

**METROPOLITAN GOVERNMENT OF NASHVILLE AND DAVIDSON COUNTY**



April 8, 2024

Erin Tomlinson, Board Chair  
STARS Nashville  
1704 Charlotte Avenue, Suite 200  
Nashville, TN 37203

Dear Ms. Tomlinson:

Please find attached the monitoring report of STARS Nashville relating to the contract it had with the Metropolitan Government of Nashville and Davidson County for the fiscal year ending June 30, 2023.

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 November 15, 2023.

We appreciate the assistance provided by your agency during the course of the review. If you have any questions, please call me at 615-880-1725.

Sincerely,

A handwritten signature in cursive script that reads "Jane Dozier".

Jane Dozier, CIA, CFE  
Director, Office of Financial Accountability

cc: Rodger Dinwiddie, Chief Executive Officer, STARS Nashville  
Cynthia Whetstone, Chief Financial Officer, STARS Nashville  
Kevin Crumbo, Director, Department of Finance  
Judge Sheila D.J Calloway, Juvenile Court  
Jim Swack, Juvenile Court

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*Metropolitan Government of Nashville and Davidson County*

# **STARS NASHVILLE**

## **◆ Monitoring Report ◆**

Conducted by



**Office of Financial Accountability**

April 8, 2024

# 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 STARS Nashville. 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 STARS Nashville 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:

<b>Contract</b>	<b>Type</b>	<b>Amount</b>	<b>Contract Term</b>	
L-5354	Community Partnership Funds	\$25,000	July 1, 2022	June 30, 2023

### **Agency Background**

STARS Nashville is a nonprofit organization and exists to support young people in overcoming social and emotional barriers through creative and innovative programs centering on prevention, intervention, treatment, training, and compassion. STARS mission is to help all young people pursue their unlimited potential by providing hope, health, and connection. Youth Overcoming Drug Abuse (YODA) is an intensive outpatient program of STARS for adolescents with substance use disorder and co-occurring disorders. The goal of YODA is to intervene in the rapid progression of substance use disorder and chemical dependency during critical developmental stages. YODA provides free treatment services to youth ages 13-18 who are uninsured or have insurance that will not pay for treatment.

## 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, 2022, through June 30, 2023.

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-5354. 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 test work 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*.

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 Appropriation.

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

### **3. Program and Performance Objectives**

The Community Partnership Fund contract stipulates that the agency shall use the funds for the Youth Overcoming Drug Abuse (YODA) program, an intensive outpatient treatment program for adolescents and youth with substance abuse and co-occurring disorders by providing the following outcomes:



## RESULTS OF REVIEW

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1. 65% of youth who complete the program will show a reduction in the rate of re-offenses with Juvenile Court.
2. 70% of youth who complete the program will have increased connection to people, places and experience that support healthy development.
3. 70% of youth who complete the program will show an increase in cognitive skills and knowledge related to healthy alternatives.

Based on our review of program documentation and discussions with staff, the program performance objectives were met, and agency was 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 an interim report by January 9, 2023, 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.