



Illinois State Board of Education

100 North First Street, Springfield, Illinois 62777-0001
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James T. Meeks
Chairman

Tony Smith, Ph.D.
State Superintendent of Education

February 03, 2018

Agreement No.
09-010-1880-04

Mr. Rod Grimsley
Gifford CCSD 188
PO Box 70
Gifford, IL 61847-0070

Dear Mr. Rod Grimsley :

Enclosed is the report of your School Nutrition Programs Administrative Review, conducted on November 9, 14, 2017. The report identifies the problems cited during the review and the corrective action recommended.

A corrective action plan to the review report must be received in our office within 30 days from the receipt of this letter. This response must detail specific actions taken to correct the problems cited.

Technical assistance materials and/or training opportunities may be available to assist in correcting the problems identified in the review. The cooperation of personnel during this review was appreciated.

If you have questions regarding your review, please contact Julie Burd at jburd@isbe.net. For all other questions, please contact our office at 800/545-7892.

Sincerely,

A handwritten signature in black ink that reads "Mark R. Haller".

Mark R. Haller, SNS
Division Administrator
Nutrition and Wellness Programs

Enclosure

CC: File

School Nutrition Programs Program Administrative Review

This report summarizes the results of the follow-up administrative review for the School Nutrition Programs Program sponsored by the Gifford CCSD 188, RCDT number 09-010-1880-04, conducted on November 9, 14, 2017, by Julie Burd, Principal Consultant

The results of the review were discussed at an exit conference on November 14, 2017, with
Rod Grimsley, Superintendent

The purpose of the review was to monitor the sponsor's compliance with Federal and state program regulations. The following areas of program compliance were evaluated:

- Afterschool Snack, if applicable
- Certification and Benefit Issuance
- Civil Rights
- Dietary Specifications and Nutrient Analysis
- Food Safety
- Fresh Fruit and Vegetable Program, if applicable
- Local School Wellness Policy
- Meal Components and Quantities
- Meal Counting and Claiming
- Offer Versus Serve
- On-Site Monitoring
- Outreach
- Professional Standards
- Reporting and Recordkeeping
- Smart Snacks
- Special Milk Program, if applicable
- Verification
- Water

During the review, technical assistance was provided to the sponsor in the following areas:

- Certification and Benefit Issuance
- Meal Components and Quantities

During the review, the following problems were identified. All other areas were found to be in compliance.

Meal Components and Quantities

Citation:

The weekly minimum meat/meat alternate ounce equivalents were not offered. Menus must contain a minimum of nine meat/meat alternate ounce equivalents per week for grades K-8. Appropriate documentation must be available to validate the contributions of the food items to the meal pattern requirements.

The minimum weekly portion requirement was not met for the dark green vegetable subgroup. The minimum weekly requirement must be met for each vegetable subgroup.

Citation:

The minimum meat/meat alternate serving size was not offered at lunch on October 16, 2017. A minimum of one ounce meat/meat alternate equivalent must be offered on a daily basis. Appropriate documentation must be available to validate the contributions of the food items to the meal pattern requirements.

The minimum vegetable serving size was not offered at lunch on October 20, 2017. A minimum of 3/4 cup vegetable must be offered on a daily basis.

Citation:

Production records did not contain the required information for the selected week of review. The following details were missing:

- 1) The recipe or product name was not recorded for all foods.
- 2) Portion sizes were not recorded accurately.
- 3) The amount of food used was not recorded.
- 4) The number of leftovers were not recorded.

Production records must accurately reflect the specific foods/condiments used, recipe or product name, grade groups, portion sizes, student and total projected servings, amount of food used, and the number of leftovers.

Citation:

The recipe used for the tortellini was not standardized. It was missing an accurate weight or measurement of each ingredient and the portion size. Standardized recipes must contain the weight or measurement of each ingredient, steps of preparation, yield, and portion sizes.

Food Safety, Storage, and Buy American

Citation:

A request to the local Health Department was not made for last school year's second sanitation inspection. When two food sanitation inspections have not occurred by January 31, the sponsor is required to send a letter to the local health department requesting the food service inspections for each site where food is prepared and served.

Sponsor:

November 9, 14, 2017

Benefit Issuance Documents

Citation:

The electronic application used did not contain the following:

- 1) An established procedure to obtain electronic household signatures.
- 2) A place to obtain the last four digits of the social security number of an adult household member.

The use of the electronic application must be suspended until the application is updated to ensure there is an established procedure to obtain legally binding electronic signatures and a place to document the last four digits of the social security number of an adult household member or an indication there is none.

Due to the electronic application not requesting the required information, four household eligibility applications were missing the signature of an adult household member and the last four digits of the social security number of an adult household member. All household eligibility applications approved for free and reduced-priced meals must contain all information as required by program regulations. A procedure must be established to ensure all household eligibility applications contain the required information.

Citation:

One student was receiving free and one student was receiving reduced-price meals without determining the eligibility on the basis of a correctly approved application or direct certification documentation. Children who do not have a current application or direct certification documentation on file must be claimed as paid. A procedure where the approved categories of students are compared to the benefit issuance document must be established.

Verification

Citation:

Annual verification of household eligibility applications was not conducted for Fiscal Year 2017. A procedure must be established to ensure verification is completed by November 15 each year. Documentation of the verification process must be maintained and available for review.

Professional Standards

Citation:

Training requirements have not been met for the director for school year 2016-17. The minimum hours of training is 12 hours annually. The response must identify how the director will meet the current annual training requirements.

Citation:

Training hours have not been documented. A method to track the number of training hours must be implemented. The USDA Professional Standards Training Tracking Tool may be utilized to document training hours

Citation:

School staff who work with the School Nutrition Programs, the individual taking meal counts, did not meet the training requirements for school year 2016-17. The minimum hours of training is 6 hours annually for staff who work with School Nutrition Programs 20 or more hours per week. Staff who work less than 20 hours per week with School Nutrition Programs are required to have a minimum of 4 hours training annually. The response must identify how staff who work with the School Nutrition Programs will meet the current annual training requirements.

Reporting and Recordkeeping

Citation:

As a result of the problems cited, an overclaim for October and November 2017 has been identified for the following programs:

*National School Lunch Program - \$135.37

*School Breakfast Program - \$20.59

Federal regulations allow this office to waive overclaims less than \$600.00; therefore, the National School Lunch Program and School Breakfast Program overclaims will not be assessed. However, if you participate in the Seamless Summer Option (SSO) and an overclaim is identified with a future SSO Claim for Reimbursement, the overclaim amount will be added to the above assessment and a new fiscal adjustment amount will be calculated. If the new assessment exceeds the \$600.00 threshold, fiscal action will be required.

Civil Rights

Citation:

Civil rights training has not been conducted for frontline staff who take meal counts. Annual civil rights training is required for frontline staff and supervisors who interact with program participants. A copy of the Summary of Civil Rights Requirements is available on the Nutrition and Wellness Programs website.

Appeal Procedures National School Lunch Program

If you do not agree with the administrative decision made by the Illinois State Board of Education regarding your organization's participation in the National School Lunch Program, you have the right to appeal that decision. You may either request 1) to have records reviewed; 2) a hearing which you may attend in person; or 3) records review and a hearing. The following are the appeal procedures with strict timelines.

- You must make a formal written request to have records reviewed or to have a hearing within fifteen (15) calendar days from the date you receive our notice of action.
- Mail your request to the Nutrition Programs, Illinois State Board of Education, 100 North First Street, Springfield, Illinois 62777. The State Superintendent or his designee will act as the review official and acknowledge the receipt of the request for appeal within ten (10) calendar days. The review official will be an independent and impartial officer other than, and not accountable to, any person authorized to make decisions that are subject to appeal.
- If you request a review of records, you must submit the written documents to the review official. In order to be considered, the written documents must be filed with the review official not later than thirty (30) calendar days after you receive our notice of action.
- You may retain legal counsel or be represented by another person.
- A hearing will be held by the review official, in addition to or in lieu of a review of written information submitted by you, only if you so specify in the letter of request for review.
- Any information on which our action was based shall be available to you for inspection from the date of receipt of the request for review.
- You will be notified by certified mail, return receipt requested, at least ten (10) calendar days prior to the time and place of the hearing.
- Failure by you or your representative to appear at a scheduled hearing shall constitute your institution's waiver of the right to a personal appearance before the review official unless the review official agrees to reschedule the hearing.
- The review official shall make a determination based on information provided by this office, by you, and according to program regulations.
- The review official will inform you of his/her decision of your appeal within sixty (60) calendar days of your request for a hearing.
- Our action will remain in effect during the appeal process. However, participating school food authorities, institutions and facilities may continue to operate under the program during an appeal of intent to terminate unless the action was based upon imminent dangers to the health or welfare of children. If this is the case, it will be specified in our notice of action.
- The determination by the state review official is the final administrative determination to be afforded to you.

