



COMPTROLLER'S INVESTIGATIVE REPORT

White County Comprehensive Multipurpose Senior Center, Inc.

November 25, 2025

Jason E. Mumpower
Comptroller of the Treasury



DIVISION OF INVESTIGATIONS



JASON E. MUMPOWER
Comptroller

November 25, 2025

White County Executive
and Members of the County Commission
1 East Brockman Way
Sparta, Tennessee 38583

White County Officials:

The Office of the Comptroller of the Treasury conducted an investigation of selected records of the White County Comprehensive Multipurpose Senior Center, Inc., and the results are presented herein.

Copies of this report are being forwarded to Governor Bill Lee, the State Attorney General, the District Attorney General of the 13th Judicial District, certain state legislators, and various other interested parties. A copy of the report is available for public inspection in our Office and may be viewed at <http://www.comptroller.tn.gov/ia/>.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jason E. Mumpower", written over a faint, larger version of the signature.

Jason E. Mumpower
Comptroller of the Treasury

JEM/MLC

INVESTIGATIVE REPORT

White County Comprehensive Multipurpose Senior Center, Inc.

The Office of the Comptroller of the Treasury investigated allegations of malfeasance related to the White County Comprehensive Multipurpose Senior Citizens, Inc. The investigation was limited to selected records for the period January 1, 2022, through October 31, 2023. The results of the investigation were communicated with the Office of the District Attorney General of the 13th Judicial District.

BACKGROUND



The White County Comprehensive Multipurpose Senior Citizens, Inc. (Center) is a nonprofit entity serving citizens of White County, Tennessee. Its initial filing date to incorporate as a nonprofit with the Secretary of State was January 26, 1987. The Center's mission is to encourage seniors to participate in the programs and services offered to meet their individual needs and enhance their continued growth and development. The Center offers free meals through a federally funded program administered by the Upper Cumberland Development District (UCDD) for registered and approved participants ages 60 and older.

The Center also offers various non-federally funded social activities for seniors, regardless of meal participation. The former director served as the Center's director since November 15, 1997. She was placed on administrative leave on October 17, 2023, and she resigned as the Center's director, effective November 18, 2023.

RESULTS OF INVESTIGATION

1. THE FORMER DIRECTOR INACCURATELY REPORTED MEALS SERVED AT THE CENTER RESULTING IN \$4,134 IN IMPROPER REIMBURSEMENTS

The former director inaccurately reported the number of meals served at the Center, resulting in \$4,134 in improper reimbursements. Congregate Meal Reports submitted for reimbursement included meal counts that exceeded the number of sign-in signatures by at least 636 participants. UCDD's contract stated that all contracted centers not using the SeniorStat electronic documentation system for daily participation must use daily sign-in sheets to document participation in the meal program. The daily sign-in sheet numbers were transferred to monthly

electronic Congregate Meal Reports to determine reimbursement, and both the daily sign-in sheets and the Congregate Meal Reports were to be maintained for 5 years (plus the current year).

The former assistant director (assistant) required seniors participating in the meal program to sign in at the door when entering the Center for meals, while the former director entered participant attendance numbers into the spreadsheet she submitted to UCDD. The former director's spreadsheet was not reconciled to the daily sign-in sheets. According to the UCDD contract, the daily sign-in sheets serve as the official participant number for senior centers that do not use the SeniorStat sign-in program. Investigators determined that from May 2023 through September 2023, the former director inaccurately reported meals for at least 636 participants, resulting in \$4,134 in improper reimbursement to the Center (**Refer to Exhibit 1**). Investigators also determined that the Center's reported numbers for reimbursement, based on the former director's spreadsheets, were always higher than the number of meal participants who signed in at the Center's door.

Exhibit 1

Description	May	June	July	August	September	Total Meals	Amount per Meal	Total Reimbursement
Meal Count Documented on Sign-in Count Sheets	488	814	639	838	723	3,502	\$6.50	\$22,763.00
Meals Submitted for Reimbursement	741	902	753	915	827	4,138	\$6.50	\$26,897.00
(Over)/Under Counted	(253)	(88)	(114)	(77)	(104)	(636)		(\$4,134.00)

Reported meals from May 2023 through September 2023

When questioned during the investigation, the former director acknowledged that she never maintained the sign-in sheets per the contract with UCDD.

Prior to May 2023, the Center was closed due to COVID-19 but was authorized to operate a drive-thru meal program. The Center was reimbursed at the allowed maximum rate of 125 meals per day, as documented only in the monthly Congregate Meal Reports. Therefore, the months the Center operated as a drive-thru due to COVID-19 were not included in this finding.

2. THE CENTER DID NOT HAVE POLICIES AND PROCEDURES GOVERNING THE CREATION AND IMPLEMENTATION OF A GRIEVANCE COMMITTEE

The Center did not have policies and procedures governing the creation and implementation of a grievance committee. The Center's bylaws address employment under equal opportunity, which states that if you believe the policy has been violated in any way, you are to report the matter to the Senior Center Director. Investigators were able to locate an additional document, titled "Procedures for Grievances or Complaints," which states that any complaints against the Senior Center should be presented to the Director in writing, or if the complaint involves the Director, it should go to the Chairman of the Board, and complaints will then be presented to the Grievance Committee, and every effort will be made at the local level to resolve the grievance through the Grievance Committee. The "Procedures for Grievances or Complaints" further states that if the

complaint is not resolved to the client's satisfaction, it can be submitted to UCDD or the Tennessee Commission on Aging and Disability.

In a letter dated March 22, 2023, a former Center employee filed a grievance against the former director, which was subsequently received by the UCDD. At that time, the former director established a Grievance Committee to address the complaint. The Grievance Committee met on April 11, 2023, per the meeting minutes on file at the Center. However, the former director said that she had no knowledge of the former Center employee appearing before the Grievance Committee.

Investigators could not determine if the Grievance Committee had been created properly. There was no documentation for who and how the committee was to be appointed, nor how many members were to be on the committee, or whether the committee was to consist solely of the executive board, or if the board would have to approve the committee. The bylaws and the "Procedures for Grievances and Complaints" state that grievances should be submitted to the Grievance Committee, which indicates that it is a standing committee, not one formed after the grievance has been made. Additionally, the Grievance Committee meeting minutes on file did not provide details about what transpired during the meeting.

3. THE FORMER DIRECTOR USED THE CENTER'S EQUIPMENT, FACILITIES, AND STAFF FOR PRIVATE CATERING

Investigators determined that the former director used the Center's equipment, facilities, and staff for private catering activities. In at least three instances, the former director used the Center's resources for catering events that were unrelated to Center operations. Two of these events were attended by clients of the former director's son's trucking business. The Center's policy states, "a conflict occurs when a staff member can influence a decision that may result in a personal gain for the staff member or for a relative/friend as a result of the Center's business". By using the Center resources for private purposes, the former director created a conflict of interest in violation of Center policy.

4. THE FORMER DIRECTOR MADE SEVEN UNAPPROVED PAYMENTS FROM THE CENTER TO HER HUSBAND AND SON TOTALING \$700

The former director made seven unapproved payments from the Center to her husband and son totaling at least \$700. During the recorded July 11, 2023, budget meeting, the former director stated that volunteers mowed the Center's lawn, maintaining that the budget line item was only for contingency purposes. When investigators questioned board members and staff about who maintained the Center's lawn, they were given the following three explanations: jail inmates mowed, the former director's husband was paid \$100 in cash per mowing, and the former director's husband had worked for free but was now considering billing the Center for the mowing. The former director told investigators that she did not pay him (her husband). When investigators asked her about checks to her husband, with mowing and trimming in the memo line, the former director said they might have paid him, but very few times. Investigators noted that the former director was responsible for preparing and signing the checks.

Investigators identified six \$100 checks to the former director's husband and one to her son, explicitly noted as "mowing" or "mowing and trimming". The board was not aware and did not approve the payments to the former director's husband and son.

5. THE FORMER DIRECTOR COMPLETED AND SUBMITTED PARTICIPANT REGISTRATION FORMS THAT CONTAINED FALSE INFORMATION

The former director completed and submitted participant registration forms to UCDD that contained false information. These forms are used to verify an individual's eligibility for meals. There were numerous unsecured participant registration forms found at the Center, and these forms were designed for a three-year cycle, with three signature lines, one for initial completion and two for annual renewals. A review of the forms revealed that eight participant registration forms contained the second-year completion dates recorded after the participants (seniors) had already died. These forms were then sent to UCDD. UCDD confirmed that contracted senior centers offer services, and these deceased individuals were listed as receiving assistance at the Center.

INTERNAL CONTROL AND COMPLIANCE DEFICIENCIES

Our investigation revealed deficiencies in internal controls and compliance, some of which contributed to the investigative findings outlined above. These deficiencies included:

Deficiency 1: The Center did not have collection procedures, and investigators could not determine if all collections were deposited

The Center hosted band nights and collected admission fees at the door. However, the Center did not have collection procedures, and as a result could not determine how much was collected from each band night. The former director provided board members and investigators with differing amounts for collections and attendance numbers at band nights. She stated that cash collections were used to pay the band with only a portion of collections deposited into the Center's account

Furthermore, the Center did not reconcile attendance with collections, document the amount paid to the band or perform, and record end-of-night cash counts. Sign-in sheets were not used or maintained for determining total attendance. Due to the lack of collection procedures and attendance documentation, investigators could not determine if all collections from band nights were deposited. Failure to maintain proper collection records increases the risk for fraud or misappropriation to occur without prompt detection.

Deficiency 2: There was no oversight in the placement of board members

There was no oversight in the placement of the Center's board members. Independent board members are crucial for unbiased decision-making and mitigating any conflicts of interest in evaluating the director's performance. Investigators noted that, in more than one interview, the former director ran the Center according to her own preferences.

Deficiency 3: Participant sign-in sheets were not reconciled to monthly reports or collections

Participant sign-in sheets were not reconciled to monthly reports or collections. For any center not using the SeniorStat electronic sign-in, meal count numbers on the monthly reports submitted to UCDD should be reconciled to participant sign-in sheets. Additionally, sign-in sheets should be reconciled to the amount collected and deposited for every event or activity. Investigators were unable to determine if all funds collected had been properly accounted for and deposited. Failure to reconcile monthly reports or collections increases the risk that fraud, waste, or abuse will occur without prompt detection.

Deficiency 4: The Center's board failed to review bank statements

The Center's board failed to review bank statements; bank statements, imaged checks, and deposits should be included in the minutes of the board meetings. Due to the lack of bank statement review(s), the Center's board failed to promptly identify and resolve personal and questionable disbursements or deposits from the Center.

Deficiency 5: The Center's board failed to establish operational policies and procedures for the collection and disbursement of funds

The Center's board failed to establish operational policies and procedures for the collection and disbursement of funds. Sound business practices require oversight boards to establish and maintain an adequate internal control system for financial reporting, managing operations, and compliance. An established internal control system would assist the Center's board and provide guidelines and structure for the Center's operations.

Deficiency 6: The Center did not adequately secure documents containing sensitive information

The Center did not adequately secure documents containing sensitive information of participants in its services. To participate in services at the Center, individuals completed participant registration forms that were then updated annually for two more years before they had to complete new forms. These forms contained sensitive information such as names, dates of birth, and addresses. The Center did not adequately secure these forms to protect the personal information contained on them. The forms were found in loose stacks on top of file cabinets, in three-ring notebooks on shelves, and unbound in boxes on the floor.

Center officials indicated that they have corrected or intend to correct these deficiencies.
