



Missouri Department of Health and Senior Services

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Randall W. Williams, MD, FACOG
Director



Michael L. Parson
Governor

December 9, 2020

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Jeremy Hahn, Executive Director
Family Life Community Services
2220 W Chesterfield Blvd
Springfield, MO 65807
Email: jeremy@life360.org

Angie Hughes, Administrator
Family Life Community Services
2220 W Chesterfield Blvd
Springfield, MO 65807
Email: angie@life360.org

Sponsor #3124

Dear Jeremy Hahn and Angie Hughes:

The Missouri Department of Health and Senior Services (DHSS) – Summer Food Service Program (SFSP) conducted a desk review of your organization's SFSP operations which was completed on November 19, 2020. Records for the months of June 2020 and July 2020 were reviewed to substantiate the claim for reimbursement in accordance with the Code of Federal Regulations- Summer Food Service Program (7CFR Part 225). The Sponsor Review Summary was discussed by phone during the exit interview with Angie Hughes. Thank you for the courtesy and cooperation during the review process. Listed below are the findings resulting from the review.

A. Findings:

1. Meals did not always provide all of the required meal components, as outlined in the meal pattern for the SFSP in accordance with 7 CFR 225.16(d). Food receipts for the month of June and July indicate that the sponsor was low of milk on purchases of milk for 2 sites each month. The sites, milk purchased and milk needed are indicated below:

Site	Month	Milk Purchased	Milk Needed
Pleasant Hope Hub	June	2224 gallons	2896 gallons
Life 360 Chesterfield	June	3760 gallons	5804 gallons
Pleasant Hope Hub	July	3062 gallons	3096 gallons
Conway	July	1344 gallons	1504 gallons

The sponsor must have records to document that meals served meet minimum meal pattern requirements. The sponsor purchased enough milk for each month to cover all sites. Milk may have been transferred between sites, if this is the case, the sponsor must develop a log to document the milk transfer. In addition, sponsors participating in the SFSP must maintain records of food and milk purchases to support claims for reimbursement. At this time, no disallowances will be made; however, this situation will

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be closely monitored at future reviews, and any shortages of milk or other food items will result in meal disallowances

Required Action:

Describe the procedures that will be implemented to ensure that all required meal components are provided to the participants in the appropriate quantities and that documentation is kept on file supporting the purchase of adequate quantities of milk.

2. Documentation was not available by the Sponsor to verify that the SFSP reimbursement was used solely for the operation of the food service for June and July 2020. Sponsors are required to maintain documentation of nonprofit food service to ensure that all program reimbursement funds are used solely for the conduct of the food service operation, or to improve the food service operation. The sponsor's documentation of costs versus reimbursement show that the amount spent June 2020 by the sponsor was \$758,352.58. The reimbursement for the month of June 2020 totaled \$1,901,830.49. The sponsor's documentation of costs versus reimbursement show that the amount spent July 2020 by the sponsor was \$814,569.09. The reimbursement for the month of June 2020 totaled \$1,678,005.61. Leaving a significant amount of unspent reimbursement in each month (the sponsor did not use half of the reimbursement in either month). Sponsors must maintain documentation of nonprofit food service to ensure that all program funds are used solely for the food service operation. Such documentation may include:
 - Copies of receipts, invoices or other records to document food and food service supply purchases;
 - Copies of receipts, invoices or other records to document costs necessary for the administration of the SFSP, such as staff mileage reimbursement records, telephone and utility bills, receipts for office supplies, printing or postage, etc.; and - Time sheets and payroll records (e.g., check stubs) to document labor attributable to the food service operation.

Required Action:

Maintain documentation to verify that SFSP reimbursement is being used solely for the operation of the food service. Provide a written statement indicating how the funds were used during this federal fiscal year and provide a written statement regarding the procedures the sponsor will implement to prevent this finding in future participation.

3. The sponsor paid bonuses to employees in both June and July 2020. Bonuses are allowable only with specific prior written approval from the state agency (DHSS). The sponsor must also have these incentives written into the employees agreements of work. Lastly, the organization needs to have a written compensation policy and these types of incentives need to be included in that policy. DHSS will allow the bonus payments for 2020, but in future participation disallowances will occur without an approved written policy.

Required Action:

Provide a written statement indicating the procedures the sponsor will implement to prevent this finding in future participation.

4. The beneficiary data collected by the sponsor during site operations was recorded on the review form as the percentage of children in each racial/ethnic category. In accordance with 7 CFR 225.15(a) sponsors are required to physically count the number of children in each racial/ethnic category at each site at least once during program operations. The actual number of children counted in each category must be recorded rather than the percentage. Many of the sites had the same racial/ethnic percentages recorded.

Required Action:

Document the actual number of children in each racial/ethnic category rather than the percentage of children in each category. This data must be collected at least once during program operations for each site. Provide a written statement indicating procedures the sponsor will implement to prevent this finding in future participation.

5. The sponsor did not include the USDA non-discrimination statement and procedure for filing a complaint in all SFSP materials in accordance with 225.15(e).

Required Action:

The sponsor shall include the USDA non-discrimination statement in all SFSP materials distributed. The USDA non-discrimination statement can be found at:

<https://health.mo.gov/living/wellness/nutrition/foodprograms/cacfp/usdastatement.php>.

Provide a written statement indicating procedures the sponsor will implement to prevent this finding in future participation.

6. Monitoring of sites was not completed and/or documented in accordance with 7 CFR 225.15(d). The pre-operational review conducted by the sponsor appeared to be the same form copied with different information filled in the top. All new sites and sites that had problems in the previous year must have a pre-operational review conducted by the sponsor prior to the start of program operations. This review is needed to ensure that the site has corrected past problems and is capable of preparing and/or serving the number of meals indicated on the site sheet. The sponsor needs to show due diligence in actually conducting reviews of the sites prior to operation.

Required Action:

Conduct pre-operational visits of all new sites and sites that have a history of problems. The pre-operational visits must be documented. Provide a written statement indicating procedures the sponsor will implement to prevent this finding in future participation.

7. There is a lack of variety of food served at all of the sponsor's sites. There was essentially a one week cycle of menus provided. Also, peanuts and peanut butter were served together at the Crosspointe Camp in both June and July 2020. To assure that the nutrition needs of the participants are being met, it is important to provide a variety of

different foods each day. It is recommended that the sponsor develop a minimum of a two-week cycle menu for all meals and snacks and use the ample reimbursement to provide higher quality foods.

Recommendation:

Provide a variety of foods from the meat/meat alternate, fruit, vegetable, and grain components.

B. Action Item:

Enclosed you will find a Corrective Action Plan (CAP) form. Please complete a written response to this letter concerning all findings in Section A of this letter.

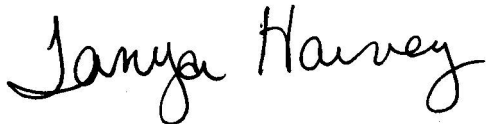
The response to this letter is due within **three weeks** of the receipt of this letter and should be submitted to:

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

You have the right to appeal any of the findings of this review that have resulted in claim revisions, disallowance of meals, or any action affecting your participation in the program. Your written appeal must be received by this office no later than 14 calendar days from the receipt of this letter. Refer to the enclosed "What To Do If You Decide to Appeal" flier for more information.

Please do not hesitate to contact Susan Barr at 888-435-1464 if you have any questions.

Sincerely,



Tanya Harvey, Summer Food Service Program Manager
Bureau of Community Food and Nutrition Assistance

TH:SB:SW:jp

Enclosures

cc: Sara West, Nutrition Specialist, DHSS-CFNA
Susan Barr, Nutritionist, DHSS-CFNA