

DISTRICT OF COLUMBIA OFFICE OF THE INSPECTOR GENERAL

OIG No. 16-I-0074

August 2016



District of Columbia Public Schools Special Evaluation of the Office of Food and Nutrition Services



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GOVERNMENT OF THE DISTRICT OF COLUMBIA
Office of the Inspector General

Inspector General



August 29, 2016

Kaya Henderson
Chancellor
D.C. Public Schools
1200 First Street, N.E.
Washington, D.C. 20002

Dear Chancellor Henderson:

My Office has completed its report *Special Evaluation of the Office of Food and Nutrition Services*. The final report is enclosed.

We acknowledge and appreciate the changes DCPS has already made to improve the quality and oversight of its food service program, and will continue to monitor DCPS' progress toward full implementation of the recommendations contained in the report. To that end, and as noted in the final report, I ask that the Office of Food and Nutrition Services notify the OIG when it has implemented the new procedure for obtaining school cafeteria inspection reports directly from the District Department of Health and administering related remediation efforts in a timely manner.

If you have questions or comments concerning this report or other matters related to the special evaluation, please contact me or Edward Farley, Assistant Inspector General for Inspections and Evaluations, at (202) 727-2540.

Sincerely,

A handwritten signature in blue ink, appearing to read "Daniel W. Lucas", is written over a circular blue stamp.

Daniel W. Lucas
Inspector General

DWL/ef

Enclosure

cc: See Distribution List

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**OIG****Why the OIG Did This
Special Evaluation**

In fiscal year (FY) 2015, the Office of the Inspector General's (OIG) Inspections and Evaluations Unit (I&E) conducted this special evaluation of the District of Columbia Public Schools (DCPS). The OIG added this special evaluation to its planned activities following well-publicized concerns with the quality of food service in District schools.

What the OIG Recommends

This report makes four recommendations to the DCPS to improve oversight of its food service contractors.

A list of this evaluation's findings and recommendations is included in Appendix B.

**DCPS SPECIAL EVALUATION OF THE OFFICE OF
FOOD AND NUTRITION SERVICES****What the OIG Found**

This special evaluation's objectives were to assess: (1) the quality of service provided by DCPS' food service contractors during SY 2014–15; and (2) DCPS principals' level of satisfaction with the food and service during that same period.

In school year (SY) 2014–2015 (August 25, 2014 – June 19, 2015), the DCPS contracted with three vendors who provided meal service at a total of 107 schools. The three contracted vendors were: Compass Group USA by and through its Chartwells and SSC divisions (Chartwells), D.C. Central Kitchen (DCKK), and Revolution Foods (Revolution). DCPS' Office of Food and Nutrition Services (OFNS) is responsible for administering the contracts and monitoring the vendors' performance.

As a result of this evaluation's first objective, we identified two findings regarding limitations in DCPS' oversight to ensure the quality of service provided by its food service contractors:

- (1) variations in the frequency and number of operations site reviews conducted at schools limit OFNS' ability to identify problems timely; and
- (2) the DCPS does not ensure that violations identified during operations site reviews and D.C. Department of Health inspections are corrected.

As a result of this evaluation's second objective, our survey of DCPS principals found varying levels of satisfaction with different aspects of food service. Principals' satisfaction with the timeliness of after-school supper service and vendors' sanitary practices received the highest ratings; principals' impressions of students' and parents' satisfaction with the vendors received the lowest ratings.

**BACKGROUND, OBJECTIVES,
SCOPE AND METHODOLOGY**

BACKGROUND, OBJECTIVES, SCOPE AND METHODOLOGY

This report is divided into two sections: (1) Background, Objectives, Scope and Methodology; and (2) Findings and Recommendations.

The Background, Objectives, Scope and Methodology section discusses DCPS OFNS' mission and duties and describes our methodology for the special evaluation.

The Findings and Recommendations section presents two findings and their underlying causes and our recommendations to improve DCPS' oversight of its food service contractors. This section also includes results of a survey we administered to measure DCPS principals' satisfaction with various aspects of food service provided during SY 2014–15.

Background

In SY 2014–15 (August 25, 2014 – June 19, 2015), the DCPS operated 114 schools serving 47,548 students. DCPS' mission is to “ensure that every DCPS school provides a world-class education that prepares ALL of [its] students, regardless of background or circumstance, for success in college, career, and life.”¹

Of the 114 schools, 107 had cafeterias that served meals to students. In addition to lunch, breakfast and after-school supper are available at many schools. During SY 2014–15, the DCPS contracted with three vendors to operate school cafeterias, and prepare and serve meals to students. The three contracted vendors were Compass Group USA by and through its Chartwells and SSC divisions (Chartwells), DC Central Kitchen (DCK), and Revolution Foods (Revolution). As Table 1 below illustrates, each used a different food service model.

Contractor	Number of Schools Served	Description of Food Service Model
Chartwells	96	National, for-profit company that prepares meals on-site at schools.
DCK	8	Local, non-profit organization that prepares meals on-site at schools.
Revolution	3	National, for-profit company that prepares and packages meals off-site, then delivers them to the schools it serves.

Table 1: Comparison of DCPS Food Service Contractors

The OFNS monitors the contractors and supports “student health and achievement by ensuring that all DCPS students receive nutritious meals and acquire the resources to make healthy choices.”² In SY 2014–15, the OFNS had 10 employees, including a Director and 3 regional managers who oversaw meal service at schools.³

¹ DISTRICT OF COLUMBIA PUBLIC SCHOOLS, GOVERNMENT OF THE DISTRICT OF COLUMBIA, FY 2015 PERFORMANCE PLAN 1 (Jan. 2015).

² See <http://dcps.dc.gov/food> (last visited Nov. 9, 2015).

³ See Appendix C for an organization chart of the OFNS.

Objectives

This special evaluation's objectives were to assess:

- (1) the quality of service provided by DCPS' food service contractors; and
- (2) DCPS principals' satisfaction with the food and service provided.

During a project engagement meeting with the OIG, DCPS officials expressed interest in the OIG's recommendations for improving DCPS' oversight of its food service contractors.

Scope and Methodology

The scope of this special evaluation included the food and service delivered to the DCPS by Chartwells, Revolution, and DCCK during SY 2014–2015.

We conducted fieldwork from July through November 2015. Fieldwork included interviewing OFNS employees; administering and analyzing responses to a survey of DCPS principals (respondents) regarding satisfaction with food service; and reviewing and analyzing documents related to vendor performance, including cafeteria site inspection reports and correspondence between the food service vendors and DCPS.

We conducted this special evaluation in accordance with standards established by the Council of the Inspectors General on Integrity and Efficiency. As a matter of standard practice, OIG evaluations pay particular attention to the quality of internal control.⁴

OIG special evaluations are unplanned, priority assessments of a particular agency operation, condition, or event that is of concern or interest to the Inspector General or to senior District officials.

⁴ "Internal control" is defined by the U.S. Government Accountability Office (GAO) as comprising "the plans, methods, and procedures used to fulfill the mission, strategic plan, goals, and objectives of the entity" and is not one event, but a series of actions that occur throughout an entity's operations. Furthermore, internal control is a process that provides reasonable assurance that the objectives of an entity will be achieved, serves as the first line of defense in safeguarding assets, and is an integral part of the operational processes management uses to guide its operations. STANDARDS FOR INTERNAL CONTROL IN THE FEDERAL GOVERNMENT, at 5-6 (Sept. 2014).

FINDINGS AND RECOMMENDATIONS

Discussion of Findings and Recommendations

In the following section, we discuss two findings regarding DCPS' limited oversight of its food service contractors:

- (1) variations in the frequency and number of operations site reviews per school limit OFNS' ability to identify problems timely; and
- (2) the DCPS does not ensure that violations cited during operations site reviews and D.C. Department of Health (DOH) inspections are corrected.

For each of the two findings, we discuss the related conditions, criteria, causes, and effects. We also present recommendations to correct the underlying causes.

Additionally, we summarize the results of the satisfaction survey we administered to DCPS principals.

Findings and Recommendations

The DCPS used several methods to assess its food service contractors' quality of service during SY 2014–15. As part of its oversight, the OFNS surveyed principals in November 2014 and May 2015 to measure their satisfaction with contractors' cafeteria staff members and the food service provided.⁵

Additionally, the DCPS received reports, called "operations site reviews," documenting contractors' inspections of the school cafeterias they operated. The DOH also provided oversight through its inspections of school cafeterias.

1. Variations in the frequency and number of operations site reviews per school limit OFNS' ability to timely identify problems.

Condition: The food service contractors conduct periodic operations site reviews of school cafeterias on their own or with DCPS representatives. During these reviews, contractors' staff members use a checklist developed by the OFNS to evaluate whether their cafeterias comply with contract requirements related to: 1) staff training and performance; 2) facility cleanliness and equipment; 3) food safety practices; and 4) the quantity and presentation of food. Contractors' staff members enter the results of the reviews online into OFNS' QuickBase database, which then uses a formula based on the number and types of violations to determine each facility's total score. We analyzed OFNS' tables showing the results of each food service contractor's operations site reviews conducted during SY 2014-2015.

⁵ While OFNS surveyed principals at schools served by each of the three contractors, only the Chartwells contract (contract No. GAGA-2012-C-0057A, § C.6.14.11) required the contractor to disseminate the survey to school principals.

FINDINGS AND RECOMMENDATIONS

Our analysis determined that the number of operations site reviews conducted at each school varied significantly during SY 2014–15; more than 90 days elapsed between reviews at some schools; and OFNS’ review-tracking database incorrectly calculated the total number of key violations.

Table 2 below illustrates the frequency with which operations site reviews were conducted during SY 2014-2015. Each school received between 3 and 12 of these formal reviews, and we did not find a correlation between a school’s scores and the number of times it was reviewed. In other words, schools with low scores did not receive increased oversight, in the form of more reviews, than schools with higher scores.

Number of Schools	Frequency of Operational Site Reviews During SY 2014-2015
2 Schools	12 Reviews
5 Schools	11 Reviews
8 Schools	10 Reviews
13 Schools	9 Reviews
17 Schools	8 Reviews
22 Schools	7 Reviews
19 Schools	6 Reviews
7 Schools	5 Reviews
11 Schools	4 Reviews
3 Schools	3 Reviews

Table 2: Number of Operations Site Reviews Conducted Per School During SY 2014-2015

In addition to the variability in the number of reviews performed at each school, the time between reviews also varied significantly. In some instances, food service contractors reviewed a school and within a few days or weeks conducted an additional review. In other instances, more than 90 days elapsed between reviews. As Table 3 illustrates (on the following page), at 33 schools, 90 days or more elapsed between site reviews.

FINDINGS AND RECOMMENDATIONS

School Name	Greatest Number of Days Elapsed Between Operations Site Reviews
Amidon-Bowen Elementary School	129
Brent Elementary School	108
Browne Education Campus	107
Burrville Elementary School	127
C.H.O.I.C.E. Academy @ Emery	127
Eliot-Hine Middle School	110
Garfield Elementary School	99
Hardy Middle School	175
Hendley Elementary School ⁶	143
Jefferson Middle School/Jefferson Academy	155
LaSalle-Backus Education Campus	118
Leckie Elementary School	106
Ludlow-Taylor Elementary School	93
Luke C. Moore High School	109
Mamie D. Lee School	104
Maury Elementary School ⁷	96
Miner Elementary School	119
Peabody Elementary School	139
Powell Elementary School	90
Raymond Education Campus	101
Ross Elementary School	130
School Without Walls @ Francis-Stevens	115
School Without Walls High School	92
School-Within-School @ Goding	102
Shepherd Elementary School	153
Simon Elementary School	128
Smothers Elementary School	123
Takoma Education Campus	102
Thomson Elementary School	119
Truesdell Education Campus	97
West Education Campus	119
Whittier Education Campus	96
Woodson High School	154

Table 3: Schools with 90 Days or More Between Operations Site Reviews

⁶ Hendley Elementary also had a gap of 112 days between reviews.

⁷ Maury Elementary had a review that was not dated. We were unable to determine whether that review took place during the 96-day gap.

FINDINGS AND RECOMMENDATIONS

Additionally, due to a technical error, the OFNS and its contractors may have had difficulty tracking and resolving violations observed during operations site reviews. The team identified an error in OFNS' QuickBase database that incorrectly calculated the total number of business-critical violations cited in the operations site review information. Business-critical violations are more serious than most violations and are weighted more heavily in calculating the review score. When the team examined the site review forms line-by-line, we found that the database did not reflect the actual number of business-critical violations found during reviews conducted during February 2015 and thereafter. We noted that in February 2015, vendors began using a new checklist⁸ provided by the OFNS, but OFNS management did not know the particular cause for the database issue.

Criteria: According to the three contracts, "The contractor shall provide management supervision at all times and maintain constant quality control inspections to check for portion size, appearance, and packaging in addition to the quality of products."⁹

Cause: The contracts lacked specific controls that would lead to enforceable requirements. Internal controls provide reasonable assurance that the objectives of an entity will be achieved, serves as the first line of defense in safeguarding assets, and is an integral part of the operational processes management uses to guide its operations.¹⁰ For the operations site reviews to be an effective quality oversight mechanism, the contracts should contain requirements regarding the number and frequency of reviews at each school. And to more effectively assess vendors' quality of service and compliance with contract terms, the OFNS should have a written SOP that details its staff members' responsibilities for monitoring the frequency and results of the reviews.

Effect: Without consistent and frequent operations site reviews, the OFNS may be unaware of persistent violations that affect the quality of school meals, such as insufficient numbers of entrée items, delays in meal service, and expired or spoiled food. Greater consistency will bolster the inherent function of operations site reviews, which is to promptly identify conditions that affect timely service, food quality and presentation, and food safety.

For example, Woodson High School received a total score of 48.7 percent during an operations site review on April 27, 2015. The school cafeteria's previous review on November 24, 2014, resulted in a total score of 89.5 percent. Due to the 5-month lapse between reviews, the violations detected during the April 2015 review may have been

⁸ The OFNS changed the site review form in the middle of the 2014-2015 school year to include an item regarding the operativeness of kitchen hoods. These hoods are intended to remove smoke, grease, and steam vapors, and non-functioning hoods are a safety hazard.

⁹ Contract No. GAGA-2012-C-0057A, § C.6.14.12, Contract No. GAGA-2010-C-0142, § C.3.2.2.8.1, and Contract No. GAGA-2010-C-0146, § C.3.2.2.8.1. The Chartwells contract also states, "Management monitoring visits shall include the completion of one or more checklists to ensure the standard operating procedure is being followed and [food service workers] are executing their responsibilities fully." Contract No. GAGA-2012-C-0057A, § C.6.14.12. All three contractors use the checklist for operations site reviews developed by the OFNS.

¹⁰ Standards for Internal Control in the Federal Government, *supra* p. 5 and note 4.

Accountability: The Contracting Officer's Technical Representative (COTR)/Contract Administrator (CA) in the OFNS is responsible for general contract administration, and ensuring that the products and service delivered meet contract requirements.

We recommend that the Director, OFNS:

- Agree X¹¹ Disagree _____

- Agree X Disagree

As documentation to support our implementation, we have included "Operations Site Review Explained" effective November 4, 2015, "Site Review Process 12.1.15" effective December 1, 2015, both of which are supported in the monitoring section in the vendor performance review presentation labeled "CTH Feb 2016".

FINDINGS AND RECOMMENDATIONS

2. The DCPS does not ensure that violations identified during operations site reviews and DOH inspections are corrected.

(1) The DCPS does not ensure that violations found during operations site reviews are corrected.

Condition: The OFNS lacked documentation indicating that its staff members determined that the three contractors resolved violations cited during operations site reviews. Additionally, in some instances, contractors did not submit written action plans to the OFNS as required.

Of all 769 operations site reviews from SY 2014–15 listed in the OFNS database, 66 percent were listed as “open,” an indication that violations had not been corrected.¹²

To further examine whether the OFNS followed up on operations site reviews that identified significant problems, we analyzed all SY 2014–2015 reviews with scores of or below 60 percent (39).¹³

Our analysis of the 39 operations site reviews¹⁴ with scores of or below 60 percent determined that OFNS was unaware whether contractors had resolved violations in many cases and that contractors frequently did not submit written action plans as required. Specifically, 19 (49 percent) of these reviews were listed as open in the OFNS database and did not have action plans to correct violations.¹⁵ An additional five reviews (13 percent) had action plans to correct violations and were listed as open.¹⁶ The other 15 reviews (38 percent) in our sample of 39 were listed as closed, indicating that the violations had been corrected, but none of these reviews had an action plan as required.¹⁷

Criteria: As set forth on the Operations Site Review form, vendors must submit action plans to the OFNS when a school’s total score is 80 percent or below.

Additionally, the Chartwells contract states, “DCPS shall issue directives regarding any deficiencies, and the Contractor shall be obligated to rectify those deficiencies in a timely manner.”¹⁸

¹² All three contractors had “open” operations site reviews from SY 2014–2015.

¹³ OFNS requires vendors to submit action plans for reviews with scores of or below 80 percent, but we focused our analysis on those reviews of or below 60 percent, rather than 80 percent, to assess OFNS’ follow up on the reviews showing the most serious deficiencies.

¹⁴ The 39 lowest-scoring operations site reviews included 37 reviews for Chartwells schools and 2 reviews for Revolution schools. DCK did not have any operations site reviews scoring at or below 60%.

¹⁵ These 19 reviews were for Chartwells schools.

¹⁶ These five reviews included three reviews for Chartwells schools and two reviews for Revolution schools.

¹⁷ These 15 reviews were for Chartwells schools.

¹⁸ Contract No. GAGA-2012-C-0057A, § C.6.12.1.8.

FINDINGS AND RECOMMENDATIONS

Cause: As of November 2015, the OFNS lacked written SOPs for how its staff members should follow up on and track violations found during operations site reviews, including ensuring that contractors submit action plans as required.

Effect: Insufficient oversight may allow problems affecting the quality of service provided to students to persist even after reviews have detected deficiencies, such as expired or spoiled food, improperly trained food service workers, food not prepared according to the recipe, or service delays. Additionally, written action plans provide the OFNS some assurance that contractors are working to correct problems found in operations site reviews. Without corrective action plans, issues that affect food and service quality may persist. For example, Capitol Hill Montessori at Logan had 4 operations site reviews with scores under 60 percent in SY 2014-2015, yet there were no action plans to correct the deficiencies.

Accountability: The COTR/CA in the OFNS is responsible for general contract administration, and ensuring that work meets contract requirements.

(2) DOH inspection reports cited half of DCPS school cafeterias for repeat critical violations.

Condition: During SY 2014-2015, the DOH inspected all 107 DCPS schools twice as required.¹⁹ During these inspections, the DOH identifies different types of violations and prescribes a timeframe in which the vendor must correct the violations.²⁰ The DOH also notes which items must be corrected while its inspector is still onsite; otherwise, the DOH allows either 14 to 45 days to correct non-critical violations, 5 days to correct critical violations, and 24 hours to correct violations that pose immediate threats to health or safety.

The DOH documented 965 violations²¹ at DCPS schools during SY 2014–15. Of these items, 274 were critical violations.²² Half of the schools had the same critical violation(s) cited during both DOH inspections, which likely resulted from failure to address the condition following the first inspection. Our review of DOH inspection reports found 54 schools with at least 1 repeated critical violation well outside the allowed time to correct the violation, with a total of 70 repeat critical violations. Of the 54 schools with repeat critical violations, Chartwells served 49 schools, DCKK served 4 schools, and Revolution

¹⁹ According to 7 CFR § 210.13(b), “[s]chools shall obtain a minimum of two food safety inspections during each school year conducted by a State or local governmental agency responsible for food safety inspections.” Information about DOH reviews of all food establishments, including school cafeterias, is available online at: http://dc.healthinspections.us/webadmin/dhd_431/web/?a=Inspections (last visited Mar. 18, 2016).

²⁰ Although vendors are responsible for correcting violations related to their operations of school cafeterias, the DCPS is responsible for correcting facility-related violations, such as those related to garbage disposals.

²¹ Five of these violations were items that may immediately threaten health or safety.

²² It is difficult to determine whether violations corrected on site were considered “critical” as no amount of time by which the violation must be corrected is listed. Many of the items on the DOH inspection report could be either critical or non-critical violations depending on which part of the item was violated.

FINDINGS AND RECOMMENDATIONS

served 1 school. In addition, there were 114 non-critical violations repeated from one DOH inspection to the next.

The three contractors did not notify the DCPS of DOH inspection results as required by their contracts. An OFNS interviewee stated that the OFNS only requires vendors to submit action plans for DOH violations when operations site reviews determine that DOH violations have not been addressed. However, we found only one action plan that noted an uncorrected DOH violation that also was found in an operations site review. Consequently, we concluded that operations site reviews are not an effective way to ensure that DOH violations are corrected, given that 54 schools had repeat critical DOH violations and only 1 school had an action plan mentioning a DOH violation.

Criteria: Chartwells' 2012 contract states:

The Contractor shall notify DCPS immediately (prior to the close of business on the same operating day) following DOH site inspections with details of the inspection. Corrections to any cited DOH violations shall be addressed immediately (prior to the close of business on the same operating day), including but not limited to, a plan of action that is mutually agreed upon between Contractor(s), DCPS, and DOH.^{23]}

Similarly, the contracts for Revolution and DCKK state that the contractors are to notify the OFNS immediately of DOH violations.²⁴ These two contracts also state, "[t]he Contractor shall notify DCPS of any health or safety violation or 'near misses' immediately upon discovery if it proves an immediate threat to continuing operations."²⁵

In addition, 7 CFR § 210.13(b), states schools must "post in a publicly visible location a report of the most recent inspection conducted, and provide a copy of the inspection report to a member of the public upon request." As set forth on the Operations Site Review form, operations site reviews must verify that the most current DOH inspection is on display and items have been reported or corrected within the required timeframes.

Cause: The OFNS does not enforce contract terms requiring vendors to notify it of DOH inspection results or DOH violations. The OFNS does not have written SOPs that instruct its staff members how to monitor compliance with contract requirements related to DOH inspections, such as periodically obtaining inspection results directly from DOH, and that ensure health violations are corrected within required timeframes. Instead, the OFNS relies on vendors' self-reporting of significant violations from DOH inspections. The OFNS apparently has not received such notifications despite repeated critical health violations in half of the schools.

²³ Contract No. GAGA-2012-C-0057A, § C.6.1.11.1.7.

²⁴ Contract No. GAGA-2010-C-0142, §§ F.7 and G.9.2; and Contract No. GAGA-2010-C-0146, §§ F.7 and G.9.2.

²⁵ Contract No. GAGA-2010-C-0142, § C.3.2.2.5; and Contract No. GAGA-2010-C-0146, § C.3.2.2.5.

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We recognize that OFNS changed its operations site review checklist starting in February 2015 to include whether previous DOH violations had been corrected or reported within the given timeframe. The effectiveness of this measure is hampered, however, by OFNS' lack of assurance that problems noted in operations site reviews have been resolved. Additionally, the time between a DOH inspection that reveals a critical violation and the next operations site review may be significantly more than the 5 days allotted to correct a critical violation, given that 33 schools had gaps of at least 90 days between operations site reviews during SY 2014-2015.

Effect: Uncorrected health violations may present food safety risks to students.

Accountability: The COTR/CA in the OFNS is responsible for general contract administration and ensuring that work meets contract requirements.

Recommendations:

We recommend that the Director, OFNS:

- (3) Develop and implement written SOPs for OFNS staff members to track and follow up on the results of operations site reviews, including ensuring that contractors submit action plans as required.

Agree X Disagree _____

- (4) Develop and implement written SOPs for OFNS staff members to enforce contract requirements regarding notifying OFNS of DOH inspection results, to obtain DOH inspection results directly from the DOH at least monthly to check contractors' compliance with requirements to notify the OFNS, and to ensure that contractors and the OFNS develop action plans to correct DOH violations.

Agree X Disagree _____

DCPS' August 2016 Response, As Received: *We agree with recommendation #3. Standard operating procedures were developed and implemented during SY15-16. Copies have been included with our response to this draft report.*

We agree with recommendation #4. We recognize that there is a variation between vendor and Department of Health (DOH) reporting times. As an effort to rectify future reporting variances, the OFNS will contact the DOH by September 15, 2016 and collaborate with them to identify a mechanism that will allow DOH reports to be submitted directly to DCPS. Once a mechanism is identified, we will work to develop a verification system that allows us to cross-reference vendor reporting and effectuate remediation efforts in a timely manner. We anticipate that all remediation efforts will begin within 30 days after the verification system is developed and implemented.

FINDINGS AND RECOMMENDATIONS

OIG Comment: Please inform the OIG when these reporting and remediation procedures have been implemented.

OIG Survey of DCPS Principals

We surveyed DCPS principals regarding their satisfaction with various aspects of food service at their schools for SY 2014–2015, and found varying levels of satisfaction. The survey asked the respondents to rate areas, such as their satisfaction with the service provided and food served, using the answer choices “extremely satisfied,” “satisfied,” “neutral,” “dissatisfied,” and “extremely dissatisfied.”

We issued the survey to 82 DCPS principals in July 2015²⁶ and received 52 completed surveys, which is a response rate of 63 percent. Table 4 below breaks down the survey responses for each of the three vendors.

Description	Total	Chartwells	DCKK	Revolution
Schools Served	107	96	8	3
Surveys Issued	82	74	6	2
Survey Responses	52	48	3 ²⁷	1
Survey Response Rate	63%	65%	33%	50%

Table 4: Survey Response Rates

Respondents rated their overall satisfaction with their vendors as follows:

- **Chartwells** – 4 percent (2 responses) were extremely satisfied, 33 percent (16 responses) were satisfied, 25 percent (12 responses) were neutral, 27 percent (13 responses) were dissatisfied, and 10 percent (5 responses) were extremely dissatisfied.
- **DCKK** – 1 response was satisfied, and 1 response was neutral.
- **Revolution** – the only respondent selected extremely satisfied.

Figure 1, starting on the next page, summarizes responses to the OIG survey, stratified by vendor.

²⁶ The OIG conducted this survey in the summer following SY 2014–15. The number of principals who received the OIG survey was less than the number of principals employed with the DCPS during SY 2014–15 due to employee turnover.

²⁷ The OIG received three responses, but most of the survey results on the following pages present responses from two schools; one of the three respondents only answered 8 of the 36 survey questions.

FINDINGS AND RECOMMENDATIONS

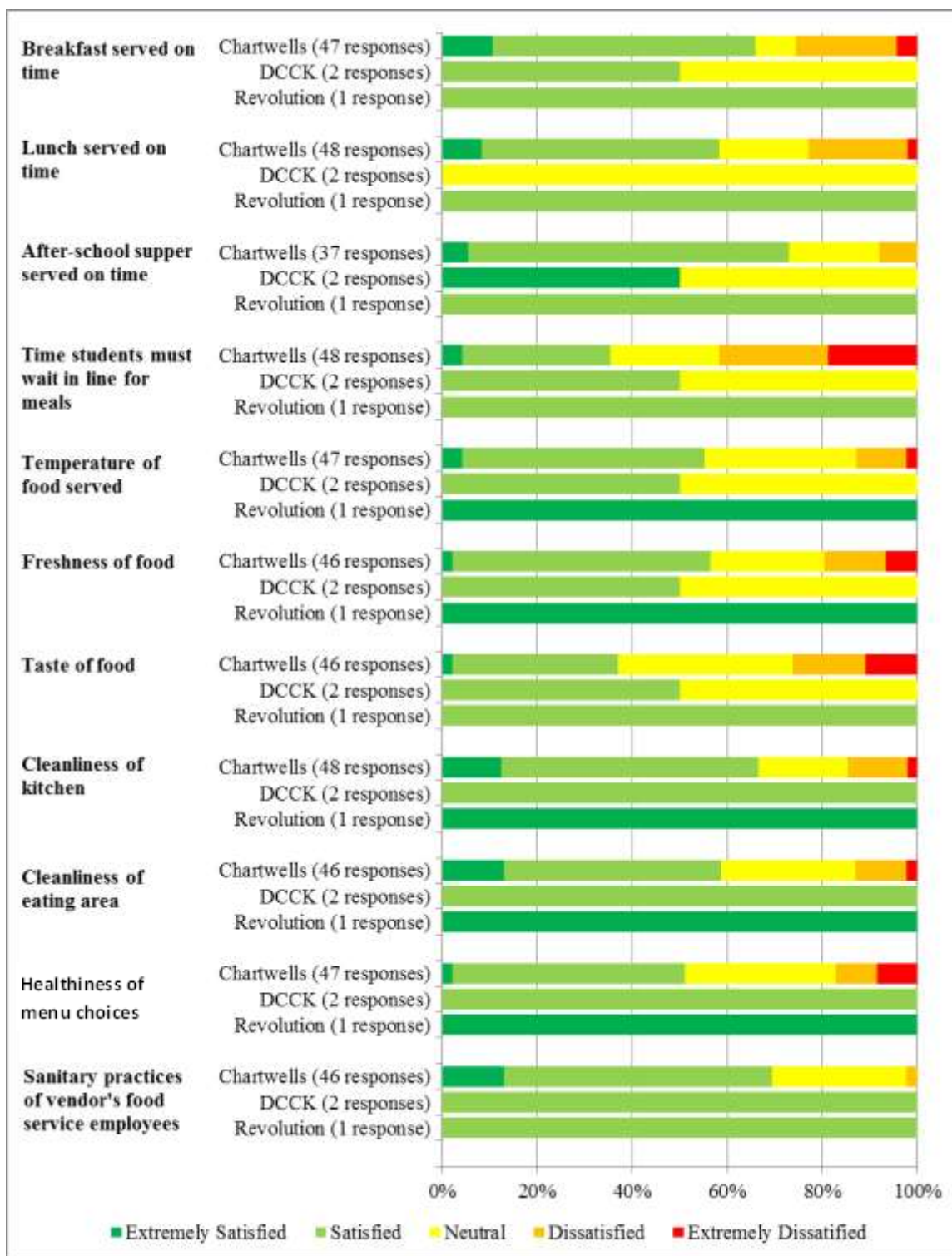


Figure 1: Principals' Ratings of OIG Survey Items by Vendor

FINDINGS AND RECOMMENDATIONS

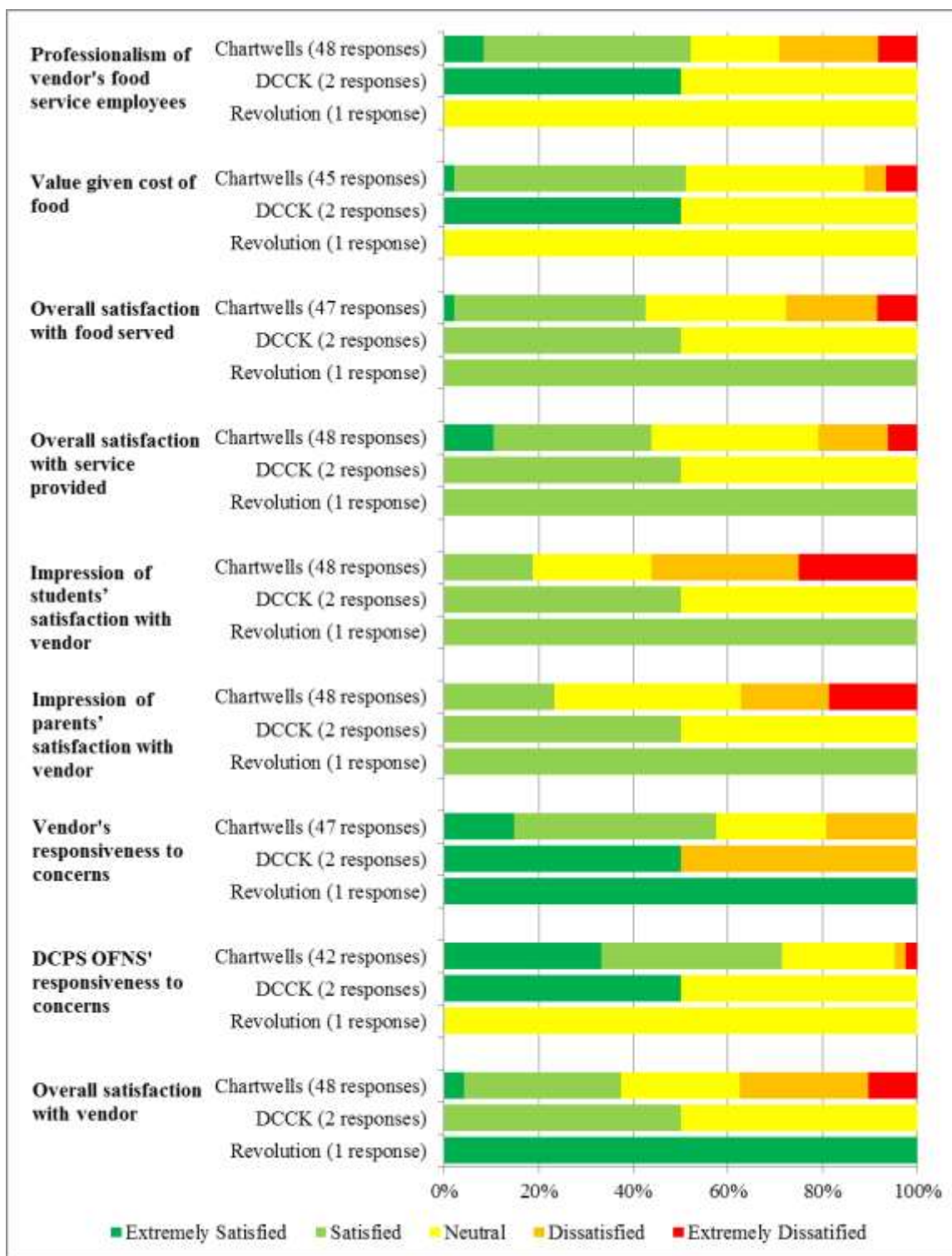


Figure 1: Principals' Ratings of OIG Survey Items by Vendor - continued

FINDINGS AND RECOMMENDATIONS

The majority of respondents reported having sufficient quantities of food:

- **Breakfast** – Of principals whose schools were served by Chartwells and served breakfast, 71 percent reported having a satisfactory amount of food, 14 percent reported having too much food, 12 percent reported having inadequate amounts of food,²⁸ and 2 percent reported that the school frequently ran out of food during breakfast service. All three of the responding principals from schools served by DCCK and Revolution reported that their vendors provided satisfactory amounts of food for breakfast.
- **Lunch** – Of principals whose schools were served by Chartwells, 65 percent reported having a satisfactory amount of food for lunch, 15 percent reported having too much food, and 21 percent reported having inadequate amounts of food. None reported frequently running out of food. All three of the responding principals from schools served by DCCK and Revolution reported that their vendor provided a satisfactory amount of food for lunch.
- **After-School Supper** – Of the schools that provided after-school supper served by Chartwells, 81 percent of principals reported that their vendor provided a satisfactory amount of food, 3 percent reported having too much food, 9 percent reported inadequate amounts of food, and 6 percent reported that they frequently ran out of food. Of the schools served by DCCK, two principals reported that their vendor provided a satisfactory amount of food for after-school supper, and one principal reported inadequate amounts of food. The only respondent from a school served by Revolution reported inadequate amounts of food for after-school supper.

²⁸ “Inadequate amounts of food” was defined in the survey as running out of food about once per quarter.

FINDINGS AND RECOMMENDATIONS

Figure 2 details principals' ratings regarding the quantity of food served at each meal, separated by vendor.

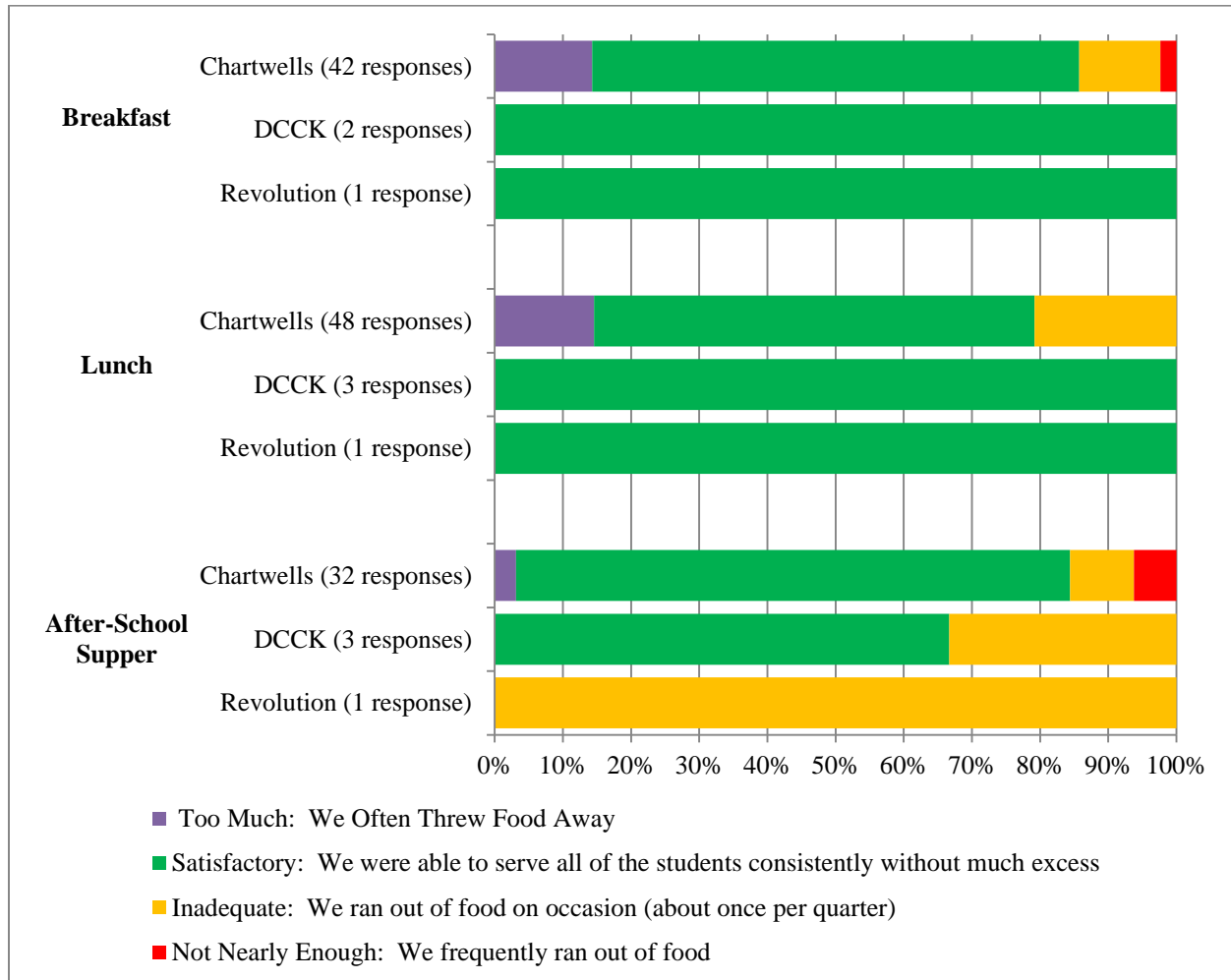


Figure 2: Responses to OIG Survey Regarding Quantity of Food Available By Type of Meal Service

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Appendix A – Acronyms and Abbreviations

D.C.	District of Columbia
DCCK	D.C. Central Kitchen
DCPS	District of Columbia Public Schools
DOH	D.C. Department of Health
FY	Fiscal Year
I&E	Inspections and Evaluations
GAO	U.S. Government Accountability Office
OFNS	Office of Food and Nutrition Services
OIG	Office of the Inspector General
SOP	Standard Operating Procedure
SY	School Year

Appendix B – List of Findings and Recommendations

1. Variations in the frequency and number of operations site reviews per school limit OFNS' ability to timely identify problems.

We recommend that the Director, OFNS:

- (1) Require DCPS food service vendors to conduct operations site reviews at each school a minimum number of times per school year, and specify the maximum permissible time period between reviews.
- (2) Develop and implement a written SOP regarding OFNS oversight of operations site reviews to include assigning responsibility for monitoring the timing of reviews and ensuring the accuracy and thoroughness of information regarding the reviews.

2. The DCPS does not ensure that violations identified during operations site reviews and DOH inspections are corrected.

(1) The DCPS does not ensure that violations found during operations site reviews are corrected.

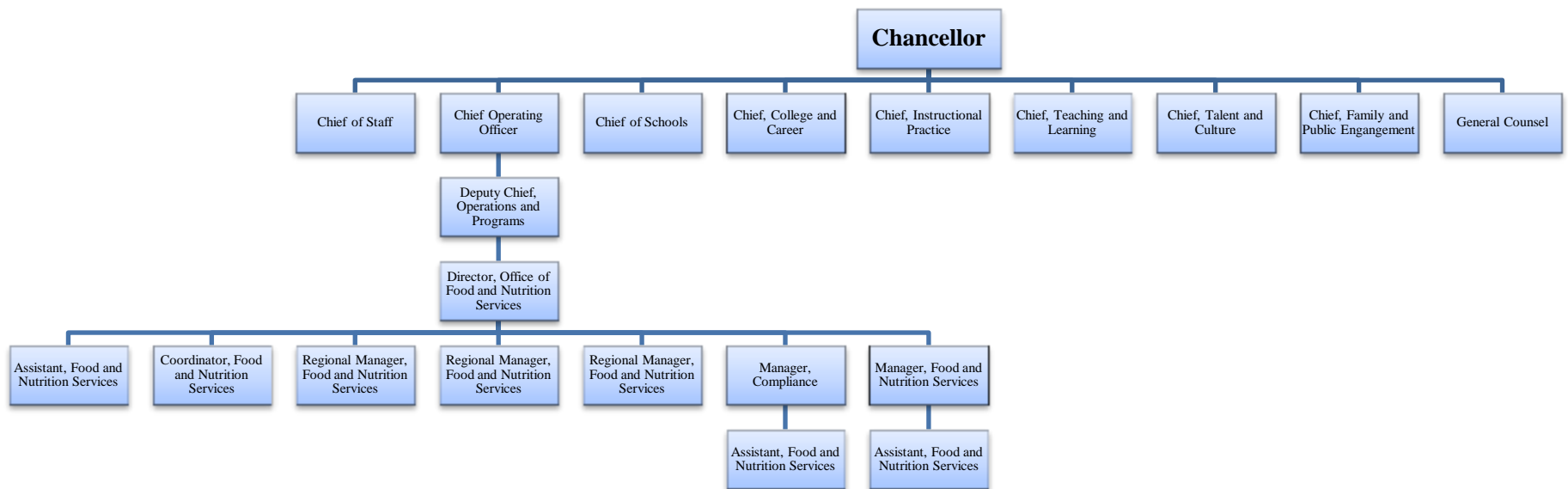
(2) DOH inspection reports cited half of DCPS school cafeterias for repeat critical violations.

We recommend that the Director, OFNS:

- (3) Develop and implement written SOPs for OFNS staff members to track and follow up on the results of operations site reviews, including ensuring that contractors submit action plans as required.
- (4) Develop and implement written SOPs for OFNS staff members to enforce contract requirements regarding notifying OFNS of DOH inspection results, to obtain DOH inspection results directly from the DOH at least monthly to check contractors' compliance with requirements to notify the OFNS, and to ensure that contractors and the OFNS develop action plans to correct DOH violations.

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Appendix C – Organization Chart



Sources: <http://dcps.dc.gov/publication/dcps-organizational-chart> (last visited Dec. 2, 2015) and OFNS organization chart as of June 2015.

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Appendix D – Detailed Results of OIG Survey of DCPS Principals

Survey Item	Vendor	Percent Extremely Satisfied	Percent Satisfied	Percent Extremely Satisfied and Satisfied	Percent Neutral	Percent Dissatisfied	Percent Extremely Dissatisfied	Percent Dissatisfied and Extremely Dissatisfied
Breakfast served on time	Chartwells (47 responses)	11%	55%	66%	9%	21%	4%	25%
	DCKK (2 responses)	0%	50%	50%	50%	0%	0%	0%
	Revolution (1 response)	0%	100%	100%	0%	0%	0%	0%
Lunch served on time	Chartwells (48 responses)	8%	50%	58%	19%	21%	2%	23%
	DCKK (2 responses)	0%	0%	0%	100%	0%	0%	0%
	Revolution (1 response)	0%	100%	100%	0%	0%	0%	0%
After-school supper served on time	Chartwells (37 responses)	5%	68%	73%	19%	8%	0%	8%
	DCKK (2 responses)	50%	0%	50%	50%	0%	0%	0%
	Revolution (1 response)	0%	100%	100%	0%	0%	0%	0%
Time students must wait in line for meals	Chartwells (48 responses)	4%	31%	35%	23%	23%	19%	42%
	DCKK (2 responses)	0%	50%	50%	50%	0%	0%	0%
	Revolution (1 response)	0%	100%	100%	0%	0%	0%	0%
Temperature of food served	Chartwells (47 responses)	4%	51%	55%	32%	11%	2%	13%
	DCKK (2 responses)	0%	50%	50%	50%	0%	0%	0%
	Revolution (1 response)	100%	0%	100%	0%	0%	0%	0%
Freshness of food	Chartwells (46 responses)	2%	54%	56%	24%	13%	7%	20%
	DCKK (2 responses)	0%	50%	50%	50%	0%	0%	0%
	Revolution (1 response)	100%	0%	100%	0%	0%	0%	0%
Taste of food	Chartwells (46 responses)	2%	35%	37%	37%	15%	11%	26%
	DCKK (2 responses)	0%	50%	50%	50%	0%	0%	0%
	Revolution (1 response)	0%	100%	100%	0%	0%	0%	0%
Cleanliness of kitchen	Chartwells (48 responses)	13%	54%	67%	19%	13%	2%	15%
	DCKK (2 responses)	0%	100%	100%	0%	0%	0%	0%
	Revolution (1 response)	100%	0%	100%	0%	0%	0%	0%
Cleanliness of eating area	Chartwells (46 responses)	13%	46%	59%	28%	11%	2%	13%
	DCKK (2 responses)	0%	100%	100%	0%	0%	0%	0%
	Revolution (1 response)	100%	0%	100%	0%	0%	0%	0%

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Survey Item	Vendor	Percent Extremely Satisfied	Percent Satisfied	Percent Extremely Satisfied and Satisfied	Percent Neutral	Percent Dissatisfied	Percent Extremely Dissatisfied	Percent Dissatisfied and Extremely Dissatisfied
Healthiness of menu choices	Chartwells (47 responses)	2%	49%	51%	32%	9%	9%	18%
	DCKK (2 responses)	0%	100%	100%	0%	0%	0%	0%
	Revolution (1 response)	100%	0%	100%	0%	0%	0%	0%
Sanitary practices of vendor's food service employees	Chartwells (46 responses)	13%	57%	70%	28%	2%	0%	2%
	DCKK (2 responses)	0%	100%	100%	0%	0%	0%	0%
	Revolution (1 response)	0%	100%	100%	0%	0%	0%	0%
Professionalism of vendor's food service employees	Chartwells (48 responses)	8%	44%	52%	19%	21%	8%	29%
	DCKK (2 responses)	50%	0%	50%	50%	0%	0%	0%
	Revolution (1 response)	0%	0%	0%	100%	0%	0%	0%
Value given cost of food	Chartwells (45 responses)	2%	49%	51%	38%	4%	7%	11%
	DCKK (2 responses)	50%	0%	50%	50%	0%	0%	0%
	Revolution (1 response)	0%	0%	0%	100%	0%	0%	0%
Overall satisfaction with food served	Chartwells (47 responses)	2%	40%	42%	30%	19%	9%	28%
	DCKK (2 responses)	0%	50%	50%	50%	0%	0%	0%
	Revolution (1 response)	0%	100%	100%	0%	0%	0%	0%
Overall satisfaction with service provided	Chartwells (48 responses)	10%	33%	43%	35%	15%	6%	21%
	DCKK (2 responses)	0%	50%	50%	50%	0%	0%	0%
	Revolution (1 response)	0%	100%	100%	0%	0%	0%	0%
Impression of students' satisfaction with vendor	Chartwells (48 responses)	0%	19%	19%	25%	31%	25%	56%
	DCKK (2 responses)	0%	50%	50%	50%	0%	0%	0%
	Revolution (1 response)	0%	100%	100%	0%	0%	0%	0%
Impression of parents' satisfaction with vendor	Chartwells (48 responses)	0%	23%	23%	40%	19%	19%	38%
	DCKK (2 responses)	0%	50%	50%	50%	0%	0%	0%
	Revolution (1 response)	0%	100%	100%	0%	0%	0%	0%
Vendor's responsiveness to concerns	Chartwells (47 responses)	15%	43%	58%	23%	19%	0%	19%
	DCKK (2 responses)	50%	0%	50%	0%	50%	0%	50%
	Revolution (1 response)	100%	0%	100%	0%	0%	0%	0%

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Survey Item	Vendor	Percent Extremely Satisfied	Percent Satisfied	Percent Extremely Satisfied and Satisfied	Percent Neutral	Percent Dissatisfied	Percent Extremely Dissatisfied	Percent Dissatisfied and Extremely Dissatisfied
DCPS OFNS' responsiveness to concerns	Chartwells (42 responses)	33%	38%	71%	24%	2%	2%	4%
	DCKK (2 responses)	50%	0%	50%	50%	0%	0%	0%
	Revolution (1 response)	0%	0%	0%	100%	0%	0%	0%
Overall satisfaction with vendor	Chartwells (48 responses)	4%	33%	37%	25%	27%	10%	37%
	DCKK (2 responses)	0%	50%	50%	50%	0%	0%	0%
	Revolution (1 response)	100%	0%	100%	0%	0%	0%	0%

Appendix E – DCPS Response to Draft Report



August 12, 2016

Daniel W. Lucas
Inspector General
Office of the Inspector General
717 14th Street, N.W.
Washington, DC 20005

Dear Mr. Lucas:

We are in receipt of the Office of the Inspector General's *Special Evaluation of the Office of Food and Nutrition Services* draft report dated July 2016. Thank you for providing this feedback as well as allowing us the opportunity to respond and provide input. Our food service programs are a very important component of DCPS' overall educational climate as our students rely on these meals to provide them with the energy to focus, learn and achieve throughout the day.

We have noted the findings and recommendations of the draft report, and are providing our responses as requested below.

Finding Number 1:

Variations in the frequency and number of operations site reviews per school limit OFNS' ability to timely identify problems.

Recommendations:

1. Establish a quantifiable frequency that requires DCPS food service vendors to conduct operations site reviews at each school a minimum number of times per school year and specify the maximum permissible time period between reviews.
2. Develop and implement written SOPs for OFNS oversight of operations site reviews to include assigning responsibility for monitoring the timing of reviews and ensuring the accuracy and thoroughness of information regarding the reviews.

DCPS Response:

We agree with both recommendations. DCPS notes that while critiquing its performance following SY14-15, the OFNS realized that there were inconsistencies in the operational site reviews conducted. As a result, we created new policies and procedures that clarify the number of operational site visits as well as the frequency of the visits in efforts to eliminate future instances of inconsistencies in our practices. These procedures were implemented during SY15-16 effective December, 2015. Additionally, we included the updated processes as a requirement of the most recent Request for Proposal and subsequent issuance of contract number GAGA-2016-C-0036A, initiated for SY16-17.



DISTRICT OF COLUMBIA
PUBLIC SCHOOLS

Office of the Chief Operating Officer

As documentation to support our implementation, we have included "Operations Site Review Explained" effective November 4, 2015, "Site Review Process 12.1.15" effective December 1, 2015, both of which are supported in the monitoring section in the vendor performance review presentation labeled "CTH Feb 2016".

Finding Number 2:

The DCPS does not ensure that violations identified during operations site reviews and DOH inspections are corrected.

3. Develop and implement written SOPs for OFNS staff members to track and follow up on the results of operations site reviews, including ensuring that contractors submit action plans as required.
4. Develop and implement written SOPs for OFNS staff members to enforce contract requirements regarding notifying OFNS of DOH inspection results, to obtain DOH inspection results directly from the DOH at least monthly to check contractors' compliance with requirements to notify the OFNS, and to ensure that contractors and the OFNS develop action plans to correct DOH violations.

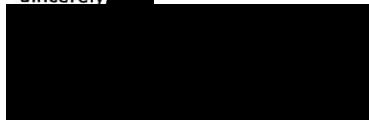
DCPS Response:

We agree with recommendation #3. Standard operating procedures were developed and implemented during SY15-16. Copies have been included with our response to this draft report.

We agree with recommendation #4. We recognize that there is a variation between vendor and Department of Health (DOH) reporting times. As an effort to rectify future reporting variances, the OFNS will contact the DOH by September 15, 2016 and collaborate with them to identify a mechanism that will allow DOH reports to be submitted directly to DCPS. Once a mechanism is identified, we will work to develop a verification system that allows us to cross-reference vendor reporting and effectuate remediation efforts in a timely manner. We anticipate that all remediation efforts will begin within 30 days after the verification system is developed and implemented.

Thank you again for your evaluation and assisting DCPS in improving the efficiency and effectiveness of the Food & Nutrition Program.

Sincerely,



Chief Operating Officer
District of Columbia Public Schools