Massachusetts Department of Elementary & Secondary Education
Child Nutrition Programs
Corrective Action Items

Review Type: Administrative Review

Review # 220058 | **Start Date:** 03/23/2022
Plymouth School Committee | **Agreement #** 12-239

Revenue from Nonprogram Foods

Finding:

The SFA did not ensure that revenues from the sale of nonprogram foods generate at least the same proportion of SFA revenues as expenditures from the purchase of nonprogram foods contribute to SFA food costs.

Regulations:

7 CFR 210.14(f)

Initial Comments:

Non program food tool indicated the district is out of compliance. Additional revenue needed to comply is $584.00. District charges $4.00 for adult lunches and the recommended charge should be $4.70 and technical assistance was provided.

4.75

Corrective Action Required:

Please develop and submit procedures to ensure the district is in compliance with the non program food tool. The FSD must ensure compliance.

Food Safety

Finding:

Extermination records are not available for determination of pest control. SFAs need to have an Integrated Pest Management Plan (IMP) and extermination records must be maintained on file for five (5) years.

Regulations:

1st DAY CUSTODIAN

7 CFR 210.13

Initial Comments:

No extermination records were available for determination of pest control at Cold Spring Elementary School.

Corrective Action Required:

FSD must develop and submit procedures to ensure all schools have access to the pest control reports and logs.

Finding:

Food temperatures are not taken and recorded on a regular basis. Food temperatures must be taken on a regular basis and recorded.

Regulations:

7 CFR 210.13(c)
7 CFR 210.15(b)(5)

Initial Comments:

HACCP

No food temps taken, no records that this is done/recorded at West Elementary School.

Corrective Action Required:

FSD must develop and submit procedures to ensure food temperatures are taken and recorded according to regulations.

Finding:

1.

One or more foodservice employees have not been trained on fire extinguisher procedures. All foodservice employees must be trained to use the fire extinguisher(s).

Regulations:

7 CFR 210.13

Initial Comments:

Both food service staff do not know how to use hand held fire ext or the pull down on wall.

Corrective Action Required:

FSD must develop and submit procedures to ensure all schools have staff that have been trained on using the fire extinguisher.

Training

Finding:

The food safety inspection is not publicly posted in a visible location.

Regulations:

7 CFR 210.13(b)

Initial Comments:

10/8/20 inspection posted in manager office

Corrective Action Required:

FSD must develop and submit procedures to ensure the most current board of health inspection report is publicly posted in a visible location at all schools.

move to public area

Finding:

The school did not ensure that the storage, preparation and service of food are maintained. Facilities for the handling, storage, and distribution of purchased and donated foods shall be such as to properly safeguard against theft, spoilage and other loss.

Regulations:

7 CFR 210.13(d)

HACCP

Initial Comments:

Some expired items- mustard, dressing packets; items not dated with year; items not dated when opened and stored in fridge can't tell how long items have been in fridge. TA provided.

Corrective Action Required:

FSD must develop and submit procedures to ensure stock is closely monitored for outdated items and correct dating of stock is implemented at all schools.

Finding:

The school did not maintain records for a period of six months following a month's temperature records to demonstrate compliance.

Regulations:

7 CFR 210.15(b)(5)
7 CFR 210.13(b)
7 CFR 210.13(c)

show Temp records

Initial Comments:

Not all equipment temps logged. TA provided.

Corrective Action Required:

FSD must develop and submit procedures to ensure temperature logs are maintained for all equipment as required in all schools.

Finding:

The school does not have a copy of the written food safety plan available?

Food safety plan

Regulations:

7 CFR 210.13(c)

Initial Comments:

Copies of the written food safety plan were not available at the school sites.

Corrective Action Required:

FSD must develop and submit procedures to ensure written food safety plans are at all school sites with proper staff training on these food safety procedures.

Finding:

The SFA did not provide documentation to indicate that the SFA requested two (2) inspections in the current school year from the local board of health.

BOH email

Regulations:

7 CFR 210.13(b)

Initial Comments:

SFA did not have documentation to indicate that the SFA requested two (2) inspections in the current school year for all schools from the applicable agency.

Corrective Action Required:

FSD must develop and submit procedures to ensure documentation is maintained to indicate that the SFA requested two (2) inspections in the current school year for all schools from the applicable agency.

Finding:

The SFA's standard operating procedures (SOPs) were not implemented. A school food authority with a food safety program must implement traditional hazard analysis and critical control point (HACCP) principles.

Regulations:

7 CFR 210.13(c)

Initial Comments:

No documented SOPs; no food temps taken, not all coolers/freezers checked daily/recorded at West Elementary. TA provided.

Corrective Action Required:

FSD must develop and submit procedures to ensure documented SOPs and food temperatures are taken and temperatures are taken and recorded for all coolers/freezers daily as required at West Elementary School.

Local School Wellness Policy

HACCP policy / Train

Finding:

The SFA has not maintained documentation to support the policy has been reviewed and updated within the past three years. Documentation of efforts to review and update the policy, including who was involved in the process and how stakeholders were made aware of their ability to participate, must be maintained.

Regulations:

7 CFR 210.31(e)
7 CFR 210.31(f)

Initial Comments:

WTF

During covid the district was not conducting regular Wellness Policy committee meetings and and no assessments or updates have been made to the policy.

Corrective Action Required:

FSD must develop and describe the steps to be taken to conduct regular Wellness Policy committee meetings and updates as needed and assess the policy every 3 years.

Meal Counting and Claiming

Finding:

The counts for some or all of the schools were incorrectly consolidated and claimed by the SFA. The SFA must correctly record, consolidate and report those lunch and supplement counts on the Claim for Reimbursement.

Regulations:

7 CFR 210.7(c)
7 CFR 210.18(b)(i)

Initial Comments:

The meal counts for West Elementary School # 047 included meal counts for Pilgrim Academy which is not an approved school site for Plymouth PS. Fiscal disallowances may be taken.

Corrective Action Required:

FSD must develop and submit procedures to ensure no meals are claimed for the Pilgrim Academy until this is an approved site. We have stopped claiming PA site meals

Finding:

The district is permitting students to charge second meals and/or a la carte items. Districts should not allow second meals and/or a la carte items to be charged to student accounts.

Regulations:

7 CFR 201.7 (c)

Initial Comments:

The school does not charge for second meals (pizza day) or a la carte (milks). The school does not track these items to bill the district. Currently food service is absorbing the expenses.

Corrective Action Required:

FSD must develop and submit procedures to ensure the tracking and billing to the district for second meals and a la carte milks taken at all schools.

Hmm m

Finding:

The school food authority shall establish internal controls which ensure the accuracy of lunch counts prior to the submission of the monthly Claim for Reimbursement. One or more meal service lines did not provide an accurate count of meals at the point of service (or approved alternate).

Regulations:

7 CFR 210.18(g)(1)(ii)(A)
7 CFR 210.7(c)(1)

Initial Comments:

During the review of PCIS it was found that the district does not offer lunch to the secondary school students on half days.

Corrective Action Required:

FSD must develop and submit procedures to ensure lunch is served every day even 1/2 days. Meals must be consumed on site. The grab n' go method of serving is non compliant.

Hmmm m

Finding:

The total meal counts from the month of review compared the number of meal count for the day of review were not reasonable.

Regulations:

7 CFR 210.18(g)(1)(ii)(A)
7 CFR 210.7(c)(1)

Initial Comments:

No point of service, using tray counts at West Elementary School. This is an unacceptable method of point of service meal counting. Fiscal disallowance may occur.

moved milk cooler | line

Corrective Action Required:

FSD must develop and submit procedures to ensure all meals are counted at the point of service using an acceptable meal counting method at West Elementary School.

Finding:

There were questionable patterns in the reported lunch meal counts in the review period.

Regulations:

7 CFR 210.18(g)(1)(ii)(A)
7 CFR 210.8(a)

Initial Comments:

FP-9 counts do not match the daily count sheets provided at West Elementary. FP-9 is higher due to counting meals sent to Pilgrim Academy (unapproved site).

Corrective Action Required:

FSD must develop and submit procedures to ensure the Pilgrim Academy becomes an approved site and meals are counted separately from West Elementary School. No claims can be made at this site until Pilgrim Academy becomes an approved site.

No more (PA)

Meal Components and Quantities

Finding:

Fluid milk was not made available in at least the two required varieties throughout the serving period on all meal service lines. Schools must offer students a variety (at least two different options) of fluid milk. All milk must be fat-free or low-fat. Milk with higher fat content is not allowed. Fat-free fluid milk may be flavored or unflavored, and low-fat fluid milk must be unflavored.

Regulations:

7 CFR 210.10(1)-(4)
7 CFR 210.10(d)(3)

Initial Comments:

There was no milk substitute offered for applicable students at Cold Spring Elementary.

Corrective Action Required: Difficult to find

FSD must develop and submit procedures to ensure a milk substitute is offered at all schools where applicable.

Finding:

One or more of the meals observed, on the day of review, did not contain all of the required meal components.

Regulations:

7 CFR 210.10(b)

Initial Comments:

Several meals counted without F/V at West Elementary School.

Corrective Action Required:

FSD must develop and submit procedures to ensure retraining of staff on the requirements of the offer vs serve method of counting. Please upload a dated training agenda with staff sign in sheets to ensure this retraining was conducted.

TRAIN

Finding:

One or more of the required meal components were not available on every reimbursable meal service line to all participating students during the meal service.

Regulations:

7 210.10(a)(i)

Initial Comments:

Beans (subgroup for wk) were not offered on the cold line at West Elementary School.

Corrective Action Required:

FSD must develop and submit procedures to ensure the vegetable of the day is offered to all meal choices to comply with daily and weekly vegetable sub group requirements.

TRAIN

Finding:

Some of the reviewed meals during the review period indicated that all of the required meal components per weekly meal pattern requirements were not offered and served to students.

Regulations:

7 CFR 210.10

Initial Comments:

Production sheets were incomplete and not listing amounts of fruits offered at Cold Spring Elementary. Requests were made for a product formulation statement for Kingston Pizza but this was not available to ensure the pizza complies with regulations.

Corrective Action Required:

FSD must develop and submit procedures to ensure improvements in edit checking daily production sheets to ensure they are complete and all reimbursable meal components are listed and the amounts offered are also recorded. Please upload the product formulation statement for the Kingston Pizza to ensure compliance.

Uploaded

Finding:

Some of the reviewed meals during the review period indicated that all of the required meal components per weekly meal pattern requirements were not offered and served to students.

Regulations:

7 CFR 210.10

Initial Comments:

Production records at West Elementary School missing reimbursable components including fruit at breakfast and milk at breakfast & lunch.

Corrective Action Required:

FSD must develop and submit procedures to ensure improvement in edit checking daily production sheets and ensure the West Elementary School staff record fruit at breakfast as well as milk at lunch and breakfast. TRAIN

Finding:

Some of the reviewed meals during the review period indicated that all of the required meal components per weekly meal pattern requirements were not offered and served to students.

Regulations:

7 CFR 210.10

Initial Comments:

Production sheets for PCIS were incomplete missing milk and often not the same as the menu listed. Some production sheets did not list all reimbursable components.

Corrective Action Required:

FSD must develop and submit procedures to ensure production sheets at PCIS list milk and listing all reimbursable components. Some days the production sheets did not match the menus. Describe why the production sheets did not always match with the menus at PCIS.

SNOW DAY had to change meals

Reporting and Recordkeeping

Finding:

One or more students (with unpaid meal debt) were provided an alternate meal which was not available to all other students participating in the meal service.

Regulations:

An Act Promoting School Nutrition (MA 2021) Chapter 62

Initial Comments:

District's meal charge policy indicates an alternate meal is only served to the students who are charging.

Corrective Action Required:

FSD must develop and submit procedures to ensure the meal charge policy is compliant with the updated requirements.

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Verification

Finding:

The applications selected for verification were not appropriate for the sample size option used. An error prone application is an approved household application with a monthly income within $100 or annual income within $1,200 of the applicable income eligibility limit for free or for reduced meals. Error prone applications should be selected as priority of the sample size.

Regulations:

7 CFR 245.6a(a)(2)
7 CFR 245.6a(c)(3)

Initial Comments:

Not all applications chosen for verification were error prone.

Corrective Action Required:

FSD must develop and submit procedures to ensure all meal benefit forms chosen for verification will be error prone.

OK

There were only 2 error prone applications out of the 4, Date

5/9 32°