



Illinois State Board of Education

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James T. Meeks
Chairman

Tony Smith, Ph.D.
State Superintendent of Education

January 11, 2017

Agreement No.
47-098-0030-26

Chad Colmone
Prophetstown-Lyndon-Tampico
Community Unit School District 3
79 Grove Street
Prophetstown, Illinois 61277-9376

Dear Mr. Colmone:

Enclosed is the report of the School Nutrition Programs administrative review conducted on November 9 and 10, 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 10, 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 Paul Hansen at phansen@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 Prophetstown-Lyndon-Tampico Community Unit School District 3, Agreement #47-098-0030-26, conducted on November 9 and 10, 2016, by Paul Hansen, Principal Consultant.

The results of the review were discussed at an exit conference on November 10, 2016, with Geraldine Lundquist, Food Service Director.

PLT Middle School was 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
- Verification
- Meal Components and Quantities
- Offer Versus Serve
- On-Site Monitoring
- Smart Snacks
- Professional Standards
- Food Safety
- Buy American Clause

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

Certification and benefit issuance procedures were evaluated and the following problems were identified:

- A household eligibility application for two children was approved free and should have been reduced price. A procedure must be established to ensure household eligibility applications are approved in the appropriate category according to the current income guidelines.
- Six household eligibility applications were missing information. The applications were missing the following:
 - One application was missing the names of all household members.
 - Two applications for four children were missing the income by source and/or frequency.
 - Three applications for five children were missing 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.

- When benefits have been extended to other children in an eligible household, adequate documentation has not been maintained. The extension of benefits to additional household members must be documented and available for review.

Verification

Verification processes and procedures were evaluated and the following problems were identified:

- 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 on the application.
- A tax form for an individual who was not self-employed was accepted. Acceptable documentation for individuals who are not self-employed must include a paycheck stub or letter from the employer that shows the gross income and how often it is received.
- The frequency of the income could not be determined based on the information submitted for one verified application. In these instances, the household{s} must be contacted to determine how frequently the income is received to accurately evaluate verification documentation.
- Direct verification was not conducted. Direct verification must be the first step in verifying all household applications that have been selected for verification.

On-site Monitoring

Annual on-site reviews for lunch were not conducted by February 1 for all four district sites. These reviews must be conducted by February 1 of each year to ensure that site claims are based on a daily meal count, by category, taken at the point of service.

Food Safety

The food safety plan on file was the template found in the Nutrition Programs website. A food safety plan specific to the district and each site, including standard operating procedures, must be developed and implemented.

PLT Middle School (14882)

As a result of the review at PLT Middle School on November 9 and 10, 2016, the following problems were identified. All other areas were found to be in compliance.

Meal Components and Quantities –Selected Week of Review (October 3-7, 2016)

The lunch menu and production documentation for the selected week of review were evaluated and the following problems were identified:

- The minimum weekly requirements were not met for the beans/peas (legumes) vegetable subgroup. The minimum weekly requirement must be met for each vegetable subgroup.
- The weekly grain/bread ounce equivalent requirement was not met for the Chef Salad entrée choice. Menus must contain a minimum of eight grain/bread ounce equivalent servings per week for grades 6-8.
- Some grain/bread ounce equivalent servings offered (potato chips) were not whole-grain rich. All of the grain/bread ounce equivalent servings offered each week must be whole-grain rich.

Production Records/Standardized Recipes

Production records for breakfast and lunch did not contain the required information for the day of review and selected week of review. The following problems were identified:

- The grade groups were not recorded separately by middle school and high school.
- Some portion sizes were not recorded accurately.

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.

Recipes used for the day of review were not standardized. The recipes were missing the following:

- The Ham Sandwich recipe was missing the weight of each ingredient, the yield, and a portion size.
- The Chef Salad recipe was missing the yield and a portion size.

Standardized recipes must contain the weight or measurement of each ingredient, steps of preparation, yield, and portion sizes.

Offer Versus Serve

Cafeteria staff was not trained on adequately on Offer vs. Serve for breakfast. Cafeteria staff must be re-trained on Offer vs. Serve requirements for breakfast.

Fiscal Action

As a result of the problems cited, an overclaim for October and November 2016 has been identified for the following programs:

- National School Lunch Program - \$727.60.
 - 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.
- School Breakfast Program - \$194.55.
 - Federal regulations allow this office to waive overclaims less than \$600.00; therefore, the School Breakfast Program overclaim will not be assessed.

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.