets for February 2020 and reconciled the meals claimed to the meals reported as served for each meal service. We also assessed compliance with civil rights requirements.

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.

The Sponsor was initially contacted via telephonically on March 31, 2020 to confirm contact information and Sponsors ability to send documentation electronically. Claim review documents for the test month of February 2020 were requested via email on April 2, 2020 with an initial deadline of April 7, 2020. Menus and non-dated receipts were received by requested deadline. Attendance and meal counts were received April 21, 2020.

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

1. The Sponsor reported meal counts incorrectly

Condition

Based on our review of the Claim for Reimbursement for February 2020, the Sponsor reported 245 am supplement meals, 248 lunch meals and 235 pm supplement meals served. However, based on our review of the available documents, we noted that there were 245 am supplement meals, 247 lunch meals and 234 pm supplement meals served, prior to any meal disallowances.

As a result, one (1) lunch meal and one (1) pm supplement meal were overreported (See Exhibit)

Criteria

Title 7 of the Code of Federal Regulations, Section 226.10(c) states, "... In submitting a Claim for Reimbursement, each institution shall certify that the claim is correct and that records are available to support that claim...."

Recommendation

The Sponsor should ensure that claims for reimbursement are completed correctly and based on accurate supporting documents.

2. The Sponsor provided menus that contained grain-based desserts as a component

Condition

Based on our review of the menus provided by the sponsor for February 2020, one menu provided did not meet the USDA meal pattern requirements. The Sponsor's menu for the am supplement served on February 5, 2020 listed granola bars and orange juice. Granola bars are a grain-based dessert.

Due to the new CACFP meal pattern requirements and emphasis on providing technical assistance during the implementation process, there were no meals disallowed.

Criteria

Title 7 of the Code of Federal Regulations, Section 226.20(a)(4)(iii) states, "Grain-based desserts

do not count towards meeting the grains requirement.”

Title 7 of the Code of Federal Regulations, Section 226.14 (b) states, “In the event that the State agency finds that an institution which prepares its own meals is failing to meet the meal pattern requirements of 226.20, the State agency need not disallow payment or collect an overpayment arising out of such failure if the institution takes such other action as, in the opinion of the State agency, will have a corrective effect”

Recommendation

The Sponsor should ensure menus meet the meal patterns established by the USDA.

Technical Assistance Provided

Technical assistance was offered via email, but it was declined by the Sponsor.

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
Child and Adult Care Food 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, CFE
Director of Audit Services

Exhibit

cc: 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

Verification of CACFP Independent Center Claim

Name of Agency: In the Beginning Learning and Care

Review Month/Year: February 2020

Total Meal Reimbursement Received: \$1,062.93

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Days of CACFP Food Service	20	20
Total Attendance	248	247 ¹
Number of AM Supplements Served	245	245
Number of Lunches Served	248	247
Number of PM Supplements Served	235	234
Number of Participants in Free Category	10	NA ²
Number of Participants in Reduced-Price Category	6	NA ²
Number of Participants in Paid Category	3	NA ²
Total Number of Participants	19	NA ²

¹The difference in the reported and verified is immaterial and was not included in this report as a finding

²The number of participants and their classifications was not verified due to the limited review due to the threat of COVID 19