

**METROPOLITAN GOVERNMENT OF NASHVILLE AND DAVIDSON COUNTY**



March 20, 2020

Jason Ross, Board Chair  
Bridges for the Deaf and Hard of Hearing  
935 Edgehill Avenue  
Nashville, TN 37203

Dear Mr. Ross:

Please find attached the monitoring report of the Bridges for the Deaf and Hard of Hearing relating to the contract it had with the Metropolitan Government of Nashville and Davidson County for the fiscal year ending June 30, 2019.

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 December 18, 2019.

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: Nancy Denning-Martin, President & CEO, Bridges for the Deaf and Hard of Hearing  
Kevin Crumbo, Director, Department of Finance  
Susan Drye, Nashville Public Library  
Elyse Adler, Nashville Public Library  
Talía Lomax-O'dneal, Deputy Director, Department of Finance

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*Metropolitan Government of Nashville and Davidson County*

# **BRIDGES FOR THE DEAF AND HARD OF HEARING**

◆ **Monitoring Report** ◆

Conducted by



**Office of Financial Accountability**

March 20, 2020

# 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 Bridges for the Deaf and Hard of Hearing. 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 Bridges for the Deaf and Hard of Hearing 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 contracts with Metro Government:

<b>Contract</b>	<b>Type</b>	<b>Amount</b>	<b>Contract Term</b>	
L-4083	Community Partnership Funds	\$20,000	July 1, 2018	June 30, 2019

### **Agency Background**

Bridges for the Deaf and Hard of Hearing provides a wide range of services for deaf and hard of hearing people. The agency’s mission is “to unite the deaf, hard of hearing and hearing communities through education, services and support in hope to empower individuals to achieve their full potential”.

Bridges for the Deaf and Hard of Hearing provides afterschool tutoring, summer camp, and recreational events for deaf and hard of hearing youths. In addition to the youth programming, the Bridges for the Deaf and Hard of Hearing also provides case management, education and outreach, interpreting services, and operates a living well program.

## 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, 2018 through June 30, 2019.

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-4083. 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. 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 the core compliance areas identified by 2 CFR Part 200: *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards*.

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 contract stipulated that the agency shall use the funds to support The Signing Aces Youth Education & Services program. The Signing ACE's serves children from birth to 18 years with programming designed to develop and nurture literacy in both American Sign Language (AS) and English. Specific early literacy interventions for children from birth to 5 years of age have been developed in the past year in light of

## **RESULTS OF REVIEW**

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current research regarding literacy, early childhood development, and academic success.

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

### **4. Reliability of Financial and Programmatic Reporting**

Typically, the Community Partnership Fund grant contract would require the agency to submit to Metro a yearend report of the program outcomes and a final expenditures report, no more than 45 days after the close of the contract. However, the Metro department responsible for administering the literacy category of the grant program omitted the program reporting clause from the grant contract. Therefore, the review was limited to agency's annual expenditure report.

We reviewed all applicable financial reports required by the contract, including audited financial statements. Based on our review, the agency failed to comply with the financial reporting requirements. See finding #1 in the Findings and Recommendations section 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

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### 1. **Failed to Adhere to Reporting Requirements**

#### **Finding**

Bridges for the Deaf and Hard of Hearing failed to adhere to the reporting requirements as stated in the grant contract. Section C.3. Annual Expenditure Report. The Recipient must submit a final grant Annual Expenditure Report, to be received by Nashville Public Library, within 45 days of the end of the Grant Contract. Therefore, the required final Annual Expenditure Report was due no later than August 15, 2019. Bridges for the Deaf and Hard of Hearing completed and filed the required report on September 9, 2019.

#### **Recommendation**

Bridges for the Deaf and Hard of Hearing should take the necessary steps to ensure that the required annual expenditure report is submitted to Nashville Public Library 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 finding identified in this report. The corrective action plan should be submitted within 14 days from the report date to the address below:

Nashville Public Library  
615 Church Street  
Nashville, TN 37219  
**Attn: Susan Drye**