

Special Diets

Strategic Assessment

Internal Audit Report

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EXECUTIVE SUMMARY

Why We Did This Assessment

The objective of this assessment was to determine whether the Food and Nutrition Services Department (FNS) has developed and implemented effective policies and procedures for students' special diets, and to address any special diets risks and concerns of management.

This assessment was included in the 2019-2020 Annual Audit Plan.

Conclusion

Our overall conclusion is that the FNS Special Diets activities are in accordance with FNS Standard Operation Procedures (SOPs).

Results and Recommendations

FNS Special diet meal services are managed efficiently as evidenced by:

- FNS Special Diets SOPs are established and updated as needed;
- Dietitians are knowledgeable of special diets menu requirements;
- Special diets related documents, forms, and communications are maintained and updated as needed; and,
- Staff are aware of special diet requirements and trainings are effective.

We would also like to note that the FNS Special Diets staff provided information requested for this assessment in a timely manner even while they were exceedingly busy implementing the district's "Grab-and-Go Meals" program when schools were closed by the Florida Governor during COVID-19.

Our assessment noted areas for improvement of documentation and monitoring of special diets activities.

1. Diet Order Forms and Discontinuation Diet Order Forms, if applicable, should be confirmed for all special diet students and collected from parents or guardians to confirm restricted food items and/or any severe medical conditions of students to whom the district provides meals and to document the special diets provided. School stakeholders should assist in these efforts.
2. To ensure an effective Meal Service Plan, it should be completed and reviewed by the FNS staff and school site personnel prior to signing the plan.
3. Special diets activities at schools with at least one special diet student should be monitored by the FNS division to prevent any unexpected events and to confirm implementation of the SOPs.
4. Information on the completed and signed Diet Order Form and the information on the Newton point-of-sale system should continue to be reviewed by district staff in a timely manner to confirm correct and current information is in the system.

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

BACKGROUND:

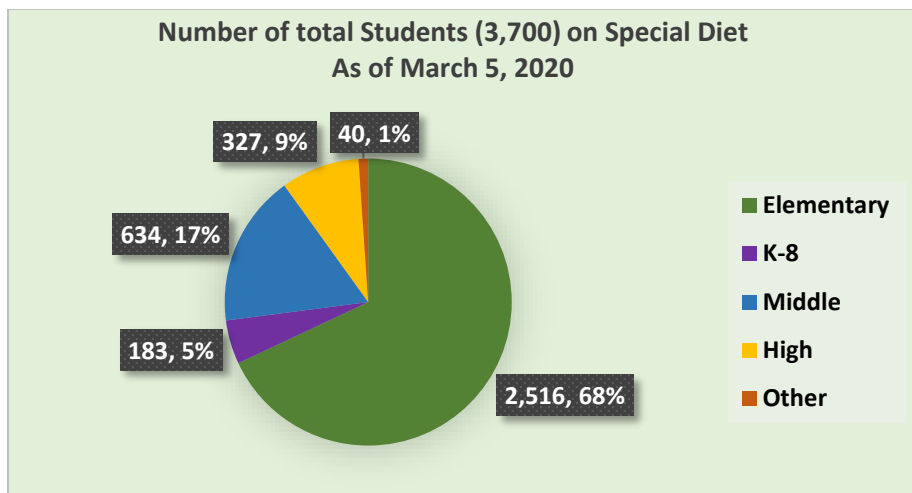
The Orange County Public Schools (OCPS) Food and Nutrition Services (FNS) district offices are located at Benrus Street. The Senior Director of FNS oversees the special diets activities, supported by the Area Manager and one district dietitian and one dietitian from a consulting firm to support.

FNS executes its operations based on its department Standard Operation Procedures (referred to as SOPs), several School Board Policies including EFAB Food Allergies - 6/26/2018, and the rules and regulations of agencies such as:

- The United States Department of Agriculture (USDA) Competitive Food Regulations - The Healthy Hunger Free Kids Act, Section 208.
- Florida Department of Agriculture and Consumer Services- Division of Food, Nutrition and Wellness, 5P-1.003 Responsibilities for the School Food Service Program.

Per USDA Regulations, FNS is required to provide reasonable accommodations for students with special diets (food allergies) with a signed physician’s statement. School Board Policy EFAB, permits FNS to also accept a Diet Order Form for special diet needs signed by the parent/guardian.

The graph below shows the total number of students on special diets by type of school as of March 5, 2020.



Special diets are managed by an Area Manager and two dietitians, one a district employee and one a consultant, and overseen by the Senior Director of FNS.

School Board policy is not as strict as USDA requirements for special diets.

The total number of special diet students as of March 5, 2020 was 3,700.

The following are acceptable methods established by schools to identify students with special diets during school meal services:

- Newton system alerts if staff enters student's ID number in system;
- Information on student's ID badge, or tag/sticker on ID badge;
- First priority (front of line) for meal service before regular students;
- Self-identification for secondary school students;
- Teacher/nurse/administrator accompanies students;
- Having information index card with students; and,
- Picture of students with information at service counter.

OBJECTIVES, SCOPE AND METHODOLOGY:

Objectives

The objective of this assessment was to determine whether the Food and Nutrition Services Department has developed and implemented effective policies and procedures, and to address special diets risks and any concerns of management.

Scope

The scope of this assessment was special diets activities from August 1, 2019 to March 5, 2020. We reviewed documentation of those OCPS students who were on special diets and taking school meals such as breakfast, lunch, and snacks.

Methodology

The special diets engagement was performed as part of the Strategic Assessment program. This program is designed to periodically review areas of potential risk or concern with short, focused analyses of key data.

Our assessment methodology included:

- Reviewing special diets rules and regulations, School Board policy, FNS department's SOPs, job responsibilities of Dietitians, information on OCPS internet, and the FNS department's intranet;

Various methods are acceptable for schools to identify students with special diets during school meal service time.

This strategic assessment evaluated FNS practices as compared to their SOPs.

We evaluated the period from August 1, 2019 to March 5, 2020.

- Discussions with the Sr. Director of FNS and special diets staff;
- Obtaining 3,700 students' special diets information from Newton System, and judgmentally selecting a sample of 40 students from 40 different schools for testing purposes; and,
- Reviewing various forms, documents, and communications related to special diets such as:
 - Employee access list for the Newton System
 - Diet Order Form
 - Discontinuation Special Diet Form
 - Annual Medical Statement Form
 - Fluid Milk Substitution Form
 - Notification letter from dietitian to kitchen manager
 - District special diets and kitchen staff's emails
 - Screenshots of comments on Newton System
 - Special diets menu for each selected students
 - Meal Service Plan for each selected schools
 - Evaluation Checklist
 - Training materials and sign in sheets

COVID-19 AND SPECIAL DIETS:

We noted that FNS management was active and efficient during the unprecedented COVID-19 emergency days. FNS division provided Free "Grab-and-Go Meals" to registered students under age 18. Children do not need to qualify for the free and reduced meal program. During this emergency time, OCPS FNS operated under a USDA special waiver for meal distribution. This option does not allow FNS to identify students by name and therefore, FNS is not able to substitute meals for children with special diets. FNS therefore requested that parents or guardians identify any food allergies for their children. At the beginning of the Free "Grab-and-Go Meals", FNS had a statement to let parents know that special diets would not be possible. FNS also placed notices in all meal packages during the first two weeks of the Free "Grab-and-Go Meals". By the third week of COVID-19, FNS posted a notice regarding not providing substitute meals for children with special food allergies on the OCPS website.

We reviewed 3,700 students' special diets information and selected 40 records for testing.

We noted that FNS management was active and efficient during the unprecedented COVID-19 emergency days.

During COVID-19 emergency time, District provided Free "Grab-and-Go-Meals" to registered students under age 18.

COMMENDATIONS:

FNS special diets meal services are managed efficiently as evidenced by:

- FNS Special Diets SOPs are established and updated as needed;
- Dietitians are knowledgeable of special diets menu requirements;
- Special Diets related documents, forms, and communications are maintained and updated as needed; and,
- Staff are aware of special diets requirements and trainings are effective and sufficient.

We would also like to note that the FNS Special Diets staff provided information requested for this assessment in a timely manner even while they were exceedingly busy implementing the Free “Grab-and-Go Meals” program when schools were closed by the Florida governor during COVID-19.

ASSESSMENT RESULTS & RECOMMENDATIONS:

1) *Eight of our sample of 40 students’ Diet Order Forms were not collected or submitted by parents/guardians, and one Discontinuation of Diet Order Form was not collected.*

Assessment Result:

Per FNS SOPs, *in the event that a parent/guardian identifies something the child should not eat, the parent should provide to the stakeholders a completed FNS Diet Order Form stating the reason, the food that is prohibited and suggested substitutions.* Per SOPs, *until Diet Order Form completion and submission, staff should use “Safe 8” Menu.* The “Safe 8” Menu includes the top eight allergen products to which most children are allergic, covering 90% of known food allergies.

According to FNS SOPs and staff, the procedure to submit the Diet Order Form is:

- When a parent/guardian identifies something the child should not eat, they notify a school stakeholder such as, Nurse, Health Assistant, Registrar, School Administrator or Food Service Manager;

FNS special diet meal services are managed efficiently.

Eight of our sample of 40 students’ Diet Order Forms were not collected or submitted by parents/guardians, and one Discontinuation Diet Order Form was not collected.

- The stakeholder provides the Diet Order Form to the parent/guardian who completes it and returns it to the stakeholder stating the reason for the diet, the food prohibited and suggested substitutions.
- The Diet Order Form (Section 1) must be completed immediately declaring any food allergy.
- In the case of a medical condition such as: diabetes, gastrointestinal disorders, maple syrup urine disease (MSUD), phenylketonuria (PKU), etc., the Diet Order Form (Section 2) must be returned once signed by a licensed medical authority.
- There is also an option to obtain the Diet Order Form on the OCPS website, and to send the completed and signed form by regular mail or email to the district office or to print out the completed and signed form and give it to any of the stakeholders.

Diet Order Forms were not found in eight students' files. FNS Dietitians had requested completed Diet Order Form by phone calls and certified mail to these eight special diets students' parents or guardian, without any response from the parents or guardian. Currently, these eight students are on the Safe 8 Menu.

Without a completed Diet Order Form, FNS staff may be unaware of any severe medical conditions of special diets student since Diet Order Form - Section 2 confirms whether special diets student has any medical conditions. Also, staff may be unaware of whether special diets student is also allergic to other food items which are not in Safe 8 Menu list.

Per SOPs, if dietary restrictions change or have been eliminated, parent must complete, sign, and submit the Discontinuation Form, identifying all of the allergens the student is no longer allergic to. A copy of the Discontinuation Form should be sent to FNS division by email for record and review by the District Dietitian.

One special diets student was discontinued on restricted food items without a Discontinuation of Diet Order Form. We notified staff and they will collect the Discontinuation of Diet Order Form from the parents/guardians once school starts after COVID-19.

Forms are available on OCPS FNS website to complete, and to submit signed form by mail or email to FNS Special Diets staff.

Eight students' files did not contain Diet Order Forms and parents have not responded to repeated attempts by FNS staff. These students are on the Safe 8 Menu.

One student's special diet was discontinued without the required document being completed.

Recommendations:

a) Documentation of completed and signed Diet Order Form and Discontinuation Diet Order Form, if any, should be confirmed for all special diets students. School stakeholders should assist in these efforts.

b) Diet Order Form and Discontinuation Diet Order Form should continue to be collected from parents or guardians to confirm restricted food items, if any, to confirm any severe medical conditions of students to whom the district provides meals, and to document special diets that are provided.

2) *Incomplete Meal Service Plans noted for two elementary schools.*

Assessment Result:

Incomplete Meal Service Plans were noted for two schools. Per FNS SOPs, a Meal Service Plan is required for each school with at least one special diet student. The plan is developed by the FNS and school staff together, and they decide the plan to identify the special diet students during the school meal service lines and prior to the student selecting a meal.

For elementary students, the group decides the responsible person from the school staff who manages the special diets students during school meals. The group may include school Health Assistants, FNS Services staff, School Administration, and FNS District Dietitian. After it is reviewed and approved by FNS and School Administration, the plan is signed by the group and maintained at the school as well as at the district FNS office.

One elementary school's Meal Service Plan was signed by the FNS and school staff but did not indicate the method to identify the special diets student during school meals. We notified FNS staff regarding this incomplete Meal Service Plan. Per staff, the school is a charter school and the FNS central kitchen drops food off at school. It is the charter school's responsibility to distribute or serve the meals to the correct students. Staff will follow up with this charter school to complete the Meal Service Plan with a method of identifying the student.

Incomplete Meal Service Plan noted for two elementary schools.

One school is a charter school which has the responsibility to see that meals are served to the correct students.

The other elementary school's Meal Service Plan is signed, and includes the method to identify special diets students but does not indicate the responsible person and position from school staff. We notified FNS staff regarding this incomplete Meal Service Plan. Staff said the Meal Service Plan for this school will be amended to include the responsible contact information.

Recommendation:

For effective Meal Service Plan, plan should be completed and reviewed by the FNS staff and school site personnel prior to signing the plan.

3) FNS completed evaluations of special diets activities for only eight of our sample of 40 schools.

Assessment Result:

Out of our sample of 40 schools, FNS had evaluated the special diets activities of only eight. The evaluation activities are intended to confirm whether special diets activities at schools are in compliance with FNS SOPs and are efficient.

When we inquired of FNS staff regarding no evaluation or monitoring of 32 schools out of the sample of 40 schools, they informed us that they were not able to visit and evaluate the more than 200 schools due to lack of staff and time. They have plans to hire two more dietitians to improve the capacity, trainings, technical support, follow up on findings based on SOPs, and to provide the tools to manage special diets. In addition, they plan to train the trainers, for example Operation Managers and Multi Unit Operation Managers.

Recommendation:

Special diets activities at schools with at least one special diets student should be monitored by the FNS division to prevent any unexpected events and to confirm the implementation of SOPs.

The other school's Meal Service Plan does not indicate the identity of the person responsible for the special diets students.

Out of our sample of 40 schools, 32 had not had evaluations of special diets activities.

FNS cited lack of staff resources as the reason for the small number of schools evaluated.

4) The special diets information on the Diet Order Form and in the Newton System (Customer Allergies Report) differed for one student.

Assessment Result:

Signed Diet Order Form, communication from the Dietitian to the Kitchen Manager, and the Newton system screen shots of customer information indicate that the student has restrictions of beef, pork, fluid milk, wheat/gluten, peanuts, fish, and chicken. Whereas, the Customer Allergies Report from the Newton System indicates only beef and pork as restricted items.

The Customer Allergies Report from the Newton system is used by the Kitchen Managers to confirm and to review students' special diets. It is a risk if the Customer Allergies Report does not reflect the correct information from the Diet Order Form.

Staff explained that due to an erroneous update of incorrect information in the Newton system, the special diet information on the Diet Order Form and in the Newton System (Customer Allergies Report) differed for one student. Management has limited the privileges to update the information of food allergies in Newton system since January, 2020.

Recommendation:

Completed and signed Diet Order Form information and the information on the Newton system should be reviewed by district staff in a timely manner to confirm that correct information is in the system and other documentation.

We wish to thank the staff of Food and Nutrition Services – Special Diets staff for their cooperation and assistance with this assessment, especially during their busy “Grab-and-Go Meals” activities in current COVID-19 time.

The special diets information on the Diet Order Form and in the Newton System (Customer Allergies Report) had different information for one student.

Staff identified the cause of the discrepancy as an inappropriate update to this information in the system and has limited access privileges.



	<p>Actions:</p> <ul style="list-style-type: none"> a. Conduct training with Food Service Staff on identifying and alerting the district of students without written documentation on file. b. Continue to provide Safe 8 meals to students declaring any Major 8 food allergy. c. Benchmark other school districts on required meal accommodations, if any, as declared by parents. 		
<p>1 a) Documentation of completed and signed Diet Order Form and Discontinuation Diet Order Form, if any, should be confirmed for all special diets students. School stakeholders should assist in these efforts.</p>	<p>Actions:</p> <ul style="list-style-type: none"> a. Train all other key-stakeholders on obtaining a completed and signed Diet Order Form the same day as declared by parent/guardian. Key-stakeholders include Health Services, Registrars, School Administration, and Teaching & Learning. 	<p>Area Manager, Sr. Dietitian, FNS Sr. Director</p> <p>Designated Teaching and Learning will coordinate the training for school based key-stakeholders.</p>	<p>Coordinate the training of school-based staff with the Teaching and Learning Division. Develop and implement the process to ensure all school-based staff identify the students with food allergens and the meal service plan.</p> <p>Development of webinar / Canvas training for key stakeholders on the requirement of the Diet Order Form and other related forms for special diet management. June/July 2020</p>
<p>1 b) Diet Order Form and Discontinuation Diet Order Form should continue to be collected from parents or guardians to confirm restricted food items, if any, to confirm any severe medical conditions of students to whom the</p>	<p>Actions:</p> <ul style="list-style-type: none"> a. Conduct and reinforce formal training with Food service staff on adherence to all diets until documented Discontinuation Form is on file at the District office. 	<p>Area Manager, Senior Dietitian</p>	<p>Back to School Training for Food Service staff on related forms for special diet management. August 2020</p>



<p>district provides meals, and to document special diets that are provided</p>			
<p>2. Incomplete Meal Service Plans noted for two elementary schools.</p> <p>Recommendation: For effective Meal Service Plan, plan should be completed and reviewed by the FNS staff and school site personnel prior to signing the plan.</p>	<p>Meal Service Plans allow the key stakeholders at the school to determine a unified method for identifying students requiring special meal accommodations when going through the meal service line.</p> <p>Annual submission is required for each school as they discover ways of improvement.</p> <p>Actions:</p> <ul style="list-style-type: none"> a. Meal Service Plans for the two schools noted during the review will be updated for the OCPS Charter that does not specify their method of identification of students and the Elementary School that does not list the person responsible for special meal services. b. Meal Service Plans will now be due prior to the beginning of each school year to allow for review at the District level. 	<p>Area Manager, Sr. Dietitian</p> <p>Teaching and Learning designated staff to assist in collecting Meal Service Plans from all schools.</p>	<p>Amend FY20 Meal Service Plans for both the charter, Orlando Science and Cypress Springs Elementary to provide the missing information determined during this audit. August 2020</p> <p>Identify the responsibility and accountability for school-based administration for the Meal Service Plan.</p> <p>Collection of FY21 Meal Service Plans from all Schools prior to the start of school 8/10/2020 with complete review by District Office. August 2020</p>
<p>3. FNS completed evaluations of special diets activities for only eight of our sample of 40 schools.</p>	<p>FNS Menu Team consists of one Administrator and one full-time dietitian. Assistance received from an outside consulting firm has been provided but with inconsistencies.</p>	<p>Area Manager, Sr. Dietitian</p>	<p>Hire and train 2 full time dietitians. December 2020</p> <p>Train Operations and Multi Unit Managers on observations related to special diets during brief</p>



<p>Recommendation: Special diets activities at schools with at least one special diets student should be monitored by the FNS division to prevent any unexpected events and to confirm the implementation of SOPs.</p>	<p>Actions:</p> <ul style="list-style-type: none"> a. FNS plans to hire one additional dietitian. b. Conduct trainings for Operations and Multi Unit Managers using a train the trainer approach on the evaluation of special diets. 		<p>visit meetings at schools. Evaluations by dietitians occur as a second tier of support upon referral or complaint. July 2020</p>
<p>4. The special diets information on the Diet Order Form and in the Newton System (Customer Allergies Report) differed for one student.</p> <p>Recommendation: Completed and signed Diet Order Form information and the information on the Newton system should be reviewed by district staff in a timely manner to confirm that correct information is in the system and other documentation.</p>	<p>Actions:</p> <ul style="list-style-type: none"> a. Match Customer Allergen Reports to Diet Order Form instructions for all students. 	<p>Area Manager, Sr. Dietitian, IT Department, Heartland Software Company to make changes</p>	<p>Reserve all access in Newton of student diet information directly related to the Customer Allergens Report for District Dietitians only via database software management. District Dietitians to ensure that all instructions on Diet Order Form matches Customer Allergen Report for all students. August 2020</p> <p>Provide training to Food Service Managers on entry of only Safe 8 Menus related to new Diet Order Forms received and use of See Manager’s notes in Newton. August 2020</p>