

METROPOLITAN GOVERNMENT OF NASHVILLE AND DAVIDSON COUNTY



November 20, 2019

Micki Yearwood, Board Chair
Tennessee Coalition to End Domestic and Sexual Violence
2 International Plaza Dr. Suite 425
Nashville, TN 37217

Dear Ms. Yearwood:

Please find attached the monitoring report of the Tennessee Coalition to End Domestic and Sexual Violence 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 October 29, 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: Kathy Walsh, Executive Director, TN Coalition to End Domestic and Sexual Violence
Kevin Crumbo, Director of Finance, Department of Finance
Diane Lance, Director, Office of Family Safety
Andrew Sullivan, Financial Officer, Office of Family Safety

OFFICE OF FINANCIAL ACCOUNTABILITY

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Metropolitan Government of Nashville and Davidson County

TN COALITION TO END DOMESTIC AND SEXUAL VIOLENCE

◆ **Monitoring Report** ◆

Conducted by



Office of Financial Accountability

November 20, 2019

MONITORING REPORT

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INTRODUCTION

The Office of Financial Accountability (hereinafter referred to as “OFA”) has completed a monitoring review of the Tennessee Coalition to End Domestic and Sexual Violence. 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 Tennessee Coalition to End Domestic and Sexual Violence 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	Contract Term	
L-4092	Community Partnership Funds	\$50,000	August 8, 2018	June 30, 2019

Agency Background

The mission of the Coalition is “to end domestic and sexual violence in the lives of Tennesseans and to change societal attitudes and institutions that promote and condone violence, through public policy advocacy, education and activities that increase the capacity of programs and communities to address such violence.”

The Coalition originated in 1983 as the Tennessee Task Force on Family Violence. On June 1, 2000, the Task Force merged with the Tennessee Coalition Against Sexual Assault to become the Tennessee Coalition Against Domestic and Sexual Violence. The merger resulted as an effort to better serve victims of domestic and sexual violence. In 2010, the Coalition changed its name to the Tennessee Coalition to End Domestic and Sexual Violence to better reflect its mission.

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 August 8, 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-4092. 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 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 stipulates that the funds shall be used to achieve the following outcomes:

1. A minimum of 28 (unduplicated) immigrant victims of domestic violence in Davidson County will be served.

RESULTS OF REVIEW

2. 24 of 28 (85%) clients receiving services from the Immigrant Clinic will report increased safety as a result of the services.
3. 24 of 28 (85%) clients will report that they are satisfied with the way the attorney explained their immigration matter and any available legal options.
4. 24 of 28 (85%) clients receiving services from the Clinic will report that the agency helped them learn how to access benefits and community resources.

Based on our review of program documentation and discussions with staff, three of the four program performance objectives were not met and the agency was not in compliance with contractual program objectives. See finding #1 in the Findings and Recommendations section 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. Based on our review, 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

1. Program Performance Goals Not Met

Finding

The Tennessee Coalition to End Domestic Violence and Sexual Assault did not meet three of the four agency's contractual program objectives as stated in the contract. The unmet objectives are listed below:

1. 24 of 28 (85%) clients receiving services from the Immigrant Clinic will report increased safety as a result of the services.
2. 24 of 28 (85%) clients will report that they are satisfied with the way the attorney explained their immigration matter and any available legal options.
3. 24 of 28 (85%) clients receiving services from the Clinic will report that the agency helped them learn how to access benefits and community resources.

Based upon the provided program documentation, and discussions with the staff, the Tennessee Coalition served 28 unduplicated Davidson county residents. However, the agency could only provide documentation to support 14 of the 28 (50%) clients receiving services from the Immigrant Clinic reported increased safety as a result of the services, 13 of the 28 (46%) reported that they were satisfied with the way the attorney explained their immigration matter and any available legal options and 14 of the 28 (50%) clients receiving services from the Clinic reported that the agency helped them learn how to access benefits and community resources.

Recommendation

Tennessee Coalition to End Domestic Violence and Sexual Assault should take the necessary steps to ensure that the program objectives are met. Management should further review their objectives to make sure they are reasonable and attainable and that they are accurately reported and well documented.

FINDINGS AND RECOMMENDATIONS

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 Family Safety
610 Murfreesboro Pike
Nashville, TN 37210
Attn: Andrew Sullivan