

STATE OF LOUISIANA

OFFICE OF STATE INSPECTOR GENERAL



REGIONAL NUTRITION ASSISTANCE, INC.

Date Released:

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File No. 1-08-0015

STATE OF LOUISIANA

OFFICE OF
STATE INSPECTOR GENERAL



REGIONAL NUTRITION
ASSISTANCE, INC.

Stephen B. Street, Jr.
State Inspector General

A handwritten signature in black ink, appearing to read "Bobby Jindal", is written over the printed name of the Governor.

Approved by:
Governor Bobby Jindal

March 30, 2009

File No. 1-08-0015

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BOBBY JINDAL
GOVERNOR

STEPHEN B. STREET, JR.
STATE INSPECTOR GENERAL

State of Louisiana
Office of the Governor
Office of State Inspector General

March 30, 2009

Honorable Bobby Jindal
Governor of the State of Louisiana
P.O. Box 94004
Baton Rouge, LA 70804-9004

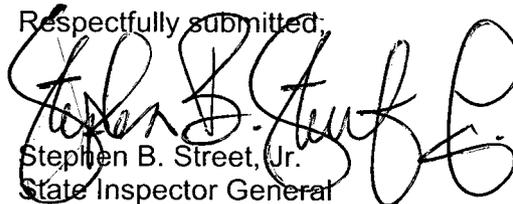
Re: Case No. 1-08-0015

Dear Governor Jindal:

This report addresses concerns regarding meal and travel reimbursements on contracts between Regional Nutrition Assistance, Inc. and the Department of Education. The report includes seven recommendations that if implemented would result in the recovery of ineligible reimbursements and improve controls over possible future reimbursements.

We provided drafts of the report to the Executive Director of Regional Nutrition Assistance, Mr. Brian Desormeaux, and the State Superintendent of Education Paul Pastorek. Their written responses are included as Appendix A.

Respectfully submitted,



Stephen B. Street, Jr.
State Inspector General

SBS/cs

Enclosure

Executive Summary

During at least the months of October and November 2007, Regional Nutrition Assistance (RNA), a company contracting with the Department of Education (DOE) to be a “sponsor” and administrator of a family day care program, knowingly submitted meal reimbursement claims to DOE that it believed to be false. The claims were submitted for at least eight providers who claimed meal expenses for more children than RNA believed were actually served. RNA’s Executive Director, Brian Desormeaux, acknowledged that he was aware that the claims were possibly false, yet still submitted the claims to DOE for reimbursement.

For the contract beginning October 2007 through January 2008, DOE reimbursed RNA \$1,427,285 for administrative costs and meals to be reimbursed to providers. According to the federal program regulations, DOE must initiate action to terminate the agreement with RNA if it determines that RNA committed one or more serious deficiencies or submitted false or fraudulent claims.

RNA did not have functioning internal controls to ensure that providers were reimbursed only for meals actually served, employees were properly monitoring providers and reporting those that were noncompliant, or to ensure sanctions for noncompliant providers were enforced. As a result, RNA reimbursed at least \$13,471 to providers for meals that were claimed on days that the providers were reported as noncompliant, and, therefore, should have been disqualified.

In addition, RNA did not have functioning internal controls to ensure that travel expenses claimed by their employees performing on-site monitoring functions were valid and properly supported. As a result, RNA reimbursed approximately \$4,876 to two monitors for 12,191 miles claimed on travel logs without the required supporting documentation.

Senior administrators with the DOE Division of Nutrition Assistance limited the scope of its investigation of an RNA employee accused of submitting false travel claims. As a result, DOE failed to adequately investigate and disclose all serious deficiencies found and determine the amount of ineligible reimbursements of travel and/or meals for recovery. Justifications provided by senior administrators for the scope limitations were inconsistent.

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Background

The Child and Adult Care Food Program (Food Program) is a federally funded program operated nationally by the United States Department of Agriculture (USDA). Under the Food Program, nutritious meals and snacks are served to eligible children and adults who are enrolled for care at participating child care centers, day care homes, and adult day care centers. Section 17 of the Richard B. Russell School Lunch Act (42 USC 1766) gives authority to the USDA Secretary to carry out the Food Program to states through grants-in-aid and other means. The USDA Food and Nutrition Service Division is responsible for administering grants to the states.

In Louisiana, the DOE Division of Nutrition Assistance is responsible for administering the Food Program in Louisiana. Independent centers and sponsoring organizations enter into contract agreements with DOE to assume administrative and financial responsibility for Food Program operations.

DOE contracted with RNA to be a “sponsor” and administrator of a Family Day Care Program, which is a component of the Food Program. RNA is a nonprofit agency established in 1990 and the home office is located in Scott, Louisiana. The Executive Director is Mr. Brian Desormeaux.

The Family Day Care Program was created to promote and improve the health of children by effecting the early development and education of children’s eating habits. It provides for the reimbursement of meals and snacks served to small groups of eligible children (six or less) receiving nonresidential day care in approved private homes. RNA contracts with individuals to be “providers” of the program.

Providers are paid based on the number of meals served to enrolled children, multiplied by the appropriate reimbursement rate for each breakfast, lunch, supper, or snack approved to serve. Sponsors receive administrative funds related to the documented costs they incur in planning, organizing, and managing a family day care program.

Contracts between DOE and RNA run from October through September of each year. On the contract starting October 2006 and ending September 2007, DOE reimbursed RNA \$4,336,818 for administrative costs and meals to be reimbursed to providers. On the most recent contract starting October 2007, DOE reimbursed RNA \$1,427,285 through January 2008. Total reimbursements during the periods were \$5,764,103.

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Scope and Methodology

We conducted our audit in accordance with *Principles and Standards for Offices of Inspector General* as promulgated by the Association of Inspectors General.

We began our audit after receiving a complaint with various allegations against DOE and RNA. Of particular concern was that an employee of DOE's Division of Nutrition Assistance accepted various monetary gifts to grant favorable treatment to RNA. Our investigation did not disclose any documentary evidence to validate this allegation. However, our investigation did result in findings related to the remaining allegations as noted in the report.

The scope of the audit included RNA's family day care program records from January 1, 2005 through February 29, 2008. Our audit procedures included, but were not limited to reviewing:

- Laws, regulations, publications, and guidelines pertaining to the federal Child and Adult Care Food Program and its Family Day Care Program component
- The contract agreements between DOE and RNA
- A complaint filed with DOE against RNA
- Documents related to DOE's investigation of the complaint and RNA's corrective action plan
- Documents related to provider's meal claims and reimbursements, documents related to the monitoring of providers, and Travel Logs and reimbursements related to monitoring activities of RNA employees.

We also conducted interviews with employees of DOE and RNA, as well as other individuals associated with RNA's Day Care Program.

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False Meal Reimbursement Claims

During at least the months of October and November 2007, RNA knowingly submitted meal reimbursement claims to DOE that it believed to be false. The claims were submitted for at least eight providers who claimed meal expenses for more children than RNA believed were actually served. Mr. Desormeaux acknowledged that he was aware that the claims were possibly false, yet still submitted the claims to DOE for reimbursement.

DOE and RNA are required to comply with all regulations set forth in the Child and Adult Care Food Program Regulations, 7 CFR, Part 226. According to 7 CFR, Part 226.6 (c)(5)(ii), if the state agency determines that a participating institution has knowingly submitted a false or fraudulent claim, the state agency **may** initiate action to suspend the institution's participation, and **must** initiate action to terminate the institution's agreement and initiate action to disqualify the institution and the responsible principals and the responsible individuals.

In addition, 7 CFR, Part 226.6 (c)(3)(i) requires the state agency to initiate action to terminate the participating institution's agreement and initiate action to disqualify the institution and the responsible principals and the responsible individuals, if the state agency determines that the participating institution has committed one or more serious deficiencies. Examples of serious deficiencies listed in 7 CFR, Part 226.6 (c)(3)(ii) are:

- Failure to maintain adequate records,
- Claiming reimbursement for meals not served to participants, and
- Failure to properly implement and administer the day care home termination and administrative provisions.

In order to receive reimbursement for meals served, providers must document their daily count of meals and snacks served and the number of children in their care during each meal or snack on Daily Meal Count and Attendance Reports. These reports are then submitted monthly to RNA for reimbursement of eligible meals. RNA is then responsible for reviewing the reports for accuracy and validity, and then submitting the information to the DOE for reimbursement.

We investigated an allegation received from our complainant that during an October 1, 2007 staff meeting an employee responsible for monitoring providers informed Mr. Desormeaux that specific providers with RNA's Shreveport, Louisiana office were routinely submitting meal reimbursement claims for six children when only two were served. The meeting was audio recorded by the complainant, who provided us with a copy of the audio tape and a handwritten list of the providers named on the tape as having submitted these false claims.

We listened to the tape and noted that Mr. Desormeaux was present at the meeting and was informed that ten providers were claiming meals for six children

when only two were served. On the tape, those present in the meeting referred to these providers as the “Six-Two Providers.”

After listening to the recording and reviewing the handwritten list, we obtained and reviewed the Daily Meal Count and Attendance Reports that were submitted to RNA by each of the ten providers from May 2007 through November 2007. The results of our review are presented below:

- Five of the ten providers claimed and were reimbursed meal expenses for six children for the months of May 2007 through October 2007
- Two of the ten providers claimed and were reimbursed meal expenses for six children for the months of May 2007 through November 2007
- One of the ten providers claimed and was reimbursed meal expenses for four children for the months of May 2007 through November 2007
- Two of the ten providers did not claim meal expenses for the months reviewed.

After Mr. Desormeaux was informed of what is considered a serious deficiency by the providers, no action was apparently taken against the providers. In fact, eight of the ten providers still submitted possible false meal claims for October and November, 2007, which were reviewed, approved, and submitted to DOE for reimbursement by RNA administrative staff.

On October 7, 2008, we conducted a formal interview with Mr. Desormeaux and questioned him about the October 1, 2007 staff meeting and his knowledge of the “Six-Two Providers.” Mr. Desormeaux acknowledged that during the meeting he was informed about the “Six-Two Providers,” and said there were actually twelve providers submitting false meal reimbursement claims.

Mr. Desormeaux cited specific instances in which he personally visited the “Six-Two Provider’s” homes after the staff meeting and observed either no children present or only one or two children present. He also observed other conditions that warranted disqualification of meal reimbursements, sanctions, and possibly the seriously deficient and/or termination procedures. Mr. Desormeaux said he instructed his staff to start termination procedures on these providers.

On October 13, 2008, we contacted Mr. Desormeaux and requested documentation supporting termination of seven of the ten providers discussed in the recorded staff meeting. On October 24, 2008, Mr. Desormeaux hand-delivered documents he obtained to fulfill our request. However, none of the documents addressed terminating the seven providers or justifications for retaining them. Mr. Desormeaux said he did not have documentation for the seven providers, and then contradicted his statements to us from the October 7, 2008 interview, claiming he only recalled three providers being discussed in the staff meeting instead of twelve.

Conclusions:

1. Mr. Desormeaux and RNA's administrative staff were aware that at least eight providers were submitting possible false meal reimbursement claims, yet RNA reviewed, approved, and submitted claims from these providers to DOE for reimbursement.
2. There is no evidence to indicate that Mr. Desormeaux and RNA's administrative staff took appropriate action to verify claims submitted by the "Six-Two Providers," and, if necessary, initiate termination procedures.

Recommendation:

1. DOE should consider initiating termination procedures of the RNA agreement as required by 7 CFR 226.6 for committing more than one serious deficiency and for knowingly submitting what it believed to be false meal reimbursement claims.
2. DOE should also consider recovery of ineligible reimbursements during contract period beginning October 2007 through January 2008.

Nonfunctioning Controls Over Meal and Travel Reimbursements

RNA did not have functioning internal controls to ensure that providers were reimbursed only for meals actually served, employees were properly monitoring providers and reporting those that were noncompliant, or to ensure sanctions for noncompliant providers were enforced. As a result, RNA reimbursed at least \$13,471 to providers for meals that were claimed on days that the providers were reported as noncompliant, and, therefore, should have been disqualified.

In addition, RNA did not have functioning internal controls to ensure that travel expenses claimed by their employees performing on-site monitoring functions were valid and properly supported. As a result, RNA reimbursed approximately \$4,876 to two monitors for 12,191 miles claimed on Travel Logs without the required supporting documentation.

As part of its family day care program contract with DOE, RNA agreed to comply with all regulations set forth in Child and Adult Care Food Program Regulations, 7 CFR, Part 226. These regulations require sponsors, such as RNA, to establish and implement internal controls and other management systems to ensure fiscal accountability and to ensure that the program operates in accordance with regulation requirements.

Specifically, 7 CFR, Part 226.16 (b) (1) requires the sponsor to employ one full-time staff person for each 50 to 150 day care homes it sponsors in order to monitor providers. Regulations for the reconciliation of meal counts and the frequency and type of facility reviews in 7 CFR, Part 226.16 (d) (4) require the sponsor to examine daily meal counts and attendance and/or enrollment records of the provider for accuracy of the meal counts to the number of children in care during each meal. The regulations also require the sponsor to review (monitor) each provider's facility three times each year or, at least, an average of three reviews of all of its providers that year for compliance.

As required by the regulations, RNA submitted attachments to the contract of its financial management policies and its procedures for sanctioning noncompliant providers, including the point at which the seriously deficient and/or termination process begins. RNA also provided a detailed description in the contract of its policies and procedures pertaining to the collection and review of provider records.

Travel, Monitoring, and Meal Count and Attendance Forms Necessary for Reimbursement

During visits to provider facilities, RNA monitors are responsible for documenting the visits on Travel Logs noting the date traveled, the destination, the number of miles per destination, the reason for the visit, and, if necessary, whether the provider had no children in attendance, was not home, or did not answer. The monitors are also responsible for completing Monitoring Forms for each provider visited noting the children in attendance and any deficiencies with registry and training, meal service, and records.

In order for the monitor's to receive travel reimbursement, RNA's financial management policies stipulate that travel checks be supported by Travel Logs that must be signed and dated by the employee and turned in to the office manager and/or compliance manager by the 1st working day of the month following the month claimed. In addition, Monitoring Forms signed by the monitor and provider during monitoring visits are to be reviewed for accuracy against Travel Logs to ensure accuracy of both the monitoring visit, as well as the travel destination.

In order for RNA providers to receive reimbursement for meals served, the providers must document their daily count of meals and snacks served and the number of children in their care during each meal or snack on Daily Meal Count and Attendance Reports. These forms are submitted monthly to RNA for reimbursement of eligible meals. RNA's policies and procedures over the collection and review of provider records stipulate that Daily Meal Count and Attendance Reports be reconciled to Monitoring Forms to ensure the accuracy of meals claimed.

Review of Travel and Meal Reimbursement Records

We reviewed Daily Meal Count and Attendance Reports, Travel Logs, and Monitoring Forms from RNA's Shreveport and Lafayette, Louisiana offices. Details from the review are noted below.

Shreveport Office

Based on our analysis of Travel Logs for three Shreveport monitors, and the results of a DOE investigation into an allegation that a Shreveport monitor falsified Travel Logs for reimbursement, we examined select records that related to the monitoring of providers by one Shreveport monitor from February 2007 through September 2007.

Our review revealed that RNA did not ensure the accuracy of monitoring visits claimed by the monitor on Travel Logs or the accuracy of meals claimed by providers on Daily Meal Count and Attendance Reports as required by the federal regulations and its own policies and procedures. As a result, RNA reimbursed the monitor approximately \$2,474 for questionable monitoring visits

and reimbursed providers approximately \$8,293 for questionable meals. The detailed results of the review are as follows:

- Travel Logs reported 494 visits to providers during scheduled meal times with the following conditions:
 - a) No Answer
 - b) Not Home
 - c) No Children

Providers are considered noncompliant for all of these conditions and are disqualified from reimbursement for any meal expenses claimed on that day.

- Travel Logs were not signed by the employee or the administrator that reviewed and approved the documents.
- There was no evidence to indicate that Monitoring Forms were completed for the 494 noncompliant provider visits.
- There was no evidence to indicate that Travel Logs were reconciled to Monitoring Forms to verify accuracy and validity of the visits and mileage
- Based on an average reimbursement rate of 40¢ per mile, the monitor was reimbursed approximately \$2,474 for a total of 6,185 miles claimed for the 494 noncompliant provider visits.
- Daily Meal Count and Attendance Reports prepared by providers for 171 of the 494 visits reported as noncompliant were reviewed. Meals were claimed and reimbursed on 152 of the 171 (89%) reports reviewed.
- Approximately 1,895 meals were claimed by and reimbursed to providers reported as noncompliant and, therefore, disqualified from reimbursement. The estimated value of the questionable meals is \$8,293.
- There was no evidence to indicate that Daily Meal Count and Attendance Reports were reconciled to Monitoring Forms to verify accuracy and validity of the meals claimed.
- Eleven providers who received reimbursement for the questionable meals were interviewed. All 11 provided written statements that they served compliant meals to authorized children on the dates reported as noncompliant on the Travel Logs.

Lafayette Office

Based on our analysis of Travel Logs for four Lafayette monitors, we examined select records that related to the monitoring of providers by one Lafayette monitor from May 2005 through January 2008.

Again, our review revealed that RNA did not ensure the accuracy of monitoring visits claimed by the monitor on Travel Logs or the accuracy of meals claimed by providers on Daily Meal Count and Attendance Reports as required by the federal regulations and its own policies and procedures. As a result, RNA reimbursed the monitor approximately \$2,402 for questionable monitoring visits and reimbursed providers approximately \$5,178 for questionable meals. The detailed results of the review are as follows:

- Travel Logs reported 563 visits to providers during scheduled meal times with the following conditions:
 - d) No Answer
 - e) Not Home
 - f) No Children

Providers are considered noncompliant for all of these conditions and are disqualified from reimbursement for any meal expenses claimed on that day.

- Travel Logs were not signed by the employee or the administrator that reviewed and approved the documents.
- There was no evidence to indicate that Monitoring Forms were completed for the 563 noncompliant provider visits.
- There was no evidence to indicate that Travel Logs were reconciled to Monitoring Forms to verify accuracy and validity of the visits and mileage.
- Based on an average reimbursement rate of 40¢ per mile, the monitor was reimbursed approximately \$2,402 for a total of 6,006 miles claimed for the 563 noncompliant provider visits.
- Daily Meal Count and Attendance Reports prepared by providers for 116 of the 563 visits reported as noncompliant were reviewed. Meals were claimed and reimbursed on 93 of the 116 (80%) reports reviewed.
- Approximately 1,230 meals were claimed by and reimbursed to providers reported as noncompliant and, therefore, disqualified from reimbursement. The estimated value of the questionable meals is \$5,178.
- There was no evidence to indicate that Daily Meal Count and Attendance Reports were reconciled to Monitoring Forms to verify accuracy and validity of the meals claimed.

Sanctions for Noncompliant Monitoring

RNA's procedures for sanctioning noncompliant providers stipulate the following sanctions when providers are found to be noncompliant during monitoring visits:

- 1st visit Meals are disallowed for the entire day. A warning is given to the provider to contact the agency. A follow-up visit is to be conducted within five working days.
- 2nd visit Meals are disallowed and the provider is not allowed to participate in the program for the next five working days. A warning is given to the provider to contact the agency. A follow-up visit is to be conducted within the next five days of resumed participation.
- 3rd visit If the provider is not in compliance, the seriously deficient process and/or termination procedures will begin.

We reviewed Travel Logs that related to the monitoring of providers by one Lafayette monitor from May 2005 through January 2008. We then checked the provider's Daily Meal Count and Attendance Reports against 191 instances where providers were reported as noncompliant on the Travel Logs for their 1st, 2nd, and, sometimes, 3rd visits.

Our review revealed that RNA did not enforce the sanctions or the seriously deficient and/or termination procedures for noncompliant providers as required by their own policies and procedures. The lack of this enforcement may be due to RNA's failure to ensure the accuracy of monitoring visits claimed by the monitor on Travel Logs or the accuracy of meals claimed by providers on Daily Meal Count and Attendance Reports.

Whatever the reason for the lack of enforcement, costs for an estimated additional 3,149 questionable meals were reimbursed to providers and 24 providers reported as noncompliant on the 3rd visit were allowed to continue in the program when they should have been terminated.

The results of our review were as follows:

- An estimated 1,389 meals should have been disqualified from reimbursement on the day reported as noncompliant for the 1st, 2nd, and 3rd visits.
- Of the 191 noncompliant visits, 41 were the 2nd follow-up visit, at which time the providers should have been suspended from participating in the program for five days. Had the sanction been enforced, an estimated 1,760 meals would have been disqualified for reimbursement. We were unable to obtain any evidence that indicated the suspensions were enforced or justifications for not enforcing them.

- Of the 191 noncompliant visits, 25 were the 3rd follow-up visit. Therefore, the seriously deficient and/or termination procedures should have been implemented. We did find evidence of termination procedures on one of the providers. However, we were unable to obtain any evidence that indicated any action was initiated against the others or justifications for not enforcing the policy.

Conclusions:

3. RNA reimbursed providers for questionable meals claimed on days they were reported as noncompliant without reconciling Daily Meal Count and Attendance Reports to Monitoring Forms to verify accuracy and validity of the meals claimed.
4. RNA did not ensure that monitors were properly monitoring providers and completing Monitoring Forms for all visits.
5. RNA reimbursed monitors for questionable mileage claimed on Travel Logs without reconciling the Travel Logs to Monitoring Forms to verify accuracy and validity.
6. RNA did not enforce its procedures for sanctioning noncompliant providers, and, therefore, providers were reimbursed for questionable meals and providers that should have been terminated from the program were allowed to continue.

Recommendation:

3. At a minimum, DOE should recover the \$18,347 in questionable travel and meal reimbursements from RNA.
4. DOE should schedule a thorough review of RNA and determine the total costs of ineligible administrative, travel, and meal reimbursements and recover these costs from RNA.
5. At the very minimum, DOE should perform frequent follow-up visits with RNA to ensure that proper internal controls are implemented and properly functioning over meals, monitoring of providers, and travel.

DOE Investigation of RNA

Senior administrators with the DOE Division of Nutrition Assistance limited the scope of its investigation of an RNA employee accused of submitting false travel claims. As a result, DOE failed to adequately investigate and disclose all serious deficiencies found and determine the amount of ineligible reimbursements of travel and/or meals for recovery. Justifications provided by senior administrators for the scope limitations were inconsistent.

On January 17, 2008, the DOE's Division of Nutrition Assistance received a letter alleging that a monitor with the RNA Shreveport office was falsifying travel reimbursement records and failing to comply with state agency rules regarding several aspects of the monitoring process. DOE opened an investigation into the allegations on January 29, 2008, assigning it to two Education Program Consultants (DOE program monitors). Ms. Linda Lambert, their immediate supervisor and an Education Program Consultant 5, issued a letter on February 25, 2008 to Mr. Desormeaux reporting the results of their investigation. Subsequent to the investigation, RNA closed its Shreveport office.

In order to assess the possible impact of the allegation and DOE's subsequent investigation, we reviewed the letter and other documents related to the investigation, and conducted formal interviews with DOE employees.

The program monitors examined approximately nine-months of travel records prepared by the monitor in-question and two other monitors from the Shreveport office. However, the letter from Ms. Lambert to Mr. Desormeaux only reported results related to the review of travel records of the monitor in-question for the months of July and August 2007. According to the letter, the review revealed a number of "troubling aspects" as follows:

- For the month of July 2007, 119 visits to providers were recorded on Travel Logs with only 20 successful visits. The remaining visits were reported as noncompliant.
- For the month of August 2007, 122 visits to providers were recorded on Travel Logs with only 32 successful visits. The remaining visits were reported as noncompliant.
- During the two-month period, the monitor recorded 103 visits to 13 providers supposedly having visited each provider between 5 and 13 times. Only 7 of these visits were successful. The providers were allowed to continue in the program without being sanctioned.
- Monitoring Forms were not completed for unsuccessful visits.
- Discrepancies were noted between the Monitoring Forms that were completed for successful visits and the Travel Logs.

Based on the results of DOE's investigation, it was apparent that either the Travel Logs were falsified or that a large number of providers needed to be terminated from the program. However, the providers needed to be contacted in order to try and conclusively prove or disprove that the monitor falsified the Travel Logs or whether the providers needed to be terminated.

If the Travel Logs were falsified, the amount of ineligible travel reimbursements should have been determined for recovery from RNA. In addition, meal reimbursements for providers reported as noncompliant needed to be reviewed to ensure the providers were only reimbursed for eligible meals. Any ineligible reimbursements should have been determined for recovery from RNA. The DOE program monitors did not perform these procedures.

The results of the investigation also indicated that RNA had nonfunctioning internal controls over monitoring of providers and travel expenses claimed by monitors. Therefore, the scope of the investigation needed to be expanded to include a review of travel and monitoring records submitted by monitors from other offices to ensure that travel discrepancies were isolated only to the monitor in-question. However, the DOE program monitors only reviewed travel records for RNA monitors within the Shreveport office and only the results related to travel in July and August 2007 for the monitor in-question were reported in Ms. Lambert's letter to Mr. Desormeaux.

According to the DOE program monitors, Ms. Lambert was responsible for the investigation and establishing the scope. Ms. Lambert limited the reporting of the results to two-months of travel records for the monitor in-question and only gave Ms. Cronin and Mr. Parrino one day to complete the fieldwork. Ms. Cronin stated that Ms. Lambert would not allow them to expand the investigation.

Ms. Lambert said she informed Mr. John Dupre, Director for DOE's Division of Nutrition Assistance and her immediate supervisor, of the need to contact the providers reported as noncompliant. However, Mr. Dupre did not support the idea of contacting the providers where it was suspected that the monitor falsified the Travel Logs.

Mr. Dupre said he did not approve of expanding the scope to include contacting the providers because he received an e-mail from Ms. Ellen Wahlberg, Acting Regional Director for the USDA, on February 11, 2008, which instructed him to ignore the allegation letter that DOE received.

During a phone interview with Ms. Wahlberg, she said that she informed Mr. Dupre and Ms. Lambert that DOE was responsible for investigating the allegations pertaining to program and USDA Food and Nutrition Service was responsible for investigating the civil rights issues contained in the letter. She said based on her review of the results in Ms. Lambert's letter to Mr. Desormeaux, DOE should have, at a minimum, scheduled RNA for additional reviews.

Conclusion:

7. DOE failed to contact providers to try and conclusively prove or disprove that the RNA monitor falsified Travel Logs or whether the providers reported as noncompliant needed to be terminated.
8. DOE failed to determine the amount of ineligible travel and meal reimbursements for recovery from RNA.
9. DOE failed to report and/or review travel and monitoring records submitted by monitors, other than the monitor in-question, to ensure that travel discrepancies were isolated only to the monitor in-question.

Recommendation:

6. DOE should determine total ineligible travel and meals reimbursements for recovery from RNA.
7. DOE should ensure all investigations or reviews are expanded when necessary to adequately investigate and disclose all conditions discovered and determine any costs that may be recovered.

APPENDIX A

Management Responses

Regional Nutrition Assistance, Inc. Response

(Attachments are included with report published on IG website.)



Brian Desormeaux
Executive Director

Regional Nutrition Assistance, Inc.

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March 10, 2009

Mr. Stephen B. Street, Jr.
State Inspector General
P.O. Box 94095
Baton Rouge, LA 70804-9095

RE: Case No. 1080015

Dear Mr. Street:

Transmitted herewith is the response as per your request with regards to your letter dated February 26, 2009. I do not concur with each and every finding and/or recommendation as outlined in the report as submitted. I will address them on a one on one basis.

I am sure the Mr. Augustus Michael Davis will concur that I and RNA, Inc.'s staff have always been cooperative and forthcoming with his entire requests. We were under the belief that the investigation would have cleared us from any intentional and deliberate wrongdoing. Unfortunately, it appears that we have to continue to defend our actions. It should be noted that the response to this report is being made without access to any of the records which the Auditor and your office have obtained from RNA, Inc. and still have never been returned. Because of this situation, I feel I am faced with an extreme disadvantage in defending any actions reviewed in this report. Moreover, by not having these records for nearly a year, not being able to discuss the situation with anyone, including my staff, (pursuant to LSA-R.S. 49:220.25 as stated in the report dated February 26, 2009 from OIG) this has crippled the management and operations of our program.

Regional Nutrition Assistance, Inc. began its operation in December, 1990 and I, Brian Desormeaux, have been the Executive Director since its inception. Throughout Regional Nutrition Assistance, Inc.'s nearly nineteen

years of serving providers of this state, Regional Nutrition Assistance, Inc., under my direction has acquired many accolades and accomplishments which we believe the United States Department of Agriculture, the Louisiana State Department of Education, Division of Nutrition Assistance, as well as the providers of this state can and are extremely proud.

- 1st Louisiana Agency to be selected in the USDA National Child Care Program Assessment. Scored 100% in all areas with no findings.
- 1st Agency to pilot the Louisiana State Department of Education On-Line claiming system.
- 1st Agency in the State of Louisiana to be selected in the National Tiering Assessment for two consecutive years. Scored 100% on both assessments with no findings.
- Represented the Louisiana Sponsors and the Louisiana Department of Education, National Sponsors Association Conference, Indianapolis, Indiana.
- Represented the Louisiana Sponsors and the Louisiana Department of Education, National Sponsors Association, Albuquerque, New Mexico.
- Represented the Louisiana Sponsors and the Louisiana Department of Education, California Round Table Conference, Anaheim, California.
- Represented the Louisiana Sponsors and the Louisiana Department of Education, National Ethics Task Force, Washington, D.C.
- Represented the Louisiana Sponsors at the Louisiana State Department of Education's USDA National Task Force Conference, New Orleans, Louisiana.
- The Agency has twice participated in the USDA Best Practices Award Program.
- Elected as Vice-President, Louisiana Sponsors Association 4 years.
- Elected and current President, Louisiana Sponsors Association past 8 years.
- Responsible for formulating and conducting the two Louisiana Sponsors Association Conferences, for the state for the past eight years.
- Voluntarily assisted Agencies throughout the State of Louisiana in providing Technical Assistance in the management policies and procedures whereby these Agencies successfully improved their State Compliance Review scores.

- Initiated the idea and negotiated the price and developed the Minute Menu Sponsor Solutions Program, designed and customized for the State of Louisiana sponsors and its providers.
- As President of the Louisiana Sponsors Association, the Association has paid for the entire amount of the Program and cost incurred to complete installment in its entirety of the Minute Menu Sponsor's Solution Program at no cost to DOE.
- 1st Agency in the State of Louisiana to pilot the Minute Menu Sponsor Solutions Program.
- RNA, Inc. has hosted three Minute Menu Sponsor's Solution Program training for all Sponsors in Louisiana. RNA, Inc. incurred all cost all cost associated with these trainings.
- Continue to help other Sponsors in the State of Louisiana with implementation and on-going training with Sponsors and their staff with the use of the Minute Menu Sponsor's Solution Program.
- Currently helping and guiding the providers of Louisiana to initiate and organize the 1st Louisiana Provider's Association.

Prior to and upon receipt of this letter, I have always and still believe this entire investigation is a result of a disgruntled employee from North Louisiana. Upon being confronted on her unsatisfactory job performance and duties, she resigned her position as Program Manager for North Louisiana on October 10, 2007, two weeks prior to RNA, Inc.'s 07/08 Compliance Audit. From that point she has continued to harass and threaten this Agency and its employees. I have tried my best to continue to work effectively while ignoring her personal allegations and having to respond legally to her allegations which she made to many outside sources.

In April, 2006, RNA, Inc. knowingly accepted the task of accepting the culmination of 3 Agencies in North Louisiana, all of which had been terminated. The approximate number of providers in North Louisiana was 250. RNA, Inc. was fully aware of the challenges it faced. RNA, Inc., failed in its efforts and although we many attempts had been tried to change the situation, we were unsuccessful.

Providers requested and began transferring after October 10, 2007, and ultimately, RNA, Inc. officially terminated its contract to service Caddo and Bossier Parishes, (North Louisiana) on March 31, 2008.

False Meal Reimbursement Claims

I stand firm and feel I, nor any member of my present staff have had a part of any deliberate wrongdoing. I have followed all correct procedures to ensure the protection of my Agency, RNA, Inc., my employees and my providers under RNA, Inc.'s jurisdiction. Since the original complaint made in confidence by a former North Louisiana RNA, Inc. employee at that time, I started and have continued to implement more internal controls to ensure the protection of all policies and procedures mandated by RNA, Inc., the State DOE, and USDA to further ensure that the Federal Rules and Regulations are adhered to and followed through.

In late September, 2007, I was notified by an employee of the Shreveport Office of possible concerns with regards to the Shreveport Program Manager and some of the providers in the northern parishes. I immediately contacted DOE to accompany me in visiting these homes. Nearly 150 home visits were conducted during the 1st week of October, 2007. Providers were questioned extensively as to child enrollment, meal claiming, unannounced monitoring, and in whole, the knowledge of the providers' general understanding of program rules. We could not find any direct evidence to disqualify providers and or the meals they were claiming. As per program rules, we were therefore required to submit the provider's claims for reimbursement. Each and every provider is required to sign and date the meal count and attendance records. Each provider testifies to the following: "I certify that I have followed USDA portion requirements and meal pattern guidelines and am claiming only meals served to enrolled day care children. If eligible, I am claiming only when at least one eligible nonresident child is claimed for a meal". We did not visit homes during mealtime; however, each home did meet the certification requirements as stated above.

It is true that on October 7, 2008 I do in fact concur that I was informed and did in fact discuss that twelve providers who may have possibly submitted possible false claims. The actions I took as a result, i.e., phone conversations with providers, and what was observed during home visits could not substantiate any conclusive factual evidence to warrant any of these claims to be disallowed as required by program regulations.

It is true that I instructed the Shreveport Program Manager to return to the twelve providers in question and to begin the Seriously Deficiency Process, if warranted. The Program Manager did in fact return to these providers.

However, the paperwork which she turned in to me on October 9, 2007 was incomplete and incorrect and did not follow the Seriously Deficiency Process guidelines. Subsequently, the Program Manager resigned from her position on with RNA, Inc. on October 10, 2007. The documentation submitted to me and which has also been submitted to the Auditor on October 24, 2008, reveals that many of these providers chose to “self-terminate” and/or “transfer” to another agency. These actions and/or decisions made by the Program Manager along with the provider are **completely incorrect**. I did not contradict myself in “only recalling three providers”, rather I stated that only three of the twelve homes discussed were actually visited by me and/or DOE staff members during the first week of October 2007. The Shreveport Program Manager did not furnish me with the correct and proper documentation to disallow and/or suspend any of these providers. I was required to submit the meal claims for reimbursement as required by RNA, Inc., DOE and USDA program rules and regulations.

It is true that I referred to twelve providers as “possible six-two” providers. “Six-two” is our FDCH own “lingo” or “slang” to situations whereby the provider will list six enrolled children, yet there may have only been two of the six present during our home visit. According to RNA, Inc., DOE, and Federal USDA rules and regulations, as long as one child is present, these providers are still in compliance. These home visits were informal. They were not formal visits which are conducted at mealtime. We observed at least one child in attendance and all questions were answered satisfactorily by providers. We had no direct evidence to warrant that the RNA, Inc. should not submit the meal claims.

Immediately following the resignation of the Program Manager on October 10, 2007, many providers in North Louisiana began to request transfers to another Sponsoring Agency. I believed then, as I do now, that the former Program Manager had intentionally persuaded North Louisiana providers to transfer. Providers began transferring. Nearly 70 providers made requests to transfer, **including the twelve providers aforementioned**, within a two-week time period. Once the provider had been given permission to transfer, RNA, Inc. no longer had any jurisdiction to contact and/or investigate or to disallow any meals on transferred providers. The day the provider is allowed to transfer, the contract between RNA, Inc. and the provider is null and void. RNA, Inc.’s last and final only obligation was to submit **all meals with correct components for claim submission** according to Federal regulations and the transfer process.

DOE report: Cheryl Ashworth Travel

The events which unfolded as a result of the initial complaint issued to DOE and their review of RNA, Inc.'s records are as follows:

- January 29, 2008, DOE begin its investigation of a complaint made against a Shreveport Monitor.
- RNA, Inc. was completely and fully cooperative and forthcoming in all request made by two representatives of the DOE staff.
- DOE staff members Ms. Gwin Cronin and Mr. Anthony. B. Parino arrived in separate vehicles.
- DOE staff arrived at 9:00 am, and left the Lafayette office at 2:00 pm. (Both taking time for lunch break).
- RNA, Inc. was informed by Ms. Gwin Cronin that she could not give a time frame as to how long her review would take. Ms. Cronin stated it could possibly take a day, a week or more to complete their task.
- RNA, Inc. offered to assist Ms. Gwin Cronin in any and all document gathering and copying. RNA, Inc. was advised by Ms. Cronin that they would themselves pull all folders and copy all documents on their own. Although Ms. Cronin only requested travel for the monitor in question, copies of all of the travel records of all of the Shreveport employees was given to Ms. Cronin by the Executive Director, Brian Desormeaux.
- Upon arrival of the two representatives from DOE, the Executive Director, Brian Desormeaux, took it upon himself to have the Shreveport Monitor travel to the Lafayette Office believing that the two DOE representatives would want to interview the monitor in question. Ms. Gwin Cronin informed the Executive Director, Brian Desormeaux, to have the Shreveport Monitor return back to Shreveport as talking to the Shreveport Monitor would "only complicate things". As a result, the Shreveport Monitor who was in route to the Lafayette Office was instructed by the Executive Director, Brian Desormeaux, to return to Shreveport, per Ms. Cronin's instructions. Ms Cronin to my knowledge has never questioned the Shreveport Monitor to this date.
- As the DOE staff was preparing to return to Baton Rouge, I, Brian Desormeaux asked Ms. Cronin to hand carry a packet needed to be turned in to DOE for RNA, Inc. Ms. Cronin advised that she did not have time to wait; she needed to beat the traffic and returned to Baton Rouge. Mr. Anthony B. Paring offered to wait for the package and

once completed, he hand delivered the package to DOE in Baton Rouge.

- I, Brian Desormeaux, was informed by Ms. Cronin that they would not be returning. She stated that they had gathered enough information to complete her report. Further, she stated that they would be in the DOE office the next day, but had no idea when her report would be completed.
- Ms. Cronin inappropriately confronted RNA, Inc.'s Executive Director, Brian Desormeaux, on December 2, 2008, during a DOE state mandatory monitoring training held at LSU Agriculture center in Crowley, Louisiana. Ms. Cronin confronted me, Brian Desormeaux, in the presence of other State Sponsors and their staff and this was witnessed by the Louisiana DOE staff present. Ms. Cronin blatantly made it aware that she wanted to discuss and defend her position and actions with regards to her investigation and that of OIG. My response was that I was not allowed to discuss any of these allegations or the subject matter with anyone. These actions by Ms. Cronin are in direct violation of LSA-R.S. 49:220.25, which had been repeatedly instructed to me by the OIG Auditor.

Review of Travel and Meal Reimbursement Records

It appears that as a result of the State OIG Audit and the review of seven of the Agency's thirteen monitors that there was a lax in internal control over travel logs as the report alludes to two of the seven monitors audited in two of their reconciliation of travel against meal count and attendance forms. These two monitors are not named directly. RNA, Inc. is at an extreme disadvantage pursuant to the laws stated in your letter with regards to not discussing this report with anyone. Not having many of the Agency's records which are still in your possession and not being allowed to discuss this report, I can only assume as to the monitors in question. One monitor in the Lafayette office was questioned by the Auditor, and to my knowledge the other monitor in question in the Shreveport Office has never been questioned by the Auditor. In addition, in the initial investigation which was conducted by DOE staff, neither employee was ever questioned.

The State OIG Audit report begins with referring to 494 home visits in the Shreveport office, but later refers to them as 494 providers. RNA, Inc. believes this is a typographical error in the report and it should be corrected to home visits, not providers. This alludes to the fact that one monitor was

given the responsibility to monitor a little less than one-half of RNA, Inc.'s total Providers at that time. This is totally false. It fails to state that these monitoring visits were during a seven month period.

Again, the report also refers to 563 home visits in the Lafayette Office, but later refers to them as 563 providers. RNA, Inc. believes this is a typographical error in the report and it should be corrected to home visits, not providers. This alludes to the fact that the other monitor was given the responsibility to monitor more than one-half of the remaining providers of RNA, Inc.'s total providers at that time. This is totally false. It fails to state that these monitoring visits were conducted over nearly a five year period.

While this number may seem large as listed, it must be noted that during these periods, over 17,500 home visits (94%) were successfully completed. Where program rules require three visits a year for each provider, this agency goes above those requirements to visit each home at a minimum of four times a year. It should also be stated that since the beginning of the Seriously Deficiency Process, this agency has terminated over 20 providers who were deemed to be seriously deficient in their child care operations.

In the Audit report, Mr. Davis states eleven providers "provided written statements that they served compliant meals to authorized children on the dates reported as non compliant on travel logs." Although we have not been afforded the privilege to review the letters or any of the files in question still the OIG's possession, we must agree, that as a result of these letters, RNA, Inc. was correct in issuing reimbursements to these providers.

During the period in question, Regional Nutrition Assistance, Inc. was in the process of installing the Minute Menu Sponsor's Solution Program. This program is designed to eliminate the reliance of employees to track and maintain many management functions and internal control systems. RNA, Inc. has and continues to go above and beyond the program administrative reimbursements to ensure the Minute Menu Providers Solution Program meets all of the needs of RNA, Inc. In 2007, RNA, Inc. invested over \$10,000.00 of its own monies on updates and training to implement this Program. In 2008, RNA, Inc. invested over \$20,000.00 and this year, RNA, Inc. estimates that nearly \$30,000.00 will be invested in updates, staff training and provider training. All of RNA, Inc.'s efforts have and continue to be on-going to strive to constantly improve the internal controls of the Agency. This program when fully functional will alleviate many hands-on

manual errors. The Program is completely customized for Louisiana and is continually updated to incorporate new State, Federal and Agency guidelines. The following are a list of some of the edit checks which ensures the agency is following State and Federal rules:

- Maintains, manages and tracks all provider information.
- Maintains, manages and tracks all child enrollment information.
- Maintains, manages and tracks all monitoring activity from scheduling, progress, through completion.
- Maintains, manages and tracks the Seriously Deficient provider process, including time frames, meal disallowance, corrective action and termination if warranted.
- Disallows all meals that are not in compliance with regards to meal components, holidays, non-compliant monitoring visits, and Seriously Deficiency Process from beginning to end.
- Computes monthly meal count and attendance and issues error reports for the agency and the providers.
- Completes meal reconciliations.
- Completes block claiming requirements.
- Processes monthly provider claims for reimbursements.
- Issues meal reimbursement to providers via direct deposit.

Corrective Action

Listed below is the corrective action which Regional Nutrition Assistance, Inc. has instituted prior to as well as a result of this Audit and the DOE review of travel records. Regional Nutrition Assistance, Inc. assures the United States Department of Agriculture and the Louisiana Department of Education, Division of Nutrition Assistance, that the corrective action listed will be immediately enforced as internal control procedures and these policies and procedures shall be a permanent part of the on-going and continued efforts to ensure every measure is being made to adequately and properly maintain the internal controls of this Agency.

1. October 1, 2007, began implementation of the Minute Menu Sponsor's Solutions Program. This system is currently revised and updated monthly with both State and National updates and is on-going.
2. New travel logs which were approved by the Board of Directors and DOE and were implemented October 1, 2007.

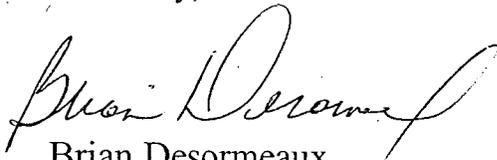
3. March 31, 2008, closed the Shreveport Office as instructed by the Board of Directors.
4. March 31, 2008, released from contract to provide service to North Louisiana Parishes as directed by the Board of Directors.
5. March 31, 2008, all records are housed and maintained in one office for the remaining nine parishes served.
6. March 26 – 28, 2008, all Senior Staff members received extensive training in Dallas, Texas at the 13th Annual Minute Menu Training on updates and further implementation of the Minute Menu Providers Solutions Program.
7. Travel log revised October 1, 2008, approved by the Board of Directors and the DOE. **(See Attachment #1).**
8. New monitoring policies and procedures revised and are effective immediately, March 5, 2009, approved by the Board of Directors, signed and dated by all employees and submitted to DOE for final approval. **(See Attachment #2).**
9. March 5, 2009, New Travel Log revised by Board of Directors and submitted to DOE for final approval. **(See Attachment #3).**
10. March 5, 2009, the elimination of the position of Monitor Supervisor. All monitors will report directly to the Senior Program Manager, Glenda Prejean and/or the Assistant Director, Amy Desormeaux, for assigned monitoring to be completed for the month.
11. Every employee will be under the direct supervision of the Executive Director, Brian Desormeaux. **(See Attachment #2, Items 12 and 13).**
12. Travel policies and procedures and payments revised March 6, 2009, approved and adopted by the Board of Directors and submitted for final approval to DOE.
13. March 6, 2009, conducted extensive Staff Monitoring Training on new policies and procedures geared toward travel.
14. March 6, 2009, conducted extensive Staff Training to assure all staff members are completely and well-versed and are totally aware of the proper policies and procedures and sanctions with regards to the Seriously Deficiency process.
15. March 10, 2009, extensive in-house re-training on use of the Minute Menu Sponsor's Solution Program.
16. March 24-28, 2009, employees will attend the 14th Annual Minute Menu Boot Camp Conference for updated training and use of the Minute Menu System. **(See Attachment # 4).**

17. Monthly on-going staff meetings will be conducted with emphasis on travel procedures, accountability of successful and unsuccessful monitoring visits and menus.

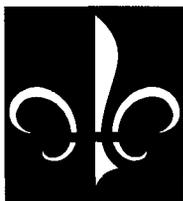
Again, I state adamantly and emphatically that there has been no deliberate malice or intent to intentionally benefit monetarily from the program. Neither I nor any of my current staff deliberately or falsely knew of or had any evidence of any provider deliberately falsifying records and as a result claimed meals. Neither I nor any member of the staff questioned have discussed any of this report or its findings as specifically as was directly instructed by the Auditor.

If you should have any questions or should require any additional information, please do not hesitate to contact me.

Sincerely,

A handwritten signature in cursive script, appearing to read "Brian Desormeaux".

Brian Desormeaux
Executive Director



Brian Desormeaux
Executive Director

Regional Nutrition Assistance, Inc.

P.O. Box 61750
Lafayette, LA 70596-1750
(337) 232-7471 1-(800)-309-6999
Email: rna4200@bellsouth.net

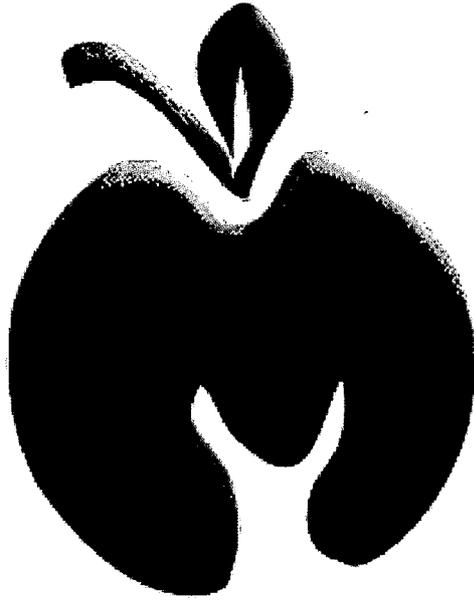
OFFICE MEMO

EFFECTIVE 3/5/09

RE: REVISED MONITORING POLICIES AND PROCEDURES

As part of the Regional Nutrition Assistance, Inc.'s Corrective Action concerning Monitoring & Travel issues, the Board of Directors has initiated the following internal controls. The procedures have been put in place to ensure that any and all discrepancies are addressed prior to submittal of the monthly meal count and attendance reimbursement claims. These procedures are permanent and will be enforced to address required monitoring visits, follow-ups, technical assistance, training and travel requirements and edit checks pertaining to monitoring visits against travel records against month meal count and attendance claims.

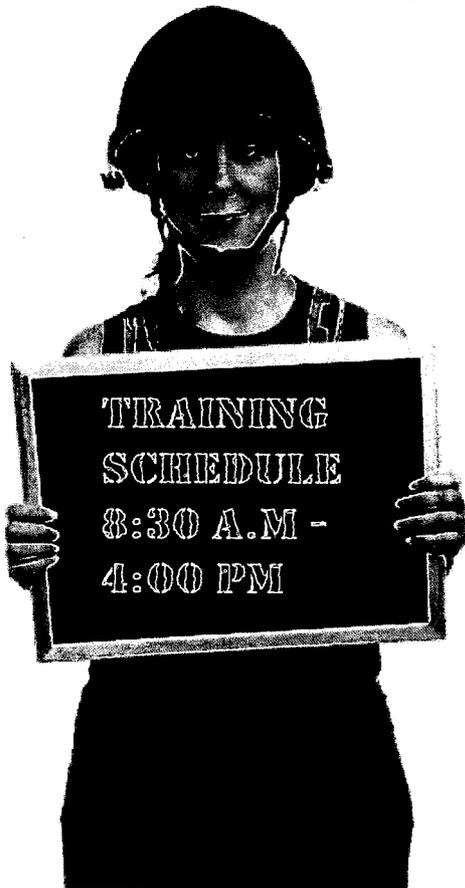
- Effective immediately all travel for monitoring will be capped at \$499.99 per month.
- Monitors are expected to carefully and strategically group home-visits as to the most cost effective routes possible on the pre-planned monitoring logs. Copies must be given to the Senior Program Manager, Glenda Prejean, as well as the Assistant Director, Amy Desormeaux, prior to leaving the office.
- All monitoring forms will be turned in on a daily basis upon completion of daily monitoring visits.
- The Senior Program Manger, Glenda Prejean, will be the only one allowed to enter each of the results of monitoring visits into the Minute Menu System as the monitoring forms are turned into the office daily.
- Immediately following any **1st unsuccessful monitoring visit**, the provider in question, will be turned over to the Executive Director along with the 1st monitoring form of the unsuccessful monitoring visit.
- The Executive Director and /or assigned members of the Senior Administrative Staff will conduct all follow-ups (i.e.: 2nd visit, 3rd visit and proceed to the Seriously Deficiency Process if warranted).
- Any monitor who is approaching the monitoring monetary cap will inform the Executive Director, Brian Desormeaux, immediately, so that other monitors or staff members can be assigned to help complete the remaining monitoring visits planned for the month.
- Travel request is due on the 1st of each month.



**invite
enutm**

**BOOT
CAMP**

**March 24-27, 2009
Richardson, TX**



**OUR 14TH ANNUAL
TRAINING CONFERENCE!**

3 DAYS OF INTENSE TRAINING

COMPUTER WORKSTATIONS

**3 CLASSES TO CHOOSE FROM
FOR EACH SESSION**

**MORE TRAINING THAN EVER
BEFORE**

**NEW CLASSES AND NEW
MATERIAL**

UPDATE!

2008 was another big year for Minute Menu. We added many new features to Minute Menu HX, and officially launched Minute Menu for Centers. This year's classes are focused on what's new in Minute Menu, and for the first time we've added optional training on Minute Menu for Centers to the schedule. There are a lot of new things to learn and old features that deserve a fresh look! We're also adding structured networking opportunities and workshops aimed at sharing ideas and strategies for success between Minute Menu users.

BOOT CAMP 101



This is not your typical conference! The Minute Menu conference is training "boot camp" for Minute Menu users. It has a single purpose--to make sure you and your staff know how to use Minute Menu to its fullest potential, getting the most out of your investment. Your registration includes 3 full days of training, individual computer workstations so you can get hands-on experience, all of your training materials (including updated manual), and breakfast & buffet lunch on all 3 training days--which enables us to start earlier and teach longer. Every class is open to everyone--and with the exception of the Minute Menu for Centers training, there's no signing up for classes ahead of time, so just show up to the class you want to attend and learn. The Minute Menu Conference is 100% learning, 100% of the time! So dress comfortably and come ready to learn!

PRE-CONFERENCE RECEPTION

TUESDAY, MARCH 24

17TH FLOOR CLUB ROOM

7:30 P.M. TO 9:00 P.M.

Come pick up your registration materials, the finalized schedule and map, and meet & greet with the Minute Menu staff and other conference attendees. We're getting started early with training on Wednesday morning, so give yourself a head start by picking up your materials on Tuesday night. It's come and go as you please, and with ice cream and casual dress, there's no reason not to stop by.

EVENING ACTIVITIES

PROGRAM DIRECTOR

HAPPY HOUR

WEDNESDAY NIGHT

5:00 P.M. TO 6:00 P.M.

HOTEL LOUNGE

Calling all commissioned officers! Are you a head honcho? An assistant head honcho? If you call the shots, let us buy you one! This happy hour is an opportunity to meet and greet with other CACFP program directors. Ever wished you could call another agency to run an idea by them? Ever wanted to know how your state policies compare to another? Make connections that will get you answers! Bring some business cards and let's start networking!

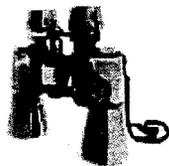
MINUTE MENU PARTY

WEDNESDAY NIGHT

8:00 P.M. TO 10:00 P.M.

HOTEL LOBBY LOUNGE

We're bringing the party to you! Put your dancing shoes on and join us in the hotel lobby lounge for live music, snacks, and a cash bar. There's no cover and no advance notice required, so come on down and enjoy! ...And it's over early enough that you'll still get a good night's sleep for more training the next day!



**THURS NIGHT LIVE AT
THE DALLAS MUSEUM
OF ART**

THURSDAY NIGHT

5:00 P.M. TO 8:45 P.M.

DOWNTOWN DALLAS, TX

We'll ride the DART light rail to the Dallas Museum of Art. Free admission, live jazz and wine in the atrium, 2 restaurants to choose from, fun activity stations, and amazing art! The music plays 6:00-8:00. Trains run back home every 15 minutes, so you can stay late or leave early. You'll need \$3 cash for the DART rail and money for dinner, but admission to the museum is free. Make it a real experience and get tickets in advance for the world-renown King Tut exhibit, open until 9:00 p.m. on Thursdays. www.dallasmuseumofart.org

FRIDAY NIGHT

7:30 P.M. TO ?::?

**PETE'S DUELING
PIANO BAR
ADDISON, TX**

Stuck in Dallas for the night? We'll organize groups to go to Pete's Dueling Piano Bar for a night of singing fun. Sing along as the performers belt out your requests. A cab with 4 people will cost each person around \$8 each way. It starts at 8 PM, and there's no cover if you get there before it starts. If you've never been to a dueling piano bar, it's something you have to try! Sign up for groups at the Pre-Conference Reception or at the registration table. www.petesduelingpianobar.com

WEDNESDAY, MARCH 25

7:45 a.m. to 8:45 a.m.	Breakfast and Conference Welcome in Junior Ballroom		
	ROOM 1	ROOM 2	ROOM 3
8:45 a.m. to 10:00 a.m.	Managing Provider Management	System Preferences	Managing Deficiency with Minute Menu
10:15 a.m. to 12:00 p.m.	Managing Provider Management	Focus on Nutrition	Managing Deficiency with Minute Menu
12:00 p.m. to 1:00 p.m.	Buffet Lunch in Junior Ballroom		
1:00 p.m. to 2:30 p.m.	Eclaiming Monthly Process	Block Claim Analysis & Reconciliation	Managing Deficiency with Minute Menu
2:45 p.m. to 4:00 p.m.	Reviewing Error Reports & Adjusting Claims	Tracking Serious Deficiency	Managing Deficiency with Minute Menu

PROVIDER INFO MANAGEMENT

Get up-to-date on how best to manage your provider data. Correct, current, and complete data are crucial to process claims accurately and to give you the information you need to make the best decisions for your agency! Among other things, we'll discuss provider reports, training, messages, and some provider file basics.
DE, CP, FS, MG

CHILD INFO MANAGEMENT

How can you make child reenrollment easier and faster? What Minute Menu updates have made managing your child data even easier? How can you make doing parent contacts easier? We'll answer these questions and more!
DE, CP, FS, MG

ECLAIMING MONTHLY PROCESS

NEW CLASS! We'll take you through best practices for processing eclaims, from start to finish. Make your eclaims processing faster, easier, and with fewer errors!
DE, CP, MG

REVIEWING ERROR REPORTS & ADJUSTING CLAIMS

Tips, tricks, and strategies that you want to know! This class will make reviewing error reports easier and faster. We'll also go over how to reprocess claims most effectively and adjust for common errors. And we'll look at some new reports that help identify common errors across all providers, which may help you focus your training resources where they're most needed.
CP, DE, FS, MG

PERSONNEL TYPES

Data Entry / File Management	DE
Field Staff / Coordinators	FS
Claim Processors / Supervisors	CP
Scanner Operators	SO
Network / Computer Technicians	IT
Management / Oversight	MG

SYSTEM PREFERENCES

EXPANDED CLASS! With recent Minute Menu updates, sponsors are now able to manage their own processing preferences. We'll walk you through that process, highlight some preferences your agency might want to implement, and show you how to track the changes you've made to your preferences over time—giving you an extra layer of internal controls over your claim process.
CP, MG

FOCUS ON NUTRITION

EXPANDED CLASS! With the new vitamin report, you can set up Minute Menu to run reports on the nutritional content of the foods your providers serve. Focusing on nutrition has never been easier or faster. We'll also go over food frequency rules, duplicate food checks, and provider menu reports. Minute Menu can help you find the time to get back to food program basics with your providers!
FS, DE, CP, MG

BLOCK CLAIM ANALYSIS & RECONCILIATION

EXPANDED CLASS! How can the updated Minute Menu attendance reports help you stay in compliance with new regulations? We'll walk you through the block claim detection and child reconciliation processes, show you how Minute Menu can reschedule your home visits cost-effectively. We'll also train on best practices to make sure you're using the Minute Menu tools to their potential.
DE, FS, CP, MG

TRACKING SERIOUS DEFICIENCY

NEW CLASS! You asked for it, and we did it! We've added a module to Minute Menu HX to help you manage the process of serious deficiency. Track communication, change settings to train providers in areas where they are out of compliance, and pull up reports on this data.
FS, CP, MG



3 CLASSES TO CHOOSE FROM!

TRAINING STAFF ON MINUTE MENU

Whether you are taking the conference material back home to train your coworkers on what you learned or you are in charge of training new or existing staff members on Minute Menu, you won't want to miss this class! We will give you a game plan for making your trainings back at the office a success. Sending an employee to the Minute Menu conference is an investment, so help maximize the effectiveness of the info you'll bring back!
DE, FS, CP, SO, IT, MG

SCANNABLE FORM TRAINING

EXPANDED CLASS! We've revamped this class to focus on best practices in dealing with all aspects of scannable forms—how to fill out the forms, how to handle the forms when they come in, how to spot check forms for accuracy before scanning, and scanning and validating best practices. All forms will be covered: menu & attendance, enrollment, and review forms.
SO, CP, IT

SCANNING & PROCESSING CLAIMS QUICKLY

Time savings is one of the essential ways that Minute Menu maximizes your agency funds. This seminar will provide a case study on one method of quickly and accurately scanning & processing claims in Minute Menu HX. Forms will be batched, scanned, and processed. You'll learn exactly how to maximize your office efficiency to reach the goal of having one person scan & process up to 1000 provider claims in one day.
SO, CP, IT

PANEL OF EXPERTS: MAXIMIZE YOUR ECLAIMING NUMBERS

NEW CLASS! Hear from sponsors who've achieved amazing success in their percentage of providers who claim online—some as high as 98%! What are their strategies? What can you do with your providers to encourage online claiming? How can you motivate your staff to promote online claiming to every provider? What are the advantages to your agency when providers eclaim?
DE, FS, CP, SO, IT, MG

Schedule subject to change.

THURSDAY, MARCH 26

7:45 a.m. to 8:30 a.m.	Buffet Breakfast in Junior Ballroom		
	ROOM 1	ROOM 2	ROOM 3
8:30 a.m. to 10:00 a.m.	Balancing Funds: State Claim Reporting & Provider Payments	Direct Entry Claims	Getting Started Sponsoring Centers
10:15 a.m. to 12:00 p.m.	Home Visits & Integrity Features in Minute Menu	Supporting eClaimers	Sponsor Hot Issues Roundtable
12:00 p.m. to 1:00 p.m.	Buffet Lunch in Junior Ballroom		
1:00 p.m. to 2:30 p.m.	Internal Controls in the CACFP: Best Practices	Kids Pro Training	IT Focus
2:45 p.m. to 4:00 p.m.	Internal Controls: Recent Findings & Minute Menu's Answer	System Preferences	Maximize Your Budget with Minute Menu

BALANCING FUNDS

State claim reporting and provider payments are the primary focus of this class. These functions have been designed to help you balance to the penny every month—even within the month if you submit original and amended claims. We'll start with a step-by-step discussion of functionality and reports and end with a few case studies on how program funds are effectively balanced.

DE, CP, MG

HOME VISITS & INTEGRITY FEATURES

Use Minute Menu HX to help manage your field staff's workload, track the results of reviews, and integrate a monitor's findings with a provider's claim for processing. Learn how to hone in on certain providers that require special visits related to block claiming, dinner or evening snack claiming, or weekend claiming. This is a must-see class for monitors and managers.

FS, CP, MG

INTERNAL CONTROLS IN THE CACFP: BEST PRACTICES

Bob Gray, USDA OIG Regional Inspector General (Retired)

Using real world examples and experience, Bob Gray explains the importance of Internal Controls to running a successful CACFP Sponsorship and outlines the ways your agency can implement them in your day-to-day operations.

DE, CP, FS, MG

INTERNAL CONTROLS: RECENT FINDINGS AND MINUTE MENU'S ANSWER

Bob Gray, USDA OIG Regional Inspector General (Retired) and Mike Morath, COO of Minute Menu Systems

A joint presentation concentrating on the Internal Controls that USDA will expect from your agency and specifically how Minute Menu can help you implement and track those controls. If you are a decision maker at your agency, this class should not be missed!

DE, CP, FS, MG

DIRECT ENTRY CLAIMS

NEW CLASS! The record full month attendance function in Minute Menu gives you a way to add some automation to claims from providers who you were unable to move to eclaiming or scannable forms. From a single screen you can enter a provider's monthly attendance and get the attendance processor checks that you get with eclaims or forms. Add a level of integrity checks to manual claims with direct entry!

DE, FS, CP, SO, IT, MG

SUPPORTING ECLAIMERS

It's easier than you may think! Make sure your providers can easily login and use WebKids to ensure their claims are submitted accurately and on time every month! We'll go over the most frequently asked questions and how to get support for more complex scenarios. The steps field staff can take to monitor WebKids providers more effectively will also be covered.

DE, CP, FS, IT, MG

KIDS PRO TRAINING

Minute Menu Kids Pro provides a valuable business tool to providers, allowing them to use a single piece of software to track their CACFP info, tax info, lesson planning, and parent invoicing. Providers can purchase this very inexpensive upgrade to add a layer of professionalism to their recordkeeping process. This workshop will walk you through the business management tools and other features that your providers might choose to use.

DE, CP, FS, CP, MG, IT

SYSTEM PREFERENCES

EXPANDED CLASS! With recent Minute Menu updates, sponsors are now able to manage their own processing preferences. We'll walk you through that process, highlight some preferences your agency might want to implement, and show you how to track the changes you've made to your preferences over time—giving you an extra layer of internal controls over your claim process.

CP, MG

GETTING STARTED SPONSORING CENTERS

NEW CLASS! Sponsoring Centers is one area where agencies can expand on current expertise to create an additional revenue stream. We'll give you an overview of the process and how it differs from sponsoring homes. Minute Menu for Centers streamlines data collection and claims processing for centers and can give you a valuable tool for starting your center sponsorship on the right foot.

IT, CP, MG

SPONSOR HOT ISSUES ROUNDTABLE WORKSHOP

NEW CLASS! What are the issues that are driving your agency to distraction? Timely provider recordkeeping? Tracking provider communication? Parent audits/household contacts? Getting ready for a review? Motivating your Monitors? Bring your issues, questions, and ideas, and we'll workshop them with other sponsors and Minute Menu staff. Let's put our heads together!

DE, CP, FS, MG

IT FOCUS

User Management, Database Management, using Minute Menu off-site, and general system configuration are just a few topics that will be covered in this workshop. If you are the go-to person in your office for IT matters, this is the workshop for you!

IT, MG

MAXIMIZE YOUR BUDGET WITH MINUTE MENU

NEW CLASS! Are you maximizing your budget with Minute Menu? Are you sure? Come to this class to find out. There are ways you may not have thought of to save. eClaiming, provider messaging, direct deposits, partnering, and more are all at your fingertips when you use Minute Menu to its fullest capacity. You could "Go Green" and reduce your carbon footprint and get some relief for your agency's wallet—all in one class!

FS, CP, MG



FRIDAY, MARCH 27

7:45 a.m. to 8:30 a.m.	Buffet Breakfast in Junior Ballroom		
	ROOM 1	ROOM 2	ROOM 3
8:30 a.m. to 10:00 a.m.	Export Files and Excel for Beginners	Export Files & Advanced Reporting	Centers: Training Your Centers
10:15 a.m. to 12:00 p.m.	Mail Merge Crash Course for Advanced Users	Kids Pro Training	Centers: Processing Claims & Managing Monthly Paperwork
12:00 p.m. to 1:00 p.m.	Buffet Lunch in Junior Ballroom		
1:00 p.m. to 2:30 p.m.	Tracking Serious Deficiency	Minute Menu on the Web: Resources & Support	Centers: Reviews & Audits
2:45 p.m. to 4:00 p.m.	Integrity with Minute Menu from the Sponsor's Perspective		Centers: Using Export Files

EXPORT FILES AND EXCEL FOR BEGINNERS

This step-by-step class is for beginning users of the export files functions. It's designed to move at a relaxed pace through the basics of dealing with Excel and export files. Advanced users should go to the Export Files session in Room 2.

DE, CP, FS, IT, MG

MAIL MERGE CRASH COURSE FOR ADVANCED USERS

We'll do a step-by-step training on how to do a Mail Merge in MS Word. Attendees should have at least some familiarity with Word and Excel, as this class will move at a pretty good pace.

DE, CP, FS, IT, MG

TRACKING SERIOUS DEFICIENCY

NEW CLASS! You asked for it, and we did it! We've added a module to Minute Menu HX to help you manage the process of serious deficiency. Track communication, change settings to train providers in areas where they are out of compliance, and pull up reports on this data.

DE, FS, CP, MG

INTEGRITY IN MINUTE MENU FROM THE SPONSOR'S PERSPECTIVE

NEW CLASS! The focus of this roundtable-style class is developing and sharing ways to use Minute Menu to implement and underscore integrity checks in your agency. If you've got questions or an issue that has you stumped, bring them to this workshop. Hear examples from a few sponsors on how they've used Minute Menu to solve specific issues in their agency and from Minute Menu staff on the newest enhancements available to help.

DE, FS, CP, MG,

EXPORT FILES & ADVANCED REPORTING

This class is for those who have already used Minute Menu's export files a good deal, and who want to get much more proficient in Microsoft Excel. This class moves at a much faster pace than the Beginner class, so we recommend that you have some experience in Excel to attend.

FS, CP, MG, DE

KIDS PRO TRAINING

Minute Menu Kids Pro provides a valuable business tool to providers, allowing them to use a single piece of software to track their CACFP info, tax info, lesson planning, and parent invoicing. Providers can purchase this very inexpensive upgrade to add a layer of professionalism to their recordkeeping process. This workshop will walk you through the business management tools and other features that your providers might choose to use.

IT, FS, CP, MG

MINUTE MENU ON THE WEB: RESOURCES & SUPPORT

We're expanding the sponsor area of our website! Learn the best way to obtain support, track issues, and review your support history. Stay up to date with release notes, Minute Menu news, and view your providers' support tickets all in one place. Also, with the new online bill pay you can even pay your Minute Menu invoice online!

DE, FS, CP, SO, IT, MG

PERSONNEL TYPES

Data Entry / File Management
Field Staff / Coordinators
Claim Processors / Supervisors
Scanner Operators
Network / Computer Technicians
Management / Oversight

DE
FS
CP
SO
IT
MG

CENTERS: TRAINING YOUR CENTERS

When you are ready to get a center started claiming with Minute Menu, what kind of training do you offer? This workshop will give you tips for the best way to get a center started. We'll cover enrolling children & updating enrollments, recording attendance & meal counts, planning menus & estimating attendance, menu production records, and even tracking receipts. We'll also discuss a variety of different procedural practices used by different agencies. DE, FS, CP, IT, MG

CENTERS: PROCESSING CLAIMS & MANAGING MONTHLY PAPERWORK

Learn everything you need to know about processing provider claims, and getting those claims in to the state (and paid for unaffiliated sites). We'll also discuss the best way to get through your annual enrollment renewal process so claims are still done on time. And we'll even discuss ways that you can scan meal count paperwork with Minute Menu to get claims done even faster. DE, CP, MG

CENTERS: REVIEWS & AUDITS

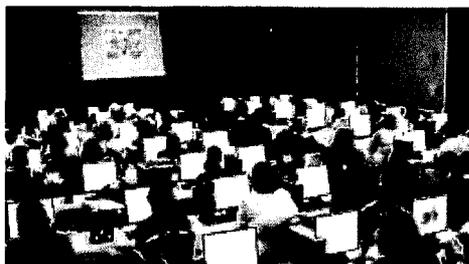
Minute Menu has a variety of tools to help you plan and track center monitoring visits. Learn how to use those tools, including Minute Menu's built-in Milk Audit, to make your visits more effective. And learn about features that may help handle certain corrective action situations that can arise. CP, FS, MG

CENTERS: USING EXPORT FILES

This step-by-step class will walk you thru the Export File features built into Minute Menu, so that you can learn how to build your own custom reports. IT, DE, CP, MG

Pre-registration required! Space is limited for Center training, so you must mark on your registration form that you will be attending these classes.

1-day, Centers only registrations are available. Email inquiries@minutemenu.com or call 972-671-5211 for details.



Schedule subject to change.

HYATT REGENCY NORTH DALLAS

This might be Boot Camp, but the accommodations are first rate! The Hyatt Regency North Dallas is a stylish, comfortable hotel. The hotel is located 8 miles north of Downtown Dallas in Richardson, Texas, just a few blocks from our offices. And the amazing group rate at \$109.00/night + tax is a great rate for this beautiful hotel!

The hotel offers a wonderful full-service restaurant that includes buffet and menu service. It also offers a large, comfortable bar and lounge for relaxing after a long day of training. For those of you too worn out from training to make it downstairs, the hotel also offers room service daily from 6 a.m. to 10 p.m. Breakfast and Lunch are provided with your registration on all 3 training days.

From fast food to seafood, you'll find something to fit any budget and taste only a short distance from the hotel. Also, new restaurants have opened up directly across the street from the hotel, so there are even more dining options within walking distance.



TRANSPORTATION

AIRPORTS

Dallas/Fort Worth International (DFW)
Dallas Love Field (DAL)

FROM THE AIRPORT

SuperShuttle offers a discount rate from DFW to The Hyatt Regency North Dallas. The prepaid rate is \$24.00 + \$10.00 for each additional passenger. Call 817-329-2000 to make your reservation. If you don't prepay with your reservation, the rate is \$25.00 each way. If you have more than 2 people, you might want to consider a cab, since you would save time by not having to stop at other hotels and the cost would be approximately the same (about \$60).

Other shuttle services include:

www.cityshuttletx.com

www.yellowcheckershuttle.com

Rental Cars: The DFW Rental Car Center houses most major car rental companies. Catch the airport shuttle to the Rental Car Center from the lower level of each terminal. Parking is free at the conference hotel, and it is located in a business/residential area, so driving is relatively stress-free. **You will have more dining, sightseeing, and entertainment options if you rent a car.**

WE'RE HERE TO HELP

Whether you need help deciding which classes to attend, want to know where to get a great Texas-style steak, or need help finding a cab to share to the airport, we're here to help you! Our staff are always available to answer your questions and make your Boot Camp experience as painless as possible. We do a lot of planning beforehand to make sure you can concentrate on learning as much about Minute Menu as you can during your stay. If you don't know, ask us! If we don't know the answer, we'll help you find someone who does!



ONCE YOU'RE HERE

The hotel is centrally located on a major freeway, so getting where you want to go is very easy if you rent a car. Parking is free. The hotel also offers complimentary shuttle service to anywhere within 5 miles of the hotel, on a first-come, first-served basis. The shuttle is available from 7 AM to 10:30 PM each day. The complimentary service area includes everything from excellent full-service restaurants to fast food. It also includes a large shopping mall and a 12-screen movie theatre. Please note that during peak times you may have to wait half an hour or so for the shuttle. The hotel also offers free transportation and discount coupons to the nearby outlet mall, which is open until 9 PM Monday-Friday.

The hotel is very close to the DART light rail public transportation system that can take you to Downtown Dallas and, with a transfer to the Trinity Railway Express line, all the way to Downtown Fort Worth! The DART station is about a 10 minute easy walk, or the hotel shuttle will take you there and pick you up.

**BOOT CAMP
2009**

Registration Form

Registration Deadline: March 2, 2009

Please make copies so that each attendee has a separate registration form.
Include payment with form.



Name: _____

Please print name as you would like it to appear on your name badge.

Client Number: _____ Agency Name: _____

Address: _____

City: _____ State: _____ Zip: _____

Phone: _____ Email: _____

Registration confirmation, updates, and
conference news will be sent out via email.

REGISTRATION COST: \$595 per person

Graduate Discount: deduct \$50 for registering individuals who attended our 2008 Conference!*

Group Discount: deduct \$50 per registration for groups of three or more.*

* Only one discount per registration.

Discounts will not apply to late registrations postmarked after March 2, 2009

Your Registration Includes:

3 full days of training

Individual Computer Workstations

Breakfast & Buffet Lunch on all 3 days

Full Conference Materials, including updated manual

Amount Enclosed: _____

Please list any special accommodations (dietary, access, etc.):

PRE-REGISTRATION FOR MINUTE MENU FOR CENTERS CLASSES

Will you be attending the Minute Menu for Centers software training on Friday in Room 3? There is no additional fee for these classes, but space is limited so you must check below if you plan on attending this software training. If the spots fill up, preference will be given to current users.

YES! I want to attend the training for the new Minute Menu for Centers software.

HOTEL RESERVATIONS

Group Rate: \$109.00 per night + 13% sales and resort tax.

(Non-profits are not exempt from this tax in Texas.)

Call **1-866-593-6300** and request
the group rate for the **Minute Menu Meeting**,
or go to **www.northdallas.hyatt.com** and use group code **G-MIMS**.

Reservation deadline for this room rate is **March 3**, but the room block may fill sooner, so reserve as soon as you can.

If you need an invoice for the hotel room bill, because you have to pay by check, please do the following:

1. Call the reservations line and make the reservation using a credit card. They will not charge this card unless you don't pay with a check when you check out of the hotel or you cancel outside of the cancellation policy.
2. When you get your confirmation code from the reservations agent, ask to be transferred to the accounting department.
3. Ask the accounting department to fax or email you an invoice for your stay so that you can pay by check.

Minute Menu cannot make hotel reservations on your behalf this year.

Make checks payable to and mail to:

Minute Menu Systems, LLC
1801 Gateway Blvd. Ste. 217
Richardson, Texas 75080

To pay with Visa, MasterCard, or Discover:

Name on Card: _____

Card Number: _____

Security Code: _____

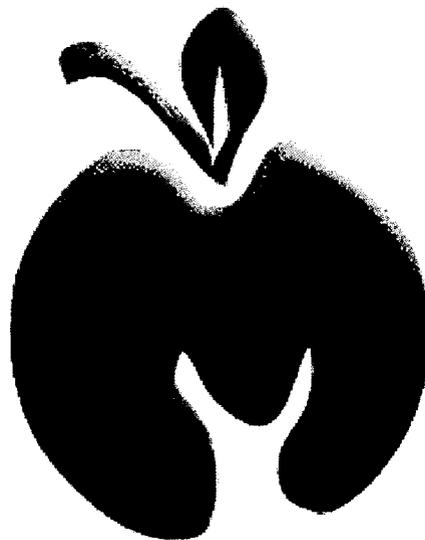
Expiration Date: _____

1801 Gateway Blvd. Suite 217
Richardson, TX 75080

Registration Deadline:
March 2, 2009!



14th Annual Training Conference



**inute
enu™**

**BOOT
CAMP
2009**

**March 24-27, 2009
Richardson, TX**

**Department of Education
Response**



STATE OF LOUISIANA
DEPARTMENT OF EDUCATION
POST OFFICE BOX 94064, BATON ROUGE, LOUISIANA 70804-9064
Toll Free #: 1-877-453-2721
<http://www.louisianaschools.net>

March 11, 2009

Mr. Stephen B. Street, Jr.
State Inspector General
P.O. Box 94095
Baton Rouge, LA 70804-9095
Re: Case No. 1080015

Dear Mr. Street:

Please find enclosed for your review a response as requested in a confidential draft audit issued to the Louisiana Department of Education on February 26, 2009. Implementation of the actions outlined in this response will begin after receipt of written notification from your office that the Louisiana Department of Education may resume monitoring efforts of the Child Nutrition Program Sponsor that has been under investigation by the State of Louisiana's Office of Inspector General, beginning March 10, 2008.

The Louisiana Department of Education will pursue all necessary actions to ensure that it remains in compliance with the requirements of the United States Department of Agriculture's Child Nutrition Programs. This will include involving the USDA in all processes related to this matter.

If you have any questions, please contact me at (225) 342-3607.

Sincerely,

Paul G. Pastorek
State Superintendent of Education

PGP/DNG/jd

xc: Ollie Tyler
Donna Nola-Ganey
John Dupre
Linda Lambert

Louisiana Department of Education
Child and Adult Care Food Program
Response to Confidential Draft State OIG Audit #1080015

1 A) State OIG Conclusions:

Mr. Desormeaux and RNA's administrative staff were aware that at least eight providers were submitting possible false meal reimbursement claims, yet RNA reviewed, approved, and submitted claims from these providers to DOE for reimbursement.

B) State OIG Recommendations:

DOE should consider initiating termination of the RNA agreement as required by 7 CFR 226.6 for committing more than one serious deficiency and for knowingly submitting what it believed to be false meal reimbursement claims.

C) DOE Response:

The DOE concurs that it should initiate actions in accordance with the applicable requirements of the code of federal regulations for addressing serious deficiencies identified in RNA's administration of the Child and Adult Care Food Program (CACFP).

The DOE will conduct a follow up review after notification is received from the State OIG that it can resume normal program monitoring activities of RNA's administration of the CACFP. The DOE will pursue contracting with an independent reviewer to conduct a thorough follow up review of RNA's operation of the CACFP. The DOE will also request that USDA participate and/or provide input in the planning, review and resolution process to ensure that all are appropriately addressed in compliance with the requirements of the federal funding agency for the CACFP.

2 A) State OIG Conclusions:

There is no evidence to indicate that Mr. Desormeaux and RNA's administrative staff took appropriate action to verify claims submitted by the "Six-Two providers," and, if necessary, initiate termination procedures.

B) State OIG Recommendations:

DOE should also consider initiating recovery of ineligible reimbursements during contract period beginning October 2007 through January 2008.

C) DOE Response:

The DOE concurs that it should also consider recovery of any ineligible reimbursements paid to RNA in accordance with the

applicable requirements of the code of federal regulations for addressing such serious deficiency.

The DOE will conduct a follow up review after notification is received from the State OIG that it can resume normal program monitoring activities of RNA's administration of the CACFP. The DOE will pursue contracting with an independent reviewer to conduct a thorough follow up review of RNA's operation of the CACFP. The DOE will also request that USDA participate and/or provide input in the planning, review and resolution process to ensure that all are appropriately addressed in compliance with the requirements of the federal funding agency for the CACFP.

3 A) State OIG Conclusions:

RNA reimbursed providers for questionable meals claimed on days they were reported as noncompliant without reconciling Daily Meal Count and Attendance Reports to Monitoring Forms for all visits.

B) State OIG Recommendations:

At a minimum, DOE should recover the \$18,347 in questionable travel and meal reimbursement from RNA.

C) DOE Response:

The DOE concurs that it should recover any ineligible reimbursements paid to RNA in accordance with the applicable requirements of the code of federal regulations for addressing such serious deficiency.

The DOE will conduct a follow up review after notification is received from the State OIG that it can resume normal program monitoring activities of RNA's administration of the CACFP. The DOE will pursue contracting with an independent reviewer to conduct a thorough follow up review of RNA's operation of the CACFP. The DOE will also request that USDA participate and/or provide input in the planning, review and resolution process to ensure that all are appropriately addressed in compliance with the requirements of the federal funding agency for the CACFP.

4 A) State OIG Conclusions:

RNA did not ensure that monitors were properly monitoring providers and completing Monitoring Forms for all visits.

B) State OIG Recommendations:

DOE should schedule a thorough review of RNA and determine that total costs of ineligible administrative, travel, and meal reimbursements and recover these costs from RNA.

C) DOE Response:

The DOE concurs that it should recover any ineligible reimbursements paid to RNA in accordance with the applicable requirements of the code of federal regulations for addressing such serious deficiency.

The DOE will conduct a follow up review after notification is received from the State OIG that it can resume normal program monitoring activities of RNA's administration of the CACFP. The DOE will pursue contracting with an independent reviewer to conduct a thorough follow up review of RNA's operation of the CACFP. The DOE will also request that USDA participate and/or provide input in the planning, review and resolution process to ensure that all are appropriately addressed in compliance with the requirements of the federal funding agency for the CACFP.

5 A) State OIG Conclusions:

RNA reimbursed monitors for questionable mileage claimed on Travel Logs without reconciling the Travel Logs to Monitoring Forms to verify accuracy and validity.

B) State OIG Recommendations:

At the very minimum, DOE should perform frequent follow-up visits with RNA to ensure proper internal controls are implemented and properly functioning over meals, monitoring of providers, and travel.

C) DOE Response:

The DOE concurs that it should perform follow up reviews with RNA to ensure that RNA is implementing appropriate internal controls necessary to administer the CACFP in compliance with the applicable code of federal regulations.

The DOE will conduct a follow up review after notification is received from the State OIG that it can resume normal program monitoring activities of RNA's administration of the CACFP. The DOE will pursue contracting with an independent reviewer to conduct a thorough follow up review of RNA's operation of the CACFP. The DOE will also request that USDA participate and/or provide input in the planning, review and resolution process to ensure that all are appropriately addressed in compliance with the requirements of the federal funding agency for the CACFP.

6 A) State OIG Conclusions:

RNA did not enforce its procedures for sanctioning noncompliant providers, and, therefore, providers were reimbursed for

questionable meals and providers that should have been terminated from the program were allowed to continue.

B) State OIG Recommendations:

DOE should determine total ineligible travel and meals reimbursements for recovery from RNA.

C) DOE Response:

The DOE concurs that it should recover any ineligible reimbursements paid to RNA in accordance with the applicable requirements of the code of federal regulations for addressing such serious deficiency.

The DOE will conduct a follow up review after notification is received from the State OIG that it can resume normal program monitoring activities of RNA's administration of the CACFP. The DOE will pursue contracting with an independent reviewer to conduct a thorough follow up review of RNA's operation of the CACFP. The DOE will also request that USDA participate and/or provide input in the planning, review and resolution process to ensure that all are appropriately addressed in compliance with the requirements of the federal funding agency for the CACFP.

7 A) State OIG Conclusions:

DOE failed to contact providers to try and conclusively prove or disprove that the RNA monitored falsified Travel Logs or whether the providers reported as noncompliant needed to be terminated.

B) State OIG Recommendations:

DOE should ensure all investigations or reviews are expanded when necessary to adequately investigate and disclose all conditions discovered and determine any costs that may be recovered.

C) DOE Response:

DOE does not concur with stating that DOE failed to contact providers to try and conclusively prove that RNA monitors falsified Travel Logs or whether the providers reported as noncompliant needed to be terminated.

- On January 18, 2008, Ellen Wahlberg, of USDA, did have a telephone conversation regarding the initial letter with allegations of discrimination in the CACFP. Ms. Wahlberg also followed up that conversation with an e-mail to Linda Lambert and John Dupre, of DOE, in which she stated, "*Linda-As we*

discussed this morning, you should begin to investigate the program issues raised in the letter sent by the former employee of Regional Nutrition Assistance. As far as the EEO/CR issues raised in the letter, please wait until we notify you to address any of those issues because the responsibility for investigating civil rights allegations falls to USDA-FNS."

- In a later e-mail on January 18, 2008, Ellen Wahlberg stated to Linda Lambert, regarding the DOE looking into the allegations, *"You can begin this whenever you like. Goodness knows when the letter will make it down here (from FNS headquarters). I just think that it would be to your advantage to have already addressed a portion of the allegations."*
- DOE staff began looking into the allegations on January 29, 2008.
- On February 11, 2008, Ellen Wahlberg sent an e-mail to Linda Lambert and John Dupre stating that she had spoken with the USDA's regional Civil Rights Director, who had contacted the person issuing the complaint and had requested a response within 20 days. She then stated, *"The letter you received should just be ignored for now."* The DOE suspended any further review of the allegations pending notification from USDA regarding the letter referenced.
- On March 10, 2008, State OIG auditors were on-site at DOE and RNA to investigate allegations. The State OIG investigation remains open to date, which, according to previous instructions regarding investigations by such agencies, prohibits the DOE from conducting follow up reviews until such notice is received from the investigating agency.
- As another example of the training that USDA has issued to the state regarding the handling of discrimination/Civil Rights complaints, DOE recently received an e-mail complaint from a parent in Bossier Parish alleging discrimination in the USDA's National School Lunch Program. After Dr. Judy Stracener, DOE section administrator, made USDA aware of the complaint,

Brenda Brewer, USDA State Manager, replied on March 4, 2009, with the following:

“Thank you for forwarding the complaint alleging discrimination in the school programs. Ellen immediately forwarded this information to Becky Lucero, Civil Rights Director. As a reminder, anytime there is a complaint alleging discrimination, the complaint must be sent immediately to our Civil Rights Division. Your office should not conduct an investigation into any complaint that alleges that discrimination. Please ensure that your staff if(are) aware of this requirement.”

- This is consistent with the fact that DOE staff wrote up what had been discovered through the initial review of the allegations and forwarded the initial findings with RNA's response to Ellen Wahlberg requesting review and response on the actions taken to that point. USDA replied that the RNA corrections, based on the deficiencies cited in the initial review, should be sufficient to address the issues cited.

- The draft State OIG report (page 12) stated that “Eleven providers who received reimbursement for the questionable meals were interviewed. All 11 provided written statements that they served compliant meals to authorized children on the dates reported as non-complaint on the travel logs.”

No reference was noted in the State OIG report as to whether the interviews and signed statements from providers, to the State OIG Auditor, “conclusively prove or disprove that the RNA monitor falsified Travel Logs or whether the providers reported as noncompliant needed to be terminated.”

The DOE will continue to cooperate with all agencies conducting investigations or with pending investigations, such as the USDA Civil Rights Office and the State Office of Inspector General, and will not conduct activities, without consent from such agency, that may interfere with such ongoing investigations.

The DOE will conduct a follow up review after notification is received from the State OIG that it can resume normal program monitoring activities of RNA's administration of the CACFP. The DOE will pursue contracting with an independent reviewer to conduct a thorough follow up review of RNA's operation of the

CACFP. The DOE will also request that USDA participate and/or provide input in the planning, review and resolution process to ensure that all are appropriately addressed in compliance with the requirements of the federal funding agency for the CACFP.

8 A) State OIG Conclusions:

DOE failed to determine the amount of ineligible travel and meal reimbursements for recovery from RNA.

B) State OIG Recommendations:

None.

C) DOE Response:

DOE does not concur with stating that DOE failed to determine the amount of ineligible travel and meal reimbursements for recovery from RNA.

The DOE followed the written instructions of the USDA, the federal agency through which oversight of the CACFP is administered. This included initiating a review of the allegations and then subsequently suspending any follow up review.

- On January 18, 2008, Ellen Wahlberg, of USDA, did have a telephone conversation regarding the initial letter with allegations of discrimination in the CACFP. Ms. Wahlberg also followed up that conversation with an e-mail to Linda Lambert and John Dupre, of DOE, in which she stated, *"Linda-As we discussed this morning, you should begin to investigate the program issues raised in the letter sent by the former employee of Regional Nutrition Assistance. As far as the EEO/CR issues raised in the letter, please wait until we notify you to address any of those issues because the responsibility for investigating civil rights allegations falls to USDA-FNS."*

- In a later e-mail on January 18, 2008, Ellen Wahlberg stated to Linda Lambert, regarding the DOE looking into the allegations, *"You can begin this whenever you like. Goodness knows when the letter will make it down here (from FNS headquarters). I just think that it would be to your advantage to have already addressed a portion of the allegations."*

- DOE staff began looking into the allegations on January 29, 2008.
- On February 11, 2008, Ellen Wahlberg sent an e-mail to Linda Lambert and John Dupre stating that she had spoken with the USDA's regional Civil Rights Director, who had contacted the person issuing the complaint and had requested a response within 20 days. She then stated, "*The letter you received should just be ignored for now.*" The DOE suspended any further review of the allegations pending notification from USDA regarding the letter referenced.
- On March 10, 2008, State OIG auditors were on-site at DOE and RNA to investigate allegations. The State OIG investigation remains open to date, which, according to previous instructions regarding investigations by such agencies, prohibits the DOE from conducting follow up reviews until such notice is received from the investigating agency.

The DOE will conduct a follow up review after notification is received from the State OIG that it can resume normal program monitoring activities of RNA's administration of the CACFP. The DOE will pursue contracting with an independent reviewer to conduct a thorough follow up review of RNA's operation of the CACFP. The DOE will also request that USDA participate and/or provide input in the planning, review and resolution process to ensure that all are appropriately addressed in compliance with the requirements of the federal funding agency for the CACFP.

9 A) State OIG Conclusions:

DOE failed to report and/or review travel and monitoring records submitted by monitors, other than the monitor in-question.

B) State OIG Recommendations:

None.

C) DOE Response:

DOE does not concur with stating that DOE failed to report and/or review travel and monitoring records submitted by monitors, other than the monitor in-question.

The DOE followed the written instructions of the USDA, the federal agency through which oversight of the CACFP is administered.

This included initiating a review of the allegations and then subsequently suspending any follow up review.

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- On February 11, 2008, Ellen Wahlberg sent an e-mail to Linda Lambert and John Dupre stating that she had spoken with the USDA's regional Civil Rights Director, who had contacted the person issuing the complaint and had requested a response within 20 days. She then stated, "*The letter you received should just be ignored for now.*" The DOE suspended any further review of the allegations pending notification from USDA regarding the letter referenced.
- On March 10, 2008, State OIG auditors were on-site at DOE and RNA to investigate allegations. The State OIG investigation remains open to date, which, according to previous instructions regarding investigations by such agencies, prohibits the DOE from conducting follow up reviews until such notice is received from the investigating agency.

The DOE will conduct a follow up review after notification is received from the State OIG that it can resume normal program monitoring activities of RNA's administration of the CACFP. The DOE will pursue contracting with an independent reviewer to conduct a thorough follow up review of RNA's operation of the CACFP. The DOE will also request that USDA participate and/or provide input in the planning, review and resolution process to ensure that all are appropriately addressed in compliance with the requirements of the federal funding agency for the CACFP.

John Dupre

From: Wahlberg, Ellen [Ellen_Wahlberg@fns.usda.gov]
Sent: Monday, February 11, 2008 11:31 AM
To: Linda Lambert (DOE)
Cc: John Dupre
Subject: RE: FDCH Provider Discrimination Complaint

Linda--I spoke with Rebecca Lucero, SWR Civil Rights Director, who had already sent a letter to Ms. Reimonenq. That correspondence requested a response within 20 days, so we should know something next week from Ms.

R. The letter you received should just be ignored for now. Rebecca will be speaking with Lorena Carrasco tomorrow. It is FNS's responsibility to investigate CR complaints for Child Nutrition Programs, not the State's. I think Headquarters got mixed up because the Food Stamp Program has delegated CR complaints to the state. I'm so sorry that you are caught in the middle of this whole situation. We will keep you informed as this unfolds.

Thanks for your patience.

Ellen

-----Original Message-----

From: Linda Lambert (DOE) [mailto:LindaB.Lambert@LA.GOV]
Sent: Friday, February 08, 2008 3:29 PM
To: Wahlberg, Ellen
Cc: John Dupre
Subject: FW: FDCH Provider Discrimination Complaint
Importance: High

Ellen, Linda Tindall forwarded this email and attachment after speaking with Ms. Hooper, who is with the Louisiana Department of Social Services. We are confused. Do you know what this means?

Linda

-----Original Message-----

From: Linda Tindall
Sent: Thursday, February 07, 2008 7:53 AM
To: John Dupre
Cc: Linda Lambert (DOE); Michelle Buhler
Subject: FW: FDCH Provider Discrimination Complaint
Importance: High

FYI

Linda Tindall
Education Program Consultant
Division of Nutrition Assistance
Phone: (225) 342-3693

-----Original Message-----

From: Ronnie Hooper [mailto:rhooper@dss.state.la.us]
Sent: Thursday, February 07, 2008 6:58 AM
To: Linda Tindall
Cc: Annette Thomas; Nelda Rains

Subject: FDCH Provider Discrimination Complaint

Ms. Tindall,

Thank you for your assistance this afternoon. Attached is the complaint filed by Ms. Elizabeth Reimonenq, former employee of the Regional Nutrition Assistance, Inc., 2924 Knight Street, Shreveport, Louisiana 71105. (318) 219-2559.

Ms. Reimonenq filed this with USDA Civil Rights Division in Virginia. USDA forwarded the complaint to the Bossier Office of Community Services (Department of Social Services) and they forwarded to me today.

Please advise if you have any questions.

Ronnie B. Hooper, Regional Administrator Shreveport Region OFS
1525 Fairfield Avenue, Room 330
Shreveport, LA 71101
Office: (318) 676-7101
Fax: (318) 676-7086
rhooper@dss.state.la.us.

Department of Social Services
"With You. For You. Building a Stronger Louisiana"

John Dupre

From: Brewer, Brenda [Brenda_Brewer@fns.usda.gov]
Sent: Wednesday, March 04, 2009 10:13 AM
To: Judy Stracener
Cc: Wahlberg, Ellen; John Dupre; Brewer, Brenda; Moody, Sandra
Subject: RE: Parent alleging lunch room discrimination

Judy:

Thank you for forwarding the complaint alleging discrimination in the school programs. Ellen immediately forwarded this information on to Becky Lucero, Civil Rights Director. As a reminder, anytime there is a complaint alleging discrimination, the complaint must be sent immediately to our Civil Rights Division. Your office should not conduct an investigation into any complaint that alleges that discrimination. Please ensure that your staff is aware of this requirement.

Thanks,

Brenda Brewer, State Manager
USDA, FNS, SNP, SWRO

From: Judy Stracener [mailto:Judy.Stracener@LA.GOV]
Sent: Tuesday, March 03, 2009 8:21 AM
To: Brewer, Brenda
Cc: Wahlberg, Ellen; John Dupre
Subject: Parent alleging lunch room discrimination
Importance: High

Brenda,
FYI

Attached is correspondence received from a parent in Bossier Parish alleging lunch room discrimination. Also attached is my response to the parent providing Civil Rights office information and additional information.

Judy

Judy Stracener, PhD, LDN, RD
Education Program Consultant 5A
School Food Service Programs
Division of Nutrition Assistance
Louisiana Department of Education
Phone (225) 342-3720
Fax (225) 342-3305
judy.stracener@la.gov

APPENDIX B

Inspector General's Comment

Inspector General's Comment

RNA Response

Mr. Desormeaux's response to this report claims that he could not defend any of his and/or RNA's actions, because he did not have access to any of the records our office obtained, including documentation supporting requests for transfer by the questionable "Six-two" providers. However, our office reviewed all documentation obtained for these providers, in addition to documentation related to the other findings in the report, and did not find any evidence to support transfer and/or termination procedures for these providers.

DOE Response

DOE responded that further review of the allegations in a letter received on January 17, 2008, was suspended, because of a February 11, 2008, email from USDA Acting Regional Director Ellen Wahlberg that instructed Ms. Lambert and Mr. Dupre to ignore the January 17th letter.

However, the February 11th email was part of a series of emails regarding Ms. Lambert and Mr. Dupre's confusion over who would investigate the civil rights allegations included in the January 17th letter. Based on our review of the series of emails and our interview with Ms. Wahlberg, in our opinion, Ms. Wahlberg did not intend for DOE to ignore the letter as a whole, but rather only the civil rights allegations.

Our review of a draft report letter dated February 21, 2008, from Ms. Lambert to Mr. Desormeaux, which not only informs Mr. Desormeaux of its findings related to the program issues but also, that any civil rights allegations would be processed through the USDA, provides further evidence that Ms. Lambert and Mr. Dupre were aware that DOE was still responsible for investigating the allegations involving program issues

In addition, the draft report letter and the final report letter dated February 25, 2008, further contradicts DOE's response that it suspended any further investigation upon receiving the February 11th email.

Finally, Ms. Lambert and Mr. Dupre had already limited the documentation it had intended to review and other procedures it intended to perform on the investigation prior to receiving the February 11th email.

Thirty-four copies of this public document were published in this first printing at a cost of \$180.96. The total cost of all printings of this document, including reprints is \$180.96. This document was published by the Office of State Inspector General, State of Louisiana, Post Office Box 94095, 150 Third Street, Third Floor, Baton Rouge, LA 70804-9095 to report its findings under authority of LSA-R.S. 39:7-8. This material was printed in accordance with the standards for printing by state agencies established pursuant to LSA - R.S. 43:31.

A copy of this report has been made available for public inspection at the Office of State Inspector General and is posted on the Office of State Inspector General's website at www.doa.louisiana.gov/oig/inspector.htm. Reference should be made to Case No. [1-08-0015](#). If you need any assistance relative to this report, please contact Bruce J. Janet, CPA, State Audit Director at (225) 342-4262.

REPORT FRAUD, WASTE, AND ABUSE

To report alleged fraud, waste, abuse, or mismanagement relative to state programs or operations, use one of the following methods:

- Complete complaint form on web site at www.doa.Louisiana.gov/oig/inspector.htm
- Write to Office of State Inspector General, P. O. Box 94095, Baton Rouge, LA 70804-9095
- Call the Office of State Inspector General at (225) 342-4262