

METROPOLITAN GOVERNMENT OF NASHVILLE AND DAVIDSON COUNTY



January 3, 2024

Ms. Terri Luke
Interim Director
Nashville Public Library
615 Church St.
Nashville, Tennessee 37219

Dear Ms. Luke:

Please find attached the preliminary monitoring report for the Nashville Public Library. This report explains the results of the review of your agency's federal and state grants and other financial assistance for the fiscal years 2021 and 2022 listed in Appendix A. Staff from the Office of Financial Accountability concluded the fieldwork for this review on October 11, 2023. You previously reviewed and responded to the preliminary report. Your responses to that report have been incorporated into this final report.

We appreciate the assistance provided by your department during the course of the review. If you have any questions, please call me at 615-880-1808.

Sincerely,

A handwritten signature in cursive script that reads "Kimery Grant".

Kimery Grant
Assistant Director, Office of Financial Accountability

cc: Susan Drye, Nashville Public Library
Kevin Crumbo, Director, Department of Finance
Lauren Riley, Metropolitan Auditor, Office of Internal Audit
Nicole Whitlock, CMFO, CICA, Office of Financial Accountability
Camile Crutcher, Office of Financial Accountability
Michael Delk, Office of Financial Accountability
Kara Waters, Office of Financial Accountability
Metro Finance Leadership Team

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Metropolitan Government of Nashville and Davidson County

NASHVILLE PUBLIC LIBRARY

◆ Monitoring Report ◆

Conducted by



Office of Financial Accountability

January 3, 2024

MONITORING REPORT

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INTRODUCTION

The Office of Financial Accountability (hereinafter referred to as “OFA”) has completed a monitoring review of the federal and state grants and contracts administered by the Nashville Public Library. The monitoring process included a review of the contracts in effect during the fiscal year ending June 30, 2022. The contracts reviewed are listed in Appendix A. The OFA conducted the monitoring review along the major compliance areas identified in the Office of Management and Budget (hereinafter referred to as “OMB”) 2 CFR 200, “*Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards.*”

Department Background

The Nashville Public Library was established in 1898; it is committed to extending the benefits and joys of reading, lifelong learning, and discovery to all people through collections and services. The library provides a wide variety of services, programs, and materials to enhance knowledge and quality of life through twenty-one (21) library branches, the Main Library and the Achieves. In FY22, over 5.1 million library materials were checked out.

Per the FY2024 operating budget book, the Nashville Public Library had an operating budget of \$44,991,000 with 442 budgeted positions.

Grants Reviewed:

The purpose of this review was to assess the Nashville Public Library’s compliance with contractual requirements set forth in the following grant contracts that provided approximately \$1,258,700 of financial assistance to the Nashville Public Library.

Library Services 21-22 (RS2021-1050)

The Nashville Public Library was awarded a grant in the amount of \$1,015,500 by the Tennessee State Library and Archives to target library materials to persons having difficulty using a library and to the underserved in the Nashville -Davidson County area (Materials for the Disadvantaged, \$10,000). Provide access to and circulation of Library materials in a variety of formats, special services for children and young people, and general educational support services (General Library Services, \$1,005,500).

T.O.T.A.L. (Totally Outstanding Teen Advocates for the Library RS2021-1073)

The Nashville Public Library was awarded a grant in the amount of \$89,500 by Nashville Public Library Foundation to staff a neighborhood-based youth engagement team name T.O.T.A.L. (Totally Outstanding Teen Advocates for the Library). This grant provides the program with a leadership team of a program coordinator and two teens hired to design, develop, and implement programs for both the public and other teens at a minimum of five branch locations. The T.O.T.A.L. team is responsible for recruiting youth volunteers throughout Nashville’s neighborhoods to conduct the classes and promote the offerings of the Public Library.

INTRODUCTION

Library Services for the Deaf and Hard of Hearing (RS2021-1572)

The Nashville Public Library was awarded a grant in the amount of \$88,000 by Tennessee State Library and Archives to provide access to, and circulation of special materials formatted for individuals who are hearing impaired, provide programming to the deaf and hard of hearing, and to promote general support of library patrons who are aurally challenged.

American Rescue Plan Act (RS2021-1290)

The Nashville Public Library was awarded a grant in the amount of \$49,200 by American Rescue Plan Act (ARPA) grant by and between the Tennessee State Library and Archives to upgrade the Limitless Libraries website to foster educational attainment and equity by providing public library materials and services.

TN State Library and Archives Training Opportunities for the Public (RS2021-1049)

The Nashville Public Library was awarded a grant in the amount of \$16,500 by Tennessee State Library and Archives to provide funds to hire computer instructors to provide free technology training to the general public.

OBJECTIVES, SCOPE AND METHODOLOGY

A monitoring review is substantially less in scope than an audit. The OFA did not audit the financial statements for the Nashville Public Library and, accordingly, does not express an opinion or any assurances regarding the financial statements of the Nashville Public Library or the Metropolitan Government of Nashville and Davidson County (hereinafter referred to as “Metro”). The OFA is responsible for the internal monitoring of Metro agencies that receive federal and state financial assistance, including cooperative agreements, and non-profit organizations that receive appropriations 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 overall monitoring objective was to determine the department’s compliance with grantors and Metro guidelines, policies, rules, and regulations. Specifically, we reviewed for the following objectives:

- To determine whether activities and costs of the program were made in accordance with OMB Circular 2 CFR 200; the minimum federal, state, and local requirements; and grantor guidelines.
- To determine whether the minimum requirements for local matching contributions and/or adequate level of expenditures by other sources of funds are met.
- To determine whether grant funds were used exclusively during the period in which the funds were authorized.
- To determine the reliability and timeliness of the financial and programmatic reporting.
- To determine whether federal compliance requirements regarding sub-recipient oversight were met and whether the sub-recipient performed in accordance with the contract terms.
- To determine whether civil rights requirements are met.
- To determine whether program objectives were met.
- To determine whether the various Metro regulations were followed.

The scope of the work included the grants listed in Appendix A. The grant period reviewed was July 1, 2021 through June 30, 2022. Although the review focused on this specific time period, certain analyses required the consideration of financial transactions outside of this time period. The methodology adopted by the OFA encompassed various interviews and an objective review of fiscal and programmatic files, including:

- Financial transactions and supporting documentation
- Contract agreements and related amendments
- Federal and/or state financial reports
- Program reports and supporting documentation
- Correspondence between related parties.

RESULTS OF MONITORING

Overall Findings and Major Review Highlights

Our review revealed two discrepancies with policies and grant requirement guidelines. The Nashville Public Library:

1. Incurred Questioned Cost.
2. Needs to Improve Efforts to Comply with Title VI of the Civil Rights Act of 1964.

The section that follows provides more detailed information for the items listed above. Management was given an opportunity to respond to the findings and their responses have been incorporated into this final report.

FINDINGS AND RECOMMENDATIONS

1. Incurred Questioned Cost.

Finding

Nashville Public Library incurred questioned cost totaling \$1,113.75. The Nashville Public Library processed and paid invoice C0001778, dated April 1, 2022, from MatchWare Incorporated totaling \$1,215.00, which included 3 years upfront billing for the following time periods: 4/1/2022 – 4/1/2023; 4/1/2023 – 4/1/2024; and 4/1/2024 – 4/1/2025. All but three (3) months exceeded the contract term and the grant’s period of availability of July 1, 2021 through June 30, 2022. Therefore, pursuant to section C.5 Invoice Requirements of the grant contract, *“The Grantee understands and agrees to the following. b (2) An invoice under this Grant Contract shall not include any reimbursement request for future expenditures”* the expenditures for services beyond June 30, 2022 have been deemed unallowed and should be refunded to the grantor.

Vendor	Invoice Number	Invoice Date	Billing Period		Quantity	Unit Price	Total Amount
MatchWare Incorporated	C0001778	4/1/2022	4/1/2022	4/1/2023	3	\$135.00	\$405.00
			4/1/2023	4/1/2024	3	\$135.00	\$405.00
			4/1/2024	4/1/2025	3	\$135.00	\$405.00
Total Invoice							\$1,215.00
Period of Availability - April 1, 2022 - June 30, 2022					Quantity	3 Month Unit Price	Total Amount (Allowable)
3 Months: April 1, 2022 - June 30, 2022 for 3 licenses					3	33.75	\$101.25
Total Questioned Cost							\$1,113.75

Recommendation

Nashville Public Library should immediately refund \$1,113.75 to the grantor as well as amend any financial reports. In addition, the NPL should take the necessary steps to ensure all costs are for services within the grant’s period of availability.

Management Comments

Nashville Public Library (NPL) reached out to the State of Tennessee, Secretary of State’s Office to inquire about returning the grant funding for these expenses that are in question. NPL will return the \$1,113.75 to the grantor and revise the year end report to reflect the reduction in expense.

FINDINGS AND RECOMMENDATIONS

2. Needs to Improve Efforts to Comply with Title VI Compliance Requirements of the Grant Contracts.

Finding

Nashville Public Library needs to improve its efforts to comply with Title VI compliance requirements for the following contracts:

Grant	Resolution #	Grant Period		Award Amount
Library Services 21-22	RS2021-1050	7/1/2021	5/31/2022	\$1,015,500.00
Library Services for the Deaf and Hard of Hearing	RS2021-1572	7/1/2021	6/30/2022	\$88,000.00
TSLA American Rescue Plan Act	RS2021-1290	7/1/2021	6/30/2022	\$49,200.00
TSLA Training Opportunities for the Public	RS2021-1049	7/1/2021	6/30/2022	\$16,500.00

In accordance with the grant contract’s section E. Special Terms and Conditions, Title VI Compliance, the Nashville Public Library was required to “*c. Train all staff (regular, contract, volunteer) on Title VI upon employment and annually thereafter. Training documentation shall be made available upon request of State and include: 1) dates and duration of each training; 2) list of staff completing training of each date*”. However, based upon the Title VI Subrecipient Annual Certification Form dated July 26, 2022, only 1.74% out of the 345 Nashville Public Library’s employees had received Title VI training.

Recommendation

Nashville Public Library should take the necessary steps to ensure all new hires and current employees receive Title VI training annually as required.

Management Comments

All Nashville Public Library (NPL) employees receive Title VI training as a part of NPL’s New Employee Orientation. However, NPL was not providing annual Title VI training to all employees as stated was necessary for all state awarded grants. NPL has instituted mandatory Title VI training for all employees on an annual basis starting in FY24 (July 1, 2023, through June 30, 2024). All employees (100%) completed Title VI training as of September 12, 2023. Going forward, all employees will receive Title VI training at the start of the new fiscal year.

APPENDIX A

Grant	Resolution #	Grant Period		Award Amount	Findings
Library Services 21-22	RS2021-1050	7/1/2021	5/31/2022	\$1,015,500.00	Y
T.O.T.A.L. (Total Outstanding Teen Advocates for the Library)	RS2021-1073	7/1/2021	6/30/2022	\$89,500.00	N
Library Services for Deaf and Hard of Hearing	RS2021-1572	7/1/2021	6/30/2022	\$88,000.00	Y
TSLA American Rescue Plan Act	RS2021-1290	7/1/2021	6/30/2022	\$49,200.00	Y
TSLA Training Opportunities for the Public	RS2021-1049	7/1/2021	6/30/2022	\$16,500.00	Y