

Missouri Department of Health and Senior Services

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Michael L. Parson Governor

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July 25, 2022

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Jeremy Hahn, Executive Director Life360 Community Services 2220 W Chesterfield Blvd Springfield, MO 65807 Email: Jeremy@life360.org Angie Hughes, Administrator Life360 Community Services 2220 W Chesterfield Blvd Springfield, MO 65807 Email: angie@Life360.org

CERTIFIED MAIL: 7021 0350 0000 5100 3856

Ted Cederblom, Board Chair Life360 Community Services 2220 W Chesterfield Blvd Springfield, MO 65807

Re: Seriously Deficient Notice

Sponsor #3124

Dear Jeremy Hahn, Angie Hughes, and Ted Cederblom:

Introduction

Based on the findings from the Department of Health and Senior Services (DHSS) – Community Food and Nutrition Assistance (CFNA), Child and Adult Care Food Program's (CACFP) monitoring review that was completed on June 9, 2022, Life 360 Community Services has been classified as seriously deficient in its operation of the CACFP as defined in Federal Regulations 7 CFR § 226.6(c)(3)(i)-(ii).

The following noncompliance issues were noted at the monitoring review and are used as the basis for classifying Life 360 Community Services:

- a) Failure to operate the Program in conformance with performance standards in accordance with 7 CFR § 226.6(c)(3)(ii)(C);
- b) Failure to maintain adequate records in accordance with 7 CFR § 226.6(c)(3)(ii)(F);
- c) Claiming reimbursement for a significant number of meals that do not meet Program requirements in accordance with 7 CFR § 226.6(c)(3)(ii)(I);
- d) 7 CFR § 226.6(c)(3)(ii)(Q): Failure to perform any of the other financial and administrative responsibilities required by this part.
- e) Failure by a sponsoring organization (SO) to properly train or monitor sponsored facilities in accordance with 226.16 (d) and pursuant to 7 CFR § 226.6(c)(3)(ii)(O).
- f) Failure to submit the required audit report for Fiscal Year 2020 in accordance with 2 CFR § 200.507(c)(1).

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The Missouri Department of Health and Senior Services will be the leader in promoting, protecting and partnering for health.

In addition, Jeremy Hahn, Angie Hughes, and Ted Cederblom have been identified as responsible for the serious deficiencies in light of their responsibility for the overall management of Life360 Community Services' operations. Through the Department's authority set forth in Federal Regulations 7 CFR § 226.6(c)(3), the Department is:

- Declaring Life360 Community Services seriously deficient in its operation of the CACFP; and
- Declaring Jeremy Hahn, Angie Hughes, and Ted Cederblom seriously deficient based on their oversight of the CACFP.

If Life360 Community Services does not fully and permanently correct the serious deficiency and submit timely and adequate documentation of the Corrective Action Plan (CAP) by the due date of **August 15, 2022,** Community Food and Nutrition Assistance (CFNA) will, through its authority derived from Federal Regulations 7 CFR § 226.6(c)(3)(iii)(c):

- Propose to terminate Life360 Community Services' contract to participate in the CACFP;
- Propose to disqualify Life360 Community Services from future CACFP participation, and;
- Propose to disqualify Jeremy Hahn, Angie Hughes, and Ted Cederblom from future CACFP participation.

Facts that Lead to the Seriously Deficient Notice

The Missouri Department of Health and Senior Services (DHSS) – Child and Adult Care Food Program (CACFP) recently conducted a review of the Sponsoring Organization's (SO's) operations. On April 26, 2022, Susan Barr and Deana McMillen started the SO review. Sara West and Dana Troxel joined Ms. Barr and Ms. McMillen on April 27, 2022. Ms. Barr and Ms. McMillen continued the review on May 5, 2022. After the May 5 review, Ms. Barr took additional records to review at her office.

Records for the month of February and March 2022 were reviewed to substantiate the claim for reimbursement. In addition, monitoring visits were conducted at the following Life360 Community Services' sites: Fairbanks Preschool on April 1, 2022, Oran Schools on April 5, 2022, Ash Grove-Bois D-Arc Elementary on April 6, 2022, Chaffee Junior and High School on April 6, 2022, Chadwick Schools on April 18, 2022, St Ambrose School on April 20, 2022, Springfield Lutheran School on April 21, 2022, Scott County R-IV School on April 22, 2022, Fair Play on April 25, 2022, St Denis School on April 26, 2022, and Guardian Angel School on April 27, 2022. Meals were observed at each site.

The CACFP requested Life360 Community Services' records which included the following:

- Daily Attendance Records,
- Training Records,
- Meal Count Records,
- Income Eligibility Forms (IEFs),
- Child Care Enrollment Forms (either Joint Child Care Form MO 580-2294 or CACFP 229) for the childcare centers only,
- Free and Reduced eligibility documentation for the childcare centers only,
- Daily Dated Menus,
- Documentation to verify CACFP reimbursement is being used solely for the operation of the food service (copies of all receipts, invoices, or other records to document food, and

food service supply costs, and administrative, and operational labor costs attributable to the food service program), and

• Documentation of Site Monitoring Visit Reports (CACFP-404).

Federal Regulation 7 CFR § 226.16(e) requires that, "Each sponsoring organization shall comply with the recordkeeping requirements established in 7 CFR § 226.10(d) and 7 CFR § 226.15(e) and any recordkeeping requirements established by the State agency in order to justify the administrative payments made in accordance with 7 CFR § 226.12(a). Failure to maintain such records shall be grounds for the denial of reimbursement."

If Life360 Community Services voluntarily terminates its CACFP contract after receiving this notice, CFNA will propose to terminate and disqualify Life360 Community Services; as well as, Jeremy Hahn, Angie Hughes, and Ted Cederblom from future CACFP participation.

If disqualified, Life360 Community Services and Jeremy Hahn, Angie Hughes, and Ted Cederblom will be placed on the National Disqualified List (NDL). While on the NDL, Life360 Community Services will not be able to participate in the CACFP as an institution or facility. Jeremy Hahn, Angie Hughes, and Ted Cederblom will not be able to serve as principal in any institution or facility that holds a contract with CACFP, or as a child care home provider in the CACFP.

If disqualified, Life360 Community Services, Jeremy Hahn, Angie Hughes, and Ted Cederblom will remain on the NDL until such time as the United States Department of Agriculture's (USDA's) Food and Nutrition Service (FNS), in consultation with CFNA, determines that the seriously deficiency has been corrected, or until seven years after their disqualification. However, if any debt relating to the seriously deficiency has not been repaid, they will remain on the NDL list until the debt has been repaid.

Findings and Required Corrective Actions for Life360 Community Services

A. Findings

1. Non-profit contracting entities expending \$750,000 or more in total federal funds during a fiscal Year (FY) must submit a Single Audit to the Federal Audit Clearinghouse (FAC). The most recent Single Audit uploaded to the FAC was for FY 2019. The FY 2020 audit was due (with COVID flex) by March 31, 2022, however at this time it has not been uploaded to the FAC. The FY 2021 audit will be due September 30, 2022. Per 2 CFR § 200.507(c)(1): The audit must be completed and the reporting required by paragraph (c)(2) or (c)(3) of this section submitted nine months after the end of the audit period.

Required Action:

Upload the required Audit report to the Federal Audit Clearinghouse. Provide a written statement indicating procedures the sponsor will implement to prevent this finding in future participation.

2. Meal counts were not recorded for two classrooms during the observation of the April 25, 2022, Fair Play site meal service. Sites are required to record each meal served to each participant.

Required Action:

Record meal counts at the point of service. The SO must train center staff to record meal counts during the service of the meal. Provide a written statement indicating procedures the sponsor will implement to prevent this finding in future participation.

3. The reviewed sites, Ash Grove-Bois D'Arc Elementary (3124-64), Chadwick Schools (3124-136), Chaffee Junior and Senior High (3124-157), Fair Play (3124-113), Fairbanks Preschool (3124-6), Guardian Angel School (3124-132), Oran Schools (3124-164), Scott County R-IV (3124-49), Springfield Lutheran School (3124-67), St. Ambrose (3124-171), and St. Denis (3124-172) appeared to have "Claiming Irregularities". "Claiming Irregularities" means a claim for reimbursement submitted by a sponsoring organization on which the <u>number of meals</u> (not participants) claimed for one or more meal type (breakfast, lunch, snack, or supper) is identical for 15 consecutive days within a claiming period. Accuracy in recording and consolidating CACFP records is critically important in submitting an accurate claim for reimbursement.

Required Action:

The SO must ensure that all site/center's monthly claims for reimbursement are based on accurate meal counts. Provide a written statement indicating procedures the sponsor will implement to prevent this finding in future participation.

4. The Building for the Future brochure or flyer was not available to participants at the Fairbanks Preschool center, the Springfield Lutheran School site, and the Fair Play site. Child care centers as well as at-risk afterschool sites are both to inform parents/guardians of their facility's participation in CACFP, the program's benefits, the name and telephone number of the sponsoring organization, and the name and telephone number of the State Agency responsible for administration of CACFP (FNS Instruction 113-1, 7 CFR 226.15). This information is included on the Building for the Future brochure and flyer.

Required Action:

Post the Building for the Future flyer in a prominent location at the center(s). Distribute the Building for the Future brochure to parents. Both the Building for the Future poster and brochure are available on the CACFP website. Provide a written statement indicating procedures the sponsor will implement to prevent this finding in future participation.

5. The WIC poster was not posted at the Fairbanks Preschool center. Child care centers must ensure that parents of enrolled children are provided with current information on the benefits and importance of the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) and the eligibility requirements for WIC participation (7 CFR 226.15). This information is included on the WIC poster.

Required Action:

Display the WIC poster in a prominent location at the center. The WIC poster is available on the CACFP website. Provide a written statement indicating procedures the sponsor will implement to prevent this finding in future participation.

6. Many of the daily meal counts appeared to have been altered. Often the meals were marked over the marks that were done in the classrooms (most generally in what appeared to be a Sharpie pen). In one case the meal count had "no takers" written in pencil at the bottom (with a frowny face) that appeared to have been attempted to be erased. Nineteen in attendance was also written in pencil. Nineteen meals were marked in the meal count section in what appeared to be a

sharpie pen. Nineteen meals were claimed. Accuracy in the recording of meal count records is critically important in submitting an accurate claim for reimbursement. In future reviews any meal counts that appear to be altered will be disallowed.

Required Action:

Implement procedures to assure that the meals count are not changed. Meals should only be marked once. There should be no changes or alterations in the meal counts. Provide a written statement indicating procedures the sponsor will implement to prevent this finding in future participation.

7. Meal counts are sent to each site with photocopied signatures. The individual verifying that the counts are accurate is not on site when the meal counts are completed. The actual person completing the meal count onsite should sign the meal count verifying accuracy.

Required Action:

Discontinue sending meal counts with photocopied signatures to the sites. The individual completing the meal count must sign the meal count verifying accuracy. Provide a written statement indicating procedures the sponsor will implement to prevent this finding in future participation.

8. There was not a Site Supervisor on-site at the majority of the sites. The Site Supervisor is a trained individual that assures accurate procedures are in place. Typically this person should be a Life360 Community Services employee or a trained official at the site willing to sign-off that all procedures are being done accurately. The Site Supervisor's name should appear on the Site Information Sheet filed with CFNA. The Site Supervisor at the majority of the Life 360 Community Services sites was the person delivering the meals and this individual was not on-site when the meals were being served.

Required Action:

List a Site Supervisor on the Site Information Sheet that is trained, onsite, and able to verify that the CACFP meals and recordkeeping are being done accurately at the site. Provide a written statement indicating procedures the sponsor will implement to prevent this finding in future participation.

9. The majority of sites did not have a copy of the most recent sanitation inspection report on file. The sponsor must request annual sanitation inspections if the local health department does not initiate the inspections.

Required Action:

Submit copies of inspections for all sites or a log of showing the sponsor has requested sanitation inspections. Provide a written statement indicating procedures the sponsor will implement to prevent this finding in future participation.

10. The SO did not maintain documentation on file that a pre-approval visit was made to each new facility as required in 7CFR 226.16(d)(1) prior to site operations.

Required Action:

Describe the procedures that will be implemented to ensure that each new facility has a preapproval visit. 11. The SO did not conduct monitoring visits as required by 7 CFR 226.16. Sponsors are required to monitor each site three times per year and not more than six-months may elapse between reviews. At least two of three monitoring visits to centers should be unannounced. The CACFP representative recommends that all monitoring visits be unannounced. Sponsors are required to conduct at least one unannounced monitoring review that includes an observation of a meal service. Sponsors are required to conduct one monitoring visit per year on weekends, holidays, or during the supper meal service if the center is claiming meals under any of these conditions. This was a finding at both the May 12, 2017 and the May 17, 2021 CACFP reviews.

Required Action:

Describe the procedures the SO will implement to ensure that all centers are monitored as outlined above. All center monitoring must be documented.

12. The SO utilizes central kitchens to provide food for the majority of their sites. Delivery tickets or delivery receipts should be provided to each site to indicate the time that each meals is delivered, the temperature of the meal upon delivery, and how many meals were delivered to each site.

Required Action:

Start completing delivery tickets showing the time that each meals is delivered, the temperature of the meal upon delivery, and how many meals were delivered to each site. Provide a written statement indicating procedures the sponsor will implement to prevent this finding in future participation.

13. The SO does not have a monitoring system in place to assure that menus created by the Fairbanks Preschool center provide all meal pattern requirements.

Required Action:

Describe the procedures the SO will implement to ensure that menus not created by the central kitchen, typically their childcare centers, provide all meal pattern requirements.

14. Menus for the month of February 2022 were reviewed. Meals did not always contain all of the required meal components as outlined in the meal pattern for the CACFP in 7 CFR 226.20. The following meals were noted as having missing or non-creditable components:

Family Life Community Services-Fairbanks Preschool (3124-6)

| DATE MEAL | | NON-CREDITABLE OR | |
|-----------|-----------|----------------------------|----------------------------|
| | | MISSING FOOD ITEM | MENU ITEMS |
| 2/7/22 | Breakfast | Missing required | WG Wheat Toast, Grape |
| | | Fruit/Vegetable component | Jelly, Milk |
| 2/11/22 | Lunch | Missing required Grain | Tater tot casserole, |
| | | component | Raspberries, Milk |
| 2/25/22 | Lunch | Missing required Meat/Meat | WG Spaghetti, Green beans, |
| | | Alternate component | Grapes, Milk |

Meals that do not provide all of the required meal components may not be claimed for reimbursement. A total of 19 breakfast and 36 lunch meals were disallowed as a result of this finding.

Required Action:

Revise menus to include all required meal components. Replace non-creditable foods with creditable foods. Review CACFP Meal Patterns to ensure all meals claimed for reimbursement contain all required meal components. Non-creditable foods may be served as extras. They may not be counted towards the meal pattern requirement. Provide a written statement indicating procedures the sponsor will implement to prevent this finding in future participation.

15. Yogurt was served as a meat/meat alternate component in meals served at the Family Life Community Services-Fairbanks Preschool (3124-6). There was no documentation to verify yogurt served met sugar guidelines. Yogurt served in the CACFP must not have more than 23 grams of sugar per six ounces (7 CFR 226.20). At this time, CACFP will make no disallowances; however, this situation will be closely monitored at future reviews.

Required Action:

Ensure yogurt provided at the centers meets the sugar restrictions of no more than 23 grams of sugar per six ounces. Quick reference sheets on yogurt are available on the CACFP website. Maintain documentation at the sponsor location. Provide a written statement indicating procedures the sponsor will implement to prevent this finding in future participation.

16. Menus show that cantaloupe was served during the review month at the Family Life Community Services-Fairbanks Preschool (3124-6). Food receipts do not reflect the purchase of this food. Food receipts from this site also show insufficient purchases of eggs and apples to support the menu. Food receipts reflect inadequate purchases of these items. Receipts and menus must accurately reflect foods served for meals claimed for reimbursement. Meals that do not meet the requirements of 7 CFR 226.20 are not eligible for reimbursement. At this time, CACFP will make no disallowances; however, this situation will be closely monitored at future reviews, and any meals served without proper documentation to verify food purchased and served will result in meal disallowances.

Required Action:

Ensure that accurate documentation is being maintained regarding food items purchased, prepared, and served. Provide a written statement indicating procedures the sponsor will implement to prevent this finding in future participation.

17. Documentation was not available to verify that all grain items were served in the appropriate portions based on grain ounce equivalent requirements at the Family Life Community Services-Fairbanks Preschool (3124-6). To be creditable in the CACFP, all grain items must have documentation available to verify that adequate amounts of grains are served.

Required Action:

Use only grain items that have documentation to support their contribution toward the grain ounce equivalent requirement. Review the meal pattern requirements and maintain grain ounce equivalent documentation of all grain items served to ensure participants are receiving adequate quantities of this component. Provide a written statement indicating procedures the sponsor will implement to prevent this finding in future participation.

18. There was incomplete documentation to verify that the daily whole grain-rich requirement was met at the Family Life Community Services-Fairbanks Preschool (3124-6). Under the CACFP Meal Pattern Requirements, at least one serving of grains per day must be whole grain-rich (7 CFR 226.20). At this time, CACFP will make no disallowances; however, this situation will be closely monitored at future reviews.

Required Action:

Review menus to ensure at least one serving of grains per day is whole grain-rich. Maintain documentation for whole grain-rich items on file at the sponsor location. Provide a written statement indicating procedures the sponsor will implement to prevent this finding in future participation.

19. There was no documentation to verify breakfast cereal served at the Family Life Community Services-Fairbanks Preschool (3124-6) met the sugar guidelines. Breakfast cereals served to infants and children must contain no more than six grams of sugar per dry ounce (7 CFR 226.20). At this time, CACFP will make no disallowances; however, this situation will be closely monitored at future reviews.

Required Action:

Serve cereal that meets the CACFP guidelines of no more than six grams of sugar in one dry ounce. Quick reference sheets on cereal are available on the CACFP website. Maintain documentation at the sponsor location. Provide a written statement indicating procedures the sponsor will implement to prevent this finding in future participation.

- 20. Documentation was not available to verify that the following processed meat products contained adequate amounts of meat/meat alternate: Meatballs, Fish Sticks, Chicken Nuggets and Chicken Strips. To be creditable in the CACFP, meat products such as these must have documentation available to verify that adequate amounts of meat/meat alternate are served. This documentation can include:
 - a. A Child Nutrition (CN) Label; or
 - b. Product Formulation Statement signed by the manufacturer, which verifies how the processed product contributes to the meal pattern requirements.

At this time, DHSS will make no disallowances; however, this situation will be closely monitored at future reviews, and any processed foods without proper documentation to support their contribution toward the meal component requirements will result in meal disallowances.

Required Action:

Use only meat products that have documentation to support their contribution toward the meat/meat alternate requirement. Documentation for processed food must be maintained on file in the centers. Discontinue use of all processed foods until the SO has documentation to support their contribution toward the meal component requirements. Provide a written statement indicating procedures the sponsor will implement to prevent this finding in future participation.

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21. The Scott County R-I central kitchen had peeling paint and holes in the drywall of the food storage area. The peeling paint could contain lead thus food contamination is possible. Holes in the drywall makes cleaning more difficult and increases the likelihood of pest infestation.

Required Action:

Address the sanitation issues listed above. Provide a written statement indicating procedures the sponsor will implement to prevent this finding in future participation.

22. Meals were served outside the approved meal times as noted on each site application. The meal at the St. Denis site was started 15 minutes early. The meal at Ash Grove-Bois D Arc lasted longer than the approved mealtime. The meal at Fair Play started prior to the approved meal time in some classrooms. Breakfast at the Fairbanks Preschool site would have also been outside of the approved mealtime, but the CFNA reviewer required the site to serve at the appropriate time. The service of meals should be served at the times listed on the Site Information Sheets. Meals served outside of approved meal times cannot be claimed for reimbursement.

Required Action:

Ensure all meals are served within the approved meal times. Meals served outside of the approved meal times are not reimbursable. Provide a written statement indicating procedures the sponsor will implement to prevent this finding in future participation.

23. During observation of meals at the Chadwick and Fair Play sites, the participants in some classrooms were observed picking through the bags (which contained a supper and a snack for each child), and only taking one or two items. The bag containing the unwanted food would be left in the totes from the sponsor and the leftover food would be taken back to the central kitchens. Each participant should take a complete bag and food not consumed by the child should either go to a share table (to be thrown away if not taken by another child), home with the child (based on Covid Waivers), or into the trash at the end of meal service. Those food items should not go back to the sponsor's central kitchen and should not go back into the sponsor's inventory.

Required Action:

Ensure that all left over food items are disposed of properly. Provide a written statement indicating procedures the sponsor will implement to prevent this finding in future participation.

24. CACFP costs must be necessary, reasonable and allocable. Per cost documentation submitted, the administrative personnel salaries appear to be above a reasonable amount paid to administrative staff and include personnel whose job descriptions do not constitute the percentage of time for the position paid out of CACFP funds. Cost documentation records in accordance with 2 CFR Part 200 "Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards" must be reasonable, necessary, and allocable. "A cost is reasonable if, in its nature and amount, it does not exceed that which would be incurred by a prudent person under the circumstances prevailing" per 200.404. The regulation goes on to state the cost should be "recognized as ordinary and necessary" for program operations. An allocable cost should be "chargeable or assignable" to the CACFP and should be incurred specifically for the Missouri CACFP and necessary for the program operation per 200.405. Per cost documentation submitted, the percentage of salaries that are charged to CACFP appear to be above a reasonable amount and/or are not necessary and allocable directly to the CACFP

operations. In addition, the current budget includes unallowable expenses such as enrichment activity expenses and flat rates for lawyers and accountants.

Required Action:

Submit a revised CACFP budget that includes costs that are reasonable, necessary, and allocable. Provide a written statement indicating procedures the sponsor will implement to prevent this finding in future participation.

OBSERVATION

1. The 2022 budget and Cost Allocation Plan have been forwarded to the USDA for review. USDA documented several concerns regarding the use of the CACFP funds to include the sponsor's procurement procedures.

B. Claim Revisions

1. Meal participation records were recounted for the centers listed. There was a discrepancy between the reviewer count and the center count due to claiming errors made for the participants in the findings above. The revised count was as follows:

Fairbanks Preschool Center Count

| | Breakfast | Lunch | PM Snack |
|---------|------------|------------|------------|
| Free | 169 | 211 | 203 |
| Reduced | 18 | 23 | 22 |
| Paid | <u>136</u> | <u>142</u> | <u>140</u> |
| Total | 323 | 376 | 140 365 |

Reviewer Count

| | Breakfast | Lunch | PM Snack |
|---------|------------|------------|------------|
| Free | 160 | 192 | 203 |
| Reduced | 17 | 22 | 22 |
| Paid | <u>127</u> | <u>126</u> | <u>140</u> |
| Total | 304 | 340 | 140 365 |

Reimbursement received by SO for February 2022 \$1,223,979.82
Reimbursement should have been: \$1,223,869.69

Amount of review month over-claim: \$110.13

There was an over-claim in the amount of \$110.13. The revised claim(s) will be held for 15 days pending an appeal of findings of this review. The balance owed to CACFP will be recovered by deducting 100% of your center's monthly CACFP claim for reimbursement payments until paid in full. Debts not totally repaid by August 25, 2022 will incur monthly interest on the remaining debt.

C. Action Items

- 1. Please send a Corrective Action Plan (CAP) using the enclosed CAP Response Form (CACFP-230) concerning all findings listed in Section A of this letter. Before the SO's corrective actions can be submitted, the center must determine WHAT the problem is and WHY it is occurring. The CAP must clearly state the following:
 - HOW the problem can be prevented or eliminated. Do not merely restate the finding or assure that the mistake will not happen again. The solution must be a process specific steps that have been taken to correct the finding and what extra steps will be taken to make sure this problem does not occur again.
 - WHEN the problem was corrected.
 - WHO will be responsible for ensuring the corrections were made and written policies and/or procedures will be maintained.

Additional CACFP-230 CAP Response Forms are also available to complete as a fill-able pdf version under Forms on the CACFP website. CACFP forms, manuals, and references, are available on the CACFP website: http://health.mo.gov/cacfp.

Response to the above items is due in our office no later than **August 15, 2022**. Please send your response to:

Susan Barr
Missouri Department of Health and Senior Services
Bureau of Community Food and Nutrition Assistance
P.O. Box 570
Jefferson City, MO 65102
Email: susan.barr@health.mo.gov

If CACFP receives the documentation of your CAP by the due date and determines that the CAP adequately addresses all of the serious deficiency findings, then CACFP will conduct an unannounced follow-up to verify the adequacy of the corrective action. If CACFP finds at any subsequent review that any of these serious deficiency findings have not been fully and permanently corrected, CACFP will immediately propose to terminate Life360 Community Services contract and propose to disqualify Life 360 Community Services, Jeremy Hahn, Angie Hughes, and Ted Cederblom without any further opportunity for corrective action.

Life360 Community Services may continue to participate in the CACFP during the corrective action period. CACFP will pay any valid claims for reimbursement that Life360 Community Services submits for this period. As always, claims must be submitted within 60 calendar days of the last day of the month covered by the claim. In addition, CACFP will deny any portion of a claim determined to be invalid. If payment of any portion of a claim is denied, that action would be appealable. In accordance with Federal Regulation 7 CFR § 226.6(k)(3)(ii), Life360 Community Services may not appeal the serious deficiency determination. However, in accordance with Federal Regulation 7 CFR § 226.6(k)(2), Life360 Community Services has the right to appeal any of the findings of this CACFP monitoring review that have resulted in a disallowance of meals, claim revisions, or any action affecting your participation in CACFP. You have 15 calendar days by regulation to request an administrative

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review. The counting of the 15 days allowed for the request begins on the fifth day after the date of mailing of the state agency notice, or on the date of email or fax by the state agency, or on the date the institution received the notice of findings, whichever is earliest.

A copy of the appeal procedures is enclosed. If you decide to appeal, follow the appeal procedures exactly, failure to do so could result in the denial of your request for an appeal.

In accordance with Federal Regulations 7 CFR § 226.6 (k)(2)(iii), if CFNA proposes to terminate Life360 Community Services' CACFP contract, or proposes to disqualify Life 360 Community Services, Jeremy Hahn, Angie Hughes, and Ted Cederblom, you will be able to appeal those actions.

If you have any questions, please contact CFNA office at 800-733-6251 or email CACFP@health.mo.gov.

Sincerely,

Tanya Harvey

Program Coordinator

Janya Harvey

Bureau of Community Food and Nutrition Assistance

TH/SW/SB

Enclosure

cc: Jerilin Nunu, USDA-MPRO
Amie Coleman, DHSS OGC
Paula Hernandez-Johnson, DHSS OGC
Sarah Walker, DHSS-CFNA
Tanya Harvey, DHSS-CFNA
Sara West, DHSS-CFNA
Susan Barr, DHSS-CFNA
Wanda Sturtz, DHSS-CFNA
Monitoring, Monitoring, DHSS-Admin