

**METROPOLITAN GOVERNMENT OF NASHVILLE AND DAVIDSON COUNTY**



April 7, 2017

Scott Tift – Board Chair  
Conexion Americas  
2195 Nolensville Pike  
Nashville, TN 37211

Dear Mr. Tift:

Please find attached the monitoring report of the Conexion Americas relating to the contract it had with the Metropolitan Government of Nashville and Davidson County for the fiscal year ending June 30, 2016.

The Office of Financial Accountability is charged with the responsibility of monitoring grant funds, including Community Enhancement Funds, from Metropolitan Nashville Government to any nonprofit organization. Staff from the Office of Financial Accountability conducted the review on March 29, 2017.

We appreciate the assistance provided by your agency during the course of the review. If you have any questions, please call me at 615-862-6712.

Sincerely,

*Kevin Brown*

Kevin Brown, CMFO, CICA, CFE  
Finance Administrator

cc: Renata Soto, Executive Director, Conexion Americas  
Jose Gonzalez, Finance Director, Conexion Americas  
Talia Lomax-O'dneal, Director of Finance  
Gene Nolan, Deputy Director of Finance

Kim McDoniel, Deputy Director of Finance  
Phil Carr, Chief of Accounts  
Mark Swann, Internal Audit  
Fred Adom, CPA, CGMA, CICA, Director, Office of Financial Accountability  
Essie Robertson, CPA, CMFO, CICA, Office of Financial Accountability  
Matthew Fouad, Office of Financial Accountability



**Metropolitan Government of Nashville and Davidson County**

# **CONEXION AMERICAS**

**◆ Monitoring Report ◆**

**Conducted by**



**Office of Financial Accountability**

April 7, 2017

# MONITORING REPORT

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## INTRODUCTION

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The Office of Financial Accountability (hereinafter referred to as “OFA”) has completed a monitoring review of the Conexión Americas. 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 Conexión Americas or any of its component units. The OFA is responsible for the internal monitoring of Metropolitan Government of Nashville and Davidson County (hereinafter referred to as “Metro”) agencies that receive federal and state financial assistance, including cooperative agreements and non-profit organizations that receive direct 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:

<b>Contract</b>	<b>Type</b>	<b>Amount</b>	<b>Contact Term</b>	
L-3463	Community Enhancement Funds	\$33,700	July 1, 2015	June 30, 2016

### **Agency Background**

Conexión Americas was organized as a Tennessee not-for-profit corporation in 2002 to help Hispanic families realize their aspirations for social, economic and civic advancement by promoting their integration into the Middle Tennessee Community. The agency provided comprehensive support services to over 3,500 immigrant and refugee residents of Davidson County.

In 2005, Conexión Américas was named the recipient of the Best Innovative Partnership Award from Neighbor Works America for their Open Doors (Puertas Abiertas) homeownership program. In 2007, Conexión Américas received the national Family Strengthening Award presented by the Annie E. Casey Foundation and the National Council of La Raza (NCLR) and the Bank of America Neighborhood Builder Award, among several other awards and recognitions.

## OBJECTIVES, SCOPE AND METHODOLOGY

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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, 2015 through June 30, 2016.

The monitoring review procedures included meeting with agency management and staff, 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-3463. 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

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### SUMMARY OF RESULTS

Criteria	Yes	No
Sufficient Resources and Capacity to Administer Funds?	✓	
Costs and Services Allowable and Eligible?	✓	
Program Objectives Met?		✓
Reporting Requirements Met?	✓	
Compliance with Civil Rights Requirements?	✓	

## RESULTS OF REVIEW

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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. 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 2 CFR Part 200: *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards*.

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 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 grant.

Based on our test work, costs and services during the period were allowable and eligible.

### **3. Program and Performance Objectives**

The Community Enhancement Fund grant contract stipulates that the agency shall use the funds to achieve the following outcomes:

- 1) The program will serve 100 unduplicated students.

## RESULTS OF REVIEW

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- 2) At least 100 English learners will successfully complete an ESL course (defined as attending at least 80% of classes).
- 3) At least 100 English learners will demonstrate increased understanding in reading and writing (through the use of curriculum-based pre and post evaluations).
- 4) At least 100 English learners will demonstrate increased conversational ability in English (through the use of BEST Plus oral evaluation).

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. See finding #1 for additional details.

#### **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. The agency complied with all financial and programmatic reporting requirements.

#### **5. 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

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### 1. **Program Performance Goals Not Met**

#### **Finding**

The Conexion Americas failed to meet program performance goals #2 and #4 as stated in the grant contract. Per the grant contract, the Conexion Americas was to perform the following:

Objective #2 stated, “At least 100 English learners will successfully complete an ESL course (defined as attending at least 80% of classes).”

Objective #4 stated, “At least 100 English learners will demonstrate increased conversational ability in English (through the use of BEST Plus oral evaluation).”

Based on documentation provided, the OFA determined that only 74 English learners successfully completed an ESL course by attending at least 80% of the classes. In addition, the OFA noted that only 72 English learners demonstrated increased conversational ability in English, through the use of a pre and post evaluation.

#### **Recommendation**

Management should take the necessary steps to ensure that program objectives are met and documentation to support program outcomes are maintained for review. Management should further review their objectives to make sure they are reasonable and obtainable.

#### **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 14 days from the report date to the address below:

Division of Grants Coordination  
PO Box 196300  
Nashville, TN 37219  
ATTN: Vaughn Wilson

OFFICE OF FINANCIAL ACCOUNTABILITY

700 2<sup>nd</sup> Avenue South, Suite 201, Nashville, TN 37210

Phone: 615-862-6712  
Fax: 615-880-2800