



February 05, 2024

Agreement No. 28-006-1150-02

Mr. JD Orwig
Princeton ESD 115
506 E Dover Rd
Princeton, IL 61356-9552

Dear Mr. JD Orwig :

Enclosed is the report of your School Nutrition Programs Meal Compliance and Accountability Review, conducted on January 29, 30, 2024. 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 WINS within 30 days from the receipt of this letter. The response to each citation must detail specific actions taken to correct the problems cited.

As a result of the problems cited, an overclaim for December 2023 through January 2024 has been identified for the following:

School Breakfast Program - \$29.73

Federal regulations allow this office to waive overclaims less than \$600.00; therefore, the overclaim 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.

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 Harley Hepner at hhepner@isbe.net. For all other questions, please contact our office at 800/545-7892.

Sincerely,

Mark R. Haller, SNS
Director
Nutrition Programs

Enclosure

CC: File

**School Nutrition Programs
Meal Compliance and Accountability Review**

This report summarizes the results of the meal compliance and accountability review for the School Nutrition Programs sponsored by the Princeton ESD 115, RCDT number 28-006-1150-02, conducted on January 29, 30, 2024, by Harley Hepner, Principal Consultant.

The results of the review were discussed at an exit conference on January 30, 2024, with Lisa Clark, Food Service Director

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

The following site(s) received an on-site review.

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

Area(s) of Technical Assistance:

Certification and Benefit Issuance
Civil Rights
Local Wellness Policy
Meal Components and Quantities
Offer Versus Serve
On-Site Reviews
Outreach
Professional Standards
Verification

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

Site: Behavior Disorder Program Coop (73616)

Meal Components and Quantities

Citation:

On the day of the breakfast observation, it was determined that eleven meals did not contain all required components because some breakfasts only had one or two food items chosen and others were missing a 1/2 cup fruit. All meals must contain the required number of components. A reimbursable breakfast must contain a fruit, a grain/bread, and milk in the required serving sizes. In addition, when "Offer versus Serve" is implemented, children must take at least three of the four food items including a minimum of 1/2 cup fruit or vegetable.

Citation:

On the day of the breakfast observation, the portion size of the fruit juice did not meet meal pattern requirements for the fruit component. The minimum serving size of fruit at breakfast must be one cup daily for grades K-12.

Citation:

The lunch menus for the selected week of review, December 4-8, 2023, were evaluated and it was determined that the minimum vegetable serving size was not offered on Tuesday for both the K-8 and 9-12 grade groups. A minimum of 3/4 cup vegetable must be offered on a daily basis for grades K-8, and a minimum of one cup vegetable daily for grades 9-12.

Citation:

A production record for breakfast was not available for the day of review. Production records must be completed on a daily basis. The record 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:

Breakfast production records for the selected week of review, December 4-8, 2023, were not available. Production records must be completed on a daily basis. Production records must be completed daily and must contain 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:

Lunch menus for the selected week of review, December 4-8, 2023, were evaluated and it was determined that the minimum weekly portion requirements were not met for the dark green and bean/peas (legumes) vegetable subgroups for the K-8 grade group, and the beans/peas (legumes) vegetable subgroup for the 9-12 grade group. The minimum weekly portion requirement must be met for each vegetable subgroup.

Citation:

Breakfast menus for the selected week of review, December 4-8, 2023, were evaluated and it was determined that the weekly grain/bread ounce equivalent requirement was not met. Menus must contain a minimum of nine grain/bread ounce equivalent servings per week for grades K-12.

Offer versus Serve

Citation:

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

Sponsor: Princeton ESD 115

Certification and Benefit Issuance

Citation:

Benefits were issued in error. The following problems were identified:

- 1) Three students were approved as reduced price; however, were receiving free benefits. Benefits must be issued in the category in which each student was approved.
- 2) Five students were receiving free 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:

The applications selected for verification were not picked from error-prone applications. When selecting a standard sample size of applications to verify, the sample must be drawn from error-prone applications. Error-prone applications are those applications with an income within \$100/month or \$1200/year of the eligibility limit for free and reduced-price benefits.

Citation:

Written notification was not provided to the households selected for verification. Households whose applications have been selected for verification must be sent a letter informing them of their selection for verification. The letter must include the types of eligibility documentation to be submitted and the due date. In addition, the letter must contain the privacy statement and the name and toll free number of a school official who may be contacted for assistance during the verification process. The verification notification letter sent to selected households must contain the required information.

Citation:

Applications selected for verification did not receive a confirmation review. Applications selected for verification must undergo a confirmation review. This must be done by an individual other than the determining official. Documentation of the confirmation review must be recorded.

Citation:

Written notification of the results of the verification process was not provided to households. Each household must receive a written notification informing them of their benefit status after verification.

Civil Rights

Citation:

Civil rights training was not conducted for administrative and frontline staff. 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.

On-site Monitoring

Citation:

Monitoring procedures for SY 2022-2023 for breakfast and lunch were evaluated and the following problems were identified:

- 1) Annual on-site reviews were not conducted for breakfast. The purpose of these reviews is to certify that site claims are based on a daily meal count, by category, taken at the point of service. A plan must be developed to ensure that these reviews are conducted by February 1 of each year. Annually, breakfast reviews must be conducted for 50% of the schools participating in the School Breakfast Program. Each site must be reviewed once every two years.
- 2) An annual on-site lunch review of the Behavioral Disorder Program Coop (B.E.S.T.) was not conducted. The purpose of these reviews is to certify that site claims are based on a daily meal count, by category, taken at the point of service. A plan must be developed to ensure that these reviews are conducted by February 1 of each year.

Outreach

Citation:

Households have not been notified of the availability of the School Breakfast Program. At or near the beginning the school year, LEA's must inform households of the availability of the School Breakfast Program. The notification should include such factors as the location, time, and price.

Citation:

Households have not been notified of the availability of the Summer Food Service Program. Outreach to households regarding the Summer Food Service Program must occur before the end of the school year.

Professional Standards

Citation:

Professional Standards training procedures for SY 2022-2023 were evaluated and the following problems were identified.

- 1) Training hours were not met for all full-time school staff who work with the School Nutrition Programs. The minimum hours of training is 6 hours documented annually for staff who work full-time with School Nutrition Programs 20 or more hours per week.
- 2) Training hours were not met for all part-time school staff who work with the School Nutrition Programs. Part-time staff who work less than 20 hours per week with School Nutrition Programs are required to have a minimum of 4 hours training documented annually.
- 3) Training hours were not met for managers. Site managers must obtain and document 10 hours of training annually. The response must identify how annual training requirements will be monitored, documented, and fulfilled.

Local Wellness Policy

Citation:

Documentation of an assessment of the local wellness policy is not on file. Assessments must be conducted once every three years for each school. A report must be on file that describes the extent to which your schools comply with the local wellness policy, the extent to which your local policy aligns with model policies and a description of progress towards attaining policy goals. The completed assessment must be publicly posted.



Illinois State Board of Education

Dr. Tony Sanders, State Superintendent of Education
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February 27, 2024

Agreement No.
28-006-1150-02

Mr. JD Orwig
Princeton ESD 115
506 E Dover Rd
Princeton, IL 61356-9552

Dear Mr. JD Orwig :

Enclosed is the report of your School Nutrition Programs Resource Management Review, conducted on February 21, 2024.

The program was found to be in compliance on the day of the review. The assistance and the cooperation of the sponsor personnel during the review was appreciated.

If you have questions regarding your review, please contact Robert Turek at rturek@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
Director
Nutrition Programs

cc: File

School Nutrition Programs Resource Management Review

This report summarizes the results of the resource management review for the School Nutrition Programs sponsored by the Princeton ESD 115, RCDD number 28-006-1150-02, conducted on February 21, 2024, by Robert Turek, Principal Consultant.

As a result of the review, the sponsor was found to be in compliance with the program requirements evaluated; therefore, no response is required.