



# Illinois State Board of Education

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**James T. Meeks**  
Chairman

**Tony Smith, Ph.D.**  
State Superintendent of Education

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July 26, 2016

Agreement No.  
34-049-0600-26

Donaldo Batiste  
Waukegan Community Unit  
School District 60  
1201 North Sheridan Road  
Waukegan, Illinois 60085-2081

Dear Dr. Donaldo:

This letter is in regards to the corrective action plan submitted in response to the findings of the School Nutrition Programs administrative review conducted on December 7 through 11 and 14, 2015 and February 26, 2016. The corrective action plan has been reviewed and found to be complete with the exception of the following:

### **SFA's Contracting with FSMC's**

The commodity credit received for the previous school year from the food service management company was compared to the value of the USDA foods made available to the food service management company; however; the usage of all federally donated foods were not credited to the school food authority. All federally donated foods made available to the food service management company must accrue only to the benefit of the school food authority nonprofit food service. When contracting with a food service management company, the commodity usage must be reconciled annually to ensure all federally donated foods are credited to the school food authority nonprofit food service account. **Your response to this indicated that you would calculate the commodity usage this year. Please explain how you intend to do it on a permanent basis.**

### **Local School Wellness Policy**

The local wellness policy was not evaluated on a periodic basis. A plan must be established to evaluate the policy periodically to ensure each school is meeting the local wellness policy.

**Your response did not indicate how you will periodically evaluate your local school well ness policy. Please describe that process.**

## Food Safety

Standard operating procedures (SOP) have not been documented. The following problems were identified:

- A SOP was not available for tracking and monitoring the pick-up and storage of food from the elementary schools.
- The elementary schools use a subcontracted vendor to provide their meals. This vendor has internal HACCP SOPs; however, it is unclear whether these SOPs were followed by the food service management company since there was no tracking log of the time, temperature, and location of the pick-ups.

The food service management company must develop and implement HACCP SOPs which outline and document the pick-up and usage of these meals, including usage time, temperature and location. These SOPs must take into consideration the internal HACCP SOPs of the subcontracted vendor. In addition an SOP for Breakfast in the Classroom must be developed.

**Your response did not specifically address the two bulleted areas above.**

## Andrew Cooke Magnet Elementary School

### Meal Components and Quantities – Day of On-Site Observation

One lunch observed did not contain all required components. 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, students unable to consume cow's milk must be served a milk substitution nutritionally equivalent to cow's milk.

**You did not respond to this portion of the citation.**

At lunch, the portion sizes did not appear to be adequate. The portion size of the meat/meat alternate and the grain/bread did not appear to meet meal pattern requirements. The minimum serving size of the meat/meat alternate and the grain/bread must be a one ounce equivalent for grades K-8. In addition, appropriate documentation must be available to validate the contributions of the food items to the meal pattern requirements.

**Your response must be more specific to the grade groups and the meal component listed in the citation.**

**Meal Components and Quantities – Selected Week of Review**  
**(November 16-20, 2015)**

*Nutrition documentation was not available for some of the special lunch menu items reviewed and because of this the contributions of the food items to the meal pattern requirements could not be validated for the following items:*

- *Amy's Mac and Cheese*
- *Amy's Burritos*
- *Ian's Popcorn Corn Dogs*

Lunch menus must offer the following components on a daily basis: meat/meat alternate; grain/bread; vegetable; fruit; and milk. In addition, appropriate documentation such as Child Nutrition (CN) labels and/or Product Formulation Statements (PFS) must be available to validate the contributions of the food items to the meal pattern requirements.

**Your response was not specific enough to the areas italicized above.**

*The planned menu was not followed for the selected week of review for lunch and the substitutions made were not acceptable. The minimum vegetable serving size was not offered on November 16, 2015. A minimum of  $\frac{3}{4}$  cup vegetable must be offered on a daily basis for grades K-8. In addition, when changes occur to the planned menu, the substitutions must be equivalent substitutions to ensure compliance with the daily and weekly meal pattern requirements.*

**Your response was not specific enough to the areas italicized above.**

**Production Records**

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

- The type of milk offered was not always listed.
- Portion sizes were not always recorded or 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

**Your response was not specific enough to the two areas bulleted above.**

## **Robert Abbott Middle School**

### **Meal Counting and Claiming**

The breakfast program and procedures were reviewed and the following problems were identified:

- The site did not utilize an acceptable meal counting system on the day of the on-site observation. *Meal counts were inaccurate because teachers were not counting at the point of service and did not complete the Daily Meal Count Form correctly or sometimes at all.* 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. Additionally, training is needed for all breakfast staff on meal counting procedures.
- *On the day of the on-site observation breakfast counts by category were not correctly combined and recorded, because mathematical errors occurred.* Daily meal counts must be accurately combined by category and recorded each day.
- *The breakfast counts by category were not correctly used in the November 2015 Claim for Reimbursement because daily meal count forms did not equal the claim for reimbursement submitted.* Meal counts by category must be accurately reported on each claim for reimbursement. Additionally, training is needed for all breakfast staff on meal counting procedures.

**Your response was not specific to the above 3 bulleted citations. Please place special emphasis on the areas italicized.**

### **Meal Components and Quantities – Day of On-Site Observation**

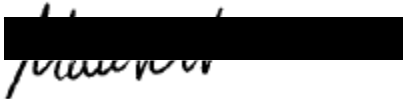
*At lunch, portion sizes did not appear to be adequate. The portion size of the tortilla chips offered with the Nacho salad did not appear to meet meal pattern requirements. The minimum serving size of the grain/bread must be one ounce equivalent.* In addition, appropriate documentation must be available to validate the contributions of the food items to the meal pattern requirements.

**Your response was not specific to the area italicized above.**

Your corrective action response to the above issue(s) must be received in our office by **August 10, 2016**. This response must detail specific actions taken to correct the problem(s) identified above and be signed by the appropriate sponsor representative.

If you have questions regarding your corrective action plan, please contact Kathryn Dundon at [kdundon@isbe.net](mailto:kdundon@isbe.net). For all other program questions, please contact the office at 800/545-7892.

Sincerely,

A black rectangular redaction box covers the signature of Mark R. Haller. Below the redaction, the handwritten signature "Mark R. Haller" is visible in cursive.

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

cc: File