



**STATE OF TENNESSEE
DEPARTMENT OF HUMAN SERVICES**

JAMES K. POLK BUILDING
505 DEADERICK STREET
NASHVILLE, TENNESSEE 37243
TELEPHONE: 615-313-4700 FAX: 615-741-4165
TTY: 1-800-270-1349
www.tn.gov/humanservices

BILL LEE
GOVERNOR

DANIELLE W. BARNES
COMMISSIONER

April 13, 2020

Robert Johnson, Chairman of the Board
Pilgrim Rest Missionary Baptist Church
P.O. Box 751
1608 Julie Street
Union City, Tennessee 38261-0751

Dear Mr. Johnson,

The Department of Human Services (DHS) - Division of Audit Services staff conducted an unannounced on-site monitoring review of the Child and Adult Care Food Program (CACFP) at Pilgrim Rest Missionary Baptist Church (Sponsor), Application Agreement number 00061, on March 2, 2020. The purpose of this review was to determine if the Sponsor complied with *Title 7 of the Code of Federal Regulations* (CFR) applicable parts, provider agreement, 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 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 site visits in November 2019.

There were ten (10) feeding sites in operation during the test month of November 2019. Three feeding sites, Trudy Kids Café, Obion County Central High School, and South Fulton Middle and High School were selected as the sample feeding sites.

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.

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

1. The Sponsor reported meal counts incorrectly

Condition

Based on our review of the Claim for Reimbursement summary, we noted the Sponsor reported 5,891 supper meals. However, based on the available documents, we noted that there were 5,962 supper meals served. The difference was based on the following:

Trudy Kids Café

The Sponsor reported 1,360 supper meals served. However, based on the available documentation, we found there were 1,431 supper meals served.

As a result, the Sponsor under reported 71 supper meals.

This is a repeat finding of the previous monitoring report dated May 4, 2017.

Criteria

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

Recommendation

The Sponsor should ensure meals served are reported accurately and based on supporting documentation.

2. The Sponsor reported the number of attendance days incorrectly

Condition

Based on our review of the Claim for Reimbursement summary, we noted the Sponsor reported 5,891 attendance days. However, based on the available documents, we found there were 5,962 attendance days. The difference was based on the following:

Trudy Kids Café

The Sponsor reported 1,360 attendance days. However, based on the available documentation, we found there were 1,431 attendance days. As a result, the Sponsor under reported the number of attendance days by 71.

This is a repeat finding of the previous monitoring report dated May 4, 2017

Criteria

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

Recommendation

The Sponsor should ensure all attendance is maintained and reported according to supporting documentation.

3. The Sponsor did not conduct monitoring of its feeding sites as required

Condition

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

Trudy Kids Café

The feeding site was monitored 6/21/19 (unable to determine if the visit was announced or unannounced), 10/31/19 (unannounced), and 11/1/19 (unable to determine if the visit was announced or unannounced). The following deficiencies were identified:

- There was only one unannounced visit documented.
- There was no 5-day reconciliation completed during the 6/21/19 and 10/31/19 visits. The 5-day reconciliation on the 11/1/19 visit did not include the dates that were reconciled.

Obion County Central High School

The feeding site was monitored 2/14/19 (unannounced), 4/15/19 (announced), and 10/22/19 (unable to determine if the visit was announced or unannounced). The following deficiencies were identified:

- There was only one unannounced visit documented.
- The 5 day-reconciliation did not include the dates that were reconciled on any of the monitoring forms. Additionally, on the 4/15/19 documentation, only three days were reconciled.
- Six months elapsed between the 4/15/19 and 10/22/19 monitoring visits.

South Fulton Middle and High School

The feeding site was monitored 3/12/19 (unannounced), 5/18/19 (announced) and 11/19/19 (unable to determine if the visit was announced or unannounced). The following deficiencies were identified:

- There was only one unannounced visit documented.
- No 5-day reconciliation was completed during the 5/18/19 visit. The 5-day reconciliation completed during the 3/12/19 and 11/19/19 visits did not include the dates that were reconciled.
- Six months elapsed between the 5/18/19 and 11/19/19 visits.
- The monitoring form dated 5/18/19 did not have the monitor or feeding site staff's signatures and other portions of the form were not completed.

Observation: Several sections of the racial and ethnic data form were completed incorrectly.

Criteria

Title 7 of the Code of Federal Regulations Section 226.16 (d)(4) (ii) states “(ii) Reconciliation of meal counts. Reviews must examine the meal counts recorded by the facility for five consecutive days during the current and/or prior claiming period. For each day examined, reviewers must use enrollment and attendance records (except in those outside-school-hours care centers, at-risk afterschool care centers, and emergency shelters where enrollment records are not required) to determine the number of participants in care during each meal service and attempt to reconcile those numbers to the numbers of breakfasts, lunches, suppers, and/or snacks recorded in the facility's meal count for that day...”

Title 7 of the Code of Federal Regulations, Section 226.16(d)(4)(iii) states, “Sponsoring organizations must review each facility three times each year, except as described in paragraph (d)(4)(iv) of this section. In addition: (A) At least two of the three reviews must be unannounced; (B) At least once unannounced review must include observation of a meal service; (C) At least one review must be made during each new facility’s first four weeks of Program operations, and (D) Not more than six months may elapse between reviews.”

Recommendation

The Sponsor should ensure all documentation is completed in its entirety and includes all required portions.

4. The Sponsor did not provide annual training to all staff members as required

Condition

The Sponsor provided training rosters for the annual Civil Rights training and the annual CACFP training. Our review of the documentation revealed the feeding site supervisors, as documented on the site applications in TIPS, from the following feeding sites were not listed on either roster:

- South Fulton Middle and High School
- Obion County Central High School
- Lake Road School
- Oak Grove Church
- South Fulton Baptist Church

Criteria

Title 7 of the Code of Federal Regulations, Section 226.16 (d)(2) states “Training on Program duties and responsibilities to key staff from all sponsored facilities prior to the beginning of Program operations. At a minimum, such training must include instruction, appropriate to the level of staff experience and duties, on the Program's meal patterns, meal counts, claims submission and review procedures, recordkeeping requirements, and reimbursement system. Attendance by key staff, as defined by the State agency, is mandatory;”

Title 7 of the Code of Federal Regulations, Section 226.16 (d)(3) “Additional mandatory training sessions for key staff from all sponsored child care and adult day care facilities not less frequently than annually...” system. Attendance by key staff, as defined by the State agency, is mandatory;

Recommendation

The Sponsor should ensure all required training is completed annually, all employees involved in the CACFP are provided training and documentation is kept on file to show the employees received the training.

Note: Our site visits to Trudy's Kids Café, Obion County Central High School, and South Fulton Middle and High School revealed no significant deficiencies.

Technical Assistance Provided

The Sponsor was provided with technical assistance regarding monitoring requirements and documentation as well as general record keeping.

Disallowed Meals Cost

The disallowed 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: Valeria Hyde, Director, Pilgrim Rest Missionary Baptist Church
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

Verification of At-Risk Afterschool Meals Program Claim

Sponsor: Pilgrim Rest Missionary Baptist Church

Review Month/Year: November 2019

Total Meal Reimbursement Received: \$21,487.42

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Days of CACFP Food Service	17	17
Total Attendance	5,891	5,962
Number of Supper Meals Served	5,891	5,962

Exhibit B

Verification of At-Risk Afterschool Meals Program Individual Site Review Data

Site: Trudy Kids Café

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Days of CACFP Food Service	17	17
Total Attendance	1,360	1,431
Number of Supper Meals Served	1,360	1,431

Exhibit C

Verification of At-Risk Afterschool Meals Program Individual Site Review Data

Site: Obion County Central High School

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Days of CACFP Food Service	11	11
Total Attendance	246	246
Number of Supper Meals Served	246	246

Exhibit D

Verification of At-Risk Afterschool Meals Program Individual Site Review Data

Site: South Fulton Middle and High School

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Days of CACFP Food Service	13	13
Total Attendance	329	329
Number of Supper Meals Served	329	329