

METROPOLITAN GOVERNMENT OF NASHVILLE AND DAVIDSON COUNTY



March 26, 2019

Beatrice Gatebuke, Board Chair
Nashville International Center for Empowerment
417 Welshwood Drive, Suite 100
Nashville, TN 37211

Dear Ms. Gatebuke:

Please find attached the Monitoring Report of the Nashville International Center for Empowerment relating to the contract it had with the Metropolitan Government of Nashville and Davidson County for the fiscal year ending June 30, 2018.

The Office of Financial Accountability is charged with the responsibility of monitoring grant funds, including Community Partnership Funds, from Metropolitan Nashville Government to any nonprofit organization. Staff from the Office of Financial Accountability conducted the review on November 27, 2018.

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, CMFO, CICA, CFE
Finance Manager

cc: Dr. Gatlaug Thack, President/CEO, NICE
Talia Lomax-O'dneal, Director of Finance, Department of Finance
Brian Kelsey, Chief Strategy Officer, Office of the Mayor
Kim McDoniel, Deputy Director of Finance, Department of Finance

OFFICE OF FINANCIAL ACCOUNTABILITY

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Metropolitan Government of Nashville and Davidson County

NASHVILLE INTERNATIONAL CENTER FOR EMPOWERMENT

◆ Monitoring Report ◆

Conducted by



Office of Financial Accountability

March 26, 2019

MONITORING REPORT

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INTRODUCTION

The Office of Financial Accountability (hereinafter referred to as “OFA”) has completed a monitoring review of Nashville International Center for Empowerment. 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 Nashville International Center for Empowerment 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 appropriations and Community Partnership 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	Amount	Contact Term	
L-3899	Community Partnership Funds	\$54,000.00	July 1, 2017	June 30, 2018

Agency Background

Nashville International Center for Empowerment, (NICE) is a Tennessee not-for-profit corporation dedicated to empowering refugees and immigrants who have resettled in Middle Tennessee. NICE provides direct social services and educational programs in adult education, career development, social adjustment, emergency services, youth development, health and nutrition services and resettlement and placement. The Community Partnership Funds were used to serve over 400 refugees and immigrants under adult education program.

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, 2017 through June 30, 2018.

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-3899. 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 Allowable and Eligible?	✓	
Program Objectives Met?	✓	
Reporting Requirements Met?		✓
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 *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 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.

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

3. Program and Performance Objectives

The Recipient will use the funds for the following:

- NICE will serve a minimum of 295 unduplicated clients in the English Language Learners programs, offering 4 hours of English Language instruction per week.

RESULTS OF REVIEW

- The students in ELL classes will achieve a minimum of 80% of the national standard for student advancement based on the appropriate number instructional hours, as measured by in-class assessments, teacher feedback, and CASAS scores (or an equivalent test).

Based on our review of program documentation and discussions with staff, the program performance objectives were met and the agency is in compliance with contractual program objectives.

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 failed to comply with the financial and programmatic reporting requirements. See finding #1 in the Findings and Recommendations section of the report for more details.

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

1. Reliability of Financial and Programmatic Reporting Not Met

Finding

The Nashville International Center for Empowerment failed to adhere to the reporting requirements as stated in the grant contract. Section C.4 of the grant contract states, “The recipient must submit a final grant annual expenditure report, to be received by Mayor’s Office, within 45 days of the end of the grant contract.” In addition, per section D.9 of the grant contract, “a Final Program Report, to be received by the Mayor’s Office, within 45 days of the end of the grant contract.” Therefore, the required final annual expenditure and final program reports were due no later than August 15, 2018. The Nashville International Center for Empowerment submitted both required final reports on December 28, 2018.

Recommendation

Management should take the necessary steps to ensure that the required final annual expenditure report is submitted to the Mayor’s Office within the required time frame.

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:

Office of the Mayor
1 Public Square, Suite 100
Nashville, TN 37201
Attn: Brian Kelsey