

# Food Supply Management Systems

Internal Audit Report

November 14, 2018



Linda J. Lindsey, CPA, CGAP, Senior Director  
Alpa H. Vyas, CIA, CRMA, Internal Auditor  
Jarai Ings, Internal Auditor

# Table of Contents

	Page Number
EXECUTIVE SUMMARY	1
BACKGROUND	2
OBJECTIVE, SCOPE, AND METHODOLOGY	5
COMMENDATIONS	8
FINDINGS AND RECOMMENDATIONS	8
GENERAL FINDINGS	17
APPENDIX A – Observation Findings By School	19

## EXECUTIVE SUMMARY

### Why We Did This Audit

The risk assessment process highlighted the issue of food supply and contamination. This audit was included in the 2017-2018 Annual Audit Plan.

The objective was to determine the effectiveness of policies and procedures used by Food and Nutrition Services (FNS) to reduce the risk of an inadequate supply of safe food products for our school food programs.

### What We Found

Our overall conclusion is that FNS has established food safety and sanitation policies and procedures; however, not all of these policies and procedures have been fully implemented.

FNS management should ensure that sufficient controls are in place to ensure that supervising and monitoring processes for food safety and sanitation are effective. Key controls include effective communication with the kitchen staff and effective training for school kitchen Managers and Operation Managers.

### What We Recommended

- FNS food safety and sanitation policies and procedures should be implemented fully through effective communication and training with kitchen staff.
- Supervising and monitoring training should be provided to the school kitchen Managers and Operation Managers for food safety and sanitation compliance.
- Minimum training requirements for food safety and sanitation for the Operation Managers and the school kitchen Managers should be established in writing.
- The monitoring process for food safety and sanitation for the Operation Managers should be in written format.

- The FNS Training and Quality Assurance Manager should play a more active role in training by requiring kitchen Managers to use the FNS prepared training materials. The FNS Training and Quality Assurance Manager should also require kitchen Managers to send documentation to support that they completed the training using the provided materials.
- FNS Management should consider the diverse language needs of FNS kitchen staff in the development of all FNS Standard Operating Procedures (SOPs) and training materials.
- FNS staff should follow food safety and sanitation procedures for Food Carts and Cooperative Carts.
- FNS Management should add food safety and sanitation procedures for Food Carts, Cooperative Carts, and Truck of the Month to the SOPs.
- Cooperative Carts Program (CCP) contracts with fundraiser sponsors should be established and documented properly.
- FNS Management should establish fire drill procedures in the event an alarm occurs during serving, so that FNS staff may adequately prepare if an actual fire or drill occurs in the school.
- The FNS Intranet site should contain the most current Health Department Inspection Reports for each school.
- FNS new Back Door Policy should be followed by FNS staff, and Health Inspectors should sign in at the front office of the school and in the kitchen.
- FNS management should clarify expectations in the new SOPs regarding Receiving Items.
- FNS management should communicate updated policies and procedures to the FNS staff with specific effective dates.

This report has been discussed with management and they have prepared their response which follows.

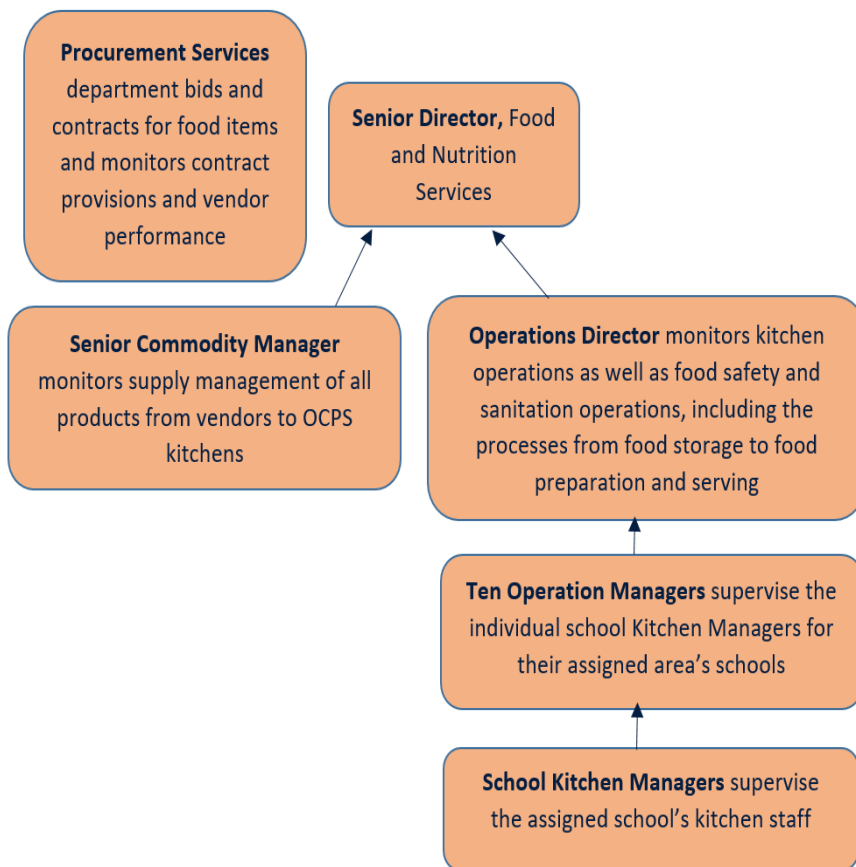
**BACKGROUND:**

**Management**

The Orange County Public Schools (OCPS) Food and Nutrition Services (FNS) division headquarters is located at Durrance Center. The Senior Director of FNS oversees the division, supported by staff members in the following areas:

- School Based Operations
- Finance and Procurement
- Technology, Equipment, Facilities and Eligibility
- Human Resources
- Marketing and Special Projects
- Nutrition and Menu Management

*Figure 1 – Food Supply Management*



**Regulations**

FNS executes its operations based on:

- Florida Administrative Code 64E-11- Food Hygiene Policy;
- FNS policies and procedures addressing receiving deliveries, pest control, glove and utensil use, food serving temperature, thawing and holding foods, preparing cold/hot foods, product recall, and leftover food;
- United States Department of Agriculture (USDA) policies; and,
- OCPS School Board policies EFH - Food Safety and Sanitation and EH – General Food and Nutrition Service Requirements, among others.

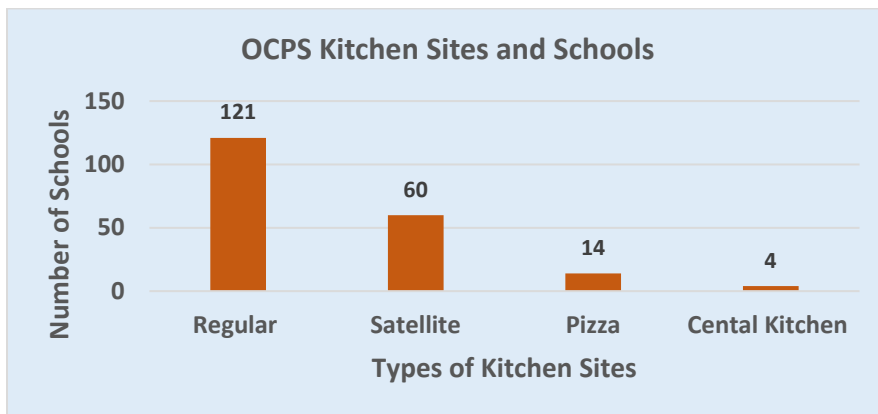
**Goals and Mission**

FNS' goal is to ensure that school meals are 100% accessible to every child in Orange County. Their mission is to provide access to quality, nutritious, meals in a customer friendly environment; to enhance and support all students' and educators' ability to achieve academic excellence while forming healthy, lifelong, eating habits.

**Statistics**

FNS prepares about 220,000 meals per day at 196 schools excluding Alternative and Charter schools. There are four types of kitchen sites as shown below with the number of schools for each type.

**Chart 1**



*The FNS department follows:*

- Florida Administrative Code 64E-11
- Departmental policies and procedures
- USDA policies
- OCPS School Board Policies

*FNS prepares about 220,000 meals per day at 196 kitchen sites.*

*There are four types of kitchen sites:*

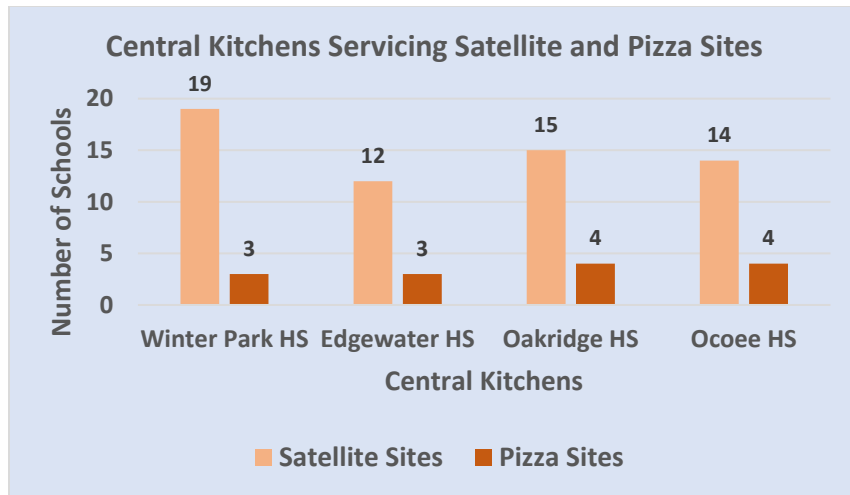
- Regular
- Satellite
- Pizza
- Central Kitchen

- **Regular sites** order directly from external vendors, receive all products from external vendors, and prepare all food on premises.
- **Satellite sites** order products from external vendors and Central kitchens. These sites receive deliveries from external vendors as well as from Central kitchens.
- **Pizza sites** order from Central Kitchens. Homemade pizza is prepared at the Central Kitchen sites and transported to pizza sites.
- **Central Kitchen sites** order all products and supplies directly from OCPS external vendors, receive all products from external vendors, and prepare all food on premises. Central kitchen sites also prepare and deliver orders to Satellite sites. Products prepared at Central Kitchens include salads, portioned fruit, boxed and bagged meals.

*There are four Central Kitchens which receive all products from vendors, and where food is prepared and served for the local students. Additionally, food is prepared and delivered to the assigned Satellite and Pizza sites every day.*

Each school day, Central Kitchen staffs prepare and serve breakfast and lunch for thousands of students at their local school, as well as at assigned Satellite and Pizza sites as shown below.

**Chart 2**



FNS prepares and serves food to students in the following ways:

- Traditional breakfast, lunch and supper
- Snack and beverage bars
- Food carts
- Cooperative food carts
- Monday Drum Day
- Food Truck of the Month

### **Food Safety and Sanitation**

The Florida Department of Health Food Safety and Sanitation inspects school kitchen facilities three to four times a year. Following inspections, the Health Department issues Food Service Inspection Reports with violation markings and comments. If a Health Inspector notes any violations, the Operation Manager and school kitchen Manager resolve issues of non-compliance with corrective actions and staff training. The FNS Quality Assurance Manager monitors Health Department, New Employee, and National Food Safety Month training. Individual school kitchen Managers independently manage all other training.

*Florida Department of Health Food Safety and Sanitation inspects school kitchen facilities three to four times a year.*

### **OBJECTIVE, SCOPE AND METHODOLOGY:**

#### **Objective**

The objective of this audit was to determine the effectiveness of policies and procedures used by FNS to reduce the risk of an inadequate supply of safe food products for our school food programs.

*Our objective focused on safe food supply for our schools.*

#### **Scope**

We conducted the audit at the beginning of the 2018-2019 school year. The scope of our audit included:

- understanding and evaluating FNS policies and procedures and vendor contracts used to manage the food supply from vendors to OCPS kitchens and from kitchens to food serving lines;

- observing FNS procedures at selected locations to determine whether procedures are implemented as intended and are effective;
- evaluating FNS control and compliance monitoring procedures for food safety and sanitation activities; and,
- evaluating FNS training activities.

### **Methodology**

Our audit methodology included:

- reviewing the FNS Intranet site, FNS 2016-2017 policies and procedures, FNS updated policies, FNS Training Manual rev 5, Requirements for All Employees Acknowledgement, Florida Administrative Code 64E-11, OCPS Board policy EFH for Food Safety and Sanitation, and FNS procurement contracts and bids;
- reviewing FNS Requests For Proposals (RFPs), bids, and vendor contracts to verify whether requirements of food quality standards and certifications are included;
- reviewing food supply management activities regarding returning contaminated and poor quality items to vendors, monitoring vendors' performance related to the supply of quality food items, recall procedures, recall protocol, and recall notification to parents, and complaint procedures and corrective actions;
- preparing observation checklists based on food safety and sanitation policies and procedures;
- conducting onsite kitchen audits at seven kitchen sites (two Central Kitchens, one Regular/Pizza Kitchen, one Satellite Kitchen, and three Regular Kitchens), collecting and reviewing documents related to FNS procedures on kitchen door access, training/certification documents (to include training sign in logs), ice machine cleaning activities, school kitchen Managers' checklists, and pest control schedule;

*We visited school food service operations from September 17, 2018 to September 27, 2018.*

*We prepared observation checklists based on FNS policies and procedures.*

*We conducted onsite kitchen audits at the selected kitchen sites.*

*We confirmed selected FNS sites' 2018 Health Inspection Reports with the Florida Health Department.*



## Food Supply Management Systems Internal Audit Report

- reviewing selected school's Health Inspection Reports and confirming Health Inspection Reports with the Florida Health Department;
- observing kitchen back door activities, kitchen surroundings, and other kitchen activities such as receiving food from vendors, storing food, preparing food, holding food, serving food, temperature taking, food cart activities, handling leftover food, cleaning, storing cleaning products, and setting the temperatures of refrigerators, freezers, and coolers;
- interviewing FNS staff;
- reviewing selected seven schools' Temp Takers and/or manual thermometer's record logs for the date of the onsite audit;
- judgmentally selecting an additional five schools based on Health Department findings related to improper temperatures to review Temp Takers<sup>1</sup> logs for a randomly selected date; and,
- reviewing management's monitoring documents such as surprise visit schedules, Brief Onsite Review checklists, and Five Orange Review checklists, developed by the Operations Department and completed by the Operation Managers.

Our audit was conducted in accordance with the *International Standards for the Professional Practice of Internal Auditing* of the Institute of Internal Auditors and included such procedures as deemed necessary to provide reasonable assurance regarding the audit objective. Internal Auditing is an independent, objective assurance and consulting activity designed to add value and improve an organization's operations. It helps an organization accomplish its objectives by bringing a systematic, disciplined approach to evaluate and improve the effectiveness of risk management, control, and governance processes.

We are required to note any material deficiencies in accordance with Florida Statutes, School Board Policy and sound business practices. We

---

<sup>1</sup> A handheld digital thermometer used to record food temperatures. The system stores the name of the food item, date, and temperature, and provides easy access to archived data for review.

*We reviewed Temp Takers and/or manual thermometers' record logs.*

*We also reviewed an additional five school's kitchen Temp Taker Logs for a randomly selected date.*

*This audit was conducted in accordance with the International Standards for the Professional Practice of Internal Auditing.*

also offer suggestions to improve controls or operational efficiency and effectiveness.

**COMMENDATIONS:**

During the onsite observations, we noted the following in one or more selected FNS kitchens:

- Staff was enthusiastic and self-initiated, and displayed team work during food preparation and serving.
- Staff was kind and thought of students while preparing food.
- Staff guided new and/or temporary staff.
- Staff served more than 1,500 students in 20 minute time periods during first and second lunch.
- Staff used the Temp Taker device correctly and took corrective action when items showed an “out of range” temperature.
- Staff was polite with students during food service.
- Staff appeared to enjoy preparing and serving food.
- Staff used hazardous equipment carefully, even during busy hours.
- School kitchen Managers had standing meetings with the staff for a few minutes to remind them of basic FNS rules.
- School kitchen Managers and leads were involved in food preparation and serving.

**FINDINGS & RECOMMENDATIONS:**

*Implementation of food safety and sanitation policies and procedures*

**1) The supervising and monitoring activities are not fully effective since we noted that FNS kitchen staff did not demonstrate implementation of FNS food safety and sanitation policies and procedures. *High Risk***

**Best Practice:**

Having established policies and procedures provide best practices and clarity to staff when dealing with accountability activities that are important to the organization. Implementation of procedures by the

*FNS staff was enthusiastic and self-initiated, and had team work during food preparation and serving.*

*FNS staff served food to more than 1,500 students within the 20 minutes.*

*We observed several instances where FNS safety and sanitation policies and procedures were not fully implemented. For more information, see Appendix A.*

staff ensures compliance with laws and regulations and quality products or services. The Supervisor or monitor serves as the link between management and staff. Effective supervision or monitoring ensures staff consistently performs quality work.

**Audit Findings:**

FNS has SOPs for most kitchen practices, which detail steps for staff to follow. The FNS Service Temperatures procedures require employees to take temperatures of hot foods and cold foods as they are put on the serving line. We observed an instance in which an empty temperature log was placed on the serving counter prior to the beginning of the lunch period, with an employee's name affixed to the log by "post-it note". However, we later received a completed log with temperatures for the same time period which was observed. As a result, it appears that the employee did not actually take these temperatures at that time.

Additionally, before taking serving temperatures, we observed staff members portioning food for serving. They later took the temperatures of the items on the serving line and identified the items as "out of range", but the students had already been served some of these items and were eating them.

We noticed several other findings pertaining to safety and sanitation policies and procedures during our onsite observations. For example, staff did not change gloves between different tasks, did not take the temperature of foods, did not use cutting gloves, did not wash fresh fruits, did not use the scoop for the ice machine, and did not use labels for meal samples. See *Appendix A- Observation Findings By School* for more findings.

***Supervision and Monitoring***

**Kitchen Managers**

School kitchen Managers use the *Manager Self-Inspection Checklist* and *Daily Hazard Analysis Critical Control Point (HACCP)* log to guide and document their supervision of daily FNS' compliance activities. Checklists, logs, and the food safety and sanitation supervision guidance for the school kitchen Managers are included in SOPs.

*The supervising and monitoring of kitchen safety and sanitation activities are not effective.*

*A temperature log appeared to have been created after the fact.*

*Observation details by school are in Appendix A.*

Operation Managers

Operation Managers review the *Manager Self-Inspection Checklist* completed by the school kitchen Managers. Operation Managers monitor assigned schools' FNS activities, and assist, mentor, and train school kitchen Managers. Operation Managers inspect their assigned schools' FNS operations with a full on-site review at least twice per year. They conduct surprise visits to the schools for audit purposes and use the *Brief Onsite Review* and *Five Oranges Review* checklists to document their monitoring results. These checklists include other items, such as Point of Sale, goals, compliance, customer service, and productivity including food safety and sanitation. Operation Managers communicate findings with the school kitchen Managers and prepare a training plan, a corrective action plan or a to-do list plan based on findings from the surprise visit. Operation Managers' monitoring procedures for food safety and sanitation are not in a written format.

Job descriptions of the school kitchen Manager and Operation Manager include the requirement to be *ServSafe* certified, accredited by the National Restaurant Association. However, we noted that there is no established requirement for a minimum number of training hours for food safety and sanitation for the school kitchen Managers and Operation Managers.

Based on the our observation findings (*Appendix A-Observation Findings By School*), we conclude that supervision by the school kitchen Manager and monitoring by the Operation Manager for food safety and sanitation activities are not effective. Due to ineffective supervision, several findings pertaining to the food safety and sanitation were noted during onsite observations. Daily observation of staff activities and periodic communication of food safety and sanitation procedures with staff will assist in the daily practice of serving quality food.

**Recommendations:**

a) FNS food safety and sanitation policies and procedures should be implemented fully through effective communication and training with kitchen staff.

*There is no requirement for a minimum number of training hours for food safety and sanitation for the FNS Managers.*

*Supervision and monitoring by kitchen Managers and Operation Managers need improvement.*

*Managers should be trained in effective supervision and monitoring for food safety and sanitation compliance.*

- b) Supervision and monitoring training should be provided to the school kitchen Managers and Operation Managers for food safety and sanitation compliance.
- c) Minimum training requirements for food safety and sanitation for the Operation Managers and the school kitchen Managers should be established in writing.
- d) Operation Managers' monitoring process for food safety and sanitation should be in a written format.

### ***Staff Training***

#### **2) Training of FNS staff in FNS Departmental SOPs was not effective.**

***Moderate Risk***

#### **Best Practice:**

Effective training is the fastest way to get staff knowledgeable and skilled and develop abilities which are required for quality work and effective job performance. Staff should participate in training that effectively addresses all FNS Departmental SOPs. Written training material serves as a guide for users and trainers.

#### **Audit Findings:**

Based on discussion with the Senior Manager, Training and Quality Assurance, and a review of training documentation, we determined that FNS does not have a set frequency in which they train kitchen staff. School kitchen Managers conduct training on an as needed basis, as a result of Health Department citations, in support of National Food Service month, or to meet the new annual Health Department training requirement. Since our site visits occurred a short time after Health Department Inspections, most of the school kitchen Managers had recently conducted training.

The FNS intranet site contains videos and other training materials available to FNS kitchen staff and Managers to use at their discretion. However, the FNS Training and Quality Assurance Manager requires kitchen Managers to submit a completed training log only for training conducted as a result of Health Department citations, or in support of the newly required annual Health Department training. As a result,

*Monitoring procedures should be in writing.*

*There is no set schedule for FNS staff trainings.*

*Although training materials are available to kitchen Managers, their use is optional, not required.*

staff are not required to use these resources but have the option to do so, with little oversight from the FNS Training and Quality Assurance department.

In several of the OCPS kitchens, staff did not demonstrate a clear understanding of food safety and sanitation policies and procedures as defined by the Florida Department of Health, and further promulgated through FNS SOPs. Specific details regarding our observations are noted in *Appendix A-Observation Findings Table*. However, a few examples are explained below:

- FNS SOPs state that staff should take the temperature of all food items at cooking and before serving, and these temperatures should be within a specified range. The range for each food item is programmed into a device called a **Temp Taker**, which in most instances is the device FNS staff use to record item temperatures<sup>2</sup>. If temperatures are properly recorded, when staff take temperatures and the device indicates that the items are “out of range,” the Temp Taker also provides directions for corrective action.

In one instance, we observed staff repeatedly taking **temperatures** for the same food item in an attempt to obtain an “in-range” reading. Each time the staff member received an “out of range” reading, she discarded that temperature reading and continued trying to obtain an “in range” reading. The staff member did not know how to begin the required corrective action, and would have continued taking temperatures if an FNS Operation Manager had not come to show her the corrective action process. The audit team obtained documentation that staff members at this site had recently received training on temperatures and corrective actions after receiving Health Department citations regarding food temperatures. This training was not effective for this particular staff member.

---

<sup>2</sup> In other instances, staff did not have enough Temp Taker devices and had to use the Temp Takers for cooking food items, while they used basic digital thermometers to take serving temperatures.

*Staff did not demonstrate a clear understanding of food safety and sanitation policies and procedures.*

*Staff at one school did not follow the required corrective action when food temperatures measured “out of range.”*



- At six of the schools we visited, we noted exceptions regarding **proper glove use**. At one location, we observed a staff member use the same gloved hands to push a cart, touch a counter, touch a table, and prepare food. In another instance, we observed a staff member touch her clothes with gloved hands, and proceed to prepare food, until she was stopped by a Food Service Lead. We did not note any recent Health Department findings regarding glove use, as this is not a separate violation<sup>3</sup>, although handwashing and cleanliness are.

Additionally, the audit team observed training at a school and reviewed the associated **training logs**. The training we observed involved the School kitchen Manager repeating parts of the SOPs and asking questions of the staff. After the kitchen Manager conducted this training, she required the staff members to sign a training log stating that they received the training. Several of the staff members at this site and other sites did not speak English as a first language, and some spoke very little English. As a result, not all staff members were actively engaged in the training. Management informed us that FNS does not currently have SOPs that address language needs for kitchen staff whose first language is not English.

Sites that employed staff who spoke very little English relied on the use of other cafeteria staff to translate directions and other communications into the staff member's native language. FNS is a very busy and fast-paced operation, particularly at the food preparation and serving levels, so FNS staff members responsible for preparing and serving food need to be able to focus on their assigned duties with little interruption. As a result, kitchen Managers should not rely upon other staff members to provide translation services.

In addition to the training logs for the school site mentioned above, we collected training logs from the other sites we visited. The training logs we reviewed included brief descriptions of the training conducted, but only three schools also provided the training materials used to train

---

<sup>3</sup> The Florida Administrative Code 64E-11 does not specifically discuss glove use policies. Instead, FNS Management determines its own glove-use policies.

*We observed staff not following proper glove use practices.*

*SOPs and training materials are not in Spanish. However, we noticed that several of the kitchen staff at different sites did not speak English as their first language and needed translation from coworkers to understand instructions.*

staff as per the directions on the training log. Most of the materials were SOPs that the school kitchen Managers reviewed with their staff.

**Recommendations:**

- a) The FNS Training and Quality Assurance Manager should play a more active role in training by requiring kitchen Managers to use the FNS prepared training materials. The FNS Training and Quality Assurance Manager should also require kitchen Managers to send documentation to support that they completed the training using the provided materials.
- b) FNS Management should consider the diverse language needs of FNS kitchen staff in the development of all FNS SOPs and training materials.

***Food Carts and Cooperative Carts***

- 3) a) **FNS SOPs do not include requirements for food safety and sanitation for the Food Carts/Cooperative Carts/Truck of the Month.**
- b) **Staff did not follow the food safety and sanitation procedures for the Food Cart.**
- c) **The Cooperative Cart Program (CCP) contract with the fundraiser sponsor was not established or not documented.**

***Moderate Risk***

**Best Practice:**

FNS staff should apply food safety and sanitation procedures to all food items prepared by the OCPS FNS staff and served to the OCPS students whether through the school's kitchen, server counters, snack bars, food carts, cooperative carts, or truck of the month.

**Audit Findings:**

FNS allows school-based organizations the opportunity to fundraise through sales from Cooperative Carts. FNS Food Carts are operated during the meal period, and are managed and monitored by the FNS staff. Cooperative Carts are also operated during the meal period, but are monitored and served by the sponsor and students. Both types of carts are equipped with hot and cold holding storage to keep selected meals from the kitchen at the appropriate temperatures. A portion of the Cooperative Cart's proceeds goes to FNS to cover food cost. Per the FNS Intranet, students are trained in food safety and sanitation and are

*The Training and Quality Assurance Manager should take a more active approach to the training of kitchen Managers.*

*SOPs do not address Food Cart and Cooperative Cart procedures for food safety and sanitation.*



supposed to be audited by FNS to ensure standards are met for the Cooperative Carts.

FNS management informed us that prior to handing over Cooperative Carts to students, FNS staff verifies the temperature of the food in it. The food served from carts is packaged and limited quantities of food are put on the cart. After four hours of serving time, leftover food must be returned to FNS to be discarded. FNS staff does not monitor Cooperative Carts since the fundraiser sponsor is supposed to monitor them. The CCP contract with the fundraiser sponsor states that it is the sponsor's responsibility to follow the food safety and sanitation policies and procedures. The contract also includes the CCP Training Manual for the sponsor, and there is an acknowledgment with the contract that the sponsor received the CCP training and agreed that the Cooperative Sales program could be terminated if the sponsor fails to follow the regulations.

During our onsite observations, we noted that FNS staff did not take temperatures of Food Cart items during lunches. The CCP contract and other documents were not available for the carts we observed. We also asked about the sponsor's acknowledgement form, CCP training manual, and signed CCP contract for the Cooperative Cart that we held observed, but none was provided.

**Recommendations:**

- a) FNS staff should follow food safety and sanitation procedures for Food Carts and Cooperative Carts.
- b) FNS Management should add food safety and sanitation procedures for Food Carts, Cooperative Carts, and Truck of the Month to the SOPs.
- c) CCP contracts with fundraiser sponsors should be established and documented properly.

***Fire Drills***

- 4) FNS Management has not established procedures that address what action staff should take in the event of a fire drill. ***High Risk***

*Food safety and sanitation procedures for Food Carts were not followed.*

*The Cooperative Carts Program (CCP) contract with the fundraiser sponsor was not available.*

**Best Practice:**

Fire drills ensure the safety of the staff and students, and ensure that staff have the knowledge to escape a fire without injuring themselves or others. As a result, FNS Management should have a policy in place to ensure staff know what action to take if a fire drill occurs during a serving period.

**Audit Finding:**

FNS fire policies and procedures address a fire that occurs in the kitchen. However, FNS does not have policies and procedures to direct staff in the event a fire drill or actual fire occurs in another part of the school during food preparation or serving.

During one of our onsite observations, a fire alarm sounded during serving and FNS staff were not able to manage students who were in the process of getting lunch. Additionally, FNS staff members were unsure about whether to leave the food out or put the food away. Staff members mentioned that this was the first time a fire alarm sounded during serving time. FNS staff eventually left the cafeteria, and waited outside. School personnel informed the staff that this was a drill and staff returned to the kitchen to continue serving lunch.

**Recommendation:**

FNS Management should establish fire drill procedures in the event an alarm occurs during serving, so that FNS staff may adequately prepare if an actual fire or drill occurs in the school.

***Health Inspection Reports***

**5) The most current versions of Health Inspection Reports are not posted on the FNS website. *Low Risk***

**Best Practice:**

The Health Inspection Reports posted on the FNS Intranet should be the most recent ones for management access and review.

**Audit Finding:**

In preparation for our site visits, we visited the district's FNS Intranet site to find the most recent Health Department reports for each of the

*We observed that FNS staff was unsure what to do during the school's fire drill.*

*Health Inspection Reports posted on the FNS Intranet were not the most recent ones.*

schools we visited. However, the FNS Intranet site did not contain copies of the most recent reports. Some of the reports on the site dated back to 2016, indicating that reports for some schools had not been updated in two years.

**Recommendation:**

The FNS Intranet site should contain the most current Health Inspection Report for each school. FNS Management should assign staff members the responsibility for updating the Health Department Intranet site, and periodically monitor the site to ensure that the Health Department Report portion of the FNS site is updated with each school's most recent Health Department Report.

**GENERAL FINDINGS:**

- 6) FNS's **Back Door** policy indicates that, once the ID badge has been validated, the visitor should sign in on the visitor sign in sheet, indicating the visitor's name and the company's name, reason for visit and time and date of the visit. During our onsite observations we noted:
- o one vendor did not sign;
  - o one vendor signed in but only after he had started delivering the products;
  - o staff did not follow the steps in the Back Door Policy;
  - o the visitor sign-in sheet was not near the back door; and,
  - o the Health Inspector signed in at the school's front desk but not on the kitchen log.

The Back Door policy should be followed and Health Department Inspectors should sign in at the front office of the school and in the kitchen.

- 7) FNS Management should clarify expectations in the new SOPs regarding **receiving items**. We observed two schools receiving items from two separate delivery companies. At neither of the schools did employees check **each** box of items received to ensure that goods met quality requirements, nor did they take the temperatures of **all** received items. FNS's SOP, Receiving Deliveries Policy, dated June 6, 2018, states that the purpose of the

*FNS new Back Door Policy is not followed consistently and completely.*

*FNS new Receiving Deliveries policy is not clear regarding checking and taking temperature of sample of receiving items.*

specified procedure is to "check **all** food for proper conditions during delivery". The policy states staff are to make sure frozen food is solid, and does not show evidence of thawing and re-freezing such as large ice crystals on the surface or frozen juices or liquids in the package. Ensure that refrigerated foods are received are below 41 degrees by taking temperatures and recording it per SOPs. **All** delivered products must meet bid specifications and quality requirements. Evaluate quality of products by odor, sight, and touch. The receiving procedures do not specifically state that staff are required to open every box upon delivery, but implies this in several places (i.e. purpose and result) by repeatedly using the word "all".

FNS Management should clarify expectations in the new SOPs regarding Receiving Items.

- 8) FNS recently updated its SOPs. FNS staff were informed of the updated SOPs through the newsletter, email, and training. However, there was no effective date indicated for the updated SOPs, and we noted that not all FNS staff were aware of them. During our audit, we observed that both the 2016-17 SOPs and the updated SOPs were in practice.

FNS management should communicate updated policies and procedures to the FNS staff with specific effective dates.

We wish to thank the Food and Nutrition Services and Procurement staffs for their cooperation and assistance with this audit.

*Quality of delivered products is evaluated by odor, sight, touch and temperature.*

*SOPs should have an effective date.*

## Appendix A - Observation Findings By School

*Source: FNS SOPs 2016-17, FNS Training Manual rev. 5, 64E-11 FL Administrative Code, Expectations For All Employees Acknowledgement, and Onsite Observations*

#	Reference Policy/Procedures/Manual/Expectations/Best Practice		Observation Notes 1 – Baldwin Park ES 2 – Prairie Lake ES 3 – Discovery MS 4 – Oakridge HS 5 – Olympia HS 6 – Howard MS 7 – Ocoee HS	Schools' Kitchen Observation						
	Source	Requirements		1	2	3	4	5	6	7
1	SOPs Holding Food:	<i>All hot foods must be held hot (above 140°F) and cold foods must be held cold (below 41°F).</i>	<p>4 - At the end of the last lunch, PBJ sandwiches were not placed in refrigerator immediately after lunch. PBJ sandwiches were still on serving counter. PBJ sandwiches will be used for supper time and served next day.</p> <p>5 - After serving students during the first lunch, staff did not place the food back in the oven for second lunch.</p>				X	X		
2	64E-11 FL Administrative Code:  SOPs Employee Health and Personal Hygiene:	<p><i>Hairnets, headbands, caps or other effective hair restraints shall be worn to keep hair from food and food-contact surfaces.</i></p> <p><i>Hairnets are required when hair extends beyond or covers any parts of the ears. All hair must be confined at all times.</i></p>	<p>4 - One of staff had hair net but it was not properly worn. Most of hairs were out of net.</p> <p>5 - Hair was not appropriately covered at all times.</p>				X	X		
3	SOPs Employee Health and Personal Hygiene:	<i>Any employee with a beard or goatee must wear a beard hairnet guard.</i>	<p>4 - During serving, male's beard was not covered.</p> <p>5 - Initially, male's beard was not covered. Manager reminded him once auditors were there.</p> <p>7 - Male staff did not cover beard.</p>				X	X		X
4	OCPS FNS Training Manual Proper Glove Use:	<i>Use clean gloves when you resume food preparation. Change gloves after touching anything that</i>	<p>2 - Touched cart, counter, and table with gloved hands and then touched food with the same gloves.</p>		X	X	X	X	X	X

X – Observation findings for the school indicated.

Prepared by Internal Audit

Reference Policy/Procedures/Manual/Expectations/Best Practice		Observation Notes 1 – Baldwin Park ES, 2– Prairie Lake ES, 3 – Discovery MS, 4 – Oakridge HS, 5 – Olympia HS, 6 – Howard MS, 7 – Ocoee HS					Schools' Kitchen Observation			
#	Source	Requirements	1	2	3	4	5	6	7	
	<p>SOPs Glove and Utensil Use:</p> <p>SOPs Serving Food:</p>	<p><i>contaminates the hands. After touching your hair, face, or body. Change gloves when beginning each new task.</i></p> <p><i>Wash hands between each different task.</i></p>	<p>3 – During temperature taking, staff touched Temp Taker, oven door handle, pencil, and then touched food with the same gloved hand to pull food from the Temp Taker's stem.</p> <p>4 – Did not change gloves (two times) after touching wiring and plug in outlets. While preparing or fixing food, touched several pieces of equipment with gloved hands, and touched food with the same gloves. Did not change gloves. -Touched machine's start button every time and touched tables with gloved hands, and then touched pineapples with the same gloves to level scoop and then packed the pineapples. -During cooking, a staff member scratched her hand with one gloved hand and then touched food with the same gloves.</p> <p>5 - Staff members touched face, clothes, and eye glasses with gloved hands and continued to prepare food. -Between two tasks, employees did not change their gloves nor did they wash their hands.</p> <p>6 - One staff member took ladle from sink, cleaned it, and handled fresh fruit bowls without changing gloves.</p> <p>7 - After wearing clean gloves, a staff member touched their own clothes and was about to touch</p>							

X – Observation findings for the school indicted.

Reference		Observation Notes		Schools' Kitchen Observation						
Policy/Procedures/Manual/Expectations/Best Practice		1 – Baldwin Park ES, 2– Prairie Lake ES, 3 – Discovery MS, 4 – Oakridge HS, 5 – Olympia HS, 6 – Howard MS, 7 – Ocoee HS		1	2	3	4	5	6	7
#	Source	Requirements								
			the food. Lead told her to change gloves before touching food. - Touched and pushed carts with gloved hands then touched salad. -Touched seasoning bottles with gloved hands then mixed salad by hand with the same gloves. - Touched electrical plugs with gloved hands, then touched food.							
5	SOPs Glove and Utensil Use:	<i>Wash hands thoroughly prior to putting on gloves and when gloves are changed.</i>	5 – One employee continuously changed their gloves, but did not wash hands in between glove changes, over a three to four hour period.					X		
6	SOPs Gloves and Utensil Use:	<i>Purchase gloves in appropriate sizes.</i>	All – Did not observe different sizes of gloves being available.	X	X	X	X	X	X	X
7	Expectations For All Employees Acknowledgement:	<i>I will wear cutting gloves to prevent accidents when handling knives, can openers, etc.</i>	4 –Staff did not use cutting gloves.  6 – Staff did not use cutting gloves for cutting vegetables. The cutting glove was not handy.  7 - Staff members were not using cutting gloves when cutting vegetables. After mentioning this to the Kitchen manager, it took staff a while to put on the cutting gloves, indicating that the cutting glove was not immediately available.				X		X	X
8	Expectations For All Employees Acknowledgement:	<i>I. A single plain wedding band is permitted. II. Watches are not permitted. III. No earrings will be permitted; this includes: 1. Studs or hoops (any size); 2. Dangling earrings; 3. No nose rings or facial/piercing(s). IV. No necklaces.</i>	4 - Employees had earrings, watch, nose ring, and necklaces.  5 - Staff had jewelry on during prep and serving. Specifically, we observed watches, earrings, nose rings, chains, and rings other than a simple plain wedding band.				X	X		X

X – Observation findings for the school indicted.

Reference Policy/Procedures/Manual/Expectations/Best Practice		Observation Notes			Schools' Kitchen Observation							
#	Source	Requirements	1 – Baldwin Park ES, 2– Prairie Lake ES, 3 – Discovery MS, 4 – Oakridge HS, 5 – Olympia HS, 6 – Howard MS, 7 – Ocoee HS			1	2	3	4	5	6	7
		<i>V. No bracelets. Only a medic alert bracelet allowed with a doctor's note.</i>	7 - Some staff members had jewelry on such as, chains, bracelets, earrings, and rings.									
9	SOPs Preparing Hot Food:	<i>Temperatures of all potentially hazardous hot foods must be taken during preparation to ensure safety of food served to children.</i>	4 - We observed staff did not take temperature during preparing or fixing food. Staff only took temperatures once, and received an out of range temperature. Staff put it for reheat. Staff was waiting until >165°F.						X			
10	SOPs Preparing Cold Food:	<i>When preparing fresh fruits and vegetables, all must be washed in running and drained water before being cut and served. All stickers must be removed on fresh fruit.</i>	4 - Fresh fruit plums were not washed. Served plums with stickers in all five counters.  7 - Staff did not wash some fresh vegetables before packaging.						X			X
11	SOPs Serving Temperatures:	<i>Take temperature of milk before the serving line begins.</i>	4 - Milk Temperature was not taken prior to the first lunch.  5 - Milk Temperature was not taken prior to the first lunch.						X	X		
12	SOPs Serving Temperatures:	<i>Take temperatures of all hot foods as soon as they are put on the serving line. Take temperatures of all cold foods as they are put on the serving line or salad bar.</i>	1 - Took temperature at 10a.m. and 11a.m. but not at 12.00. No time to take.  4 - Temperature of food was taken during serving, but not prior to serving food. Almost all food had been served and temperature taker was still taking food temperature. For 5 counters with two lunches, only one temperature taker was assigned. -Staff started to take temperature of cold food but lunch was finished and food was taken to the refrigerator for second lunch. No time to take temperature.			X			X	X	X	

X – Observation findings for the school indicted.



#	Reference Policy/Procedures/Manual/Expectations/Best Practice		Observation Notes 1 – Baldwin Park ES, 2– Prairie Lake ES, 3 – Discovery MS, 4 – Oakridge HS, 5 – Olympia HS, 6 – Howard MS, 7 – Ocoee HS	Schools’ Kitchen Observation						
	Source	Requirements		1	2	3	4	5	6	7
			<p>-Temperature was not taken prior to serving food during the second lunch.</p> <p>5 - Temperatures were not taken on all of the coleslaw before the first lunch started.</p> <p>6 - Took serving temperature of hot food, but not cold food- PJB, salad, fruit, and milk.</p>							
13	SOPs Serving Temperatures:	<p>Take corrective action, if needed. If hot foods are below 140°F, they must be heated to above 165°F before serving. If cold foods are above 41°F, they must be chilled to below 41°F before serving.</p>	<p>1 - Pineapple temperature was 44°F. It should be &lt;41°F. Staff did not put in refrigerator.</p> <p>2 - Corn soup was not in temperature range to serve. It was too hot.</p> <p>3 - PBJ sandwich was not in temperature range and staff did not put the PBJ sandwiches back into the refrigerator.</p> <p>4 - Apple sauce was not within the temperature range but staff did not put in refrigerator, and continued to serve the apple sauce to students. However, apple sauce is served at room temp..</p>	X	X	X	X			
14	SOPs Preparing Hot Food:  Best Practice:	<p>Take temperatures in the thickest part of a food item (usually the center). Two readings should also be taken in different locations to assure thorough cooking to the appropriate end-point temperature.</p> <p>Take one to two temperature readings. Do not take more than</p>	<p>3 - Taking temperature several times to try to get in correct range temperature.</p>			X				

X – Observation findings for the school indicted.

#	Reference		Observation Notes	Schools' Kitchen Observation								
	Policy/Procedures/Manual/Expectations/Best Practice	Requirements		1	2	3	4	5	6	7		
		<i>two temperature readings to get temperature in range.</i>										
15	Expectations For All Employees Acknowledgement:	<i>I will not use a personal cell phone or Bluetooth while on duty. This includes no texting.</i>	4 - One staff had on a Bluetooth device while preparing food.				X					
16	SOPs Receiving Deliveries:	<i>Make sure frozen food is solid, and does not show evidence of thawing and re-freezing such as large ice crystals on the surface or frozen juices or liquids in the package. Check delivery invoice against all items delivered. Products must meet bid specifications and quality requirements. Evaluate quality of products by odor, sight and touch. Unacceptable products should be rejected.</i>	4 - During receiving, staff did not have any documents (Invoices on hand) to verify that they received the items they were supposed to receive. 5 - Looked at one item in the box, but did not check the other items to ensure receiving of quality products.	N o t	N o t	N o t	X		N o t	N o t		
17	SOPs Storage Food:	<i>Placing chemicals and supplies in appropriate storage areas, away from food. Storing chemicals away from food handling and storage areas.</i>	4 - In kitchen, daily cleaning products were near the sink while the food cart with pita breads was also located next to the sink. - Daily cleaning products were placed next to cleaned trays.  6 - Dry area storage has cleaning products but they are located away from the food.				X		X			
18	SOPs Storage Food:	<i>Placing foods in the proper storage area (refrigerator or freezer) quickly</i>	6 - Initially, pizza cart was outside of the freezer. One staff told another to put inside. (Freezer was small and full so it was outside). Staff received the						X			

X – Observation findings for the school indicted.

#	Reference Policy/Procedures/Manual/Expectations/Best Practice		Observation Notes 1 – Baldwin Park ES, 2– Prairie Lake ES, 3 – Discovery MS, 4 – Oakridge HS, 5 – Olympia HS, 6 – Howard MS, 7 – Ocoee HS	Schools’ Kitchen Observation						
	Source	Requirements		1	2	3	4	5	6	7
		<i>to avoid bacterial growth. 41°F or lower – refrigerator temperatures.</i>	pizzas from Edgewater HS Central kitchen on that morning.							
19	SOPs Storage Food:	<i>Maintain clean and uncluttered storage areas. Limit overloading refrigerated storage areas, as this prevents airflow and makes the unit work harder to stay cold.</i>	2 - Boxes were not organized in the storage room.  6 - Refrigerator and freezer were not organized.		X					X
20	SOPs Ice Machine Usage:	<i>Use a scoop to transfer ice to a clean and sanitized container. The scoop should be stored in a sanitary manner adjacent to the ice machine. It should never be stored in the ice storage bin. Scoop should be cleaned and sanitized daily. Scoop should always be face down. Don’t use bare hands or insert a glass or cup directly into the ice storage bin.</i>	4 - No ice scoop on ice machine.				X			
21	SOPs Ice Machine Usage:	<i>Wash hands before handling scoop or portioning ice.</i>	7 – We did not observe the driver wash his hands prior to approaching the ice machine. He also did not have gloves on.							X
22	SOPs Ice Machine Usage:	<i>Develop an ice machine cleaning schedule, following FNS guidelines.</i>	2 - Ice machine cleaning schedule is not maintained.  3 - Maintained ice machine inspection in Manager Self-Inspection checklist, but did not maintain an ice machine cleaning schedule.		X	X		X		

X – Observation findings for the school indicted.

Reference Policy/Procedures/Manual/Expectations/Best Practice		Observation Notes 1 – Baldwin Park ES, 2– Prairie Lake ES, 3 – Discovery MS, 4 – Oakridge HS, 5 – Olympia HS, 6 – Howard MS, 7 – Ocoee HS			Schools’ Kitchen Observation						
#	Source	Requirements			1	2	3	4	5	6	7
			5 - Ice machine cleaning schedule is not maintained.								
23	SOPs Serving Food:	Remove pest/ rodent evidence.	4 - Dead cockroach was near serving line.					X			
24	SOPs Sample Meal:	After the first batch prepared, for perishable food items, both breakfast & lunch. Keep a portion of a minimum of ½ cup each item served for the day, including menu enhancements and all a la carte items for 5 business days.	7 - Sample for microbiological testing was not taken for 9/26/2018 for breakfast and lunch.								X
25	SOPs Sample Meal:	Use the leftover label with Date of service, Date to throw away, and Initials of the person preparing the plate of samples.	All - Sample for microbiological testing did not have labels and all information.	X	X	X	X	X	X	X	X
26	SOPs Laundry and Linen Use:	Potholders should be washed in temperatures appropriate for color and type of fabric; generally wash water of 120° F is recommended.	4 - Oven mitts were dirty. Needed to do laundry. 7 - Potholders/oven mitts were dirty. Needed to do laundry.					X			X
27	SOPs Serving Temperature:  SOPs Preparing Hot Food:	Sanitize the thermometer stem prior to taking the temperature of any food item.  Wipe the thermometer stem with alcohol wipes prior to and after taking the temperatures of each food; or wash stem, rinse, and sanitize.	3 - Using the same alcohol wipe for different food items. Shortage of alcohol wipes in the kitchen area.  4 - Did not observe boxes of alcohol wipes in the kitchen.  7 - Not always using alcohol wipes to clean Temp Taker stems in between taking temperatures.				X	X			X

X – Observation findings for the school indicted.

#	Reference Policy/Procedures/Manual/Expectations/Best Practice		Observation Notes 1 – Baldwin Park ES, 2– Prairie Lake ES, 3 – Discovery MS, 4 – Oakridge HS, 5 – Olympia HS, 6 – Howard MS, 7 – Ocoee HS	Schools’ Kitchen Observation						
	Source	Requirements		1	2	3	4	5	6	7
28	SOPs Leftovers:	<i>Bread - fresh from bread vendor. Use on or before the best by date. Do not freeze fresh bread except before a long break.</i>	5 - Bread had a best if used by date of 9/20/2018. Initially, staff pulled the bread out to use for sandwiches. After some discussion, they decided to dispose of the bread.					X		
29	SOPs Serving Food:	<i>Do not touch cooked or ready-to-eat foods with bare hands. Use gloves or utensils.</i>	2 - Gloves did not cover the wrist. Staff used gloved hands for spreading cheese instead of using the scoop to prepare food.  6 - One staff member was using her bare hands to handle fresh produce (green grapes and cucumbers)		X					X
30	OCPS FNS Training Manual- Proper Glove Use:	<i>Dispose of gloves immediately upon removal.</i>	2 – Used/dirty gloves were on the floor.  6 - Used gloves were on backside tables.		X					X
31	SOPs Preparing Hot/Cold Foods:	<i>Clean and sanitize all surfaces, cutting boards, and utensils that have been used in the preparation of raw meats, poultry, and fish prior to using for fruits, vegetables, and ready-to-eat foods. Cleaning and sanitizing steps MUST be done separately in order to be effective.</i>	6 - Noticed dirty table with food on it.							X
32	SOPs Holding Food:	<i>Keep foods covered to retain heat and to keep contaminants from falling into food.</i>	6 - Food was partially open beside the sink.  7 - Pizzas were left uncovered during pizza prep and prepped in the snack bar area, where flies were flying around. The flies landed on the pizza and sat there for a minute or so, until someone came to put the pizzas away.						X	X

X – Observation findings for the school indicted.

#	Reference Policy/Procedures/Manual/Expectations/Best Practice		Observation Notes 1 – Baldwin Park ES, 2– Prairie Lake ES, 3 – Discovery MS, 4 – Oakridge HS, 5 – Olympia HS, 6 – Howard MS, 7 – Ocoee HS	Schools' Kitchen Observation							
	Source	Requirements		1	2	3	4	5	6	7	
33	SOPs The Best Accident Prevention is to Remove the Cause:	<i>Do not leave dishes stacked up outside the sinks waiting to be washed as they can be a trip hazard and can drip grease or water onto the floor.</i>	6 - Dirty dishes were beside the sink for a long period of time. The sink had food in it.							X	
34	Best Practice:	<i>Gloves should be handy and easy to access at serving line.</i>	6 - Gloves were not placed besides serving areas. When staff needed gloves, they had to run inside the kitchen to get them. No sink in serving areas.							X	
35	Best Practice:	<i>Use cleaned and new napkins.</i>	4 - During pineapple packaging, napkins fell on the floor, staff took those and put on the counter for use.				X				
36	Best Practice:	<i>Do not reheat food in oven with the plastic lid.</i>	4 - Chicken lunch box plastic lids were burnt and bent. Some students gave it back to server. Returned and bent boxes were later thrown away.				X				
37	Best Practice:	<i>Recent Health Inspection Report should be in display on wall.</i>	4 – The most recent Health Inspection Report was not on display.				X				
38	Best Practice:	<i>Make sure there are napkins in napkin holder. Napkins should not be on sinks.</i>	4 - No napkins in holder. Napkin holder was not working properly. Napkins were on the sinks.				X				
39	Best Practice:	<i>Floor should be cleaned. Cleaned kitchen, tables, and surrounding areas assist to prevent any contamination food.</i>	1 - Did not clean surfaces after taking first sample for testing.  2 - Used alcohol wipes and used dirty gloves were on the floor.	X	X						

X – Observation findings for the school indicted.



<b>Department / School Name</b>	<b>Food and Nutrition Services</b>
<b>Administrator / Department Head</b>	<b>Lora Gilbert, Sr. Director</b>
<b>Cabinet Official / Area Superintendent</b>	<b>Chief Operating Officer, Roberto Pacheco</b>

<b>Exception Noted (Finding / recommendation)</b>	<b>Management Response (Corrective Action)</b>	<b>Responsible Person (Name &amp; Title)</b>	<b>Expected Outcome &amp; Completion Date What is the evidence of the corrective action?</b>
<b>What is? What should be?</b>	<b>What needs to be done?</b>	<b>Who needs to do it?</b>	<b>When will the action be completed? (MM/YYYY)</b>
1. The supervising and monitoring activities are not fully effective since we noted that FNS kitchen staff did not demonstrate implementation of FNS food safety and sanitation policies and procedures.	<p>Background:</p> <ol style="list-style-type: none"> <li>1. The Food and Nutrition Services (FNS) Standard Operating Procedures (SOP) are at a higher level than Food and Drug Administration (FDA) and Florida State Health Codes.</li> <li>2. During FY18 FNS, contracted with a Food Safety and Sanitation vendor for a peer review. The results of the review were integrated and resulted in new or revised SOPs for Employee Health and Hygiene. The training and implementation of the new or revised procedures was in progress during audit process. Additionally, the new or revised SOPs will be presented at the March 2019 FNS District Manager Meeting.</li> </ol>	FNS Sr. Director; FNS Operations Director; FNS Managers, exempt; and School Based Managers	<p>FNS District Managers reviewed the industry standards and compared the current FNS SOPs with State Health Code and Food and Drug Administration (FDA). January 2019</p> <p>FNS District Managers conducted observation of methods January 8-16, 2019, at 31 schools. Results were analyzed. FNS will continue observations in randomly selected schools by FNS District Managers. June 2019.</p> <p>Cooking Temperature SOP was revised for clarity and to distinguish between the end-point cooking temperatures and holding &amp; serving temperatures. January 2019</p> <p>SOPs roll out and training plan 1a. (below)</p> <p>Communicate and re-release the updated SOPs to all managers and staff. March 2019.</p>



	<p>3. FNS meets with Orange County Health Department (HD) Inspectors each year to review previous citations and share information. In August, 2018, the HD announced new regulations to include cooking and holding temperatures would be forthcoming. Intensive training focusing on meeting any new criteria is a yearly priority.</p> <p>The rigor of food safety practiced by FNS is evident by the 302 Satisfactory Health Department Inspections as of January 30, 2019.</p> <p>Actions:</p> <ul style="list-style-type: none"> <li>a. Benchmark and compare FNS SOP with industry standards</li> <li>b. Conduct observations to identify any sanitation issues</li> <li>c. Revise cooking temperature SOP for clarity</li> <li>d. Communicate and/or train staff on updates or changes.</li> </ul>		
<p>1a. FNS food safety and sanitation policies and procedures should be implemented fully through effective communication and training with food service staff.</p>	<p>Food Safety and Sanitation SOPs will be distributed supported by continuous communications and formally scheduled observations.</p> <p>Actions:</p> <ul style="list-style-type: none"> <li>a. SOPs manual to be published and distributed to managers.</li> </ul>	<p>FNS Sr. Director, FNS Operations Director, Sr. Training Manager, FNS Managers, exempt</p>	<p>Developed SOPs Training and Implementation Plan. December 2018</p> <p>FNS managers trained staff on current SOPs. January 2019</p> <p>Conduct district Training for Food Service Managers to focus on supervision, training and current SOP's. March 2019</p>





	<ul style="list-style-type: none"> <li>b. SOPs will be published and clearly identified on FNS Web site.</li> <li>c. On-Site Reviews of all operations to focus on SOPs.</li> </ul>		<p>Conduct onsite reviews of all kitchen operations. May 30, 2019</p> <p>Conduct Back to School Training for all FNS staff to focus on SOPs. August 2019.</p>
<p>1b. Supervision and monitoring training should be provided to the School Food Service Managers and Operation Managers for food safety and sanitation compliance.</p>	<p>Actions:</p> <ul style="list-style-type: none"> <li>a. Span of control for Food Service Manager should be evaluated and recommendations be made for floor supervision.</li> <li>b. Benchmark organizational structure for supervision.</li> <li>c. Conduct training in observation and supervision for district and school based managers.</li> </ul>	<p>FNS Sr. Director; FNS Operations Director;</p>	<p>Benchmark supervision roles and duties in food service industry. Perform evaluation of span of control for school based food service manager and develop recommendations. Revise job description if applicable. March 2019</p> <p>Train all school based food service managers in observation and supervision. April 2019</p> <p>Conduct Back to School Training for district food service staff. August 2019</p>
<p>1c. Minimum training requirements for food safety and sanitation for the Operation Managers and school based food service managers should be established in writing.</p>	<p>Background: OCPS Job Descriptions Requires ServSafe® Certification. USDA requires 10 hours/year.</p> <p>Actions:</p> <ul style="list-style-type: none"> <li>a. Ensure that all FNS Operation Managers and school based Food Service Managers are required to pass the National Restaurant Association’s secure ServSafe® Test.</li> <li>b. Assign the required 10 hours of training to be completed in food safety and sanitation and “Train the Trainer”.</li> </ul>	<p>FNS Sr. Director; FNS Operations Director;</p>	<p>FNS will assign the hours to be completed in “Train the Trainer” and Food Safety. March 2019</p>



<p>1d. Operations Managers monitoring process for food safety and sanitation should be in a written format.</p>	<p>Background: On-Site Review Document is completed twice per year. The written FNS On-Site Review exceeds the Florida Dept. of Agriculture required annual review.</p> <p>Actions: a. FNS Operations Managers to observe and review the school based operations on an on-going basis.</p>	<p>FNS Sr. Director; FNS Operations Director; FNS Operations Managers</p>	<p>On-Site Review will focus on SOPs implementation and evaluation. June 2019</p>
<p>2. Training of FNS staff in FNS Departmental SOPs was not effective.</p>	<p>Background: Documentation of Safety and Sanitation training exists in each school. Health Department Inspections YTD are all 100% Satisfactory.</p> <p>Actions: a. Increase oversight of food service. Evaluate possible organizational structure modifications.</p>	<p>FNS Operations Director; Sr. Training Manager</p>	<p>Monthly Training with Agenda will be provided to managers to train staff. April 2019</p> <p>Floor production supervisor position will be developed to assist the managers. December 2019</p>
<p>2a. The FNS Training and Quality Assurance Manager should play a more active role in training by requiring food service managers to use the prepared training materials. Require documents to support that they completed the training using documents.</p>	<p>Background: The Training Manager position was recently upgraded to Sr. Manager.</p> <p>Yearly Safety and Sanitation Training is documented with employee logs on file. A rigorous training plan is documented for all new employees with seven hours of safety and sanitation. Career FNS Training is documented for each level of food service employee.</p>	<p>FNS Sr. Director; FNS Sr. Administrator for HR; FNS Sr. Manager Training</p>	<p>District Sr. Training Manager and Operations Managers will select appropriate materials and train food service managers on how to conduct training with employees. August 2019.</p>



	<p>Actions:</p> <p>a. Review the documentation, observation, supervision and available training material for the Sr. Training Manager and Training Staff.</p>		
2b. FNS Management should consider the diverse language needs of FNS food service staff in the development of all FNS SOPs and training materials.	<p>Actions:</p> <p>a. Work with Labor Relations to include the allowable language translations for training materials.</p>	FNS Area Adm. For HR; Sr. Training Manager	Develop a training plan, translate materials, create SOPs, and conduct training. December 2019
3a. FNS SOPs do not include requirements for food safety and sanitation for the Food Carts/Cooperative Carts/Truck of the Month.	<p>Actions:</p> <p>a. The SOP for food safety and sanitation for the Cooperative Carts will be updated with new Florida Sanitation Code.</p> <p>b. Staff will be trained on updated SOPs.</p>	FNS Sr. Director; FNS Operations Director; FNS Sr. Administrator, Finance;	FNS SOPs for Cooperative Carts will be updated to ensure they do cover all processes. Train staff on SOPs. March 2019
3b. Staff did not follow the food safety and sanitation procedures for the Food Cart.	<p>Background:</p> <p>Food Safety and Sanitation SOPs apply to the use of Food Carts. New HD regulations allowed for revision of food holding temperatures.</p> <p>Actions:</p> <p>a. Ensure FNS Staff taking food carts to the courtyards follow current SOPs.</p>	FNS Sr. Director; FNS Operations Director	Staff will be trained in SOPs. April 2019



<p>3c. Cooperative Cart Program (CCP) contract with the fundraiser sponsor was not established or not documented.</p>	<p>Actions: a. Verify that all CCP Agreements are up to date and filed at the school.</p>	<p>FNS Sr. Director; FNS Operations Director; FNS Sr. Administrator, Finance</p>	<p>All agreements for CCP are on file at the applicable schools. March 2019  Conduct random audits of CCP each month with reports to HS Operations Manager. May 2019</p>
<p>4. FNS Management has not established procedures that address what action staff should take in the event of a fire drill.</p>	<p>Actions: a. Request for OCPS Safety and Emergency Management to discuss fire/safety procedures for food service staff. b. School based food service staff should follow directions for all school staff.</p>	<p>FNS Sr. Director; FNS Operations Director; School Administrator assigned to food service program</p>	<p>All school food service managers will communicate with their principals to review the fire drill procedures during a meal period. April 2019  FNS will follow OCPS Fire Safety and Emergency Management SOPs to ensure proper compliance. June 2019</p>
<p>5. The most current versions of the Health Department (HD) Inspection Reports are not posted on the FNS website.</p>	<p>Background: HD Inspections are reported on OCPS Intranet Site.  Actions: a. FNS will ensure all HD Inspection Reports are posted on the FNS internet website.</p>	<p>Sr. Training Manager</p>	<p>Health Department Inspections will be posted on the Internet and Intranet Websites. March 2019</p>
<p>6. FNS Back Door Policy should be followed.</p>	<p>Actions: a. Verify that all visitors entering the back door sign the FNS Back Door Log. b. Visitors entering the front of the kitchen will be signed in if they did not sign in at the school front office.</p>	<p>FNS Sr. Director; FNS Operations Director; FNS Operations Managers; School Based Managers</p>	<p>See rollout training and continuous audit plan 1a.</p>



7. FNS Management should clarify expectations in the SOPs regarding receiving items.	Actions: a. Ensure that SOPs clearly state the expectations while receiving product.	FNS Sr. Director; FNS Operations Director;	Revise SOP and provide it to school based food service managers. See roll out plan 1a. March 2019
8. FNS recently revised SOPs should have an “effective date”. All staff should receive and respond with documentation of receipt.	Background: The effective date on FNS SOPs is the last revision date.  Actions: a. SOPs should be formally sent to all FNS managers and document receipt.	FNS Sr. Director; FNS Operations Director;	FNS school food service managers and leads received SOPs. January 2019  Conduct FNS district training for FNS school food service managers and document receipt of SOP Book. March 2019