



**STATE OF TENNESSEE  
DEPARTMENT OF HUMAN SERVICES**

CITIZENS PLAZA BUILDING  
400 DEADERICK STREET  
NASHVILLE, TENNESSEE 37243-1403

TELEPHONE: 615-313-4700 FAX: 615-741-4165  
TTY: 1-800-270-1349  
www.tn.gov/humanservices

**BILL HASLAM**  
GOVERNOR

**DANIELLE W. BARNES**  
COMMISSIONER

October 13, 2017

Mr. Calvin E. Johnson, Director of School Operations  
Shelby County School System  
3176 Jackson Avenue  
Memphis, Tennessee 38112-1520

Dear Mr. Johnson:

The Department of Human Services (DHS) Audit Services staff conducted an on-site, unannounced review of the Summer Food Service Program (SFSP) at Shelby County School System, Application Agreement number 00069, on August 28, 2017. We reviewed the Sponsor's records of reimbursements and expenditures for June 2017. The Sponsor was approved for 508 feeding sites of which 393 were in operation during our unannounced visits in June 2017. The purpose of this review was to determine if the Sponsor complied with *Title 7 of the Code of Federal Regulations* (CFR) applicable parts, application agreement, and applicable Federal and State regulations.

**Background**

Meals served by participating sponsoring organizations must meet the minimum guidelines set by the United States Department of Agriculture (USDA) and the Tennessee Department of Human Services (DHS) to be eligible for reimbursement. SFSP sponsors utilize meal count sheets to record the number of meals served at feeding sites for breakfast, lunch, supper, and supplements (snacks). Second meals are offered once all eligible children have been served first meals. The SFSP sponsor will report the number of meals served through the DHS Tennessee Information Payment System (TIPS) to seek reimbursement. We inspected meal counts sheets for each site for our test period and reconciled the meals claimed to the meals reported as served for each meal service.

We also observed or attempted to observe select meal services for the sample sites: 0662 Whitestation MS-ESL, 1399 Kate Bond MS-SCS Summer School, 0333 Leadership Empowerment Center, 0333 Leadership Empowerment Center, 1421 Dexter ES-SSLA, 0427 Neighborhood Christian Center- Greenbriar, 0737 Frayser Headstart-Porter Leath, 1396 Lucie E. Campbell ES-SCS Summer School, 1485 Delano Headstart, 1502 Positive Impact- Girls Camp, 1548 Cordova Middle School- Cougar Tech Camp, 0696 Kate Bond ES-SCS Summer

School, 1564 Destination Education LC, 0114 Community Center- Gaisman, 0217 Gardenwood Apartment Homes, 0278 Hill's Home Before & After School-Agers Kingdom AC, 0279 Hilldale Apartments, 0048 Avon Lennox-ESY, 0518 Rev Wind Martial Arts Center, 1356 Airways Police Station- G.R.E.A.T., 1429 New Friendship MBC- King's Kids, 0100 Colonial Hearing, Speech, and Vision, 0704 Knowledge Quest- Gaston Community Center, 1556 Lamar Crossing Apartments, 0142 Day and Night Child Care, 0824 Longviews Garden Apartment Homes, 0123 Community Center- Pine Hill, 1517 Hattiloo-MPLOY Summer Youth, 0242 Grad Academy Memphis- Freedom School, 0580 Stax Music Academy, 0659 Whitehaven High Summer Enrichment, 0741 Longstreet United Methodist Church-Project Transformation TN, 1451 Brown Temple COGIC Summer Camp, 1575 Faith Heritage Summer Program, 1572 Kipp Memphis Academy, 1579 Memphis Heritage GED Childcare, 1341 Catholic Charities camp Love and Learn- St. Anne School, 1484 Chickasaw Council-MPLOY Summer Youth Camp, 1439 Early Grove Baptist Church- VBS, 0204 First Baptist church-Broad, 1391 Grahamwood ES-SCS Summer School, 0119 Community Center-Lester, 1334 Memphis Academy of Science and Engineering, 1492 Mid-South Food Bank- MPLOY Youth Program, 0467 Park Services-Howze Pool, 0505 RBI- Bickford, 0124 Community Center- Raleigh, 0513 Refugee Empowerment Program, 1475 Shelby Metro-Football, 0729 Urban Community Ministries-Safe Haven Program, 0475 Park Services- Riverview Pool, 0227 Glitzy Girls, 1526 Greater Mt. Moriah- Safe haven Summer Camp, 0771 Holy nation Church-Camp Royale Summer Camp, 0272 Helping Hands Community Outreach, 1140 Case Management Inc-Youth Summer Camp, 0889 Young Actors Guild, 1401 Ridgeway Middle School-SCS Summer School, 0221 Getwell-ESY, 1530 Accomplishing Word Ministries-Summer Camp, 1570 Germantown Middle-Enrichment Camp, 1478 Durham Housing SVC-MPLOY Summer Youth, 1505 Palabra Miel Memphis-Summer Camp, 0178 Emmanuel Episcopal Church Theater Camp, 0219 Germanshire ES-SACC, 0276 Highland Oaks Middle School, 0780 Houston Levee Community Center-Summer Day Camp, 1490 Skyway Computer-MPLOY, 1542 Westhaven Elementary, 1335 Mount Zion AME Church-Bible Study, 0719 Mt. Zion M.B. Church (Rossville)-VBS, 1394 Alton Elementary-Superintendent Summer Learning Academy, 0103 Community Center-Charles Powell

Our review of the Sponsor's records for June 2017 indicates the following:

**1. The number of meals reported for reimbursement was incorrect**

Condition

The number of meals reported for reimbursement was incorrect. The differences were based on the following:

**Breakfasts**

Site	Reported	Verified	Difference
0227 Glitzy Girls	328 Breakfasts	316 Breakfasts	-12 Breakfasts
0276 Highland Oaks	359 Breakfasts	360 Breakfasts	+1 Breakfast
1542 & 1159 Westhaven Ele.	962 Breakfasts	1,162 Breakfasts	+200 Breakfasts
0719 Mt. Zion Rossville	143 Breakfasts	125 Breakfasts	-18 Breakfasts
1394 Alton Elementary-Superintendent Summer Learning Academy	1,446 Breakfasts	1,448 Breakfasts	+2 Breakfasts
1399 Kate Bond	1,002 Breakfasts	1,004 Breakfasts	+2 Breakfasts

Site	Reported	Verified	Difference
0427 Neighborhood Christian Center Greenbriar	692 Breakfasts	740 Breakfasts	+48 Breakfasts
0737 Frayser Head start-Porter Leath	932 Breakfasts	911 Breakfasts	-21 Breakfasts
1502 Positive Impact-Girls Camp	186 Breakfasts	182 Breakfasts	-4 Breakfasts
0704 Knowledge Quest Gaston	791 Breakfasts	779 Breakfasts	-12 Breakfasts
0242 Grad Academy Memphis-Freedom School	656 Breakfasts	645 Breakfasts	-11 Breakfasts
0659 Whitehaven high-Summer Enrichment	875 Breakfasts	879 Breakfasts	+4 Breakfasts
1341 Catholic Charities Camp Love and Learn- St. Anne School	1,717 Breakfasts	1,616 Breakfasts	-101 Breakfasts
1535 East High Operation Re-start	1,539 Breakfasts	1,189 Breakfasts	-350 Breakfasts
1585 Kingsbury Middle School/Summer Learning	110 Breakfasts	120 Breakfasts	+10 Breakfasts
1494 Mt. Moriah- East Church	834 Breakfasts	607 Breakfasts	-227 Breakfasts
1427 RBI- Douglass High School	273 Breakfasts	276 Breakfasts	+3 Breakfasts
0529 Robert R. Church-Summer School	2,695 Breakfasts	2,685 Breakfasts	-10 Breakfasts
1400 Snowden MS-SCS Summer School	2,158 Breakfasts	2,133 Breakfasts	-25 Breakfasts
1344 Star Academy	1,118 Breakfasts	1,088 Breakfasts	-30 Breakfasts
0801 Winridge Elementary-ELOP	1,265 Breakfasts	1,226 Breakfasts	-39 Breakfasts
0852 Wooddale Middle School- Green dot Public Schools	364 Breakfasts	363 Breakfasts	-1 Breakfasts
1561 Whitestation Elementary- Summer Camp	1,533 Breakfasts	1,453 Breakfasts	-80 Breakfasts
1491 Brown Missionary Baptist Church	47 Breakfasts	34 Breakfasts	-13 Breakfasts
1520 Divine Providence-Summer Camp	848 Breakfasts	788 Breakfasts	-60 Breakfasts
1575 Faith Heritage Summer Program	327 Breakfasts	313 Breakfasts	-14 Breakfasts

As a result, 758 breakfasts were over reported.

### Lunch

Site	Reported	Verified	Difference
0227 Glitzy Girls	329 Lunches	348 Lunches	+19 Lunches
1505 Palabra Mel Memphis	779 Lunches	780 Lunches	+1 Lunch

Site	Reported	Verified	Difference
0221 Getwell ESY	862 Lunches	908 Lunches	+46 Lunches
1542 and 1159 Westhaven Ele	1,172 Lunches	1,272 Lunches	+100 Lunches
1399 Kate Bond	1,822 Lunches	1,929 Lunches	+107 Lunches
1396 Lucie E. Campbell ES- SCS Summer School	3,390 Lunches	3,392 Lunches	+2 Lunches
1548 Cordova Middle School- Cougar Tech Camp	83 Lunches	78 Lunches	-5 Lunches
1564 Destination Education LC	319 Lunches	305 Lunches	-14 Lunches
0279 Hilldale Apartment	1,650 Lunches	1,595 Lunches	-55 Lunches
0048 Avon Lennox- ESY	1,986 Lunches	1,935 Lunches	-51 Lunches
1356 Airways Police Station G.R.E.A.T.	432 Lunches	424 Lunches	-8 Lunches
0242 Grad Academy Memphis- Freedom School	616 Lunches	617 Lunches	+1 Lunch
0580 Stax Music Academy	232 Lunches	231 Lunches	-1 Lunch
0659 Whitehaven High- Summer Enrichment	871 Lunches	925 Lunches	+54 Lunches
1484 Chickasaw Council MPLOY Summer Youth	48 Lunches	47 Lunches	-1 Lunch
0467 Park Services- Howze Pool	772 Lunches	797 Lunches	+25 Lunches
0124 Community Center- Raleigh	2,785 Lunches	2,720 Lunches	-65 Lunches
0065 Camp Hope Memphis	509 Lunches	465 Lunches	-44 Lunches
0106 Community Center- Douglass	830 Lunches	860 Lunches	+30 Lunches
0121 Community Center- McFarland	2,220 Lunches	2,222 Lunches	+2 Lunches
1535 East High Operation Re-start	1,309 Lunches	1,299 Lunches	-10 Lunches
0120 Community Center Marion Hale	1,602 Lunches	1,571 Lunches	-31 Lunches
1549 Future Leaders FCDH	500 Lunches	498 Lunches	-2 Lunches
1585 Kingsbury Middle School/Summer Learning	99 Lunches	114 Lunches	+15 Lunches
0321 Knowledge Quest- College park	1,239 Lunches	1,245 Lunches	+6 Lunches
0924 Memphis Scholars- Raleigh Egypt Middle	215 Lunches	240 Lunches	+25 Lunches
1493 Mid-South Food Bank- MPLOY Youth Program	31 Lunches	24 Lunches	-7 Lunches
1352 Middle Baptist Church- Whitehaven	807 Lunches	815 Lunches	+8 Lunches
0432 New Growth in Christ	1,294 Lunches	1,297 Lunches	+3 Lunches
0746 New Hope Baptist Church- Sunshine Summer Camp	665 Lunches	614 Lunches	-51 Lunches
0461 Park Services	593 Lunches	557 Lunches	-36 Lunches

Site	Reported	Verified	Difference
Denver/Shivler			
0465 Park Services- Gooch Pool	534 Lunches	425 Lunches	-109 Lunches
1538 Rising Scholars	243 Lunches	238 Lunches	-5 Lunches
1456 Rozelle ES-Read to be Ready Camp	379 Lunches	381 Lunches	+2 Lunches
1400 Snowden MS-SCS Summer School	2,370 Lunches	2,395 Lunches	+25 Lunches
0851 Spiritual Growth Ministries	189 Lunches	201 Lunches	+12 Lunches
0588 Street Reach-National	932 Lunches	1,022 Lunches	+90 Lunches
0877 Tennessee College of Applied Science	40 Lunches	48 Lunches	+8 Lunches
0794 Trezvant CTC	665 Lunches	825 Lunches	+160 Lunches
0668 Winbranch Apartments	854 Lunches	859 Lunches	+5 Lunches
0801 Winridge Elementary-ELOP	1,173 Lunches	1,178 Lunches	+5 Lunches
0631 Unity Church of God in Christ-Summer Camp	163 Lunches	162 Lunches	-1 Lunch
1491 Brown Missionary Baptist Church	59 Lunches	46 Lunches	-13 Lunches
1520 Divine Providence Summer Camp	776 Lunches	722 Lunches	-54 Lunches
0518 Rev Wind Martial Arts Center	0 Lunches	272 Lunches	+272 Lunches
0505 RBI Bickford	0 Lunches	509 Lunches	+509 Lunches

As a result, 969 lunches were under reported.

Site	Reported	Verified	Difference
1484 Chickasaw Council MPLOY Summer Youth	48 PM Snacks	46 PM Snacks	-2 PM Snacks
0102 Community Center-Bickford	692 PM Snacks	689 PM Snacks	-3 PM Snacks
0120 Community Center-Marion Hale	1,841 PM Snacks	1,874 PM Snacks	+33 PM Snacks
1549 Future Leaders FCDH	493 PM Snacks	495 PM Snacks	+2 PM Snacks
0325 Lagoshen M.B. Church-Summer Camp	859 PM Snacks	819 PM Snacks	-40 PM Snacks
1432 Pavilion of Hope-Summer Camp	570 PM Snacks	590 PM Snacks	+20 PM Snacks
0528 Riverwood Elementary	1,562 PM Snacks	1,641 PM Snacks	+79 PM Snacks
0715 World Overcomers Outreach Ministries	2,127 PM Snacks	2,170 PM Snacks	+43 PM Snacks
0518 Rev Wind Martial Arts Center	0 PM Snacks	268 PM Snacks	+268 PM Snacks

As a result, 400 pm supplements were under reported.

## Supper

Site	Reported	Verified	Difference
0832 RBI- Whitehaven	822 Suppers	922 Suppers	+100 Suppers
1335 Mount Zion AME Church-Bible Study	60 Suppers	46 Suppers	-14 Suppers

As a result, 86 suppers were under reported.

### Criteria

*Title 7 of the US Code of Federal Regulations, Section 225.9 (d) (5)* states "claims for reimbursement shall report information in accordance with the financial management system established by the State agency, and in sufficient detail to justify the reimbursement claimed and to enable the State agency to provide the Reports of Summer Food Service Program Operations required under §225.8 (b). In submitting a claim for reimbursement, each sponsor shall certify that the claim is correct and that records are available to support this claim. 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."

### Recommendation

The Sponsor should ensure that meals claimed for reimbursement are based on completed meal count sheets and any other appropriate records.

## 2. Point of Service meal count forms contained errors

### Condition

The Sponsor did not correctly complete the daily point of service meal count sheets. Some of the numbers reported did not match what was marked at the actual point of service. Meals were also disallowed if the point of service meal count sheet was not signed. Our review of the Sponsor's records revealed the following:

### **Breakfasts**

Site Name	Meals Allowed/ Disallowed	Dates of Meal Allowance/ Disallowance
1394 Alton	-71 Breakfasts	06/12/17
1421 0711 combined with Dexter ES SSLA	-2 Breakfasts	06/13/17
1356 Airways Police Station	-9 Breakfasts	06/30/17
0659 Whitehaven High Summer Enrichment	-4 Breakfasts	06/06/17
1341 Catholic Charities Camp Love and Learn- St. Anne School	+5 Breakfasts	06/20/17, 06/23/17, 06/29/17

Site Name	Meals Allowed/ Disallowed	Dates of Meal Allowance/ Disallowance
1391 Grahamwood ES-SCS Summer School	+2 Breakfasts	6/13/17
1569 Chickasaw Middle Bridge Program	+1 Breakfast	06/12/17
1462 Fairly High School- Summer Bridge	-113 Breakfasts	06/20/17
0775 Games before Games	-15 Breakfasts	06/15/17
1487 Geeter Middle School	+6 Breakfasts	06/20/17
0225 Girl's Inc. of Memphis-South Park	-17 Breakfasts	06/09/17
1481 Idlewild ES-SSLA	-30 Breakfasts	06/19/17
1585 Kingsbury Middle/Summer Learning	-30 Breakfasts	06/13/17
0375 MAM- St. Andrew	+10 Breakfasts	06/06/17
0425 Neighborhood Christian Center	+5 Breakfasts	06/21/17
1409 Northaven ES-SSLA	-28 Breakfasts	06/13/17
0516 Resurrection Catholic School	+5 Breakfasts	06/07/17
0524 Rising Sun Outreach Ministries	-13 Breakfasts	06/13/17
1416 Scenic Hills ES SSLA	-39 Breakfasts	06/13/17, 06/20/17, 06/26/17
0538 Sheffield Elementary	-42 Breakfasts	06/26/17
1387 Southern Avenue Charter-Superstars Summer Camp	-32 Breakfasts	06/07/17, 06/15/17
0601 Tabernacle of Praise Baptist- Sunday School	-50 Breakfasts	06/25/17
0801 Winridge Elementary- ELOP	-12 Breakfasts	6/14/17
1509 Winchester ES-ELOP	-60 Breakfasts	06/13/17, 06/22/17
0631 Unity Church of God in Christ- Summer Camp	-3 Breakfasts	06/27/17, 06/28/17, 06/30/17
1460 Vision Preparatory-Camp Riverview A.C.I.V.E. Summer Camp	-1 Breakfasts	06/12/17
0249 Greater Community Temple	-50 Breakfasts	06/21/17

As a result, 587 breakfasts were disallowed.

**Lunch**

Site Name	Meals Allowed/ Disallowed	Dates of Meal Allowance/ Disallowance
1478 Durham MPLOY	-10 Lunches	6/21/17
1394 Alton	-72 Lunches	06/12/17
0662 Whitestation MS-ESL	+21 Lunches	06/15/17, 06/16/17
1421 combined with 0711 Dexter ES- SSLA	-3 Lunches	06/22/17, 06/23/17
0427 Neighborhood Christian Center- Greenbriar	-1 Lunch	06/20/17
1485 Delano Headstart	+4 Lunches	06/16/17
0704 Knowledge Quest-Gaston Community	-4 Lunches	06/29/17
1517 Hattiloo MPLOY Summer Youth	-1 Lunch	06/06/17
0659 Whitehaven High- Summer Enrichment	-3 Lunches	06/05/17, 06/06/17, 06/08/17, 06/14/17
1484 Chickasaw Council MPLOY Summer Youth	-3 Lunches	06/20/17
0204 First Baptist Church-Broad	+1 Lunch	06/05/17
1391 Grahamwood ES-SCS Summer School	+2 Lunches	06/13/17
0099 College Park Apartments	+2 Lunches	06/26/17
0107 Community Center- Hollywood	+5 Lunches	06/15/17
0104 Community Center-Cunningham	+2 Lunches	06/22/17
0175 Emmanuel Center-Summer Camp	-13 Lunches	06/07/17
1535 East High School-Operation Re-Start	-14 Lunches	06/15/17
0120 Community Center-Marion hale	-63 Lunches	06/27/17
1549 Future Leaders FCDH	+5 Lunches	06/14/17, 06/21/17
0305 Kasace Creative Arts Camp	-16 Lunches	06/09/17
1434 Kids Come First	-15 Lunches	06/16/17
0330 Landmark Food Pantry	-2 Lunches	06/09/17
0325 Lagoshen M.B. Church- Summer Learning	-20 Lunches	06/12/17
0367 MAM-Greenlaw	-1 Lunch	06/08/17
0370 MAM- Hamilton	+8 Lunches	06/05/17
0387 Memphis Business Academy Summer Enrichment	+54 Lunches	06/21/17, 06/26/17
0705 Memphis Catholic- Extended Year	-2 Lunches	06/15/17
0746 New Hope Baptist Church-Sunshine Summer Camp	+6 Lunches	06/21/17
0773 Our Lady of Sorrows School-Year round Curriculum	+45 Lunches	06/28/17
0461 Park Services- Glenview	-40 Lunches	06/12/17
0832 RBI Bellvue	-25 Lunches	06/26/17
0520 Ride Outside the Box	-3 Lunches	06/22/17
1416 Scenic Hills ES SSLA	-2 Lunches	06/30/17
0571 St. Patrick Catholic School	+13 Lunches	06/20/17
1344 Star Academy	-41 Lunches	06/09/17
0668 Winbranch Apartments	+1 Lunch	06/28/17
1460 Vision Preparatory- Camp Riverview	-75 Lunches	06/16/17

A.C.I.V.E. Summer Camp		
------------------------	--	--

As a result, 260 lunches were disallowed.

**PM Snack**

Site Name	Meals Allowed/ Disallowed	Dates of Meal Allowance/ Disallowance
0019 Agape Pershing Park (Frayser)	-30 PM Snacks	06/23/17
0107 Community Center- Hollywood	-70 Pm Snacks	06/15/17
0105 Community Center- Dave Wells	-5 PM Snacks	06/23/17
0110 Community Center- Raymond Skinner Center	-65 PM Snacks	06/20/17, 06/22/17
0120 Community Center Marion Hale	-31 PM Snacks	06/14/17, 06/27/17, 06/28/17
1549 Future Leaders FCDH	-1 PM Snack	06/12/17, 06/27/17
0275 Highland Meadow Apartments	-1 PM Snack	06/21/17
0305 Kasace Creative Arts Camp	+45 PM Snacks	06/09/17
0325 Lagoshen M.B. Church – Summer Camp	-4 Pm snacks	06/20/17, 06/30/17
0344 Life Change and Ministries	-62 PM Snacks	06/14/17, 06/19/17, 06/21/17, 06/22/17
0351 Lily Roze Studios	-1 PM Snack	06/05/17
0372 MAM-Magnolia	-28 PM Snacks	06/09/17, 06/22/17
1597 Mitchell Community Center	-35 PM Snacks	06/14/17
1500 Overton High School-Athletic Camp	+16 PM Snacks	06/15/17, 06/19/17
0504 Raleigh Family Redevelopment Center	-4 PM Snacks	06/20/17
0519 Richland Elementary	-57 Pm Snacks	06/06/17
0537 Shadowbrook Townhomes	-19 PM Snacks	06/28/17
1433 Shelby Farms Park- Summer Camp	-28 PM Snacks	06/16/17
1511 The Enlightenment Center	-200 PM Snacks	06/07/17, 06/27/17
0668 Winbranch Apartments	-12 PM Snacks	06/12/17, 06/16/17

As a result, 592 pm snacks were disallowed.

**Supper**

Site Name	Meals Allowed/ Disallowed	Dates of Meal Allowance/ Disallowance
RBI-Whitehaven 0832	-1 Supper	06/13/17
1514 Whitehaven Golf Course	-5 Suppers	06/14/17

As a result, six pm snacks were disallowed.

Criteria

According to the USDA FNS Summer Food Service Program 2016 Administration Guide for sponsors, pages 66 and 184, 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.

According to the Summer Food Service Program 2016 Administrative Guidance for Sponsors, pages 184 and 139, 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. They may have their monitors pick up site reports on designated days, or the site supervisors may be asked to mail the records to the sponsor's office. When they collect the site records, sponsors should check for the site supervisor's signature.

#### Recommendation

The Sponsor should ensure that site personnel complete and submit accurate meal count records which support the claim for reimbursement and sign before submission.

### **3. Meals were recorded prior to the meal service**

#### Condition

During the breakfast meal observation on June 15, 2017 to 0704 Knowledge Quest – Gaston Community Center audit services staff observed meals being recorded prior to the actual meal service. Meals should be marked at the point of service. 59 meals were documented as served, however, the monitor observed 47. The reported and reconciled differences were reflected in finding 1. 47 meals were allowed because they were observed by a monitor.

#### Criteria

According to the USDA FNS Summer Food Service Program 2016 Administration Guide for sponsors, pages 66 and 184, 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 that site personnel are trained on the procedures of record keeping and recording meals at the actual point of service.

### **4. Meals were served outside of the sponsor's approved meal service time**

#### Condition

Meals were served outside of the approved meal service time during meal observations. We do not disallow meals if we observed them being served outside the approved meal service time and the meal components were in compliance otherwise; however, sites are listed for observation purpose and should only be served during the approved meal service time. The following sites served meals outside of the approved meal service time:

1394 Alton Elementary-Superintendent Summer Learning Academy

- The approved meal service time for lunch was 11:45 a.m. to 1:00 p.m. A monitor arrived on June 14, 2017 at approximately 11:30 am and was told that meals had been served between 10:30 am and 11:30 am, prior to the monitor's arrival. 122 lunches were documented as served and were disallowed.
- Monitoring staff returned on June 15, 2017 and observed 102 meals being served at 10:30 am, again outside of the approved meal service time. Those meals were not disallowed since they were observed.

0103 Community Center- Charles Powell

- The approved meal service time for the pm snack was 3:30 pm to 4:30 pm. A monitor arrived on June 12, 2017 at approximately 3:15 pm and was told that meals were served at 3:00 pm, prior to the monitor's arrival. 45 pm snacks were recorded as served and disallowed.
- Monitoring staff returned on June 13, 2017 and observed 45 pm supplements served at 3:00 pm, again outside of the approved meal service time. Those meals were not disallowed since they were observed.

1517 Hattiloo MPLOY Summer Youth

- The approved meal service time for the lunch was 11:30 am to 12:00 pm. A monitor arrived on June 14, 2017 at approximately 10:50 am and observed four meals served after 12:00 pm. Those meals were not disallowed since they were observed.

0242 Grad Academy Memphis- Freedom School

- The approved meal service time for the breakfast was 8:00 am to 8:30 am. A monitor arrived on June 13, 2017 at approximately 7:30 am and observed 20 breakfasts served between 8:30 am and 9:00 am. Those meals were not disallowed since they were observed.

1556 Lamar Crossing Apartments

- The approved meal service time for the lunch was 11:00 am to 12:00 pm. A monitor collected meal count sheets on June 14, 2017 and according to the June 7<sup>th</sup> meal count sheet meals were served at 12 pm and according to the June 21<sup>st</sup>, June 22<sup>nd</sup> and June 23<sup>rd</sup> meal count sheets meals were served at 10 am, outside of the approved meal service time. 155 lunches were documented as served for the listed days and were disallowed.
- The approved meal service time for the pm supplement was from 4:30 pm to 5:00 pm. According to meal count sheets for June 6<sup>th</sup>, June 7<sup>th</sup>, June 8<sup>th</sup>, June 9<sup>th</sup> meals were served at 11:00 am and for June 20<sup>th</sup>, June 21<sup>st</sup>, June 22<sup>nd</sup> and June 23<sup>rd</sup> meals were documented as served at 10:00 am. 315 snacks were documented as served for the listed days and were disallowed.

1475 Shelby Metro- Football

- The approved meal service time for the lunch was 10:30 am to 11:30 am. A monitor observed meals being delivered at 11:35 am after the approved meal service time. Meals were observed and therefore not disallowed for this reason.

1335 Mount Zion AME Church- Bible Study

- The approved meal service time for the supper was 5:30 pm to 6:00 pm. A monitor observed one meal served after the approved meal service time on June 14, 2017. The meal was observed and therefore not disallowed.

Based on the results of our testing, 277 lunches and 360 pm snacks were disallowed.

#### Criteria

The *United States Department of Agriculture Food and Nutrition Service Code of Federal Regulations, 7 CFR Section 225.16 (c) (3) and (4)* states, "Meals served outside of the period of approved meal service shall not be eligible for Program payments. Any permanent or planned changes in meal service periods must approved by the State agency.

#### Recommendation

The Sponsor should ensure that site personnel serve meals during the approved meal service time and if changes are necessary the information should be updated the DHS Tennessee Information Payment System (TIPS).

### **5. Standard meal pattern requirements were not met**

#### Condition

During the observation of lunch at 1399 Kate Bond on June 29, 2017 143 meals were served. 82 meals met meal pattern requirements and consisted of a hot turkey ham and cheese sub sandwich, a 100% juice bar, craisins, and milk. However, 61 lunches were not served with the second fruit/juice/vegetable component and were identified as ineligible for reimbursement.

During the observation of lunch at 0427 Neighborhood Christian Center- Greenbriar on June 7, 2017 39 lunches were served that consisted of a turkey and cheese sandwich, an apple or orange and milk. The meals had a missing second fruit/juice/vegetable component. Those 39 lunches were identified as ineligible for reimbursement.

During the observation of lunch at 1517 Hattiloo –Mploy Summer Youth on June 14, 2017 staff observed 13 lunches which consisted of turkey and cheese, whole grain bun, a pear, dried cranberries, and milk. It was observed that participants were not required to take milk with their meals. 12 participants did not take milk with the meal and those lunches were identified as ineligible for reimbursement.

During the observation of breakfast at 1334 Memphis Academy of Science and Engineering on June 12, 2017 lunches were served that consisted of a blueberry oatmeal bar and juice or a whole grain donut and juice. No milk component was delivered or served. 8 breakfasts were served and identified as ineligible for reimbursement.

During the observation of lunch at 0659 Whitehaven High-Summer Enrichment on June 12, 2017 lunches were served consisting of pizza, craisins, orange, and milk. It was observed that 26 meals were not served with milk and were disallowed.

Criteria

The *United States Department of Agriculture Food and Nutrition Service Code of Federal Regulations 7 CFR Section 225.16 (d) (1) (2) (3)* states, "Sponsors shall ensure that meals served meet all of the (meal pattern) requirements."

As a result, eight breakfasts and 138 lunches were disallowed.

Recommendation

The Sponsor should ensure that all meals served meet the USDA guidelines for reimbursable meal patterns.

**6. The number of meals reported exceeded the site's approved level of meal service**

Condition

Our review of the Sponsor's records revealed the following:

<b>Name of Site and serving capacity</b>	<b>Date</b>	<b>Number of meals reported</b>	<b>Number of meals disallowed</b>
1421 Dexter ES SSLA, capacity 350	06/12/16	457 Lunches	-107 Lunches

Criteria

The *USDA FNS Code of Federal Regulations, 7 CFR Section 26.6 (d) (2)*, states "the State agency shall establish for each meal service an approved level for the maximum number of children's meals which may be served under the Program."

The *USDA FNS Summer Food Service Program 2016 Administration Guide* for sponsors, states "Reimbursement may not be claimed for meals in excess of the site's approved level of meal service."

As a result, 107 lunches were disallowed.

Recommendation

The Sponsor should ensure that meals are not claimed over the site's approved level of meal service and when necessary the information should be updated in the DHS Tennessee Information Payment System (TIPS).

**7. Sites did not have adequate facilities to store food**

Condition

During a lunch observation on 6/12/17 at Hill's Home Before & After School Agers Kingdom AC, a monitor observed meals sitting on a porch in a box with no adequate storage or cooling. It was documented that 18 meals were served and were disallowed.

Criteria

7 CFR Section 225.16 (a) states in part that "*Sanitation*. Sponsors shall ensure that in storing, preparing, and serving food, proper sanitation, and health standards are met which conform with all applicable State and local laws and regulations. Sponsors shall ensure that adequate facilities are available to store food or hold meals..."

Recommendation

The Sponsor should ensure that each approved site serving meals has adequate facilities for the storage of meals.

**8. One site did not have a thermometer in the storage facility**

Condition

During the pm snack observation at 0123 Community Center Pine Hill on June 12, 2017 it was noted that there was no thermometer in the storage facility.

Criteria

7 CFR Section 225.16 (a) states in part that "*Sanitation*. Sponsors shall ensure that in storing, preparing, and serving food, proper sanitation, and health standards are met which conform with all applicable State and local laws and regulations. Sponsors shall ensure that adequate facilities are available to store food or hold meals..."

Recommendation

The Sponsor should ensure that each site has a thermometer in the storage facilities to monitor temperatures and proper health standards.

**9. Point of Service meal counts were not taken at two feeding sites**

Condition

During a supplement observation on June 13, 2017 at 1484 Chickasaw Council-MPLOY Summer youth, we noted that the feeding site's personnel were not taking point of service meal counts for the supplement that we observed. Instead, the meal count form was completed after all participants were served. There were three supplements served, however, there were no disallowances since the meals were observed.

During a lunch observation on June 13, 2017, at 0659 Whitehaven High- Summer Enrichment we noted that staff did not take meal count at the point of service. Instead, the meal counts calculated by taking the number of meals delivered minus the number of meals

remaining. Second meals were also recorded as first meals. Meal counts should be taken at the point of service. There were no meal disallowances since the meal was observed.

#### Criteria

The *Summer Food Service Program 2016 Administrative Guidance for Sponsors*, page 66 and 184, states that 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 that feeding site personnel complete the meals count sheets at the point of service as meals are being served to participants.

### **10. The Sponsor served meals at unapproved address**

#### Condition

During a supper observation on June 8, 2017, at 1439 Early Grove Baptist Church – VBS meals were served at an unapproved address. The suppers were served at 557 Lester Street Memphis, but the address listed in TIPS was 557 Early Grove Boulevard. Meals were not disallowed since they were observed.

#### Criteria

The United States Department of Agriculture (USDA) Food and Nutrition Service (FNS) *Summer Food Service Program 2016 Administration Guide* for sponsors, page 133, states that meals are non-reimbursable if served at sites not approved by the State agency.

#### Recommendation

The Sponsor should ensure that information listed in the DHS Tennessee Information Payment System (TIPS) is current and up to date for all approved sites.

### **11. Meals were not served as a complete unit**

#### Condition

During the breakfast observation on June 29, 2017 at 1391 Grahamwood ES- SCS Summer School meals were not served as a complete unit. Participants went through a line and given the options of which components to choose. 179 breakfasts were observed and documented as served and will be disallowed.

During the lunch observation on June 29, 2017 at 0124 Community Center- Raleigh meals were not served as a complete unit. Participants were served turkey ham, cheese, a Hawaiian bun, raisins, a juice bar and milk. The juice bar was served approximately 30 minutes into the meal. 122 meals were observed, but 121 were disallowed due to meals being non-unitized at the point of service.

### Criteria

The United States Department of Agriculture (USDA) Food and Nutrition Service (FNS) Summer Food Service Program 2016 *Administration Guide* for sponsors, page 133, states "that reimbursement may not be claimed for meals not served as a complete unit (except in "offer versus serve "sites where complete meals must be offered to participants)."

As a result, 179 breakfasts and 121 lunches were disallowed.

### Recommendation

The Sponsor should ensure that meals are being served as one unit which includes all components.

## **12. The "And Justice for All" poster was not posted at two sites**

### Condition

1492 Mid-South Food Bank-Mploy Youth Program did not have the "And Justice for All" poster posted at the time of a meal observation on 06/13/17.

1475 Shelby Metro Football did not have the "And Justice for All" poster posted at the time of a meal observation on 06/08/17.

### Criteria

The United States Department of Agriculture (USDA) Food and Nutrition Service (FNS) Summer Food Service Program 2016 *Administration Guide* for sponsors, page 121, states "all sponsors and their sites are required to display in a prominent place at the site and in the sponsor's office, the "And Justice for All" poster developed by USDA or approved by FNS."

### Recommendation

The Sponsor should ensure that all sites have the "And Justice for All" poster displayed in a prominent place.

## **13. Site staff did not sign the meal delivery receipt**

### Condition

During the site visit on June 16, 2017 at 0467 Park Services- Howze Pool, a monitor attempted to observe the meal delivery ticket for the observed meal, but a meal delivery receipt was not available. Site staff did not sign the meal delivery receipt.

### Criteria

The United States Department of Agriculture (USDA) Food and Nutrition Service (FNS) Summer Food Service Program 2016 *Administration Guide* for sponsors, page 139, states "Any sponsor serving vended meals must be sure that the figure entered as the number of meals delivered on the site record is the same as that entered on the vendor's report. When they collect the site records, sponsors should check for the site supervisor's signature."

### Recommendation

The Sponsor should ensure that all meal delivery receipts are accurate and signed by a site supervisor.

### Technical Assistance

Program monitors provided technical assistance regarding the correct manner to complete point of service meal count sheets, meal patterns, meal service and record keeping.

### Overpayment

Based on our review, we determined that the Sponsor's noncompliance with the applicable Federal and State regulations that govern the SFSP resulted in disallowed meals cost of \$3,361.63.

### Corrective Action

Shelby County School System must complete the following actions within 30 days from the date of this report:

- Login to the Tennessee Information Payment System (TIPS) and revise the claim submitted for the center for June 2017, which contains the claim data from the enclosed exhibits;
- Remit a check payable to the ***Tennessee Department of Human Services*** in the amount of \$3,361.63 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  
Child and Adult Care Food Program  
8th Floor Citizens Plaza Building  
400 Deaderick Street  
Nashville, Tennessee 37243  
[Allette.Vayda@tn.gov](mailto:Allette.Vayda@tn.gov)  
(615) 313-3769

Please note that the amount of disallowed cost is subject to an interest charge. The interest charge will be waived if your revised claim is received within 30 days from the date of this report. If the revised claim is not completed by the 30-day deadline, an interest charge may be billed to your institution. Please mail your check and the billing notice to:

Summer Food Service Program  
Fiscal Services  
11th Floor, Citizens Plaza Building  
400 Deaderick Street  
Nashville, Tennessee 37243

As provided by the federal regulation found at 7 CFR Part 225.13, your institution may appeal the amount of disallowed costs 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 meals 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 Jackie Yokley, Audit Director 2, at 615-837-5035 or [Jackie.D.Yokley@tn.gov](mailto:Jackie.D.Yokley@tn.gov).

Sincerely,



Sam O. Alzoubi, CFE  
Director of Audit Services

Exhibits

cc: Allette Vayda, Director, 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  
Elke Moore, Community and Social Services Nutrition Programs  
Comptroller of the Treasury, State of Tennessee

**EXHIBIT A**

**Summary of Total Claimed and Reconciled Meals**

**Sponsor: Shelby County School System**

**Review Month/Year: June 2017**

**Total Meal Reimbursement Received: \$1,734,999.91**

<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 Breakfast	210	210
Number of Participating Sites for Lunch	348	350
Number of Participating Sites for PM Snacks	110	111
Number of Participating Sites for Supper	23	23
Number of Breakfasts Served	185,517	183,985
Number of Lunches Served	320,670	320,718
Number of Supplements Served	86,027	85,475
Number of Suppers Served	5,778	5,858

**Exhibit B**

**Sponsor: Shelby County School System**

**Site: White Station Middle 622**

**Review Month/Year: June 2017**

<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	20	20
Number of Breakfast Served	1,671	1,671
Number of Lunch Served	1,873	1,894

**Exhibit C**

**Sponsor: Shelby County School System**

**Site: White Katebond 1399**

**Review Month/Year: June 2017**

<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	15	15
Number of Breakfast Served	1,002	1,004
Number of Lunch Served	1,822	1,868

**Exhibit D**

**Sponsor: Shelby County School System**

**Site: Leadership Empowerment Center 0333**

**Review Month/Year: June 2017**

<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	15	15
Number of Breakfast Served	835	835
Number of Lunch Served	938	938

**Exhibit E**

**Sponsor: Shelby County School System**

**Site: Dexter Elementary 1421/711 combined**

**Review Month/Year: June 2017**

<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	15	15
Number of Breakfast Served	3,157	3,155
Number of Lunch Served	4,609	4,499

**Exhibit F**

**Sponsor: Shelby County School System**  
**Site: Neighborhood Christian Center-Greenbriar 0427**  
**Review Month/Year: June 2017**

<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	14	14
Number of Breakfast Served	692	740
Number of Lunch Served	840	800

**Exhibit G**

**Sponsor: Shelby County School System**  
**Site: Frayser Headstart-Porter Leath 0737**  
**Review Month/Year: June 2017**

<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	20	20
Number of Breakfast Served	932	911
Number of Lunch Served	1,180	1,180

**Exhibit H**

**Sponsor: Shelby County School System**  
**Site: Lucie E. Campbell ES- SCS Summer School 1396**  
**Review Month/Year: June 2017**

<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	15	15
Number of Breakfast Served	3,246	3,246
Number of Lunch Served	3,390	3,392

**Exhibit I**

**Sponsor: Shelby County School System**

**Site: Delano Headstart 1485**

**Review Month/Year: June 2017**

<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	20	20
Number of Breakfast Served	938	938
Number of Lunch Served	912	916

**Exhibit J**

**Sponsor: Shelby County School System**

**Site: Positive Impact-Girls Camp 1502**

**Review Month/Year: June 2017**

<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	19	19
Number of Breakfast Served	186	182
Number of Lunch Served	188	188

**Exhibit K**

**Sponsor: Shelby County School System**

**Site: Cordova Middle School- Cougar Tech Camp 1548**

**Review Month/Year: June 2017**

<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	10	10
Number of Lunch Served	83	78

**Exhibit L**

**Sponsor: Shelby County School System**  
**Site: Kate Bond ES- SCS Summer School 0696**  
**Review Month/Year: June 2017**

<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	15	15
Number of Breakfast Served	1,649	1,649
Number of Lunch Served	1,716	1,716

**Exhibit M**

**Sponsor: Shelby County School System**  
**Site: Destination Education LC 1564**  
**Review Month/Year: June 2017**

<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	19	19
Number of Breakfast Served	316	316
Number of Lunch Served	319	305

**Exhibit N**

**Sponsor: Shelby County School System**  
**Site: Community Center-Gaisman 0114**  
**Review Month/Year: June 2017**

<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	15	15
Number of Breakfast Served	663	663
Number of Lunch Served	860	860

**Exhibit O**

**Sponsor: Shelby County School System**

**Site: Gardenwood Apartments 0217**

**Review Month/Year: June 2017**

<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 Served	1,370	1,370

**Exhibit P**

**Sponsor: Shelby County School System**

**Site: Hill's Home Before & After School Agers Kingdom AC 0278**

**Review Month/Year: June 2017**

<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	14	14
Number of Lunch Served	338	320
Number of Snack Served	320	320

**Exhibit Q**

**Sponsor: Shelby County School System**

**Site: Hilldale Apartments 0279**

**Review Month/Year: June 2017**

<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 Served	1,650	1,595
Number of Snack Served	1,650	1,650

**Exhibit R**

**Sponsor: Shelby County School System**

**Site: Avon Lenox 0048**

**Review Month/Year: June 2017**

<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	20	20
Number of Breakfast Served	1,762	1,762
Number of Lunch Served	1,986	1,935

**Exhibit S**

**Sponsor: Shelby County School System**

**Site: Rev Wind Marital Arts Center 0518**

**Review Month/Year: June 2017**

<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	0	13
Number of Breakfast Served	0	272
Number of Lunch Served	0	268

**Exhibit T**

**Sponsor: Shelby County School System**

**Site: Airways Police Station- G.R.E.AT 1356**

**Review Month/Year: June 2017**

<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	15	15
Number of Breakfast Served	478	469
Number of Lunch Served	432	424

**Exhibit U**

**Sponsor: Shelby County School System**  
**Site: New Friendship MBC King's Kids 1429**  
**Review Month/Year: June 2017**

<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	3	2
Number of Breakfast Served	60	60
Number of Lunch Served	60	60

**Exhibit V**

**Sponsor: Shelby County School System**  
**Site: Colonial Hearing, Speech, & Vision 0100**  
**Review Month/Year: June 2017**

<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	20	20
Number of Breakfast Served	1,126	1,126
Number of Lunch Served	936	936

**Exhibit W**

**Sponsor: Shelby County Schools**  
**Site: Knowledge Quest Gaston Community Center 0704**  
**Review Month/Year: June 2017**

<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	15	15
Number of Breakfast Served	791	779
Number of Lunch Served	1,292	1,288

**Exhibit X**

**Sponsor: Shelby County School System**  
**Site: Lamar Crossing Apartments 1556**  
**Review Month/Year: June 2017**

<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	21	21
Number of Lunch Served	785	635
Number of Snack Served	785	430

**Exhibit Y**

**Sponsor: Shelby County School System**  
**Site: Day & Night Childcare 0142**  
**Review Month/Year: June 2017**

<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	20	20
Number of Lunch Served	328	328
Number of Snack Served	324	324

**Exhibit Z**

**Sponsor: Shelby County School System**  
**Site: Longviews Garden Apartments Homes 0824**  
**Review Month/Year: June 2017**

<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 Served	870	870

**Exhibit AA**

**Sponsor: Shelby County School System**  
**Site: Community Center Pine Hill 0123**  
**Review Month/Year: June 2017**

<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	15	15
Number of Lunch Served	869	869
Number of Snack Served	812	812

**Exhibit BB**

**Sponsor: Shelby County School System**  
**Site: Hattiloo MPLOY Summer Youth 1517**  
**Review Month/Year: June 2017**

<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	16	16
Number of Lunch Served	200	187

**Exhibit CC**

**Sponsor: Shelby County School System**  
**Site: Grad Academy Memphis-Freedom School 0242**  
**Review Month/Year: June 2017**

<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	15	15
Number of Breakfast Served	656	645
Number of Lunch Served	616	617

**Exhibit DD**

**Sponsor: Shelby County School System**

**Site: Stax Music Academy 0580**

**Review Month/Year: June 2017**

<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	14	14
Number of Breakfast Served	240	240
Number of Lunch Served	232	231

**Exhibit EE**

**Sponsor: Shelby County School System**

**Site: Whitehaven High Summer Enrichment 0659**

**Review Month/Year: June 2017**

<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	10	8
Number of Breakfast Served	875	875
Number of Lunch Served	871	896

**Exhibit FF**

**Sponsor: Shelby County School System**

**Site: Longstreet United Methodist Church-Project Transformation TN 0741**

**Review Month/Year: June 2017**

<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	16	16
Number of Breakfast Served	768	768
Number of Lunch Served	877	877

**Exhibit GG**

**Sponsor: Shelby County School System**  
**Site: Faith Heritage Summer Program 1575**  
**Review Month/Year: June 2017**

<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	18	18
Number of Breakfast Served	327	313
Number of Lunch Served	309	309

**Exhibit HH**

**Sponsor: Shelby County School System**  
**Site: Brown Temple C.O.G.I.C.-Summer Camp 1451**  
**Review Month/Year: June 2017**

<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	8	8
Number of Lunch Served	200	200

**Exhibit II**

**Sponsor: Shelby County School System**  
**Site: Catholic Charites Camp Love and Learn St. Ann School 1341**  
**Review Month/Year: June 2017**

<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	20	20
Number of Breakfast Served	1,717	1,621
Number of Lunch Served	1,537	1,537

**Exhibit JJ**

**Sponsor: Shelby County School System**  
**Site: Chickasaws Council-MPLOY Summer Youth 1484**  
**Review Month/Year: June 2017**

<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	16	16
Number of Breakfast Served	48	44
Number of Lunch Served	48	46

**Exhibit KK**

**Sponsor: Shelby County School System**  
**Site: Early Grove Church VBS 1439**  
**Review Month/Year: June 2017**

<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	4	4
Number of Breakfast Served	0	0
Number of Supper Served	165	165

**Exhibit LL**

**Sponsor: Shelby County School System**

**Site: First Baptist Church-Broad 0204**

**Review Month/Year: June 2017**

<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	20	20
Number of Breakfast Served	320	320
Number of Lunch Served	902	903
Number of Snack Served	170	170

**Exhibit MM**

**Sponsor: Shelby County School System**

**Site: Grahamwood ES-SCS Summer School1391**

**Review Month/Year: June 2017**

<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	15	15
Number of Breakfast Served	2,652	2,475
Number of Lunch Served	2,777	2,779

**Exhibit NN**

**Sponsor: Shelby County School System**

**Site: Community Center-Lester 0119**

**Review Month/Year: June 2017**

<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	15	15
Number of Lunch Served	1,878	1,878
Number of Snack Served	1,890	1,890

**Exhibit OO**

**Sponsor: Shelby County Schools**

**Site: Memphis Academy of Science Engineering 1334**

**Review Month/Year: June 2017**

<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	15	15
Number of Lunch Served	304	296
Number of Snack Served	391	391

**Exhibit PP**

**Sponsor: Shelby County School System**

**Site: Mid-South Food Bank- MPLOY Youth Program 1492**

**Review Month/Year: June 2017**

<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	11	11
Number of Lunch Served	44	44

**Exhibit QQ**

**Sponsor: Shelby County Schools System**

**Site: Park Services- Howze Pool 0467**

**Review Month/Year: June 2017**

<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	20	20
Number of Lunch Served	772	797

**Exhibit RR**

**Sponsor: Shelby County Schools System**

**Site: RBI- Bickford 0505**

**Review Month/Year: June 2017**

<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	0	17
Number of Lunch Served	0	509

**Exhibit SS**

**Sponsor: Shelby County School System**

**Site: Community Center- Raleigh 0124**

**Review Month/Year: June 2017**

<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	15	15
Number of Lunch Served	2,785	2,599
Number of Snack Served	374	374

**Exhibit TT**

**Sponsor: Shelby County Schools**  
**Site: Refuge Memphis Summer Camp 513**  
**Review Month/Year: June 2017**

<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	15	15
Number of Breakfast Served	738	738
Number of Lunch Served	748	748

**Exhibit UU**

**Sponsor: Shelby County School System**  
**Site: Shelby Metro-Football 1475**  
**Review Month/Year: June 2017**

<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	5	5
Number of Lunch Served	738	738
Number of Snack Served	0	0

**Exhibit VV**

**Sponsor: Shelby County School System**  
**Site: Urban Community Ministries Safe Haven Program**  
**Review Month/Year: June 2017**

<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	16	16
Number of Breakfast Served	399	399
Number of Lunch Served	454	454

**Exhibit WW**

**Sponsor: Shelby County School System**  
**Site: Park Services Riverview Pool 0475**  
**Review Month/Year: June 2017**

<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	15	15
Number of Lunch Served	584	584

**Exhibit XX**

**Sponsor: Shelby County School System**  
**Site: Glitzy Girls 0227**  
**Review Month/Year: June 2017**

<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	16	16
Number of Breakfast Served	328	316
Number of Lunch Served	329	348

**Exhibit YY**

**Sponsor: Shelby County School System**  
**Site: Greater Moriah Safe Haven Summer Camp 1526**  
**Review Month/Year: June 2017**

<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	17	17
Number of Lunch Served	193	193
Number of Snack Served	223	223

**Exhibit ZZ**

**Sponsor: Shelby County Schools**  
**Site: Greater Moriah Safe Haven 1526**  
**Review Month/Year: June 2017**

<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	17	17
Number of Lunch Served	193	193
Number of Snack Served	223	223

**Exhibit AAA**

**Sponsor: Shelby County School System**  
**Site: Holy Nation Church- Camp Royale Summer Camp 0771**  
**Review Month/Year: June 2017**

<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 Breakfast Served	999	999
Number of Lunch Served	997	997

**Exhibit BBB**

**Sponsor: Shelby County School System**  
**Site: Helping Hands Community Outreach 0272**  
**Review Month/Year: June 2017**

<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	15	13
Number of Breakfast Served	271	271
Number of Lunch Served	276	276

**Exhibit CCC**

**Sponsor: Shelby County School System**  
**Site: Case Management Inc.-Youth Summer Camp 1440**  
**Review Month/Year: June 2017**

<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	12	12
Number of Lunch Served	330	330
Number of Snack Served	330	330

**Exhibit DDD**

**Sponsor: Shelby County School System**  
**Site: Young Actors Guild 0889**  
**Review Month/Year: June 2017**

<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 Breakfast Served	2,119	2,119
Number of Lunch Served	2,452	2,452

**Exhibit EEE**

**Sponsor: Shelby County School System**  
**Site: Ridgeway Middle School-SCS Summer School 1401**  
**Review Month/Year: June 2017**

<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	15	15
Number of Breakfast Served	1,139	1,139
Number of Lunch Served	2,356	2,356

**Exhibit FFF**

**Sponsor: Shelby County School System**

**Site: Getwell ESY 0221**

**Review Month/Year: June 2017**

<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	20	20
Number of Breakfast Served	862	862
Number of Lunch Served	862	908

**Exhibit GGG**

**Sponsor: Shelby County School System**

**Site: Accomplishing Word Ministries -Summer Camp 1530**

**Review Month/Year: June 2017**

<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	20	20
Number of Breakfast Served	304	304
Number of Lunch Served	285	285

**Exhibit HHH**

**Sponsor: Shelby County School System**

**Site: Germantown Middle Enrichment Camp 1570**

**Review Month/Year: June 2017**

<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	3	3
Number of Lunch Served	146	146
Number of Snack Served	0	0

**Exhibit III**

**Sponsor: Shelby County School System**

**Site: Durham Housing SVC- MPLOY Summer Youth Program 1478**

**Review Month/Year: June 2017**

<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	17	17
Number of Lunch Served	280	270
Number of Snack Served	280	280

**Exhibit JJJ**

**Sponsor: Shelby County School System**

**Site: Palabra Miel Memphis- Summer Camp 1505**

**Review Month/Year: June 2017**

<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	20	20
Number of Breakfast Served	763	763
Number of Lunch Served	779	780

**Exhibit KKK**

**Sponsor: Shelby County School System**

**Site: Emmanuel Episcopal Church Theater Camp 0178**

**Review Month/Year: June 2017**

<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	6	6
Number of Lunch Served	180	180
Number of Snack Served	180	180

**Exhibit LLL**

**Sponsor: Shelby County School System**  
**Site: Germanshire ES-SACC 219**  
**Review Month/Year: June 2017**

<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	20	20
Number of Lunch Served	559	559
Number of Snack Served	568	568

**Exhibit MMM**

**Sponsor: Shelby County School System**  
**Site: Highland Oaks Middle School 0276**  
**Review Month/Year: June 2017**

<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	15	15
Number of Breakfast Served	359	360
Number of Snack Served	421	421

**Exhibit NNN**

**Sponsor: Shelby County School System**  
**Site: Houston Levee Community Center-Summer Day Camp 0780**  
**Review Month/Year: June 2017**

<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	20	20
Number of Lunch Served	1,082	1,082
Number of Snack Served	1,300	1,300

**Exhibit OOO**

**Sponsor: Shelby County School System**

**Site: Skyway Computer-MPLOY 1490**

**Review Month/Year: June 2017**

<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	17	17
Number of Lunch Served	90	90

**Exhibit PPP**

**Sponsor: Shelby County School System**

**Site: Westhaven Elementary (1542 & 1559 combined)**

**Review Month/Year: June 2017**

<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	17	17
Number of Snack Served	962	1162
Number of Supper Served	1172	1272

**Exhibit QQQ**

**Sponsor: Shelby County School System**

**Site: Mount Zion AME Church Bible Study - 1335**

**Review Month/Year: June 2017**

<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	4	4
Number of Snack Served	46	46
Number of Supper Served	60	46

**Exhibit RRR**

**Sponsor: Shelby County School System**  
**Site: Mt. Zion M.B. Church (Rossville) VBS 0710**  
**Review Month/Year: June 2017**

<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	3	3
Number of Breakfast Served	143	125
Number of Lunch Served	126	126

**Exhibit SSS**

**Sponsor: Shelby County School System**  
**Site: Alton Elementary-Superintendent Summer Learning Academy 1394**  
**Review Month/Year: June 2017**

<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	15	15
Number of Breakfast Served	1,446	1,255
Number of Lunch Served	1,993	1,901

**Exhibit TTT**

**Sponsor: Shelby County School System**  
**Site: Community Center-Charles Powell 0103**  
**Review Month/Year: June 2017**

<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	15	15
Number of Lunch Served	670	670
Number of Snack Served	670	625

**Exhibit UUU**

**Overpayment Summary**

<b>Disallowed Meals</b>	<b>X Meal Rate</b>	<b>Total</b>
1532 Breakfasts	\$2.1875	\$3,351.25
552 PM Snacks	\$0.9075	\$500.94
<b>Allowed Meals</b>		
48 Lunches	\$3.8325	-\$183.96
80 Suppers	\$3.8325	-\$306.60
<b>Total Overpayment</b>		<b>\$3,361.63</b>



**STATE OF TENNESSEE  
DEPARTMENT OF HUMAN SERVICES**

CITIZENS PLAZA BUILDING  
400 DEADERICK STREET  
NASHVILLE, TENNESSEE 37243-1403

TELEPHONE: 615-313-4700 FAX: 615-741-4165  
TTY: 1-800-270-1349  
www.tn.gov/humanservices

**BILL HASLAM**  
GOVERNOR

**DANIELLE W. BARNES**  
COMMISSIONER

October 13, 2017

Mr. Calvin Johnson  
Shelby County School System  
3176 Jackson Avenue  
Memphis, Tennessee 38112-1520

**Notice of payment due to findings disclosed in the monitoring report dated October 13, 2017 for Summer Food Service Program (SFSP).**

Institution Name:	Shelby County School System
Institution Address:	3176 Jackson Avenue Memphis, Tennessee 38112-1520
Agreement Numbers:	00069
Amount Due:	\$3,361.63
Due Date:	November 13, 2017

Based on the monitoring report issued on October 13, 2017 by the Audit Services Division within the Tennessee Department of Human Services, the Community and Social Services- Food Programs- CACFP & SFSP management has agreed with the findings which requires Shelby County School System to reimburse the Department of Human Services unallowed cost in the amount of \$3,361.63.

Please remit a check or money order payable to the **Tennessee Department of Human Services** in the amount of \$3,361.63 by the due date to:

**Tennessee Department of Human Services  
Fiscal Services 11<sup>th</sup> Floor  
Citizens Plaza Building  
400 Deaderick Street  
Nashville, Tennessee 37243-1403**

Please note that the unallowed cost/overpayment of the SFSP is subject to an interest charge. The interest charge will be waived if the payment is received by the due date. If payment is not received by the end of 5th day of the due date, an interest charge may be added to the original amount due and will be billed to your entity.

If you have any questions regarding this notice, please feel free to contact Allette Vayda, Director, Community and Social Services- Food Programs- CACFP & SFSP at (615) 313-3769 or [Allette.Vayda@tn.gov](mailto:Allette.Vayda@tn.gov).

Thank you for your attention



# Corrective Action Plan for Monitoring Findings

**Instructions:** Please print in ink or type the information to complete this document. Enter the date of birth for each Responsible Principal and/or Individual in Section B. Attach the additional documentation requested. Enter your name, title and date of signature on the last page. Please sign your name in ink.  
**Please return ALL pages of the completed Corrective Action Plan form.**

## Section A. Institution Information

Name of Sponsor/Agency/Site: Shelby County School System	Agreement No. 00069	<input checked="" type="checkbox"/> SFSP <input type="checkbox"/> CACFP
--	------------------------	--

Mailing Address: 3176 Jackson Avenue Memphis, Tennessee 38112-1520

## Section B. Responsible Principal(s) and/or Individual(s)

Name and Title: Mr. Calvin E. Johnson, Director of School Operations	Date of Birth: / /
--	--------------------

## Section C. Dates of Issuance of Monitoring Report/Corrective Action Plan

Monitoring Report: 10/13/17	Corrective Action Plan: 10/13/17
-----------------------------	----------------------------------

## Section D. Findings

Findings:

1. The number of meals reported for reimbursement was incorrect
2. Point of Service meal count forms contained errors
3. Meals were recorded prior to the meal service
4. Meals were served outside of the sponsor's approved meal service time
5. Standard meal pattern requirements were not met
6. The number of meals reported exceeded the site's approved level of meal service
7. Sites did not have adequate facilities to store food
8. One site did not have a thermometer in the storage facility
9. Point of Service meal count were not taken at two feeding sites
10. The Sponsor served meals at unapproved address
11. Meals were not served as a complete unit
12. The " And Justice for All" poster was not posted at two sites
13. Site staff did not sign the meal delivery receipt

The following measures will be completed within **30 calendar days** of my institution's receipt of this corrective action plan:

**Measure No. 1: The number of meals reported for reimbursement was incorrect**

The finding will be fully and permanently corrected.

Identify the name(s) and position title(s) of the employee(s) who will be responsible for ensuring that the finding is fully and permanently corrected:

Name:

Position Title:

Name:

Position Title:

Describe below the **step-by-step** procedures that will be implemented to correct the finding:

---

---

---

---

---

---

---

When will the procedures for addressing the finding be implemented? Provide a timeline below for implementing the procedures (i.e., will the procedures be done daily, weekly, monthly, or annually, and when will they begin?):

---

---

---

---

---

---

---

Where will the Corrective Action Plan documentation be retained? Please identify below:

---

---

---

---

How will new and current staff be informed of the new policies and procedures to address the finding (e.g., Handbook, training, etc.)? Please describe below:

---

---

---

---

**Measure No.2: Point of Service meal count forms contained errors**

The finding will be fully and permanently corrected.

Identify the name(s) and position title(s) of the employee(s) who will be responsible for ensuring that the finding is fully and permanently corrected:

Name: Position Title:

Name: Position Title:

Describe below the **step-by-step** procedures that will be implemented to correct the finding:

---

---

---

---

---

---

---

When will the procedures for addressing the finding be implemented? Provide a timeline below for implementing the procedures (i.e., will the procedures be done daily, weekly, monthly, or annually, and when will they begin?):

---

---

---

---

Where will the Corrective Action Plan documentation be retained? Please identify below:

---

---

---

How will new and current staff be informed of the new policies and procedures to address the finding (e.g., Handbook, training, etc.)? Please describe below:

---

---

---

---

**Measure No. 3: Meals were recorded prior to the meal service**

The finding will be fully and permanently corrected.  
Identify the name(s) and position title(s) of the employee(s) who will be responsible for ensuring that the finding is fully and permanently corrected:

Name: Position Title:

Name: Position Title:

Describe below the **step-by-step** procedures that will be implemented to correct the finding:

---

---

---

---

---

---

---

When will the procedures for addressing the finding be implemented? Provide a timeline below for implementing the procedures (i.e., will the procedures be done daily, weekly, monthly, or annually, and when will they begin?):

---

---

---

---

---

---

Where will the Corrective Action Plan documentation be retained? Please identify below:

---

---

---

How will new and current staff be informed of the new policies and procedures to address the finding (e.g., Handbook, training, etc.)? Please describe below:

---

---

---

---

**Measure No. 4: Meals were served outside of the Sponsor's approved meal service time**

The finding will be fully and permanently corrected.  
Identify the name(s) and position title(s) of the employee(s) who will be responsible for ensuring that the finding is fully and permanently corrected:

Name: Position Title:

Name: Position Title:

Describe below the **step-by-step** procedures that will be implemented to correct the finding:

---

---

---

---

---

When will the procedures for addressing the finding be implemented? Provide a timeline below for implementing the procedures (i.e., will the procedures be done daily, weekly, monthly, or annually, and when will they begin?):

---

---

---

---

---

---

Where will the Corrective Action Plan documentation be retained? Please identify below:

---

---

---

How will new and current staff be informed of the new policies and procedures to address the finding (e.g., Handbook, training, etc.)? Please describe below:

---

---

---

---

**Measure No. 5: Standard meal pattern requirements were not met**

The finding will be fully and permanently corrected.

Identify the name(s) and position title(s) of the employee(s) who will be responsible for ensuring that the finding is fully and permanently corrected:

Name:

Position Title:

Name:

Position Title:

Describe below the **step-by-step** procedures that will be implemented to correct the finding:

---

---

---

---

---

---

---

When will the procedures for addressing the finding be implemented? Provide a timeline below for implementing the procedures (i.e., will the procedures be done daily, weekly, monthly, or annually, and when will they begin?):

---

---

---

---

---

---

---

Where will the Corrective Action Plan documentation be retained? Please identify below:

---

---

---

---

How will new and current staff be informed of the new policies and procedures to address the finding (e.g., Handbook, training, etc.)? Please describe below:

---

---

---

---

---

**Measure No.6: The number of meals reported exceeded the site’s approved level of meal service**

The finding will be fully and permanently corrected.

Identify the name(s) and position title(s) of the employee(s) who will be responsible for ensuring that the finding is fully and permanently corrected:

Name:

Position Title:

Name:

Position Title:

Describe below the **step-by-step** procedures that will be implemented to correct the finding:

---

---

---

---

---

---

---

---

When will the procedures for addressing the finding be implemented? Provide a timeline below for implementing the procedures (i.e., will the procedures be done daily, weekly, monthly, or annually, and when will they begin?):

---

---

---

---

---

---

---

---

Where will the Corrective Action Plan documentation be retained? Please identify below.

---

---

---

---

---

---

---

---

How will new and current staff be informed of the new policies and procedures to address the finding (e.g., Handbook, training, etc.)? Please describe below:

---

---

---

---

**Measure No. 7: Sites did not have adequate facilities to store food**

The finding will be fully and permanently corrected.

Identify the name(s) and position title(s) of the employee(s) who will be responsible for ensuring that the finding is fully and permanently corrected:

Name: \_\_\_\_\_ Position Title: \_\_\_\_\_

Name: \_\_\_\_\_ Position Title: \_\_\_\_\_

Describe below the **step-by-step** procedures that will be implemented to correct the finding:

---

---

---

---

---

---

---

When will the procedures for addressing the finding be implemented? Provide a timeline below for implementing the procedures (i.e., will the procedures be done daily, weekly, monthly, or annually, and when will they begin?):

---

---

---

---

---

---

---

Where will the Corrective Action Plan documentation be retained? Please identify below:

---

---

How will new and current staff be informed of the new policies and procedures to address the finding (e.g., Handbook, training, etc.)? Please describe below:

---

---

---

---

**Measure No. 8: One site did not have a thermometer in the storage facility**

The finding will be fully and permanently corrected.

Identify the name(s) and position title(s) of the employee(s) who will be responsible for ensuring that the finding is fully and permanently corrected:

Name: \_\_\_\_\_ Position Title: \_\_\_\_\_

Name: \_\_\_\_\_ Position Title: \_\_\_\_\_

Describe below the **step-by-step** procedures that will be implemented to correct the finding:

---

---

---

---

---

---

When will the procedures for addressing the finding be implemented? Provide a timeline below for implementing the procedures (i.e., will the procedures be done daily, weekly, monthly, or annually, and when will they begin?):

---

---

---

---

---

Where will the Corrective Action Plan documentation be retained? Please identify below:

---

---

---

---

How will new and current staff be informed of the new policies and procedures to address the finding (e.g., Handbook, training, etc.)? Please describe below:

**Measure No. 9: Point of Service meal counts were not taken at two feeding sites**

The finding will be fully and permanently corrected.

Identify the name(s) and position title(s) of the employee(s) who will be responsible for ensuring that the finding is fully and permanently corrected:

Name:

Position Title:

Name:

Position Title:

Describe below the **step-by-step** procedures that will be implemented to correct the finding:

When will the procedures for addressing the finding be implemented? Provide a timeline below for implementing the procedures (i.e., will the procedures be done daily, weekly, monthly, or annually, and when will they begin?):

---

---

---

---

---

Where will the Corrective Action Plan documentation be retained? Please identify below:

---

---

---

How will new and current staff be informed of the new policies and procedures to address the finding (e.g., Handbook, training, etc.)? Please describe below:

---

---

---

---

**Measure No. 10: The Sponsor served meals at unapproved address**

The finding will be fully and permanently corrected.

Identify the name(s) and position title(s) of the employee(s) who will be responsible for ensuring that the finding is fully and permanently corrected:

Name:

Position Title:

Name:

Position Title:

Describe below the **step-by-step** procedures that will be implemented to correct the finding:

---

---

---

---

---

---

When will the procedures for addressing the finding be implemented? Provide a timeline below for implementing the procedures (i.e., will the procedures be done daily, weekly, monthly, or annually, and when will they begin?):

---

---

---

---

Where will the Corrective Action Plan documentation be retained? Please identify below:

---

---

---

How will new and current staff be informed of the new policies and procedures to address the finding (e.g., Handbook, training, etc.)? Please describe below:

---

---

---

---

**Measure No. 11: Meals were not served as a complete unit**

The finding will be fully and permanently corrected.  
Identify the name(s) and position title(s) of the employee(s) who will be responsible for ensuring that the finding is fully and permanently corrected:

Name: \_\_\_\_\_ Position Title: \_\_\_\_\_

Name: \_\_\_\_\_ Position Title: \_\_\_\_\_

Describe below the **step-by-step** procedures that will be implemented to correct the finding:

---

---

---

---

---

---

---

---

When will the procedures for addressing the finding be implemented? Provide a timeline below for implementing the procedures (i.e., will the procedures be done daily, weekly, monthly, or annually, and when will they begin?):

---

---

---

---

---

---

---

---

Where will the Corrective Action Plan documentation be retained? Please identify below:

---

---

---

---

---

---

---

---

How will new and current staff be informed of the new policies and procedures to address the finding (e.g., Handbook, training, etc.)? Please describe below:

---

---

---

---

---

---

---

---

**Measure No. 12: The "And Justice for All" poster was not posted at two sites**

The finding will be fully and permanently corrected.

Identify the name(s) and position title(s) of the employee(s) who will be responsible for ensuring that the finding is fully and permanently corrected:

Name:

Position Title:

Name:

Position Title:

Describe below the **step-by-step** procedures that will be implemented to correct the finding:

---

---

---

---

---

---

---

When will the procedures for addressing the finding be implemented? Provide a timeline below for implementing the procedures (i.e., will the procedures be done daily, weekly, monthly, or annually, and when will they begin?):

---

---

---

---

---

---

---

Where will the Corrective Action Plan documentation be retained? Please identify below:

---

---

---

---

How will new and current staff be informed of the new policies and procedures to address the finding (e.g., Handbook, training, etc.)? Please describe below:

---

---

---

---

**Measure No. 13: Site staff did not sign the meal delivery receipt**

The finding will be fully and permanently corrected.

Identify the name(s) and position title(s) of the employee(s) who will be responsible for ensuring that the finding is fully and permanently corrected:

Name: \_\_\_\_\_ Position Title: \_\_\_\_\_

Name: \_\_\_\_\_ Position Title: \_\_\_\_\_

Describe below the **step-by-step** procedures that will be implemented to correct the finding:

---

---

---

---

---

---

---

---

When will the procedures for addressing the finding be implemented? Provide a timeline below for implementing the procedures (i.e., will the procedures be done daily, weekly, monthly, or annually, and when will they begin?):

---

---

---

---

---

---

Where will the Corrective Action Plan documentation be retained? Please identify below:

---

---

---

How will new and current staff be informed of the new policies and procedures to address the finding (e.g., Handbook, training, etc.)? Please describe below:

---

---

---

---

I certify by my signature below that I am authorized by the institution to sign this document. As an authorized representative of the institution, I fully understand the corrective measures identified above and agree to fully implement these measures within the required time frame. I also understand that failure to fully and permanently correct the findings in my institution's CACFP or SFSP will result in its termination from the program, and the placement of the institution and its responsible principals on the National Disqualified List maintained by the U.S. Department of Agriculture.

Printed Name of Authorized Institution Official:

Position:

Signature of Authorized Institution Official: \_\_\_\_\_

Date: / /

Signature of Authorized TDHS Official: \_\_\_\_\_

Date: / /

**SUMMER FOOD SERVICE PROGRAM  
SPONSOR APPEAL PROCEDURES  
REVISED FEBRUARY 26, 2014**

7 C.F.R. § 225.13 governs appeals in the Summer Food Service Program and the maximum time limit for processing appeals is nineteen (19) calendar days for the Summer Food Service Program as follows:

1. The Department shall notify the appellant (Sponsor) in writing of the grounds upon which the Department has based the action. The Department's notice of action shall be sent by certified mail, return receipt requested, and shall also state whether the sponsor has the right to appeal the Department's action.
2. Appealable actions are outlined in 7 C.F.R. § 225.13(a) and are: A denial of an application for participation; a denial of a sponsor's request for an advance payment; a denial of a sponsor's claim for reimbursement (except for late submission under 7 C.F.R. § 225.9(d)(6)); the Department's refusal to forward to FNS an exception request by the sponsor for payment of a late claim or a request for an upward adjustment to a claim; a claim against a sponsor for remittance of a payment; the termination of the sponsor or a site; or a denial of a sponsor's application for a site.
2. The time period allowed for filing the appeal, where actions are appealable as specified in 7 C.F.R. § 225.13(a), is **ten (10) calendar days** from the date on which the notice of action sent by certified mail return receipt requested, is received.
3. The appeal must be in writing and must conform to the requirements outlined in 7 C.F.R. § 225.13(b)(4), which are set forth in paragraph (5) below.
4. The address to file an appeal is as follows:  
  
Tennessee Department of Human Services  
Appeals and Hearings Division, Clerk's Office  
P.O. Box 198996  
Nashville, TN 37219-8996  
Toll Free: (866) 787-8209  
Local: (615) 744-3900  
Fax: (866) 355-6136  
[AppealsClerksOffice.DHS@tn.gov](mailto:AppealsClerksOffice.DHS@tn.gov)
5. The appellant is allowed to refute the charges in the notice of action in person, or by filing written documentation with the review official. If the appeal letter does not specifically request a hearing, a review of written

documentation in lieu of a hearing will occur. To be considered, written documentation must be submitted by the appellant within seven (7) calendar days of submitting the appeal. An appellant is allowed the opportunity to review information upon which the action described in the notice of action was based.

6. If the appellant requested a hearing in the appeal letter, the appellant shall be given at least five (5) calendar days advance written notice by certified mail, return receipt requested, of the date, time, and place of hearing.
7. If the appellant requested a hearing in the appeal letter, the hearing will be conducted within fourteen (14) calendar days of the receipt of the appeal. However, the hearing will not be held before the appellant's written documentation is received where the appellant has requested to submit the written documentation. The appellant may retain legal counsel or may be represented by another person. Failure of the appellant's representative to appear at a scheduled hearing shall constitute the appellant's waiver of the right to a personal appearance before the review official, unless the review official agrees to reschedule the hearing. A representative of the State agency shall be allowed to attend the hearing to respond to the appellant's testimony and written information and to answer questions from the review official. The review officer shall be independent of the original decision-making process.
8. Within five (5) working days after receiving the written documentation, and where a hearing was not requested in the appeal letter, the administrative review official, based on a full review of the administrative record, will inform the appellant, by certified mail, return receipt requested, of the official's determination.
9. Within five (5) working days after the hearing has been held, when a hearing was requested in the appeal letter, the hearing official, based on a full review of the administrative record, will inform the appellant, by certified mail, return receipt requested, of the official's determination.
10. 7 C.F.R. § 225.13(11) requires the Program's administrative action to remain in effect during the appeal process.
11. Participating sponsors and sites may continue to operate during an appeal of a termination.
12. Reimbursement shall be paid for meals served during the appeal process if the administrative review determination overturns the Program's administrative action that was appealed.

13. If the sponsor or site has been terminated for the reason of imminent dangers to the health or welfare of children, the operation shall not be allowed to continue during the appeal process and this reason shall be specified in the notice of action.
14. The review official will make a determination based on information provided by the State agency and the appellant, and on Program regulations.
15. The determination made by the hearing official is the final administrative determination provided under 7 C.F.R. § 225.13(12), and will become the Final Order and set forth the time limits for seeking judicial review.