



**STATE OF TENNESSEE  
DEPARTMENT OF HUMAN SERVICES**

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**BILL HASLAM**  
GOVERNOR

**DANIELLE W. BARNES**  
COMMISSIONER

September 4, 2018

Gregory Cullum, Board Chair  
YMCA of Metropolitan Chattanooga  
301 West 6<sup>th</sup> Street  
Chattanooga, Tennessee 37402-1108

Dear Mr. Cullum,

The Department of Human Services (DHS) – Division of Audit Services staff conducted an unannounced on-site monitoring review of the Summer Food Services Program (SFSP) at YMCA of Metropolitan Chattanooga (Sponsor), Application Agreement 00-082, on July 18, 2018. We made a return visit and completed our monitoring on July 23, 2018. The purpose of this review was to determine if the Sponsor complied with the *Title 7 of the Code of Federal Regulations* (CFR) applicable parts, provider agreement, and applicable Federal and State regulations.

Based on our review of the Sponsor's records and information provided, the Sponsor had 100 feeding sites operating during the review period. **Apison Elementary School, Arnold Elementary, Dayton Housing Authority, Family Worship Center, Granite Heights Apartments, Graysville Elementary, Hidden Valley Apartments, Hillcrest Elementary, Jones Memorial United Methodist Church, Joy School, Mayfield Elementary, North Hamilton County Elementary, Oak at Camden, Red Bank Elementary, Rhea County High School, Rivermont Elementary, and Stuart Elementary** were selected as the sample sites.

Background

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

Our review of the Sponsor's records for June 2018 disclosed the following:

## 1. The Sponsor reported the number of meals served incorrectly

### Condition

#### ***Apison Elementary School – sample site***

The Claim for Reimbursement for **Apison Elementary School** for the test month reported 491 breakfast meals and 491 lunch meals served. However, based on our review of the Sponsor's records, we found that there were 491 breakfast meals and 499 lunch meals served prior to any meal disallowances.

As a result, eight lunch meals served were underreported. (See Exhibit B)

#### ***Booker T. Washington State Park***

The Claim for Reimbursement for **Booker T. Washington State Park** for the test month reported 120 lunch meals served. However, based on our review of the Sponsor's records, we found that there were 122 lunch meals served prior to any meal disallowances.

As a result, two lunch meals served were underreported. (See Exhibit D)

#### ***Camp Ocoee***

The Claim for Reimbursement for **Camp Ocoee** for the test month reported 3,135 breakfast meals and 2,682 lunch meals served. However, based on our review of the Sponsor's records, we found that there were 3,145 breakfast meals and 2,682 lunch meals served prior to any meal disallowances.

As a result, ten breakfast meals served were underreported. (See Exhibit E)

#### ***Cleveland Middle School***

The Claim for Reimbursement for **Cleveland Middle School** for the test month reported 429 first breakfast meals and 9 second breakfast meals served and 548 first lunch meals and 11 second lunch meals served. However, based on our review of the Sponsor's records, we found that there were 429 first breakfast meals and 9 second breakfast meals served and 542 first lunch meals and 11 second lunch meals served prior to any meal disallowances.

As a result, six lunch meals served were overreported. (See Exhibit F)

#### ***East Side Elementary***

The Claim for Reimbursement for **East Side Elementary** for the test month reported 143 breakfast meals and 139 lunch meals served. However, based on our review of the Sponsor's records, we found that there were 243 breakfast meals and 252 lunch meals served prior to any meal disallowances.

As a result, 100 breakfast meals and 113 lunch meals served were underreported. (See Exhibit H)

***Family Worship Center – sample site***

The Claim for Reimbursement for **Family Worship Center** for the test month reported 100 first supper meals and two second supper meals served. However, based on our review of the Sponsor's records, we found that the meal count sheet for the monitoring site visit date on June 27, 2018 was not provided by the Sponsor.

As a result, 18 first supper meals were overreported. (See Exhibit I)

***First Church of the Nazarine***

The Claim for Reimbursement for **First Church of the Nazarine** for the test month reported 57 lunch meals served. However, based on our review of the Sponsor's records, we found that there were 71 lunch meals served prior to any meal disallowances.

As a result, 14 lunch meals served were underreported. (See Exhibit J)

***Hamilton YMCA Camp Shelter***

The Claim for Reimbursement for **Hamilton YMCA Camp Shelter** for the test month reported 195 first breakfast meals and four second breakfast meals served and 276 first lunch meals and four second lunch meals served. However, based on our review of the Sponsor's records, we found that there were 235 first breakfast meals and four second breakfast meals served and 316 first lunch meals and four second lunch meals served prior to any meal disallowances.

As a result, 40 breakfast meals and 40 lunch meals served were underreported. (See Exhibit M)

***Highland Park Commons***

The Claim for Reimbursement for **Highland Park Commons** for the test month reported 463 lunch meals served. However, based on our review of the Sponsor's records, we found that there were 458 lunch meals served prior to any meal disallowances.

As a result, five lunch meals served were overreported. (See Exhibit O)

***Mayfield Elementary – sample site***

The Claim for Reimbursement for **Mayfield Elementary** for the test month reported 964 first breakfast meals and 15 second breakfast meals served and 951 first lunch meals and 15 second lunch meals served. However, based on our review of the Sponsor's records, we found that there were 957 first breakfast meals and 15 second breakfast meals served and 944 first lunch meals and 15 second lunch meals served prior to any meal disallowances.

As a result, seven breakfast meals and seven lunch meals served were overreported. (See Exhibit S)

***North Hamilton County Elementary***

The Claim for Reimbursement for **North Hamilton County Elementary** for the test month reported 136 first breakfast meals and three second breakfast meals served 203 first lunch

meals and four second lunch meals served. However, based on our review of the Sponsor's records, we found that there were 136 first breakfast meals and three second breakfast meals served, 199 first lunch meals and four second lunch meals served, and 90 first pm supplement meals and two second pm supplement meals served prior to any meal disallowances.

As a result, four lunch meals served were overreported. (See Exhibit T)

***Northside Neighborhood***

The Claim for Reimbursement for **Northside Neighborhood** for the test month reported 801 lunch meals and 844 pm supplement meals served. However, based on our review of the Sponsor's records, we found that there were 821 lunch meals and 864 pm supplement meals served prior to any meal disallowances.

As a result, 20 lunch meals and 20 pm supplement meals served were underreported. (See Exhibit U)

***Red Bank Elementary***

The Claim for Reimbursement for **Red Bank Elementary** for the test month reported 297 first breakfast meals and six second breakfast meals served and 334 first lunch meals and seven second lunch meals served. However, based on our review of the Sponsor's records, we found that there were 322 first breakfast meals and six second breakfast meals served and 306 first lunch meals and seven second lunch meals served prior to any meal disallowances.

As a result, 25 breakfast meals served were underreported, and 25 lunch meals were overreported. (See Exhibit W)

***Rhea Central Elementary***

The Claim for Reimbursement for **Rhea Central Elementary** for the test month reported 500 breakfast meals and 500 lunch meals served. However, based on our review of the Sponsor's records, we found that there were 570 breakfast meals and 570 lunch meals served prior to any meal disallowances.

As a result, 70 breakfast meals and 70 lunch meals served were underreported. (See Exhibit X)

***Rivermont Elementary***

The Claim for Reimbursement for **Rivermont Elementary** for the test month reported 344 first breakfast meals and seven second breakfast meals served and 326 first lunch meals and seven second lunch meals served. However, based on our review of the Sponsor's records, we found that there were 352 first breakfast meals and five second breakfast meals served and 326 first lunch meals and seven second lunch meals served prior to any meal disallowances.

As a result, eight second breakfast meals served were underreported, and two second breakfast meals served were overreported. (See Exhibit Z)

### ***Soddy Elementary***

The Claim for Reimbursement for **Soddy Elementary** for the test month reported 240 first breakfast meals and five second breakfast meals served and 240 first lunch meals and five second lunch meals served. However, based on our review of the Sponsor's records, we found that there were 281 first breakfast meals and five second breakfast meals served and 294 first lunch meals and five second lunch meals served prior to any meal disallowances.

As a result, 41 first breakfast meals and 54 first lunch meals served were underreported. (See Exhibit AA)

### ***Southside Community Park***

The Claim for Reimbursement for **Southside Community Park** for the test month reported 67 lunch meals served. However, based on our review of the Sponsor's records, we found that there were 71 lunch meals served prior to any meal disallowances.

As a result, four lunch meals served were underreported. (See Exhibit BB)

### ***Spring Creek Elementary***

The Claim for Reimbursement for **Spring Creek Elementary** for the test month reported 121 breakfast meals and 146 lunch meals served. However, based on our review of the Sponsor's records, we found that there were 121 breakfast meals and 137 lunch meals served prior to any meal disallowances.

As a result, nine lunch meals served were overreported. (See Exhibit CC)

This is a repeat finding from the monitoring report dated January 21, 2016.

### Criteria

*Title 7 of the Code of Federal Regulations, Section 225.9 (d)(5) states, "... In submitting a claim for reimbursement, each sponsor shall certify that the claim is correct and that records are available to support this claim...."*

### Recommendation

The Sponsor should ensure that claims for reimbursement are completed based on proper supporting documents.

## **2. The Sponsor claimed more meals than we observed, resulted in meals disallowance**

### Condition

The Sponsor claimed more meals than we observed during our on-site monitoring visits to several feeding sites. Below is a summary of the feeding sites visited and number of meals disallowed.

Date	Site	Meal Type	Meals Observed	Meals Claimed	Meals Disallowed
6/15/18	Granite Heights Apartments	Lunch	12	14	2 Lunches
6/26/18	Graysville Elementary	Lunch	8	15	7 Lunches
6/26/18	Red Bank Elementary	Lunch	20	23	3 Lunches

As a result, 12 lunches were disallowed. (See Exhibits K, L, T, and W)

Criteria

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

Recommendation

The Sponsor should ensure that claims for reimbursement are completed based on proper supporting documents.

**3. The Sponsor claimed more meals than served and block-claimed for June 2018**

Condition

Based on our review of the Sponsor’s own monitors documents of **Graysville Elementary** feeding site dated June 19, 2018, we noted that there were nine participants for the lunch meals service. However, the Sponsor claimed and was reimbursed for 15 lunch meals. The 6 lunch meals claimed and were reimbursed for will be disallowed. The Sponsor claimed 15 lunch meals every service for June 2018, however, as noted above (finding 2), we also observed less meals served than claimed. Block claiming is unallowed activity and may result in disallowance.

As a result, 6 lunches were disallowed. (See Exhibit L)

Criteria

*Title 7 of the Code of Federal Regulations, Section 225.11 (e)(1)* states, “If the State agency determines that a sponsor has failed to plan, prepare, or order meals with the objective of providing only one meal per child at each meal service at a site, the State agency shall disallow the number of children's meals prepared or ordered in excess of the number of children served.”

Recommendation

The Sponsor should ensure that claims for reimbursement are based on proper supporting documents that reflect the actual meals served. The Sponsor should be mindful of block claiming and rely only on the meals served.

**4. The Sponsor provided meal count sheets that were not signed or dated by site personnel**

Condition

Meal count sheets were dated at the top of the meal count forms, but were not signed by a site supervisor or dated. The dated meal count sheets were missing site supervisor signatures and dates:

Site	Dates	Meal Type	No. Disallowed
Veterans Park	June 11-15 & 25-29	Lunch	57
Villages at Alton Park	June 4-9 & 11-15	Lunch	151
Westside	June 4-8	Breakfast	141

As a result, 57 lunches were disallowed at **Veterans Park** (See Exhibit EE), 151 first lunches were disallowed at **Villages at Alton Park** (See Exhibit FF), and 141 breakfasts were disallowed at **Westside** (See Exhibit GG).

Criteria

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

The USDA SFSP Administration Guide, page 139, states, "All sponsors must use daily site records in order to document the number of Program meals they have served to children.... When they collect the site records, Sponsors should check for the site supervisor's signature...."

Recommendation

The Sponsor should ensure that all meal count sheets are signed and dated by the site supervisor at each site.

**5. The Sponsor did not maintain daily meal count records as required**

Condition

During our monitoring visit on July 18, 2018, we requested daily meal count sheets for all active sites during the review period. The Sponsor provided consolidated meal count sheets for each week of operation for each site. The Sponsor stated that the site supervisors counted each meal as it was served and then added the total to the weekly consolidated meal count sheet.

Criteria

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

The USDA SFSP Administration Guide, page 66, states, "In addition to serving meals that meet meal pattern requirements, sponsors must comply with the following rules when serving meals at each of their sites: Attachments 18, 19, and 20 are sample meal count forms. Attachment 18 is a daily meal count form. Attachment 19 is a weekly, consolidated meal count form. Attachment 20 is a consolidated form for 20 days that also provides guidance on calculating reimbursable second meals. A training session attendance sign-in sheet for site personnel can be used by sponsors to assemble a list of the signatures of the site supervisors and assistants who are responsible for signing daily records. Sponsors can use these lists when reviewing the records returned by the sites to ensure that the proper person is signing the daily records. Daily meal count sheets are required; however, the weekly consolidated meal count form is not."

#### Recommendation

The Sponsor should ensure that a system for recording daily meal counts at the point of service for each meal is followed. Consolidated weekly meal count sheets may be used for reporting meals to the Sponsor, but daily records should be kept.

### **6. The Sponsor served meals outside the approved meal service time**

#### Condition

##### ***Graysville Elementary School – sample site***

During our monitoring visit at **Graysville Elementary School** on June 26, 2018, we observed eight lunch meals served outside of the TIPS approved meal service time. The meals were served from 11:15 am to 12:00 pm and the approved meal service time was from 11:00 am to 11:30 am.

##### ***Joy School – sample site***

During our monitoring visit at **Joy School** on June 20, 201, we observed 23 lunch meals served outside of the TIPS approved meal service time. The meals were served from 11:50 am to 12:05 pm and the approved meal service was from 12:00 pm to 12:45 pm.

##### ***Mayfield Elementary – sample site***

During our monitoring visit at **Mayfield Elementary** on June 20, 2018, we observed 43 breakfast meals served outside of the approved meal service. The meals were served from 8:45 am to 9:30 am and the approved meal service time was from 9:00 am to 9:30am.

##### ***Red Bank Elementary – sample site***

During our monitoring visit at **Red Bank Elementary** on June 26, 2018, we observed 20 lunch meals served outside of the TIPS approved meal service time. The TIPS approved meal service was from 11:00 am to 11:25 am. However, the meals were not delivered until 11:40 am, and the meals were served from 11:40 am to 12:25 pm.

### ***Stuart Elementary – sample site***

During our monitoring visit at **Stuart Elementary** on June 26, 2018, we observed 33 breakfast meals served outside of the TIPS approved meal service time. The meals were served from 8:52 am to 9:45 am and the approved meal service was from 9:00 am to 9:45 am.

**Note:** No meals were disallowed as the meals observed met the USDA meal pattern requirements.

This is a repeat finding from the monitoring report dated January 21, 2016.

#### Criteria

The USDA SFSP Administration Guide, page 60, states, "In addition to serving meals that meet meal pattern requirements, sponsors must comply with the following rules when serving meals at each of their sites: Serve meals during the meal service times submitted on the Site Information Sheet and approved by the State agency. The State agency must approve any changes in meal service times."

#### Recommendation

The Sponsor should ensure that meals are served within the approved serving time.

### **7. The Sponsor provided delivery tickets that did not match the number of meals delivered noted on meal count sheets**

#### Condition

The lunch delivery ticket for **Arnold Elementary** on June 14, 2018 showed 16 meals were delivered. The meal count sheet on this date for this site showed 17 lunch meals were delivered.

No meals were disallowed as the 13 lunch meals claimed on this date were less than the number of meals available.

#### Criteria

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

The USDA SFSP Administration Guide, page 139, states, "Site personnel must be sure that they record all required counts. These counts should include the number of: Meals delivered or prepared, by type (breakfast, snack, lunch, supper). A designated member of the site staff must verify the adequacy and number of meals delivered by checking the meals when they are delivered to the site."

### Recommendation

The Sponsor should ensure that the delivery tickets reflect the accurate number of meals delivered.

### **8. The Sponsor did not provide documentation that the monitoring reviews were conducted as required.**

### Condition

The Sponsor did not provide the documentation that the monitoring review was conducted during the first week of operation at the **Apison Elementary School** feeding site.

### Criteria

*Title 7 of the Code of Federal Regulations, Section 225.15(d)(2)* states, "Sponsors shall visit each of their sites at least once during the first week of operation under the Program and shall promptly take such actions as are necessary to correct any deficiencies."

### Recommendation

The Sponsor should ensure that all monitoring is completed as required.

### **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:

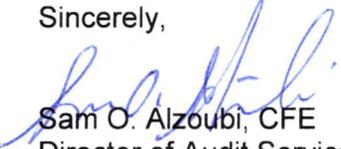
[AuditServices.CAPS.DHS@tn.gov](mailto:AuditServices.CAPS.DHS@tn.gov)

If you have questions relative to the corrective action plan please contact:

Allette Vayda, Director of Operations  
Summer Food Service Program  
8th Floor Citizens Plaza Building  
400 Deaderick Street  
Nashville, Tennessee 37243  
[Allette.Vayda@tn.gov](mailto: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](mailto:Sean.Baker@tn.gov).

Sincerely,

  
Sam O. Alzoubi, CFE  
Director of Audit Services

## Exhibits

cc: Janet Dunn, CEO, YMCA of Metropolitan Chattanooga  
Laura Horne, Senior Program Director, YMCA of Metropolitan Chattanooga  
Allette Vayda, Director of Operations, Summer Food Service Program  
Debra Pasta, Program Manager, Summer Food Service Program  
Elke Moore, Administrative Services Assistant 3, Summer Food Service Program  
Constance Moore, Program Specialist, Summer Food Service Program  
Marty Widner, Program Specialist, Summer Food Service Program  
Comptroller of the Treasury, State of Tennessee

**Exhibit A**

**Sponsor: YMCA of Chattanooga**  
**Review Month/Year: June 2018**  
**Claim Reimbursement Total: \$278,899.09**

<b>Site Meal Service Reconciliation and Monitor Activity</b>	<b>Reported on Claim</b>	<b>Reconciled to Documentation</b>
Number of Participating Sites for Breakfast	57	57
Number of Participating Sites for AM Snacks	0	0
Number of Participating Sites for Lunch	95	95
Number of Participating Sites for PM Snacks	11	11
Number of Participating Sites for Supper	2	2
Total Amount of Food Costs	XXXXXXXX	
Total Amount of Eligible Food and Nonfood Costs	XXXXXXXX	

**Exhibit B**

**Sample Site: Apison Elementary School**  
**Review Month/Year: June 2018**

<b>Site Meal Service Reconciliation and Monitor Activity</b>	<b>Reported on Claim</b>	<b>Reconciled to Documentation</b>
Total Number of Days Food Served	12	12
Number of Breakfasts Served	491	491
Number of Lunches Served	491	499

**Exhibit C****Sample Site: Arnold Elementary School****Review Month/Year: June 2018**

<b>Site Meal Service Reconciliation and Monitor Activity</b>	<b>Reported on Claim</b>	<b>Reconciled to Documentation</b>
Total Number of Days Food Served	16	16
Number of 1 <sup>st</sup> Breakfasts Served	256	256
Number of 2 <sup>nd</sup> Breakfasts Served	5	5
Number of 1 <sup>st</sup> Lunches Served	248	248
Number of 2 <sup>nd</sup> Lunches Served	5	5

**Exhibit D****Site: Booker T. Washington State Park****Review Month/Year: June 2018**

<b>Site Meal Service Reconciliation and Monitor Activity</b>	<b>Reported on Claim</b>	<b>Reconciled to Documentation</b>
Total Number of Days Food Served	2	2
Number of 1 <sup>st</sup> Lunches Served	120	122

**Exhibit E****Site: Camp Ocoee****Review Month/Year: June 2018**

<b>Site Meal Service Reconciliation and Monitor Activity</b>	<b>Reported on Claim</b>	<b>Reconciled to Documentation</b>
Total Number of Days Food Served	24	24
Number of 1 <sup>st</sup> Breakfasts Served	3,135	3,145
Number of 1 <sup>st</sup> Lunches Served	2,682	2,682

**Exhibit F****Site: Cleveland Middle School****Review Month/Year: June 2018**

<b>Site Meal Service Reconciliation and Monitor Activity</b>	<b>Reported on Claim</b>	<b>Reconciled to Documentation</b>
Total Number of Days Food Served	14	14
Number of 1 <sup>st</sup> Breakfasts Served	429	429
Number of 2 <sup>nd</sup> Breakfasts Served	9	9
Number of 1 <sup>st</sup> Lunches Served	548	542
Number of 2 <sup>nd</sup> Lunches Served	11	11

**Exhibit G****Sample Site: Dayton Housing Authority****Review Month/Year: June 2018**

<b>Site Meal Service Reconciliation and Monitor Activity</b>	<b>Reported on Claim</b>	<b>Reconciled to Documentation</b>
Total Number of Days Food Served	15	15
Number of 1 <sup>st</sup> Breakfasts Served	122	122
Number of 1 <sup>st</sup> Lunches Served	294	294

**Exhibit H****Site: East Side Elementary School****Review Month/Year: June 2018**

<b>Site Meal Service Reconciliation and Monitor Activity</b>	<b>Reported on Claim</b>	<b>Reconciled to Documentation</b>
Total Number of Days Food Served	4	7
Number of 1 <sup>st</sup> Breakfasts Served	143	243
Number of 1 <sup>st</sup> Lunches Served	139	252

**Exhibit I**

**Site: Family Worship Center**  
**Review Month/Year: June 2018**

<b>Site Meal Service Reconciliation and Monitor Activity</b>	<b>Reported on Claim</b>	<b>Reconciled to Documentation</b>
Total Number of Days Food Served	4	4
Number of 1 <sup>st</sup> Suppers Served	100	82
Number of 2 <sup>nd</sup> Suppers Served	2	2

**Exhibit J**

**Site: First Church of the Nazarine**  
**Review Month/Year: June 2018**

<b>Site Meal Service Reconciliation and Monitor Activity</b>	<b>Reported on Claim</b>	<b>Reconciled to Documentation</b>
Total Number of Days Food Served	26	21
Number of 1 <sup>st</sup> Lunch Served	57	71

**Exhibit K**

**Sample Site: Granite Heights Apartments**  
**Review Month/Year: June 2018**

<b>Site Meal Service Reconciliation and Monitor Activity</b>	<b>Reported on Claim</b>	<b>Reconciled to Documentation</b>
Total Number of Days Food Served	26	26
Number of 1 <sup>st</sup> Lunches Served	312	310

**Exhibit L**

**Sample Site: Graysville Elementary School**

**Review Month/Year: June 2018**

<b>Site Meal Service Reconciliation and Monitor Activity</b>	<b>Reported on Claim</b>	<b>Reconciled to Documentation</b>
Total Number of Days Food Served	20	20
Number of 1 <sup>st</sup> Breakfasts Served	300	300
Number of 1 <sup>st</sup> Lunches Served	285	272

**Exhibit M**

**Site: Hamilton YMCA Camp Shelter**

**Review Month/Year: June 2018**

<b>Site Meal Service Reconciliation and Monitor Activity</b>	<b>Reported on Claim</b>	<b>Reconciled to Documentation</b>
Total Number of Days Food Served	21	23
Number of 1 <sup>st</sup> Breakfasts Served	195	235
Number of 2 <sup>nd</sup> Breakfasts Served	4	4
Number of 1 <sup>st</sup> Lunches Served	276	316
Number of 2 <sup>nd</sup> Lunches Served	4	4

**Exhibit N**

**Sample Site: Hidden Valley Apartments**

**Review Month/Year: June 2018**

<b>Site Meal Service Reconciliation and Monitor Activity</b>	<b>Reported on Claim</b>	<b>Reconciled to Documentation</b>
Total Number of Days Food Served	15	15
Number of 1 <sup>st</sup> Breakfasts Served	110	110
Number of 1 <sup>st</sup> Lunches Served	245	245

**Exhibit O**

**Site: Highland Park Commons**  
**Review Month/Year: June 2018**

<b>Site Meal Service Reconciliation and Monitor Activity</b>	<b>Reported on Claim</b>	<b>Reconciled to Documentation</b>
Total Number of Days Food Served	26	26
Number of 1 <sup>st</sup> Lunches Served	463	458
Number of 2 <sup>nd</sup> Lunches Served	9	9

**Exhibit P**

**Sample Site: Hillcrest Elementary School**  
**Review Month/Year: June 2018**

<b>Site Meal Service Reconciliation and Monitor Activity</b>	<b>Reported on Claim</b>	<b>Reconciled to Documentation</b>
Total Number of Days Food Served	16	16
Number of 1 <sup>st</sup> Breakfasts Served	248	248
Number of 2 <sup>nd</sup> Breakfasts Served	5	5
Number of 1 <sup>st</sup> Lunches Served	251	251
Number of 2 <sup>nd</sup> Lunches Served	5	5

**Exhibit Q**

**Sample Site: Jones Memorial United Methodist Church**  
**Review Month/Year: June 2018**

<b>Site Meal Service Reconciliation and Monitor Activity</b>	<b>Reported on Claim</b>	<b>Reconciled to Documentation</b>
Total Number of Days Food Served	19	19
Number of 1 <sup>st</sup> Lunches Served	139	139

**Exhibit R**

**Sample Site: Joy School**

**Review Month/Year: June 2018**

<b>Site Meal Service Reconciliation and Monitor Activity</b>	<b>Reported on Claim</b>	<b>Reconciled to Documentation</b>
Total Number of Days Food Served	9	9
Number of 1 <sup>st</sup> Breakfasts Served	210	210
Number of 2 <sup>nd</sup> Breakfasts Served	1	1
Number of 1 <sup>st</sup> Lunches Served	214	214
Number of 2 <sup>nd</sup> Lunches Served	0	0

**Exhibit S**

**Sample Site: Mayfield Elementary**

**Review Month/Year: June 2018**

<b>Site Meal Service Reconciliation and Monitor Activity</b>	<b>Reported on Claim</b>	<b>Reconciled to Documentation</b>
Total Number of Days Food Served	20	20
Number of 1 <sup>st</sup> Breakfasts Served	964	957
Number of 2 <sup>nd</sup> Breakfasts Served	15	15
Number of 1 <sup>st</sup> Lunches Served	951	944
Number of 2 <sup>nd</sup> Lunches Served	15	15

**Exhibit T**

**Sample Site: North Hamilton County Elementary School**  
**Review Month/Year: June 2018**

<b>Site Meal Service Reconciliation and Monitor Activity</b>	<b>Reported on Claim</b>	<b>Reconciled to Documentation</b>
Total Number of Days Food Served	16	16
Number of 1 <sup>st</sup> Breakfasts Served	136	136
Number of 2 <sup>nd</sup> Breakfasts Served	3	3
Number of 1 <sup>st</sup> Lunches Served	203	199
Number of 2 <sup>nd</sup> Lunches Served	4	4

**Exhibit U**

**Site: Northside Neighborhood**  
**Review Month/Year: June 2018**

<b>Site Meal Service Reconciliation and Monitor Activity</b>	<b>Reported on Claim</b>	<b>Reconciled to Documentation</b>
Total Number of Days Food Served	20	20
Number of 1 <sup>st</sup> Lunches Served	801	821
Number of 1 <sup>st</sup> Snacks Served	844	864

**Exhibit V**

**Sample Site: Oak at Camden**  
**Review Month/Year: June 2018**

<b>Site Meal Service Reconciliation and Monitor Activity</b>	<b>Reported on Claim</b>	<b>Reconciled to Documentation</b>
Total Number of Days Food Served	26	26
Number of 1 <sup>st</sup> Lunches Served	162	162
Number of 2 <sup>nd</sup> Lunches Served	1	1

**Exhibit W**

**Sample Site: Red Bank Elementary**  
**Review Month/Year: June 2018**

<b>Site Meal Service Reconciliation and Monitor Activity</b>	<b>Reported on Claim</b>	<b>Reconciled to Documentation</b>
Total Number of Days Food Served	16	16
Number of 1 <sup>st</sup> Breakfasts Served	297	322
Number of 2 <sup>nd</sup> Breakfasts Served	6	6
Number of 1 <sup>st</sup> Lunches Served	334	306
Number of 2 <sup>nd</sup> Lunches Served	7	7

**Exhibit X**

**Site: Rhea Central Elementary School**  
**Review Month/Year: June 2018**

<b>Site Meal Service Reconciliation and Monitor Activity</b>	<b>Reported on Claim</b>	<b>Reconciled to Documentation</b>
Total Number of Days Food Served	20	20
Number of 1 <sup>st</sup> Breakfasts Served	500	570
Number of 1 <sup>st</sup> Lunches Served	500	570

**Exhibit Y**

**Sample Site: Rhea County High School**  
**Review Month/Year: June 2018**

<b>Site Meal Service Reconciliation and Monitor Activity</b>	<b>Reported on Claim</b>	<b>Reconciled to Documentation</b>
Total Number of Days Food Served	21	21
Number of 1 <sup>st</sup> Breakfasts Served	1,071	1,071
Number of 2 <sup>nd</sup> Breakfasts Served	15	15
Number of 1 <sup>st</sup> Lunches Served	2,263	2,263
Number of 2 <sup>nd</sup> Lunches Served	24	24

**Exhibit Z****Sample Site: Rivermont Elementary****Review Month/Year: June 2018**

<b>Site Meal Service Reconciliation and Monitor Activity</b>	<b>Reported on Claim</b>	<b>Reconciled to Documentation</b>
Total Number of Days Food Served	16	16
Number of 1 <sup>st</sup> Breakfasts Served	344	352
Number of 2 <sup>nd</sup> Breakfasts Served	7	5
Number of 1 <sup>st</sup> Lunches Served	326	326
Number of 2 <sup>nd</sup> Lunches Served	7	7

**Exhibit AA****Site: Soddy Elementary****Review Month/Year: June 2018**

<b>Site Meal Service Reconciliation and Monitor Activity</b>	<b>Reported on Claim</b>	<b>Reconciled to Documentation</b>
Total Number of Days Food Served	15	15
Number of 1 <sup>st</sup> Breakfasts Served	240	281
Number of 2 <sup>nd</sup> Breakfasts Served	5	5
Number of 1 <sup>st</sup> Lunches Served	240	294
Number of 2 <sup>nd</sup> Lunches Served	5	5

**Exhibit BB****Site: Southside Community Park****Review Month/Year: June 2018**

<b>Site Meal Service Reconciliation and Monitor Activity</b>	<b>Reported on Claim</b>	<b>Reconciled to Documentation</b>
Total Number of Days Food Served	26	18
Number of 1 <sup>st</sup> Lunches Served	67	71

**Exhibit CC**

**Site: Spring Creek Elementary School**

**Review Month/Year: June 2018**

<b>Site Meal Service Reconciliation and Monitor Activity</b>	<b>Reported on Claim</b>	<b>Reconciled to Documentation</b>
Total Number of Days Food Served	14	14
Number of 1 <sup>st</sup> Breakfasts Served	121	121
Number of 1 <sup>st</sup> Lunches Served	146	137

**Exhibit DD**

**Sample Site: Stuart Elementary School**

**Review Month/Year: June 2018**

<b>Site Meal Service Reconciliation and Monitor Activity</b>	<b>Reported on Claim</b>	<b>Reconciled to Documentation</b>
Total Number of Days Food Served	16	16
Number of 1 <sup>st</sup> Breakfasts Served	530	530
Number of 2 <sup>nd</sup> Breakfasts Served	11	11
Number of 1 <sup>st</sup> Lunches Served	603	603
Number of 2 <sup>nd</sup> Lunches Served	3	3

**Exhibit EE**

**Site: Veterans Park**

**Review Month/Year: June 2018**

<b>Site Meal Service Reconciliation and Monitor Activity</b>	<b>Reported on Claim</b>	<b>Reconciled to Documentation</b>
Total Number of Days Food Served	21	21
Number of 1 <sup>st</sup> Lunches Served	89	32

**Exhibit FF**

**Site: Villages at Alton Park**  
**Review Month/Year: June 2018**

<b>Site Meal Service Reconciliation and Monitor Activity</b>	<b>Reported on Claim</b>	<b>Reconciled to Documentation</b>
Total Number of Days Food Served	23	26
Number of 1 <sup>st</sup> Lunches Served	352	201

**Exhibit GG**

**Site: Westside**  
**Review Month/Year: June 2018**

<b>Site Meal Service Reconciliation and Monitor Activity</b>	<b>Reported on Claim</b>	<b>Reconciled to Documentation</b>
Total Number of Days Food Served	20	20
Number of 1 <sup>st</sup> Breakfasts Served	537	396
Number of 2 <sup>nd</sup> Breakfasts Served	11	11
Number of 1 <sup>st</sup> Lunches Served	614	614
Number of 2 <sup>nd</sup> Lunches Served	12	12



# 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: YMCA of Metropolitan Chattanooga	Agreement No. 00082	<input checked="" type="checkbox"/> SFSP <input type="checkbox"/> CACFP
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Mailing Address: 301 West 6<sup>th</sup> St. Chattanooga, TN 37402

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

Name and Title: Gregory Cullum, Board Chair	Date of Birth: / /
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### Section C. Dates of Issuance of Monitoring Report/Corrective Action Plan

Monitoring Report: 9/4/18	Corrective Action Plan: 9/4/18
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### Section D. Findings

Findings:

1. The Sponsor reported the number of meals served incorrectly
2. The Sponsor claimed more meals than we observed, resulted in meals disallowance
3. The Sponsor claimed more meals than served and block-claimed for June 2018
4. The Sponsor provided meal count sheets that were not signed or dated by site personnel
5. The Sponsor did not maintain daily meal count records as required
6. The Sponsor served meals outside the approved meal service time
7. The Sponsor provided delivery tickets that did not match the number of meals delivered noted on meal count sheets.
8. The Sponsor did not provide documentation that the monitoring reviews were conducted as required.

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

#### Measure No. 1: The Sponsor reported the number of meals served incorrectly

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:

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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?):

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

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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:

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**Measure No.2: The Sponsor claimed more meals than we observed, resulted in meals disallowance**

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:

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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?):

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

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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:

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**Measure No. 3: The Sponsor claimed more meals than served and block-claimed for June 2018**

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:

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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?):

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

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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:

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**Measure No. 4: The Sponsor provided meal count sheets that were not signed or dated by site personnel**

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:

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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?):

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

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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:

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**Measure No. 5: The Sponsor did not maintain daily meal count records as required**

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:

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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?):

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

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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:

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**Measure No.6: The Sponsor served meals outside the 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:

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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?):

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

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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:

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**Measure No. 7: The Sponsor provided delivery tickets that did not match the number of meals delivered noted on meal count sheets**

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:

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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?):

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

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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:

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**Measure No. 8: The Sponsor did not provide documentation that the monitoring review were conducted as required.**

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:

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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?):

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

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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:

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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

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 that the sponsor or food service management company 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 CFR § 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, a denial of a sponsor's application for a site, a denial of a food service management company's application for a site; of a food service management company's registration, if applicable.
3. 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.
4. 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 number (6) below.
5. 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) 757-8209  
Local (615) 744-3900  
Fax. (866) 355-6136  
AppealsClerksOffice.DHS@tn.gov**

6. 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.

7. 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.
8. 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. If the appellant institution or sponsoring agency is a corporation, partnership or other legally created entity, then the sponsoring institution or agency must be represented by an attorney. Otherwise, the individual representing the agency will have limited participation in the hearing. If the appellant institution or sponsoring agency is a natural person (not a corporation, partnership or other artificial entity), he/she may retain an attorney, represent themselves or 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.
9. 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.
10. 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.
11. 7 CFR. § 225.13(11) requires the Program's administrative action to remain in effect during the appeal process.
12. Participating sponsors and sites may continue to operate during an appeal of a termination.
13. 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.

14. 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.
15. The review official will make a determination based on information provided by the State agency and the appellant, and on Program regulations.
16. The determination made by the hearing official is the final administrative determination provided under 7 225.13(12), and will become the Final Order and set forth the time limits for seeking judicial review.