



Illinois State Board of Education

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James T. Meeks
Chairman

Tony Smith, Ph.D.
State Superintendent of Education

January 25, 2017

Agreement No.
12-017-0040-26

Jeff Patchett
Oblong Community Unit School District 4
Post Office Box 40
Oblong, Illinois 62449-0040

Dear Mr. Patchett:

Enclosed is the report of the School Nutrition Programs administrative review conducted on December 12 and 13, 2016. 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 by February 24, 2017. This response must detail the specific actions taken to correct any problems cited and must be signed by the appropriate school official.

As a result of this review, an overclaim of meals was identified; adjustments will be made to future Claims for Reimbursement or repayment may be requested by letter. If you do not agree with the overclaim, you have the right to appeal. A copy of the appeal procedures is enclosed.

Technical assistance materials and/or training opportunities may be available to assist in correcting problems identified in the review. The cooperation of personnel during the visit was appreciated. If you have questions regarding your review, please contact Andrea Gregory at agregory@isbe.net. For all other program questions, please contact our office at 800/545-7892.

Sincerely,

A handwritten signature in black ink, appearing to read "Mark R. Haller".

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

Enclosure

cc: File

SCHOOL NUTRITION PROGRAMS

ADMINISTRATIVE REVIEW REPORT

This report summarizes the results of the administrative review of the School Nutrition Programs sponsored by Oblong Community Unit School District 4, Agreement #12-017-0040-26, conducted on December 12 and 13, 2016, by Andrea Gregory, Principal Consultant.

The results of the review were discussed at an exit conference on December 13, 2016, with Susan Madlem, Unit Secretary.

Oblong High School visited during this review.

The purpose of the review was to monitor the school food authority's compliance with the federal and state program regulations. The following areas of program compliance were evaluated:

- Certification and Benefit Issuance
- Verification
- Meal Counting and Claiming
- Meal Components and Quantities
- Offer Versus Serve
- Dietary Specifications and Nutrient Analysis
- Civil Rights
- On-Site Monitoring
- Local School Wellness Policy
- Smart Snacks
- Professional Standards
- Water
- Food Safety
- Reporting and Recordkeeping
- Outreach

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

- Certification and Benefit Issuance
- Meal Components and Quantities
- Offer Versus Serve
- Smart Snacks
- Food Safety

As a result of the review, the following problems were identified. All other areas were found to be in compliance with program requirements.

Certification and Benefit Issuance

Three household eligibility applications were approved in the wrong category. One application was approved free and should have been denied and two applications were approved reduced price and should have been free. A procedure must be established to ensure household eligibility applications are approved in the appropriate category according to the current income guidelines.

Benefits were issued in error. A student was approved as reduced price, but was receiving free benefits. Also, a student was receiving free meals without determining the eligibility on the basis of a correctly approved application or direct certification documentation. Benefits must be issued in the category in which each student was approved. 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.

Oblong High School

As a result of the review at Oblong High School on December 12 and 13, 2016, the following problems were identified. All other areas were found to be in compliance.

Meal Components and Quantities – Day of On-Site Observation

At lunch, the portion size of the vegetable did not meet meal pattern requirements. The minimum serving size of the vegetable must be one cup.

Offer Versus Serve

Signage is not posted at lunch or breakfast to explain a reimbursable meal under Offer vs. Serve. When implementing Offer vs. Serve, adequate signage must be posted to explain what constitutes a reimbursable meal.

Meal Components and Quantities –Selected Week (Dates)

The grain/bread ounce equivalents offered were not whole-grain rich at lunch and breakfast. All of the grain/bread ounce equivalents offered each week must be whole-grain rich.

The weekly minimum meat/meat alternate ounce equivalents were not offered at lunch. Menus must contain a minimum of ten meat/meat alternate ounce equivalents per week for grades 9-12. Appropriate documentation must be available to validate the contributions of the food items to the meal pattern requirements.

The minimum meat/meat alternate serving size was not offered at lunch on Wednesday. A minimum of two ounce equivalents 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.

For lunch, the minimum grain/bread serving size was not offered on Friday. A minimum of two ounce equivalents 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 Monday, Tuesday, and Wednesday. A minimum of one cup must be offered on a daily basis.

Standardized Recipes

The chili recipe was not standardized. The recipe was missing the yield and portion sizes. Standardized recipes must contain the weight or measurement of each ingredient, steps of preparation, yield, and portion sizes.

Food Safety

The established HACCP plan was not available at Oblong High School. The HACCP plan must be available on site and training must be implemented to ensure site personnel are following the plan.

Fiscal Action

As a result of the problems cited, overclaims for October through December 2016 have been identified for the following programs:

- National School Lunch Program - \$672.72
 - Revised Claims for Reimbursement must not be submitted for those months in which errors were found. Fiscal adjustments for the National School Lunch Program overclaim will be made by the Illinois State Board of Education to future Claims for Reimbursement or repayment may be requested by letter. 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 and assessed.
- School Breakfast Program - \$151.30
 - Federal regulations allow this office to waive overclaims less than \$600.00; therefore, the School Breakfast Program overclaim will not be assessed. However, if you participate in the (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.

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.