

METROPOLITAN GOVERNMENT OF NASHVILLE AND DAVIDSON COUNTY



Thursday, January 20, 2011

Cathy Rosenblum, Board Chair
The Mary Parrish Center
P.O. Box 60009
Nashville, TN 37206

Dear Ms. Rosenblum:

Please find attached the Monitoring Report of The Mary Parrish Center relating to the contract it has with the Metropolitan Government of Nashville and Davidson County for the fiscal year ending June 30, 2010.

The Office of Financial Accountability (OFA) is charged with the responsibility of monitoring grant funds, including Community Enhancement Funds (CEF), from Metropolitan Nashville Government to any nonprofit organization. The OFA is also responsible for monitoring the federal and state grants to departments within the Metropolitan Nashville Government. Staff from the OFA conducted the review on November 5, 2010.

We appreciate the assistance provided by your agency during the course of the review. If you have any questions, please call me at 615-880-1035.

Sincerely,

Fred Adom, CPA
Director

cc: Valerie Wynn, Executive Director
Richard M. Riebeling, Director of Finance
OFFICE OF FINANCIAL ACCOUNTABILITY

Talia Lomax-O'dneal, Deputy Director of Finance
Gene Nolan, Deputy Director of Finance
Kim McDoniel, Chief of Accounts
Mark Swann, Internal Audit
Kevin Brown, Office of Financial Accountability
Essie Robertson, Office of Financial Accountability
Brad Thompson, Office of Financial Accountability



◆ **Monitoring Report of** ◆

The Mary Parrish Center



Conducted by



Office of Financial Accountability

January 20, 2011

MONITORING REPORT

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INTRODUCTION

The Office of Financial Accountability (hereinafter referred to as “OFA”) has completed a monitoring review of The Mary Parrish Center. A monitoring review is substantially less in scope than an audit. The OFA did not audit the financial statements and, accordingly, does not express an opinion or any assurances regarding the financial statements of the Metropolitan Government of Nashville and Davidson County (hereinafter referred to as “Metro”) or any of its component units. The OFA is responsible for the internal monitoring of Metro agencies that receive federal and state financial assistance, including cooperative agreements and non-profit organizations that receive appropriations and Community Enhancement Funds from Metro government. In summary, any agreement(s) that imposes performance and/or financial requirements on Metro government is subject to review by the OFA.

The purpose of this review was to assess the agency’s compliance with contractual requirements set forth in the following contract with Metro Government:

Contract	Type	Grantor	Amount	Contract Term	
L-2292	Community Enhancement Funds (CEF)	Metro Government	\$32,000	July 1, 2009	June 30, 2010

Agency Background

The Mary Parrish Center (MPC) for Victims of Domestic Violence is a nonresidential program that provides access to an array of services for domestic/sexual violence victims and their children during dangerous and/or critical times. The agency offers a transitional housing program where women can live safely and receive services they need to heal and thrive. This is the largest transitional housing program for victims of domestic violence in middle Tennessee. Since opening in 2002, approximately 1,000 women have sought help at the MPC each year. The agency also collaborates with all major systems that impact the health and well being of victims. These systems include the health, housing, legal, law enforcement, and educational systems. By integrating and developing positive relationships with these systems, victims receive comprehensive expert care in one central location.

OBJECTIVES, SCOPE AND METHODOLOGY

The objectives of our review were:

- 1) To determine whether the agency has the resources and capacity to administer the grant funds.
- 2) To determine if costs and services are allowable and eligible.
- 3) To verify that program objectives are being met.
- 4) To test the reliability of the financial and programmatic reporting.
- 5) To verify contractual compliance.

The scope of our review was limited to the contract term July 1, 2009 through June 30, 2010.

Audit procedures included meeting with agency management and staff, reviewing the design of internal controls as a basis for establishing our testwork, reviewing Board minutes and obtaining written representations from management. In addition, we examined certain financial records and supporting documentation necessary to ensure compliance with contractual requirements set forth in Contract L-2292. Specific procedures included:

- Interviewing the employees responsible for grant management, financial reporting, and accountability.
- Reviewing supporting documentation of expenditures for allowability, necessity and reasonableness.
- Reviewing the agency's General Ledger and verifying the accuracy of all invoices submitted to Metro.
- Reviewing documentation to determine that funds were used for intended beneficiaries and expended in accordance with the Spending Plan of the contract.
- Reviewing documentation to support program activities for consistency with grant requirements.
- Assessing the financial stability of the agency and its ability to continue to administer the grant program funded by Metro.

RESULTS OF REVIEW

Summary of Results

Criteria	Yes	No
Agency in Compliance with Contract Requirements?		✓
Sufficient Resources and Capacity to Administer Funds?	✓	
Costs and Services are Allowable and Eligible?	✓	
Program Objectives being Met?		✓
Reporting Requirements Met?		✓
Sufficient Internal Control Environment?	✓	
Compliance with Civil Rights Requirements?	✓	

RESULTS OF REVIEW

The overall results of the monitoring review are provided in this section. Results are based on testwork performed and include conclusions regarding specific review objectives and, if applicable, recommendations for improvement and an action plan for implementation. Where applicable, the Findings and Recommendations section of this report provides more insight into any issues identified below.

1. Sufficient Resources and Capacity to Administer Grant Funds

Our review of the agency's accounting system and the qualifications of the individuals assigned to manage the accounting records indicate that the agency possesses the necessary resources and professional expertise to effectively administer the grant funds.

2. Allowable and Eligible Costs and Services

Our review covered all of the core compliance areas identified by OMB Circular A- 133: *Audit of States, Local Government, and Non-Profit Organizations*. Based on our test work, costs and services during the period were allowable and eligible. Costs incurred by the agency complied with applicable guidelines stated in OMB Circular A-122.

Additionally, the Metro Grants Manual requires separate accounting of the Metropolitan Nashville Government grant funds to prevent co-mingling of Metro Funds with other sources of funding. The agency is in compliance with this requirement. Different revenue classes as well as expenditure classes have been established to separately track the sources and amounts of funding. Also, the agency can easily and accurately report their expenses supported by the Metro Appropriation.

3. Program and Performance Objectives

The contract stipulates that the agency shall use the funds to provide the following outcomes:

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- 600 domestic violence victims will be assisted by the Paralegal Victim Advocate with Order of Protection Petitions; 90% of these will report they had adequately prepared petitions, their OP questions answered; they felt prepared for their court appearance and felt safer.

- 950 residents of the MPC Transitional Housing Program will be provided with support services by the Paralegal Victim Advocate; 98% will report that the help they received made them feel safer and added to their sense of well-being and empowerment.

Based on our review of program documentation and discussions with staff, program performance objectives were not met and the agency is not in compliance with contractual program objectives. Please see Finding #1 for specific information regarding unmet program outcomes.

4. Reliability of Financial and Programmatic Reporting

The contract requires submission of an annual audit report performed by a Certified Public Accountant. The contract also requires the agency to submit to Metro year end reports of the program outcome and a final expenditures report, no more than 45 days after the close of the contract. We reviewed all applicable financial and programmatic reports required by the contract, including audited financial statements.

OFA reviewed all applicable financial and programmatic reports required by the contract, including audited financial statements. Based on our review, the agency did not comply with all financial and programmatic reporting requirements. Please see Findings #2 for specific information regarding the programmatic report.

5. Internal Control Environment

In order to determine the adequacy of the design of internal controls, we obtained and reviewed an independent auditor's report on internal control over financial

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reporting and/or a completed internal control questionnaire. This audit procedure was performed solely as a basis for determining our test work and to assist us in making suggestions for improvement to management. We did not evaluate the operating effectiveness of internal controls over financial reporting.

Our review of the design of the agency's internal controls did not reveal any control deficiencies. Further, nothing came to our attention that would necessitate suggestions for improvement in internal control activities to management.

6. Civil Rights Requirements

Our review did not reveal anything to indicate that the agency was noncompliant with civil rights requirements. The agency also has necessary written policies and procedures relating to civil rights. The agency has not received any complaints regarding any form of discrimination. Further, civil rights and ADA postings are publicly displayed.

FINDINGS AND RECOMMENDATIONS

1. Program Performance Goals Not Met

The Mary Parrish Center reported the following outcomes in their final program report:

- The PA provided assistance to 497 domestic violence victims with Order of Protection (OP) Petitions; 87% of these reported in a client-satisfaction survey they had adequately prepared petitions, their OP questions answered, they felt prepared for their court appearance and felt safer
- The PA provided support services to 867 domestic violence victims including daily case management to residents of the MPC Transitional Housing (TH) program. 100% of the residents of the TH program self reported that the supportive services they received from the PA made them feel safer and added to their sense of well-being and empowerment. Of the clients the PA provided support services, 82% self-reported that the services they received made them feel safer and added to their sense of well-being and empowerment.

The OFA staff was not able to verify that the above objectives were met. Mary Parrish Center failed to maintain adequate supporting documentation on Davidson County clients. The agency was only able to provide an excel spreadsheet listing the name of domestic violence victims and the services provided during the contract period.

Recommendation:

Management should review the achievement of those objectives before they are reported to Metro Office of Grants Coordination, in order to ensure their accuracy. Information pertaining to program objectives in the Final Program Report should be based on actual results and supported by written documentation as required.

2. Late Programmatic Reports

Tests of the reporting requirements revealed the Mary Parrish Center failed to complete and submit the final expenditures report and/or final program report within the 45 days of the close of the grant as required by the contract. The **revised** final program report was not received by the Metro Grants Coordination until August 23, 2010. Per section D.9 Reporting requirements under the Standard Terms and Conditions of the grant contract, the recipient “shall submit a final program report within 45 (forty-five) days of the end of the Grant Contract.” The contract period ended on June 30, 2010; therefore, the final program report was due no later than August 15, 2010.

Recommendation:

The agency should ensure that final program reports are submitted to the Division of Grants Coordination no later than August 15th.

Corrective Action Plan Required

Please submit a corrective action plan indicating the actions the agency intends to take to correct the findings identified in this report. The corrective action plan should be submitted within 30 days from the report date to the address below:

Ms. Brandie Haywood, Director
Division of Grants Coordination
700 2nd Avenue South, Suite 201
P. O. Box 196300
Nashville, TN 37219-6300