

METROPOLITAN GOVERNMENT OF NASHVILLE AND DAVIDSON COUNTY



October 6, 2021

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

Dear Mr. Palk:

Please find attached the monitoring report of Bridges for the Deaf and Hard of Hearing relating to the contract it had with the Metropolitan Government of Nashville and Davidson County that ended on December 30, 2020.

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 initiated the review on July 13, 2021.

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, CFE
Director, Office of Financial Accountability

cc: Nancy Denning-Martin, President & CEO, Bridges for the Deaf and Hard of Hearing
Kelly Flannery, Director, Department of Finance
Kent Oliver, Nashville Public Library
Susan Drye, Nashville Public Library
Talia Lomax-O'dneal, Deputy Director, Department of Finance

Tom Eddlemon, Deputy Director, Department of Finance
Mary Jo Wiggins, Deputy Director, Department of Finance
Jenneen Kaufman, Chief of Accounts, Department of Finance
Lauren Riley, Metropolitan Auditor, Office of Internal Audit
Essie Robertson, CPA, CMFO, CICA, Office of Financial Accountability
Dolly Cook, CICA, CMFO, Office of Financial Accountability
Nicole Whitlock, CICA, Office of Financial Accountability
Anthony Conley, Office of Financial Accountability



Metropolitan Government of Nashville and Davidson County

BRIDGES FOR THE DEAF AND HARD OF HEARING

◆ **Monitoring Report** ◆

Conducted by



Office of Financial Accountability

October 6, 2021

MONITORING REPORT

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INTRODUCTION

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:

Contract	Type	Amount	Contract Term	
L-4606	Community Partnership Funds	\$20,000	March 1, 2020	December 30, 2020

Agency Background

Bridges for the Deaf and Hard of Hearing provides a wide range of services for deaf and hard of hearing. Due to COVID-19, Bridges for the Deaf and Hard of Hearing had to transition most of their services to online. 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

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 March 1, 2020 through December 30, 2020.

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-4606. 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 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 stipulates that the agency shall use the funds, due to COVID-19, to expand their virtual spaces, particularly as they allowed Bridges for the Deaf and Hard of Hearing to reach students in outlying and more rural areas. Because virtual school is not as successful for deaf and hard of hearing students, Bridges for the Deaf and Hard of Hearing was to focus on creating support classes and networks for K-12 students who were traditionally in the after-school program.

RESULTS OF REVIEW

In addition to the first Deaf Education Institute held in collaboration with Interpreting Services, Bridges for the Deaf and Hard of Hearing was to provide workshops specifically on Remote Learning for Deaf and Hard of Hearing students as well as IEP guidance and advocacy.

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 for this grant.

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 the 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 was in compliance with the financial 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.