



February 13, 2024

Agreement No. 47-098-0050-26

Dr. Tad Everett
Sterling CUSD 5
410 E Le Fevre Rd
Sterling, IL 61081-1391

Dear Dr. Tad Everett :

Enclosed is the report of your School Nutrition Programs Meal Compliance and Accountability Review, conducted on January 30, 31, 2024 and February 1, 2, 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:

National School Lunch Program - \$204.45

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.

School Breakfast Program - \$13.65

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 Paul Hansen at phansen@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 Sterling CUSD 5, RCDT number 47-098-0050-26, conducted on January 30, 31, 2024 and February 1, 2, 2024, by Paul Hansen, Principal Consultant.

The results of the review were discussed at an exit conference on February 2, 2024, with
Matt Birdsley, Director of Finance
Amber Williams, Food Service Director (Aramark)

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.

14889 Franklin Elem School

14890 Jefferson Elem School

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

Area(s) of Technical Assistance:

Local Wellness Policy

Meal Components and Quantities

Meal Counting and Claiming

Offer Versus Serve

On-Site Reviews

Procurement

Professional Standards

Smart Snacks

Water

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

Site: Franklin Elem School (14889)

Meal Components and Quantities

Citation:

On the day of the breakfast and lunch observation, the following problems were identified:

1) Nine lunches observed did not contain all required components (missing a 1/2 cup fruit or vegetable). All meals must contain the required number of components. A reimbursable lunch must contain a meat/meat alternate, a fruit, a vegetable, a grain/bread, and milk in the required serving sizes. In addition, when participating in "Offer versus Serve", children must take at least three of the five components including a minimum of 1/2 cup fruit or vegetable.

2) Five breakfast observed did not contain all required components (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:

The standardized recipe for the cheesy chicken salad offered on the day of the lunch observation was not followed because the students were not served 1 cup of lettuce which the recipe called for. Standardized recipes must be followed to ensure a consistent product is produced and to ensure the integrity of the recipe.

Citation:

Drinking water was not made available at both breakfast and lunch to the students eating in the gym area, and those students eating in their classrooms. Throughout the meal service, water must be made available to students.

Citation:

Lunch menus for the selected week of review, December 4-8, 2023, were evaluated and it was determined that on Tuesday, December 5, a grain/bread was not offered with the Yogurt, Cheese stick, and apple slices meal. Lunch menus must offer the following components on a daily basis: meat/meat alternate; grain/bread; vegetable; fruit; and milk.

Offer versus Serve**Citation:**

"Offer versus Serve" was not implemented correctly at breakfast and lunch. The following problems were identified:

1) At breakfast, the students were only allowed to select one of the two 1/2 cup portions of fruit. Other than the requirement to select a fruit or vegetable, students must be allowed to decide which components they will select.

2) At lunch, the students were only allowed to select one of the two 1/2 cup vegetables offered. Other than the requirement to select a fruit or vegetable, students must be allowed to decide which components they will select. In addition, the students must be allowed to select all components which meet the meal pattern requirements if they elect to.

Citation:

It did not appear cafeteria staff were adequately trained on Offer vs. Serve at breakfast and lunch. Cafeteria staff must be sufficiently trained on Offer vs. Serve requirements for both breakfast and lunch.

Citation:

Signage to explain what constitutes a reimbursable meal was not consistently viewable in each of the classrooms or was not the right signage for the meal being served. When implementing Offer vs. Serve, adequate viewable signage must be posted to explain what constitutes a reimbursable meal.

Counting and Recording Daily Meal Totals**Citation:**

On the day of the breakfast and lunch observation, the site did not utilize an acceptable meal counting system for those students eating in the cafeteria, and those students eating in their classrooms. The following problems were identified:

1) The teachers serving the students did not consistently ensure a reimbursable meal was selected.

2) The teachers serving the students did not consistently complete the daily meal count form at the point of service.

All meal counts must be taken on a daily basis at the point of service which is where a determination can accurately be made that a free, reduced-price, or paid meal has been served to an eligible child. Fiscal action was not warranted because the final count for the day of review for breakfast and lunches served matched the state agency reviewer's count.

Site: Jefferson Elem School (14890)

Counting and Recording Daily Meal Totals**Citation:**

Meal counts by category for lunch were not correctly used in the December 2023 Claim for Reimbursement because mathematical errors occurred (tick off errors) totaling the daily meal count forms. Meal counts by category must be accurately reported each month.

Citation:

On the day of the lunch observation, the site did not utilize an acceptable meal counting system for those students eating in the cafeteria, and those students eating in their classrooms. The following problems were identified:

- 1) The teachers serving the students did not consistently ensure a reimbursable meal was selected.
- 2) The teachers serving the students did not consistently complete the daily meal count form at the point of service.

All meal counts must be taken on a daily basis at the point of service which is where a determination can accurately be made that a free, reduced-price, or paid meal has been served to an eligible child. Fiscal action was not warranted because the final count for the day of review for breakfast and lunches served matched the state agency reviewer's count.

Offer versus Serve

Citation:

It did not appear cafeteria staff were adequately trained on Offer vs. Serve for lunch. Cafeteria staff must be sufficiently trained on Offer vs. Serve requirements for both breakfast and lunch.

Meal Components and Quantities

Citation:

The standardized recipe for the diced chicken salad offered on the day of the lunch observation was not followed because the students were not served 1 cup of lettuce which the recipe called for. Standardized recipes must be followed to ensure a consistent product is produced and to ensure the integrity of the recipe.

Citation:

Drinking water was not made available at both breakfast and lunch to the students eating in the gym area, and those students eating in their classrooms. Throughout the meal service, water must be made available to students.

Citation:

Lunch menus for the selected week of review, December 4-8, 2023, were evaluated and it was determined that on Tuesday, December 5, a grain/bread was not offered with the Yogurt, Cheese stick, and apple slices meal. Lunch menus must offer the following components on a daily basis: meat/meat alternate; grain/bread; vegetable; fruit; and milk.

Sponsor: Sterling CUSD 5

On-site Monitoring

Citation:

Breakfast reviews were not conducted for SY 2023-2024.

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.

Professional Standards

Citation:

The SFA did not conduct training for SY 2022-2023, for the individual who is assuming 12 hours of school meals training annually (Food Service Director). Each SFA must have an individual designated to assume 12 hours of training annually for School Nutrition Programs. The response must identify how annual training requirements will be monitored and fulfilled.

Smart Snacks

Citation:

The nutrition information of foods and beverages sold in vending machines, outside of the reimbursable meal are not checked to ensure compliance with Smart Snack guidelines. All items sold outside of the reimbursable meal must be checked for compliance to ensure Smart Snack guidelines are followed.

Local Wellness Policy

Citation:

The local wellness policy is not available to the public. The local wellness policy must be highlighted in a public platform such as school or community website, social media, newsletter, school or community bulletin boards and/or newspaper.

Citation:

Transparency and inclusion are not promoted with the local wellness policy process. Local education agencies must allow stakeholders such as parents, students, food service staff, teachers, school nurses, school board members, school administrators and general members of the public to participate in the local wellness policy process. This process includes the development, implementation, and periodic review and update of the local wellness policy.

Citation:

The triennial assessment report was not made available to the public. Public notification of the triennial assessment report is required and may be achieved by posting on the school website, including in presentations made to parents and staff, providing copies at school events, or placing information on social media or in newsletters/newspapers.

Procurement

Citation:

A menu planning advisory board does not exist. When a school district contracts with a food service management company, the school district must establish a menu planning advisory board and maintain direct control over the group. The board must consist of parents, teachers, and students.



Illinois State Board of Education

Dr. Tony Sanders, State Superintendent of Education
Dr. Steven Isoye, Chair of the Board

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February 15, 2024

Agreement No.
47-098-0050-26

Dr. Tad Everett
Sterling CUSD 5
410 E Le Fevre Rd
Sterling, IL 61081-1391

Dear Dr. Tad Everett :

Enclosed is the report of your School Nutrition Programs Resource Management Review, conducted on February 14, 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 Michael Gogerty at mgogerty@isbe.net. For all other 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
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 Sterling CUSD 5, RCDT number 47-098-0050-26, conducted on February 14, 2024, by Michael Gogerty, 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.