

METROPOLITAN GOVERNMENT OF NASHVILLE AND DAVIDSON COUNTY



December 1, 2011

Ms. Sara Hoover, Board Chair
Oasis Center, Inc.
1704 Charlotte Ave., Suite 200
Nashville, TN 37203

Dear Ms. Hoover:

Please find attached the Monitoring Report of the Oasis Center relating to the contract it had with the Metropolitan Government of Nashville and Davidson County for the fiscal year ended June 30, 2011.

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 completed its review on September 22, 2011.

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: Judy Freudenthal, Senior Director of Youth Engagement and Action
Richard M. Riebeling, Director of Finance

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 ◆

Oasis Center, Inc.



Conducted by



Office of Financial Accountability

December 1, 2011

MONITORING REPORT

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INTRODUCTION

The Office of Financial Accountability (hereinafter referred to as “OFA”) has completed a monitoring review of Oasis 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 Oasis Center. 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-2453	Community Enhancement Funds (CEF)	Metro Government	\$63,600	July 1, 2010	June 30, 2011

Agency Background

Founded in 1970 to provide community-based care for youth experiencing alcohol and drug problems, Oasis Center has evolved over the past four decades into one of the nation’s leading youth-serving organizations, offering safety and support to Nashville’s most vulnerable and disconnected youth, while seeking to also teach young people how to transform the conditions that create problems for them in the first place. As a result, the Oasis Center is a nationally recognized organization on a mission to help young people move into a happy, healthy and productive adulthood. Oasis Center recognizes that the lives of our young people are complex, and that supporting their healthy transition to adulthood can’t happen through a singular support. That’s why the agency currently offer 22 programs ranging from Nashville’s only runaway teen shelter to Nashville’s only college counseling center for first generation college students. Currently over a third of their program participants are involved in more than one of the programs or services offered.

OBJECTIVES, SCOPE AND METHODOLOGY

The objectives of our review were:

- 1) To determine whether the agency had the resources and capacity to administer the grant funds.
- 2) To determine if costs and services were allowable and eligible.
- 3) To verify that program objectives were 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, 2010 through June 30, 2011.

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-2453. 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
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 was in compliance with this requirement. Different revenue classes as well as expenditure classes had been established to separately track the sources and amounts of funding. Also, the agency could easily and accurately report their expenses supported by the Metro Grant.

3. Program and Performance Objectives

The grant contract stipulates that the agency was to provide the following program objectives:

RESULTS OF REVIEW

- 75 youth to participate in July 2010 Summer Programs, 75 youth to participate in June 2011 Summer Programs, 600 youth to participate in Academic Year 2010-2011 Programs. For each program:
 - 1) 70% of youth will know strategies to more greatly assure their safety.
 - 2) 70% of youth will state they have gained positive connections with peers and adults.
 - 3) 70% of youth will state they are able to create positive changes in their lives and communities.
 - 4) 70% of youth will appreciate differences with others and demonstrate respect for others.
- For youth in Academic Year 2010-2011 Program, by aggregate average school based group, 600 participating youth total, will exceed the average advancement AND attendance rates in their respective schools.

Based on our review of program documentation and discussions with staff, program performance objectives were not met and the agency was 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. Based on our review, the agency was in compliance with the reporting requirements.

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 reporting and/or a completed internal control questionnaire. This audit procedure

RESULTS OF REVIEW

was performed solely as a basis for determining our test work and to assist us in making suggestions for improvement to management.

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

Oasis Center was to provide the following program objectives:

- 75 youth to participate in July 2010 Summer Programs, 75 youth to participate in June 2011 Summer Programs, 600 youth to participate in Academic Year 2010-2011 Programs. For each program:
 - 5) 70% of youth will know strategies to more greatly assure their safety.
 - 6) 70% of youth will state they have gained positive connections with peers and adults.
 - 7) 70% of youth will state they are able to create positive changes in their lives and communities.
 - 8) 70% of youth will appreciate differences with others and demonstrate respect for others.
- For youth in Academic Year 2010-2011 Program, by aggregate average school based group, 600 participating youth total, will exceed the average advancement AND attendance rates in their respective schools.

Based on documentation reviewed and discussion with agency staff, the OFA determined that the agency failed to meet the program objectives for the Academic Year 2010-2011 Program. The Oasis Center was relying on MNPS to provide results as to whether the students attained the average advancement and attendance rates. The Oasis Center was only able to obtain measures on 515 students and not the 600 students in the program. Based on the 600 students enrolled in the program and the 600 students expected to exceed the average advancement and attendance rates in their respective schools, the agency was in essence projecting 100% of the participants would meet the program objective of the Academic Year 2010-2011 Program. Review of the supporting documentation indicated that only 387 out of 515 (75%) of the participants exceeded the average attendance rate; not the 600 out of 600 (100%) as expected.

FINDINGS AND RECOMMENDATIONS

Recommendation:

The Oasis Center should ensure the proposed outcomes stated in the grant contract are realistic and attainable. The agency should ensure that program objectives agreed to in the grant contract are met.

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